Decision **PROPOSED DECISION OF ALJ KIM** **(Mailed 5/13/14)**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U338E) for Approval of its 2012-2014 California Alternate Rates for Energy (CARE) and Energy Savings Assistance Programs and Budgets.	Application 11-05-017 (Filed May 16, 2011)
And Related Matters.	Application 11-05-018 Application 11-05-019 Application 11-05-020

PHASE II DECISION ON THE LARGE INVESTOR-OWNED UTILITIES' 2012-2014 ENERGY SAVINGS ASSISTANCE (ESA) PROGRAM AND CALIFORNIA ALTERNATE RATES FOR ENERGY (CARE) PROGRAM APPLICATIONS

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PHASE II DECISION ON THE LARGE INVESTOR-OWNED UTILITIES' 2012-2014 ENERGY SAVINGS ASSISTANCE (ESA) PROGRAM AND CALIFORNIA ALTERNATE RATES FOR ENERGY (CARE) PROGRAM APPLICATIONS

1. Summary

On August 30, 2012, the Commission issued Decision (D.) 12-08-044, the Phase I Decision, on the 2012-2014 programs and budget applications (Applications) for the Energy Savings Assistance (ESA) and California Alternate Rates for Energy (CARE) Programs, filed by the large investor-owned utilities, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company, (collectively Investor-Owned Utilities, IOUs or Utilities).

D.12-08-044 authorized the ESA Program budgets in excess of $1 billion and the CARE Program budgets of just under $4 billion for the Utilities' 2012-2014 program cycle. It also resolved a majority of the issues raised in the Utilities' Applications by setting forth a multitude of programmatic directions and directed further review of the more complex issues to the second phase of this proceeding through working group activities and studies.

This decision resolves and/or continues the review of several pending Phase II issues, as follows:

- Revisits the High Efficiency Furnace measure and Smart Strips measure, and provides guidance concerning those measures.
- Reviews the various Phase II activities ordered in the Phase I Decision, including four completed studies and three working groups' reports, progress review of high usage customer rules, as well as progress review of the IOUs' probability modeling and post enrollment verification activities.

- Adopts the 2013 Low Income Needs Assessment Study,[1] the 2013 Energy Education Study (Phase 1 Report),[2] the 2013 Multifamily Segment Study,[3] and the 2013 Impact Evaluation Report[4] to guide the substance of the 2015-2017 program applications.
- Adopts the reports of the Cost-effectiveness Working Group,[5] Workforce Education and Outreach Working Group,[6] and Mid-cycle Working Group[7] to guide the substance of the 2015-2017 program applications.
- Adopts and directs implementation of the key recommendations from the 2013 Multifamily Segment Phase I Study.
- Adopts and directs implementation of the 2013 Cost-Effectiveness Working Group's four recommendations for the 2015-2017 program applications.
- Adopts and approves, with modifications, the recommendations of the Mid-cycle Working Group to approve the proposed and updated ESA Program

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[1] The 2013 Low Income Needs Assessment Study can be seen at the following link: http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=100255063.

[2] The 2013 Energy Education Study (Phase 1 Report) can be seen at the following link: http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=100255062.

[3] The 2013 Multifamily Segment Study can be seen at the following link: http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=100255060.

[4] The 2013 Impact Evaluation Report can be seen at the following link: http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=100354179.

[5] The Cost-effectiveness Working Group's Final Report can be seen at the following link: http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=99753158.

[6] The Workforce Education and Outreach Working Group's Final Report can be seen at the following link: http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=100255059.

[7] The Mid-cycle Working Group's Final Report can be seen at the following link: http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=100354171.

Statewide Policy and Procedure and California Installation Standards Manuals.

- Adopts the Macias Consulting Group's Audit Report of Southern California Gas Company (Audit Report), ordered as a result of the December 2011 Order to Show Cause hearing.
- Directs Southern California Gas Company to implement the recommendations from the Audit Report and to make other management improvements, based on the Audit Report.
- Continues the further review of some of the Phase II issues (Energy Education Study, Multifamily Segment Study, three working groups' reports and the income definition and categorical eligibility issues identified in the Assigned Commissioner's Ruling dated February 25, 2014) to the next cycle as they require additional review and are not yet poised for resolution at this junction.

This decision also resolves several pending petitions for modifications of D.12-08-044, authorizes bridge funding for the IOUs' ESA and CARE Programs to continue for 12 months after the 2012-2014 cycle ends at the 2014 authorized budget level, authorizes continued funding for the Community Help and Awareness of Natural Gas and Electric Services pilot program, provides guidance to the IOUs in preparation of their program years 2015-2017 CARE and ESA Programs and Budget Applications, and directs the IOUs to file their 2015-2017 applications for ESA and CARE programs and budgets within 90 days after the issuance of this decision.

Finally, this decision makes minor corrections and clarifications to D.12-08-044 and closes the above-captioned proceedings.

2. Procedural Background

On May 15, 2011, Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas), (collectively Investor-owned Utilities, IOUs, or Utilities) filed their 2012-2014 Energy Savings Assistance (ESA) and California Alternate Rates for Energy (CARE) Programs and Budget Application (A.), 11-05-017, A.11-05-018, A.11-05-019, and A.11-05-020.

The Commission's Office of Ratepayer Advocates (ORA), National Consumer Law Center (NCLC), The East Los Angeles Community Union, Association of California Community and Energy Services, and Maravilla Foundation (collectively, TELACU *et al.*), California Housing Partnership Corporation (CHPC), The Donald Vial Center on Employment in the Green Economy, Natural Resources Defense Council (NRDC), The Greenlining Institute (Greenlining), Synergy Companies (Synergy), and the Energy Efficiency Council (EEC) filed protests and responses. The IOUs filed replies.

On July 21, 2011, the assigned Administrative Law Judge (ALJ) issued a ruling consolidating the four Applications (Consolidated Proceeding) and setting the first consolidated prehearing conference (PHC). Two PHCs were held on August 8, 2011 and September 6, 2011. On September 26, 2011, the assigned Commissioner and the ALJ jointly issued the Scoping Memo Ruling setting the scope and the schedule for the Consolidated Proceeding, explicitly anticipating the need for a bridge funding decision in the ESA and CARE Programs to cover January 1 through June 30, 2012 while reviewing some of the more complex issues raised by the parties in the Consolidated Proceeding. The Scoping Memo Ruling also ordered eight separate workshops on the following issues to begin

laying the groundwork for the review of the studies and the reports from the preceding cycle with the stakeholders:

> Workshop #1 [Overview of the Lessons Learned]: Review of major ESA and CARE Programs related studies, pilots and reports since D.08-11-031, including (1) Final Report on Low Income Energy Efficiency Program, 2009-2010 Process Evaluation (The 2009 Process Evaluation), and (2) Final Report on Impact Evaluation of the 2009 California Low Income Energy Efficiency Program (The 2009 Impact Evaluation).
>
> Workshop #2 [Review of the ESA Program]: Review of overall effectiveness of the ESA Program in reaching the energy saving Strategic Plan goals, and cost effectiveness of ESA Program, including examination of potential barriers to energy savings, methods of removing barriers to energy savings and review of delivery models.
>
> Workshop #3 [Cost Effectiveness Methodology and Measures]: Discussion and review of cost effectiveness at the measure level, including discussion on cost effectiveness methodology and what and how measures are added, deleted, etc.
>
> Workshop #4 [Multifamily Sector Issues]: Review of multifamily sector needs, proposals, and any related operational and legal concerns.
>
> Workshop #5 [Workforce, Education and Training]: Review of workforce, education and training issues, including review of current contractor selection and bidding process.
>
> Workshop #6 [Outreach and Enrollment]: Review of current ESA Program outreach and enrollment practices/efforts and ways to improve them to reach the Strategic Plan goals, including any energy education proposal.
>
> Workshop #7 [Review of the CARE Program]: Review of current CARE Program, including re-certification, categorical eligibility, high usage customers and CARE Program complaint and oversight.

> Workshop #8 [Working Groups, Pilots and Studies]: Review of potential ongoing working groups, pilots and studies to improve the ESA and CARE Programs in the near term and longer term, including standardizing Utilities' various reports.

In October 2011, parties participated in all eight workshops. On November 9, 2011, the assigned ALJ issued a ruling tentatively setting the evidentiary hearing dates, adjusting the proceeding schedule and directing parties to file statements of material disputed facts. On November 9, 2011, the ALJ issued a ruling to recirculate the March 30, 2011 Guidance Ruling and related attachments, and the updated Energy Division template for the presentation of pilot proposals.

Following the foregoing activities, on November 10, 2011, the Commission adopted a bridge funding decision[8] for the IOUs to continue to administer the ESA and CARE Programs from January 1 through June 30, 2012 while the Commission continued the review of some of the more complex issues in the Consolidated Proceeding.

On December 28, 2011, the ALJ issued a ruling seeking comments from the parties on 39 detailed questions (December 2011 Ruling), as a follow-up to the October 2011 workshops to create a record on certain issues. In January 2012, detailed comments and responses were filed by San Francisco Community Power (SFCP), TELACU *et al.*, Center for Accessible Technology (CforAT), Brightline Defense (Brightline), Green for All, Proteus, Inc. (Proteus), SDG&E,[9]

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[8] Decision (D.) 11-11-010, the bridge funding decision, also authorized $6.06 million in additional bridge funding for SoCalGas, for the bridge funding period based upon SoCalGas's projections.

[9] On February 13, 2012, SDG&E filed an amended response to its prior response to the December 2011 Ruling.

PG&E, SoCalGas, SCE, The Utility Reform Network (TURN), Niagara Conservation Corporation (Niagara), EEC, La Cooperativa De Campesina (La Cooperativa), The Black Economic Council, National Asian American Coalition, and the Latino Business Chamber of Greater Los Angeles (collectively, the Joint Parties), Division of Ratepayers Advocate (DRA), CHPC, National Housing Law Project (NHLP), NCLC, Greenlining, California Large Energy Consumers Association (CLECA), NRDC, and Opower, Inc.

In February 2012, opening briefs were filed by SoCalGas, SDG&E, PG&E, SCE, CforAT, SFCP, Greenlining, CHPC, NCLC, NHLP, TURN, Niagara, DRA, TELACU *et al.*, Joint Parties, CLECA, NRDC, and EEC. Reply briefs were filed by PG&E, CforAT, Greenlining, CHPC, NCLC, NHLP, TURN, Niagara, TELACU *et al.*, Joint Parties, NRDC, and Brightline.

On February 16, 2012, the ALJ issued rulings identifying and admitting the testimonies served in the Consolidated Proceeding and certain data requests and reference documents.

On June 21, 2012, the Commission adopted a second bridge funding decision approving a month-to-month extension of bridge funding to continue the ESA and CARE Programs. The bridge funding was to start on July 1, 2012 and continue until the Commission adopts a decision on the IOUs' ESA Program and CARE Program Budget Applications for 2012-2014.[10]

On August 30, 2012, the Commission adopted D.12-08-044 (hereinafter referred to as Phase I Decision or D.12-08-044) which approved approximately $5 billion for the IOUs' ESA and CARE Programs and set forth programmatic

[10] D.12-06-030.

directives to continue the two energy-related low-income programs for the IOUs for the 2012-2014 program cycle (over $1 billion for the ESA Programs and approximately $4 billion for the CARE Programs).

The Phase I Decision resolved a majority of the issues in the Consolidated Proceeding and directed several of the more complex issues to be further examined during the second phase of this proceeding through working group activities and studies. These issues include: (1) Development of a comprehensive multifamily segment strategy including the review of potential expedited enrollment process, (2) Review of the ESA Program cost-effectiveness methodology, (3) Review of several critical low-income program studies and reports, and (4) Review of any pilot program evaluation as well as several other working group activities ordered in D.12-08-044.

The Phase II activities have been completed, including studies and reports ordered in D.12-08-044, and several petitions to modify that decision have also been filed.

3. Petitions to Modify Decision 12-08-044

3.1. SDG&E's October 29, 2012 Petition to Modify

SDG&E filed a petition to modify (PTM) five elements of D.12-08-044. ORA filed comment. SDG&E's PTM is addressed below.

3.1.1. Request for Budget Increase

In the PTM, SDG&E requests a net budget increase of $3,769,897 to ensure that it can adequately deliver all of the ESA Program services ordered in D.12-08-044 to its customers throughout the 2012-2014 program cycle. SDG&E projects an ESA Program budget deficit of $13,168,113. However, SDG&E proposed to partially offset the total projected budget deficit by shifting

$9,398,216 in funds from its other budget categories[11] and was granted authority by the assigned ALJ to shift funds as follows:

(1) $4.2 million in unspent 2011 electric department funds to the 2012 gas department budget; and

(2) $3,227,895 from its 2012 authorized electric department funds to its 2012 gas department budget.[12]

Accordingly, SDG&E's net resulting budget increase need is $3,769,897, which is the budget increase amount requested by SDG&E in its PTM.

SDG&E' PTM indicates several measures and activities that were approved in D.12-08-044 but were not included and budgeted for in the initial 2012-2014 forecast. SDG&E's PTM also includes a breakdown of increased costs to account for the ESA Program budget increase request in the PTM.

Table 1: Measures/Activities Approved and Increased Budget Estimates

Measures/Activities Approved by D.12-08-044	Estimated Increase in Budget
Furnace repairs & replacements	$6,684,221
Water heater repair & replacements	$1,134,703
High efficiency clothes washers	$1,256,778
Enclosure measures	$3,632,745
Customer Enrollment	$339,666
Inspections	$120,000
TOTAL	**$13,168,113**

SDG&E's PTM indicates that the costs associated with installing ESA measures have continued to increase annually. SDG&E also attributes the

[11] SDG&E's concurrently filed a motion to shift funds with its PTM. SDG&E's Motion was dated and filed October 29, 2012, as amended, with Amended Motion dated and filed December 10, 2012. No party has filed opposition to SDG&E's Motion, as amended.

[12] SDG&E requests $1.7 million in under spent 2012 electric department funds (from refrigerator replacements) to the 2012 gas department budget; and 2) approximately $1,527,895 from the 2012 under spent electric department funds (from unspecified budget subcategory) to the gas department budget to accommodate gas-electric funding allocations authorized during the latest bridge period through the end of 2012.

overall increase in the costs of ESA measure installations and inspections to increased enrollment in ESA Program and an increase in the number of households[13] treated due to successful program promotion and enrollment.[14]

As reflected in Table 2 below, SDG&E has continued to exceed its annual households treated target since 2009. With the exception of 2010, SDG&E exceeded its home or household treated targets while remaining within the authorized program budgets.

Table 2: 2009-2014 Homes Treated vs. Program Budgets

Program Year	Homes Treated Planned	Homes Treated Actual	Budget Planned $M	Budget Actual $M	% Homes Treated	% Budget Spent
2009	20,384	20,924	21.2	16.2	103	77
2010	20,384	21,593	21.2	18.9	106	88
2011	20,384	22,575	19.6	20.9	111	107
***2012**	20,316	20,888	21.7	21.1	103	97
2013	20,316	TBD	22.1	TBD	TBD	TBD
2014	20,316	TBD	22.5	TBD	TBD	TBD
Source: 2009-2011 PY data; SDG&E Annual Reports; *2012 data SDG&E December 2012 Monthly Report; 2013-2014 Projected data D.12-08-044						

Upon review of SDG&E's PTM and its performance and budget trends in its annual reports, SDG&E's requested net budget increase of $3.7 million is justified. As illustrated in Table 3, the measures identified have generally trended upward since 2009.

[13] In this decision, terms "homes" and "home" are used interchangeably with the terms "households" and "household."

[14] SDG&E's PTM at 2-3.

Table 3: 2009-2012 Affected ESA Measure Installations

Program Year	Furnaces	Water Heaters	Clothes/ Washers	Envelope/ Air Sealing
2009	1,725	39	0	15,400
2010	2,115	72	971	16,313
2011	4,296	165	1,550	16,726
2012	3,909	243	1,631	15,260
Source: 2009 -2012 PY data; SDG&E Annual reports				

Additionally, during 2012, SDG&E experienced an approximate 23% increase in the number of gas measures installed and a 32% increase in expenditures in the gas department compared to prior forecasts.[15]

Recognizing these increasing cost trends, the authorized 2012-2014 program budgets under D.12-08-044 are insufficient to meet the respective households treated projections as indicated in SDG&E's PTM. However, while the ALJ's Ruling shifted funds to partially address SDG&E's 2012-2014 program cycle budget shortfall, there is still a need for the requested budget augmentation of $3,769,897 to complete the 2012-2014 program cycle. Based on the foregoing, SDG&E's net budget augmentation request of $3,769,897 in the PTM is reasonable and is granted.

3.1.2. Request to Clarify ESA Program Enrollment Processes

SDG&E requests clarification of D.12-08-044 and direction to continue categorical enrollment for the ESA Program as previously authorized in D.06-12-038. Specifically, SDG&E requests that the language on pages 310-311 of D.12-08-044 be revised to clarify the Commission's intent to retain both

[15] ALJ Ruling, dated December 20, 2012, at 4.

self-certification and categorical enrollment processes as alternative enrollment processes.

In D.06-12-038, the Commission authorized SDG&E to use both categorical enrollment and targeted self-certification for the ESA Program as alterative enrollment processes.[16]

During the 2009-2011 program cycle, SDG&E enrolled approximately 37,000 customers (57% of the total enrollments) through the targeted self-certification process. SDG&E also enrolled approximately 14,200 customers (22% of the total enrollments) in the ESA Program through the categorical enrollment process. It is our intent to continue to encourage enrollment through both of those processes and retain both of those processes.

We, therefore, approve SGD&E's request to modify D.12-08-044 by striking the proposed words, as shown below to clarify the use of categorical enrollment process.

> In this decision, we make no changes and approve continuation of self-certification for the ESA Program in areas where 80% of the households are at or below 200% of the federal poverty guideline. Consistent with prior Commission decisions, we also approve continuation of categorical enrollment of ESA Program ~~in these targeted areas~~.

We note that the statistics provided by SDG&E in its PTM show that a majority of SDG&E's enrollments are completed through the self-certification process. According to SDG&E's statistics, during the 2009-2011 program cycle, SDG&E enrolled almost 80% of its ESA enrollees (57% enrolled through the targeted self-certification process and 22% enrolled through the categorical

[16] D.06-12-038, Ordering Paragraph 21.

eligibility process) without any form of pre-enrollment income verification. We remind SDG&E to carefully administer its program enrollments with an eye to prevent any and all potential abuses of the program that may occur through these enrollment processes.

3.1.3. Request for Directives on Collaborative Activities

SDG&E requests that the Commission provide explicit language requiring the utilities to engage in joint contracting for statewide program activities. SDG&E requests that D.12-08-044 include a finding that explicitly authorizes four utilities to engage in certain specific activities, which they feel will be necessary to collaboratively implement the 2012-2014 low-income programs as ordered by the Commission.

The Commission has previously provided such language in the energy efficiency proceeding. For example, in Ordering Paragraph 7 of D.10-12-054, the Commission adopted the following:

> …In recognition of the need for affirmative steps to prove effective and efficient joint investor-owned utility management of the California utilities' statewide energy efficiency program, so they can better meet the state's energy efficiency goals, the Commission authorizes Southern California Edison Company, Pacific Gas & Electric Company, Southern California Gas Company, and San Diego Gas & Electric Company to engage in the following activities:
>
> (a) Joint and cooperative consultations between and among these utilities and energy efficiency contractors to assist with determination of the contract requirements of their jointly administered and jointly funded energy efficiency programs;
>
> (b) Joint cooperative process among the four utilities for the sourcing and negotiation (including program requirements, performance, price, quantity, and

specifications) of joint contracts for energy efficiency to be managed and run by one lead utility, subject to the approval and review by the other utilities;

(c) Joint submission to the Commission for its approval of proposed energy efficiency contracts pertaining to implementation of statewide programs; and,

(d) Other joint and collaborative activities pertaining to the collaboration and joint contracting for statewide energy efficiency programs as the four utilities may determine is necessary for implementation of statewide programs, subject to the Commission's oversight.

SDG&E suggests that similar language in this proceeding will also help to ensure that the utilities can comply with D.12-08-044 without running afoul of anti-trust laws.[17]

We find this request reasonable, and to the extent that there is any need for the four utilities to engage in further collaborative activities during the remainder of the 2012-2014 low-income programs, we approve this request and adopt the same directive we did in Ordering Paragraph 7 of D.10-12-054.

3.1.4. Request to Limit the Focus of Cost-Effectiveness Working Group

SDG&E proposes that the Cost-Effectiveness Working Group limit their focus only to two of the four issues outlined in D.12-08-044. Specifically, SDG&E proposes that the working group only addresses two of the four issues, since the other two of the four issues (e.g., the cost-effectiveness framework and cost effectiveness applications for equity and resource measures) are currently being examined in a separate Commission proceeding, Rulemaking (R.) 09-11-014.

[17] SDG&E's PTM at 5-6.

SDG&E is correct that similar cost-effectiveness issues are being examined in another proceeding, R.09-11-014. We also generally share in SDG&E's concern that addressing common issues in a single proceeding is a more efficient and effective use of resources.[18] However, R.09-11-014 is not examining cost-effectiveness issues in the context of low-income proceeding, which is a significant point.

Therefore, it is important for this proceeding to examine these cost-effectiveness issues through the filter and focus of this proceeding. There is significant value to the Cost-Effectiveness Working Group's reports, addressing all issues ordered to be reviewed by D.12-08-044, in this proceeding. We fully intend to coordinate all of the cost-effectiveness issues in this proceeding with the overall approach the Commission takes in R.09-11-014 and any other proceedings. SDG&E's request to limit Cost-Effectiveness Working Group's focus, therefore, is denied.

3.1.5. Request to Modify High Usage Customer Process

SDG&E seeks modification of the CARE high usage customer process ordered in D.12-08-044. Ordering Paragraph 101(c) of D.12-08-044 which sets out the current high usage customer rule provides, *in part*, for 400%-600% baseline users:

> California Alternate Rates for Energy high electric customers with electric usage at 400%-600% of baseline in any monthly billing cycle must undergo Post Enrollment Verification and, if not previously enrolled in the program, must apply for the

[18] *Id.* at 7.

> Energy Savings Assistance Program within 45 days of notice….

As proposed, SDG&E's request would modify the above high usage customer rules such that only those customers who repeatedly (three times or more) use greater than 400% of baseline in a 12-month period would be subject to the above high usage customer rules, as currently ordered in D.12-08-044.[19]

SDG&E contends that only 3% of the customers in its territory fall into the category of the 400% to 600% baseline user group, and 1/3 of those customers fall into that group only one time in a 12-months period. SDG&E contends that if the Commission's intent in D.12-08-044 and the high usage customer rule is to target customers who are ineligible for the CARE program and may be purposefully misdirecting the CARE program discount, SDG&E believes the rule should be modified to apply only to the customers who repeatedly exceed the 400% baseline usage.[20]

We are not persuaded by SDG&E's request to modify the rule. In part, one of the purposes of the high usage customer rule was to eliminate the customers who are ineligible for the CARE Program and/or are purposefully misdirecting CARE program discount for purposes other than legitimate household needs and to de-enroll them. However, the more important aim of the rule was to also help the high usage customers with legitimate high uses with enrollment in the ESA Program and to help with lowering energy usage while achieving bill savings going forward.

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[19] SDG&E does not propose modification to the high usage customer rule relating to those customers who use 600% above baseline.

[20] SDG&E's PTM at 8.

To modify the rule to ignore those who only exceed the 400% baseline usage once in a 12-month period would be contrary to that latter purpose of helping the high usage customers with legitimate high uses with enrollment in the ESA Program and lowering of their energy usage. In fact, those customers who are generally within a reasonable usage range, but exceed the 400% baseline usage infrequently, may very well be in an optimal position to take advantage of the ESA Program to benefit from energy savings to drop below that 400% baseline range.

In addition, the high usage customer rule is relatively new and will likely be further examined as part of the next cycle applications in the next few months. We are therefore hesitant to modify this rule only a year after it has been in place and without the benefit of knowing other implementation issues or what other IOUs are experiencing.

Based on the foregoing, we do not modify the high usage customer rule at this time. SDG&E may instead prioritize its PEVs of 400%-600% baseline high usage customers who repeatedly exceed 400% baseline usage limit. Since the high usage customer rule does not set a mandatory timeline on how soon the high usage customers must be post enrollment verified after the customer exceeds 400% baseline usage, we clarify that SDG&E already has the necessary discretion on how and when it conducts the post-enrollment verification of a customer who exceed the 400% base usage only once. For instance, SDG&E may place the first time customers that exceed 400% baseline usage as their last PEV priority group.

This issue will be reexamined in the upcoming cycle as more information becomes available through further implementation and with information from all of the IOUs. At this time, SDG&E's request to target only the customers who

repeatedly exceed 400% of baseline usage (three times or more out of 12 months) is denied.

3.2. SoCalGas's October 29, 2012 Petition to Modify

SoCalGas filed a PTM to modify six elements of D.12-08-044. TELACU *et al.* filed comments generally in support of this PTM. SoCalGas's PTM is addressed below.

3.2.1. Request for Budget Increase

SoCalGas requests a net budget increase of $35,463,958 to ensure that it can adequately deliver all of the ESA Program services ordered in D.12-08-044 to its customers throughout the 2012-2014 program cycle. SoCalGas also seeks an additional $3,139,726 to replenish SoCalGas's 2012-2014 program cycle budget. We discuss these requests below.

First, regarding SoCalGas's request for an increase of approximately $35.464 million, SoCalGas contends that this additional fund is needed due to more updated cost data, the additional measures ordered in D.12-08-044 and related additional administrative costs as well as a higher number of households qualifying for the measures approved and ordered in D.12-08-044, as listed below. The cost increases and decreases associated with the measures or activities, listed below, serve as basis for the requested net budget increase:

Table 4: Measures/Activities Approved and Requested Budget Increase

Measures/Activities Approved by D.12-08-044	Requested Increases and Decreases in Budget
High efficiency clothes washers	+ $31,988,985
Domestic Hot Water	+ $2,711,572
Enclosure measures	+ $1,131,817
HVAC	+ $2,013,888
Inspections	+ $614,500
General Admin	- $1,670,327
Maintenance	- $1,283,093
Customer Enrollment	- $39,514
Home Education	- $3,869
NET TOTAL	**$35,463,958**

Second, SoCalGas also seeks an additional budget increase of $3,139,726 to replace funds SoCalGas had to use to cover emergency budget shortfalls in 2011. In the fall of 2011, SoCalGas had to use $3.4 million which had to be shifted from its 2012 bridge funding budget to fund its unexpected 2011 year-end spike in the ESA Program activities. This effectively reduced the funds available to SoCalGas for program year 2012. As such, SoCalGas now requests that the Commission increases its budget by $3,139,726 to replenish some of that amount to 2012-2014 ESA Program budget to successfully complete its 2012-2014 program cycle.

On July 18, 2013, SoCalGas submitted a Supplement to its PTM (Supplement) further explaining SoCalGas's forecasting methodology and describing the significant factors for the specific budget increase request.

A majority of the requests to increase and decrease the various budget components outlined above are in line with the approvals and orders set forth in D.12-08-044 and are logical, reasonable and comprise of smaller relative fiscal adjustments. Two major budget increase requests require more detailed review as discussed herein.

First, the main driver of the budget increases requested in the PTM and the Supplement is the high efficiency clothes washer measure totaling a budget increase of $31.989 million.

In its PTM and Supplement, SoCalGas provides clarifications and detail as to its forecasting methodology used in developing the high efficiency clothes washer budget. SoCalGas explains that the budget request includes estimated funding for 65,596 high efficiency clothes washer measures, which SoCalGas anticipates would be required in the 2012-2014 program cycle. This updated forecast incorporates an assumption that roughly 12.5% of the 410,508 households to be treated in the 2012-2014 program cycle, the adopted households treated goal in D.12-08-044, would be eligible for and ultimately receive a washer.

SoCalGas states that the 12.5% assumption is based on its experience in the 2011 and 2012 program years through August 2012. The 12.5% rate was predicated upon the rate at which customers qualified for a high efficiency washer (13.6%), which was then adjusted for the level of successful and complete installations relative to the number of qualified installations (91.5%). This in turn resulted in an estimated 12.5% rate of successful installation per household treated.

In addition to the 12.5% of new enrollees expected to receive a washer, the Supplement forecast included washers for customers who were identified as eligible for the measure in the prior program cycle, but had not yet received a high efficiency washer due to operational and budget constraints SoCalGas experienced in 2011. SoCalGas explained that this component contributed to over 14,000 more high efficiency washers to the overall 2012-2014 forecast and associated funding request.

Based on the above information, SoCalGas arrived at approximately $50 million total revised budget for high efficiency clothes washers. Given that D.12-08-044 approved approximately $18 million for the same measure, SoCalGas concludes that it requires an increase of just under $32 million in order to fulfill the expected needs of this measure during 2102-2014 program cycle, as illustrated below.

Table 5: SoCalGas's 2012-2014 Program Cycle High Efficiency (HE) Washer Revised Budget Request

		Units		Average Cost		Budget Request	
	HE Washers To Be Installed Based On New Assessments 2012-2014	51,2371	1	$760.52	2	$38,966,817	
	HE Washers To Be Installed Based On Eligible Customers Identified Prior to 2012	14,359	3	$760.52		$10,920,702	
	Total	**65,596**		**$760.52**		**$49,887,519**	
1	410,508 treated homes goal x 12.5% of treated homes expected to be eligible for and ultimately receive a washer.						
2	Average unit cost based on historical January-August 2012 incidence of all applicable charges and fees including: washer installation ($739), trip fee charged to reimburse installation contractor when a household is deemed ineligible for a washer upon installation visit ($25), installer paperwork fee ($10), and enrollment contractor assessment fee ($5). 3-year forecast assumed August 2012 YTD average of $750.02 would increase by 2% in 2013-2014.						
3	Of 18,894 customers identified as eligible for an HE washer not yet installed by year end 2011, SoCalGas forecasted that 14,359 washers (76.0%) would eventually be installed.						

SoCalGas further explains in its Supplement that looking at the historical installation rates (and associated expenditures) for high efficiency washers has not proven to be helpful for SoCalGas as a forecasting tool as too many other variables have affected SoCalGas's actual installation rate. For instance, the historical rates did not take into consideration that although the high efficiency washer was a new measure approved in 2009, the request for proposal process to engage an enrollment contractor did not conclude until late 2010, resulting in the low levels of installations in 2010. SoCalGas also noted that other variables not accurately reflected in the historical rate are the rapid ramp-up in high efficiency washer assessments during 2011 as well as the budgetary constraints and uncertainty associated with the ESA Program cycle funding level. Those factors

then affected and resulted in a lag time between the time customers are initially assessed as eligible for the high efficiency washers and the time they actually received their washers. This also caused lower installation rates as compared to the level of need and those that qualify for the measure.

Based on the foregoing, SoCalGas notes historical installation rates should not be looked upon for definitive projection of future installation rates nor as determinative of future funding based on past installation rates. SoCalGas requests that the Commission approve the new requested budget for high efficiency washers based on the current and expected level of customers eligible for high efficiency washers (as detailed above), and not solely based on prior installation activities/rates. SoCalGas contends the additional funding requested in the PTM and the Supplement will allow SoCalGas to continue to address the rapid rate of households being newly assessed as eligible for a high efficiency washer and to treat those households on the installation waiting list.

Therefore, with approval of this budget increase, SoCalGas acknowledges that its total authorized 2012-2014 program funding would equal approximately $390 million, increasing the average cost to treat each household by $94 to a level of $950 per treated home. SoCalGas requests that in evaluating the overall reasonableness of SoCalGas's PTM and Supplement request, the averages of the other IOUs not be loosely compared due to the differences in each IOU's unique geographic profile, measure mix and operational practices. SoCalGas continues to state that as a gas only utility, its average unit cost to treat a household is reasonable considering the high-cost measures that it provides its customers including weatherization, furnaces, water heaters and high efficiency washers.

Domestic hot water, enclosure, and heating, ventilation and air conditioning (HVAC) are the three additional measures approved and ordered in

D.12-08-044, for which SoCalGas did not anticipate and propose adequate associated budgets. Therefore, SoCalGas's delivery of these measures as approved in D.12-08-044 requires additional funding. Collectively, a budget increase totaling approximately $5.858 million for 2012-2014 program cycle accounts for these three measures. We find this budget increase reasonable. In addition, SoCalGas contends the measures and more robust activities as ordered in D.12-08-044 would require additional $614,500 in inspection expense, which seems reasonable. Finally, SoCalGas requests a reduction totaling $2,996,383, in these following budget categories: (1) maintenance, (2) customer enrollment, (3) in-home education and (4) general administration.

In early 2014, Governor Brown declared a state of emergency due to the drought and directed state officials to take all necessary actions to prepare for these drought conditions. The Commission's approval of high efficiency washers, including budget, is in line with Governor Brown's directive. In addition to the high efficiency washers, the IOUs should also explore ways to prioritize the ESA measures that have been approved in the existing ESA Program and also save water and could contribute to alleviating the drought emergency.

We, therefore, find SoCalGas's requested budget increase for high efficiency washers reasonable and justified. We will note our ongoing concern with the constant increase in the average cost to treat a household in SoCalGas's service territory. Nonetheless, we approve the budget request but note that the Commission will continue to monitor SoCalGas's overall program costs. We strongly encourage the IOUs to continue to seek efficiencies in their program operations and delivery. Although we anticipate some increased costs over time due to inflation, we anticipate seeing savings in the areas of leveraging,

coordination and technological improvements that enhance efficiencies and avoid costly and wasteful duplications.

We also find SoCalGas's requested budget increase of $3,139,726 to its 2012-2014 budget cycle reasonable. That amount is the deficit in SoCalGas's 2012-2014 program cycle budget, having no relation to its 2012-2014 programs and activities ordered in D.12-08-044. Instead, that is the amount that SoCalGas was forced to borrow against its 2012 budget to cover emergency budget shortfalls in 2011,[21] which effectively left SoCalGas in a deficit during the 2012-2014 program cycle. Thus, that amount must be replenished to SoCalGas's 2012-2014 program cycle budget in order for SoCalGas to successfully complete its 2012-2014 program cycle. The requested budget increase of $3,139,726 is granted.

We, therefore, approve SoCalGas's budget augmentation requests as summarized below:

High efficiency clothes washers	+ $31,988,985
Domestic Hot Water[22]	+ $2,711,572
Enclosure measures	+ $1,131,817
HVAC	+ $2,013,888
Inspections	+ $614,500
General Admin	- $1,670,327
Maintenance	- $1,283,093
Customer Enrollment	- $39,514

[21] In the fall of 2011, SoCalGas had to use $3,139,726 which had to be fund-shifted from its 2012 bridge funding budget to fund the unexpected 2011 year-end spike in ESA program activities, which effectively reduced the funds available to SoCalGas for program year 2012 and program cycle 2012-2014.

[22] This approved augmentation amount includes additional approval discussed in Section 1.2.2 of this decision.

Home Education	- $3,869
Replenishment of Budget	+$3,139,726
TOTAL	**$38,603,684**

3.2.2. Request for Add Back Measures

SoCalGas requests authorization to add back Domestic Hot Water measures, water heater blankets and pipe insulation for owner-occupied multifamily dwellings. D.12-08-044 authorized add backs for all water measures for multifamily renters and directed that each of the eight "measures proposed for retirement by the IOUs in their 2012-2014 Applications [ ] be retained and made available for renter-occupied multifamily units." However, D.12-08-044 did not similarly authorize those measures for owner-occupied multifamily dwellings.

SoCalGas contends approval of these measures as "add back" measures will advance the Commission's goal of serving more multifamily customers and ensure there is no inequity between multifamily renters and multifamily homeowners with respect to eligibility for water measures. In addition, although water heater blanket measure did not pass for mobile home dwelling types, SoCalGas correctly notes this measure is already approved pursuant to D.12-08-044. SoCalGas, therefore, proposes these measures remain in the program, consistent with the request to provide all water measures to qualifying customers of all housing types.

We agree with SoCalGas and approve its requested authorization to add back Domestic Hot Water measures, water heater blankets and pipe insulation for owner-occupied multifamily dwellings. As reflected in the approved budget augmentation discussion above, SoCalGas is correct that D.12-08-044 authorized add backs for all water measures for multifamily renters, which SoCalGas did

not originally forecast in its Application for the 2012-2014 program cycle. Additionally, consistent with SoCalGas's instant request to provide all water measures to qualifying customers of all housing types, we approve the water heater blanket measure for mobile home dwelling types and approve the associated budget augmentation requested for the Domestic Hot Water measure category. This latter augmentation, as approved, is also reflected in Section 3.2.1 of this decision.

3.2.3. Request to Clarify ESA Program Enrollment Process

SoCalGas requests clarification of D.12-08-044 and direction to continue categorical enrollment for the ESA Program as previously authorized in D.06-12-038. As discussed in Section 3.1.2 of this decision, and in response to similar request by SDG&E, we approve SoCalGas's request to modify D.12-08-044 by striking the proposed words, as shown below to clarify the use of categorical enrollment process.

> In this decision, we make no changes and approve continuation of self-certification for the ESA Program in areas where 80% of the households are at or below 200% of the federal poverty guideline. Consistent with prior Commission decisions, we also approve continuation of categorical enrollment of ESA Program ~~in these targeted areas~~.

3.2.4. Request for Directives on Collaborative Activities

SoCalGas requests that the Commission provide explicit language requiring the utilities to engage in joint contracting for statewide program activities. As discussed in Section 3.1.3 of this decision, and in response to similar request by SDG&E, we conclude that this request is reasonable, and to the extent that there is any need for the four utilities to engage in further

collaborative activities during the remainder of the 2012-2014 low-income programs, we approve this request and adopt the same directive we did in Ordering Paragraph 7 of D.10-12-054.

3.2.5. Request to Limit the Focus of Cost Effectiveness Working Group

SoCalGas proposes that the Cost-Effectiveness Working Group limit their focus only to two of the four issues outlined in D.12-08-044. Specifically, SoCalGas proposes that the Working Group only address two of the four issues, since the other two of the four issues (e.g., the cost-effectiveness framework and cost effectiveness applications for equity and resource measures) are currently being examined in a separate Commission proceeding, R.09-11-014. As discussed in Section 3.1.4 of this decision, and in response to similar request by SDG&E, SoCalGas's request to limit Cost-Effectiveness Working Group's focus therefore is denied.

3.3. SCE's October 29, 2012 Petition to Modify

SCE filed a PTM to modify five elements of D.12-08-044.[23] No party filed comments. SCE's PTM is addressed below.

3.3.1. Budget Reduction Request

SCE explains that the proposed decision preceding D.12-08-044, anticipated and set substantially higher levels of income verification and corresponding CARE Program budgets that were ultimately not adopted in the final decision, D.12-08-044. As a result, when D.12-08-044 was adopted with directives of less income verifications than the proposed decision along with the

[23] SDG&E filed its PTM on October 29, 2012.

budget associated with much higher levels of income verifications, an excess budget totaling $20.25 million was allocated for CARE administration budget category for PEVs for program cycle 2012-2014.

To address this $20.25 million in excess budget, in its PTM, SCE requests reduction of its CARE administration budget by approximately $16.78 million dollars. For the remaining portion of the excess allocation, $3,472,206, SCE requests authorization to reallocate that amount to other CARE necessary activities as ordered and approved in D.12-08-044, as illustrated below:

Table 6: Summary of SCE's Requested CARE Budget Adjustments

Issue	CARE Budget Category	2012	2013	2014	Cycle
Authorized CARE Management Budget Approved by D.12-08-044		$12,357,000	$12,256,000	$12,412,000	$37,025,000
(reverse) 2% Monthly PEV Budget Requirement Increases	Post Enrollment Verification	($2,756,000)	($2,756,000)	($2,756,000)	($8,268,000)
(reverse) Eligibility Proof at time of Recertification	Processing, Certification, Recertification	($3,994,000)	($3,994,000)	($3,994,000)	($11,982,000)
Consultant Cost for Categorical Review	General Administration	$20,000	$10,000	$10,000	$40,000
Annual PEV @ $10.15 per request (5% requested in 2012, 7% in 2013 & 10% in 2014).	Post Enrollment Verification	-$	$289,460	$723,650	$1,013,110
Capitation contractors to aid in the PEV process (15% of Verifs Requested @ $18 per processed fee)	Outreach	-$	$269,497	$384,996	$654,493
Capitation contractors to aid in the PEV process (development, training, materials)	Outreach	-$	$200,000	$150,000	$350,000
Increase in the capitation fee to "up to $20.00" (5K annual enrollments @ $5 incremental cost per enrollment)	Outreach	-$	$25,000	$25,000	$50,000

Total additional Cost of IT Enhancements	IT Programming	($500,000)	$1,000,000	-$	$500,000
Increase in Outreach to offset attrition (events, campaigns, collateral)	Outreach	-$	$250,000	$250,000	$500,000
Incremental Cost to Pay SCE Call Center per CARE enrollment (50K enrollments @ $3.66 incremental cost per enrollment)	Outreach	-$	$183,000	$183,000	$366,000
Proposed Adjusted CARE Management Budget		$5,127,000	$7,732,957	$7,388,646	**$20,248,603**

SCE is correct. D.12-08-044 set SCE's CARE PEV rates for 2012-2014 far below the funded level (25%) which was the level budgeted in the proposed decision. Therefore, SCE's request for a reduction in the CARE Administration budget to align with the actual approved reduced PEV rates ordered in D.12-08-044 is reasonable. However, we have concerns about the proposed reallocation of some of these funds, and as discussed below, we approve some of them while denying others.

Specifically, SCE's request to reallocate $40,000 to its general administration category to pay for the contract with the independent consultant, ICF International (ICF), to perform the comprehensive assessment of the current list of categorically eligible programs pursuant to Ordering Paragraph 88 of D.12-08-044 is denied. No other IOU is seeking additional funds to pay for similar contracts. It is unclear from our review of SCE's PTM, its Program Year (PY) 2012 Annual Reports and monthly reports as to how this contract was funded by SCE. Furthermore, D.12-08-044 did not authorize nor direct SCE to hire an outside consultant to do this work. We deny the requested reallocation of funds. In the future, if the IOUs seek to use CARE funds for hiring consultants for regulatory compliance issues, they should explicitly request approval from the Commission's Energy Division's Director prior to hiring a consultant.

As for SCE's request to reallocate $1,013,110 for PEVs in 2013 and 2014, we approve the proposed adjustment. This proposed adjustment is consistent with the directives of D.12-08-044 and Energy Division's approval of SCE's Advice Letter 2814-E, setting SCE's increased PEV rates at 7% in 2013 and 10% in 2014.

As for SCE's request to reallocate $1,004,493 to train and pay capitation contractors to aid in the PEV process ordered in D.12-08-044, we deny the proposed adjustment as lacking in merit. At this juncture, the number of PEVs proposed for processing through the CARE capitation contractors is unknown since this is a new PEV process ordered in D.12-08-044, and the program cycle is nearly completed. Thus, this could be a proposal that SCE presents as part of its next cycle application, with proper justification and showing.

As for SCE's request to reallocate $50,000 to ensure that CARE capitation contractors are not hindered by a restrictive budget, we find this request reasonable and approve it. In 2012, SCE only had total of 3,140 CARE Program enrollments through CARE capitation contractors. It is therefore unclear why SCE estimates a 60% annual increase in the number of these types of enrollments (5,000 for 2013, and 5,000 for 2014) which serve as a basis for the requested upward adjustment. However, we generally support the ambitious target and plan to increase CARE enrollment through CARE capitation contractors for 2014 and support SCE's plans to ramp up and increase enrollment activities this year. We also note that the latest Low Income Needs Assessment Study found that perhaps capitation contractors may not be the most effective use of funds for increasing enrollment. Thus, we approve the request to reallocate $50,000 for this purpose for 2014, but review the capitation issue again in the next cycle. This will help ensure that enrollment by CARE capitation contractors are not hampered by potential budget shortfall in the next few months.

We approve SCE's request to reallocate $500,000 for "Total additional Cost of IT Enhancements" required to implement the high usage PEV process. Upon closer examination, we find this request reasonable. This request is supported by the record.

As for SCE's request to reallocate $500,000 to increase CARE Outreach "to offset attrition (events, campaigns, collateral)," we find the request reasonable and approve it. In 2012, SCE expended 83% ($1,693,295 of an authorized $2,050,000) of its CARE Outreach budget. While SCE still retains $356,705 in unspent Outreach funds from 2012 program year, SCE's request is justified based on the increased PEV rates for the 2012-2014 program cycle.

As for SCE's request to reallocate $366,000 for its call centers to enroll an additional 50,000 customers in both 2013 and 2014 (a total of 100,000 customers), we find the request reasonable and we approve it. We recognize and support enrollments through call centers. Call centers are cost-effective and efficient channel of enrolling customers into the CARE program. In light of the increased PEVs rates for the 2012-2014 program cycle, which could lead to a decrease in the total number of CARE enrollees, it is even more important to ramp up and support CARE enrollments to offset the potential attrition due to the increased PEV activities. As we approve these budget reallocations to increase the SCE's CARE Outreach budget, we remind SCE and other IOUs to continually think outside the box and diligently explore ways to cost-effectively enroll and re-enroll CARE customers. Such endeavors could be through the use of new technology, new applications or by coordination with non-energy utilities and/or other low-income programs such as the federal and state Lifeline Program.

Based on the foregoing, we approve SCE's budget augmentation requests as summarized below:

Table 7: Summary of SCE's Approved CARE Budget Adjustments

Issue	CARE Budget Category	2012	2013	2014	Cycle
Authorized CARE Management Budget Approved by D.12-08-044		$12,357,000	$12,256,000	$12,412,000	$37,025,000
(reverse) 2% Monthly PEV Budget Requirement Increases	Post Enrollment Verification	($2,756,000)	($2,756,000)	($2,756,000)	($8,268,000)
(reverse) Eligibility Proof at time of Recertification	Processing, Certification, Recertification	($3,994,000)	($3,994,000)	($3,994,000)	($11,982,000)
Annual PEV @ $10.15 per request (5% requested in 2012, 7% in 2013 & 10% in 2014).	Post Enrollment Verification	-$	$289,460	$723,650	$1,013,110
Increase in the capitation fee to "up to $20.00" (5K annual enrollments @ $5 incremental cost per enrollment)	Outreach	-$	$25,000	$25,000	$50,000
Total additional Cost of IT Enhancements	IT Programming	($500,000)	$1,000,000	-$	$500,000
Increase in Outreach to offset attrition (events, campaigns, collateral)	Outreach	-$	$250,000	$250,000	$500,000
Incremental Cost to Pay SCE Call Center per CARE enrollment (50K enrollments @ $3.66 incremental cost per enrollment)	Outreach	-$	$183,000	$183,000	$366,000
SCE PTM Requested Net Adjustments		($7,230,000)	($4,523,043)	($5,023,354)	**($16,776,397)**
SCE's Proposed Adjusted CARE Management Budget		$5,127,000	$7,732,957	$7,388,646	**$20,248,603**
SCE's Approved Adjusted CARE Management Budget		$5,107,000	$7,253,460	$6,843,650	**$19,204,110**

Issue	CARE Budget Category	2012	2013	2014	Cycle
Authorized CARE Management Budget Approved by D.12-08-044		$12,357,000	$12,256,000	$12,412,000	$37,025,000
(reverse) 2% Monthly PEV Budget Requirement Increases	Post Enrollment Verification	($2,756,000)	($2,756,000)	($2,756,000)	($8,268,000)
(reverse) Eligibility Proof at time of Recertification	Processing, Certification, Recertification	($3,994,000)	($3,994,000)	($3,994,000)	($11,982,000)
Annual PEV @ $10.15 per request (5% requested in 2012, 7% in 2013 & 10% in 2014).	Post Enrollment Verification	-$	$289,460	$723,650	$1,013,110
Increase in the capitation fee to "up to $20.00" (5K annual enrollments @ $5 incremental cost per enrollment)	Outreach	-$	$25,000	$25,000	$50,000
Increase in Outreach to offset attrition (events, campaigns, collateral)	Outreach	-$	$250,000	$250,000	$500,000
Incremental Cost to Pay SCE Call Center per CARE enrollment (50K enrollments @ $3.66 incremental cost per enrollment)	Outreach	-$	$183,000	$183,000	$366,000
SCE PTM Requested Net Adjustments		($7,230,000)	($4,523,043)	($5,023,354)	**($16,776,397)**
SCE's Proposed Adjusted CARE Management Budget		$5,127,000	$7,732,957	$7,388,646	**$20,248,603**
SCE's Approved Adjusted CARE Management Budget		$5,607,000	$6,253,460	$6,843,650	**$18,704,110**

3.3.2. Request to Modify High Usage Customer Rule

SCE is concerned that it cannot offer its ESA Program on a timely basis to all of the willing and eligible CARE customers exceeding 400% of baseline in any monthly billing cycle as directed by D.12-08-044 as part of the high usage customer rule. SCE, therefore, requests that D.12-08-044 be modified to set a ceiling limit on the number of PEVs SCE must perform under that rule. SCE's justification for this proposed modification is that such ceiling would help pace

the ESA Program services by ensuring SCE's number of households treated in the ESA Program per month stays under 1500 households, with the caveat that if SCE is able to treat more than 1500 households, it will increase the number of households served.

SCE has not demonstrated why the Commission must now intervene and set a ceiling to address and deal with the pacing or its program implementation and delivery. That type of discretion is well within the purview of the IOUs, including SCE, to exercise with reasoned business judgment. The number of customers who exceed specified usage levels in any monthly billing cycle may differ each month and by each utility. Likewise, the processes utilized to identify high usage customers may also vary depending on the utility. Moreover, although D.12-08-044 requires ESA participation within 45 days of notice following a PEV, the rule does not specify other required timelines including the timeline for the IOUs to provide notice to high usage customers. Thus, the rule allows each utility to flag and address high usage households according to their individual business models, including staffing resources and IT programming capabilities.

Therefore, we find this rule does not need to be modified. SCE is encouraged to maximize treatment of as many households as they are able to treat under the high usage customer rule. Since the high usage customer rule does not set a mandatory timeline on how soon the high usage customers (exceeding 400% baseline usage) must be post enrollment verified and then provided ESA treatments, SCE already has the necessary discretions on how and when it conducts the post-enrollment verifications and delivers ESA treatments. SCE should use its best judgment based on SCE's and its contractors delivery

capacity to pace and manage their ESA treatment delivery with the ultimate aim of treating 100% of all willing and eligible low-income customers by 2020.

In sum, dealing with this type of issue having to do with the ebb and flow of program delivery activities and effectively managing them are the essence of IOUs' administrative role. We therefore, find this request unreasonable and deny it.

3.3.3. Request to Modify Cooling Center Requirement

SCE states that it does not directly manage activities at cooling centers and will need to rely on the cooling centers alone to provide D.12-08-044 data ordered to be tracked and reported under Ordering Paragraph 83 of that decision which required the Utilities to file reports on "cooling center facility activities including, attendance, low-income program enrollments, and itemized expenses and describing the energy education and marketing materials provided at each cooling center facility." SCE contends that it lacks the resources to verify the accuracy of that data. SCE therefore requests D.12-08-044 be modified to acknowledge that some of the requested information may not be available to SCE and instead require SCE to report only the information that is provided to it by the cooling centers. SCE further contends that it cannot implement additional data reporting required in D.12-08-044 without additional resources. Since D.12-08-044 provided no additional resources for this report, SCE explains that it is unable to verify the accuracy of the data the cooling centers provide and must rely on the unverified reports by the cooling centers to prepare and submit the reports, as ordered in D.12-08-044.

This issue can be addressed by modifying Ordering Paragraph 83 of D.12-08-044. We, therefore, modify the Ordering Paragraph 83 of D.12-08-044, as follows:

> 83. By December 21st of each year, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company ~~and Southern California Gas Company~~ shall file their reports, based on best information available to the utility on cooling center facility activities including, attendance, low-income program enrollments, and itemized expenses. These annual cooling center reports shall ~~and~~ describe, based on the best information available to the utility, ~~ing~~ the energy education and marketing materials provided at each cooling center facility and provide attendance and enrollment tracking data for all cooling centers with annual expenses that exceed $5,000.

3.3.4. Request for Waiver from Complying with Ordering Paragraph 61

SCE requests a waiver from complying with Ordering Paragraph 61 of D.12-08-044 to file (a) the cost-effectiveness values for the high efficiency forced air unit measure for each of the different housing types and climate zones that they cover, to see if they pass the Cost-Effectiveness Test, and (b) an estimate for the costs, energy savings values, as well as the projected quantity (by housing type and climate zone) of this measure to be installed for each program year. SCE correctly points out the inadvertent error in D.12-08-044. This ordering paragraph applies only to gas utilities since the high efficiency forced air unit measure is a gas measure. Since SCE is an electric only utility, SCE does not need to comply with this directive. Therefore, SCE's request to be excused from complying with Ordering Paragraph 61 of D.12-08-044 is granted. Ordering Paragraph 61 of D.12-08-044 is modified to exclude SCE.

3.3.5. Request for Corrections

SCE points out that D.12-08-044 approves room air conditioners in climate zone (CZ) 10 and CZ 13 for all housing types on page 106 and Ordering Paragraph 46. However, Appendix I.1 of D.12-08-044 shows room air conditioners in CZ 10 and 13 as not approved. SCE also points out Evaporative Cooler Maintenance is listed as an "Add Back" measure at the bottom of Appendix I.1 of D.12-08-044, but Ordering Paragraph 53 of D.12-08-044 approves SCE's request to retire the Evaporative Cooler Maintenance Measure. SCE requests the Commission correct these errors in Appendix I.1 of D.12-08-044.

We agree that Appendix I.1 of D.12-08-044 should be corrected to allow room air conditioners in all housing types for CZs 10 and 13, consistent with Ordering Paragraph 46 of that decision. We also agree that Appendix I.1 of D.12-08-044 should be corrected to remove “add back” from the Evaporative Cooler Maintenance Measure row, consistent with Ordering Paragraph 53 of that decision.

3.4. Joint Utilities’ Petition to Modify D.12-08-044 Concerning Energy Education Study

On November 1, 2013, a joint petition to modify D.12-08-044 (Joint Petition) was filed by the IOUs seeking modification of that decision that would authorize extension of time for the IOUs to complete the Energy Education Study ordered in that decision, including completing the field study requirements in assessing the benefits of the current energy education offerings until the ESA and CARE 2015-2017 program cycle.

3.4.1. Background on Energy Education Study ordered in D.12-08-044

The Commission initially authorized a study budget of $300,000 for the IOUs and directed the IOUs to conduct an Energy Education Study[24] that, *inter alia*:

- Tests whether and how the current energy education program could be improved to yield *actual* energy and bill savings and how to effectively deliver the energy education toward the lasting behavioral change in the low-income household;
- Explores how to measure success of such education;
- Includes a field study component to help assess the benefits of the current energy education offerings, and include a before and after test period and household bill analysis that measures any *actual* energy- and bill- savings;
- Includes an experimental group to be added to this energy education study consisting of CARE participants with monthly usage of 200%-400% of baseline, and the new and existing education could be tested on this experimental group to study any *actual* energy and bill savings gleaned from energy education; and
- Examines all feasible methods of aligning and integrating ESA Program energy education with information from other demand-side programs offerings including the IOUs' CA-ICEAT hosted, free of charge, on each IOU's website.

This study was to inform the Commission in determining whether there are energy and/or bill savings associated with ESA Program energy education

[24] D.12-08-044 at 240-241 and Ordering Paragraph 110.

and whether, going forward, this justifies energy education as a cost-effective, standalone measure.[25]

The research for the initial phase of the ESA Energy Education Study has been completed as ordered in D.12-08-044.[26] The study objective was to identify ways to optimize and/or improve the educational component of the ESA Program and examine the current and potential value of this energy education. Phase 1 of the study included the following components: 1) Secondary Research and comprehensive review of the current ESA Program energy education content and materials; 2) Contractor Research including in-depth interviews and internet surveys; and 3) Customer Research including in-home interviews, telephone interviews, and focus groups throughout the four IOU service territories.

Some of the key findings and conclusions of the Energy Education Study - Phase 1 are:

- The guidebooks utilized by the IOUs are key tools that all have room for improvement;
- Additional materials could be developed to help overcome the issues of customers retaining the energy education provided and the challenges relating to delivering effective energy education to multi-person households;
- Current educational content is relatively comprehensive, but information that customers consider "new" is more memorable;
- Assessor recruitment, selection, training, retention and overall performance of delivering energy education have been effective, although areas for improvement were identified among a small minority of customer experiences and assessors;

[25] Ibid.

- Language barrier problems are minimal;
- In-home delivery methods are also generally on target, but the practice of not providing education until after qualification of measures is likely to reduce its effectiveness;
- Information retention has proven to be a problem for some customers and that should be addressed; and
- Households with multiple adults and/or children in the home face challenges with gaining cooperation in reducing the household's energy consumption.

Some of the key recommendations of the Energy Education Study - Phase 1 are:

- Standardize more of the training across the IOUs to encourage adoption of best practices and enhance the knowledge-base of assessors statewide concerning energy saving information that is passed on to customers;
- Provide follow up with customers after the initial assessment mail-back or web-based survey or other forms of periodic communication;
- Consider modified and additional energy education materials to increase the materials' appeal and subsequent use;
- Consider more customized information for customers and for the household;
- Provide energy education throughout the visit, and training should more explicitly teach the approach of providing energy education throughout the assessment process; and
- Revise the protocol to withhold providing energy education until after qualification on measures and the walkthrough. This will help tailor and limit the energy education and information based on the actual measures being provided during the visits.

A workshop was held on October 17, 2013 to review the draft Energy Education Study – Phase 1 Report. Parties were invited and provided opportunity to post comments on Energy Division's public document website (http://www.energydataweb.com). That draft Phase I report was finalized and submitted to the herein proceeding docket thereafter, on October 31, 2013.

3.4.2. Joint Petition and Justifications

Upon completion of Phase 1 of the Energy Education Study, the IOUs in their Joint Petition seek authorization for extension of time for the IOUs to complete the remainder of the Energy Education Study, ordered in D.12-08-044, as Phase 2 Report. The IOUs provided the following justifications for their Joint Petition:

- A viable proposal for measuring energy savings will require significantly more time and resources for development beyond the time remaining in the current 2012-2014 program cycle.
- Measuring energy savings as ordered in D.12-08-044 cannot be accomplished within the time frame and budget allotted.
- The billing analysis would require a minimum of nine months of pre- and post-treatment usage data to ascertain reliable results. Post-treatment usage data cannot be collected until after the "new education" is implemented based on Phase I results.
- Measurement of any new educational materials or practices and contractor training is unlikely to occur until at least the middle of the 2015-2017 program cycle and would reflect an analysis of energy education practices that will be implemented in response to Phase I of the Energy Education study, (which was completed and submitted on October 31, 2013).

- The design would require the measurement of savings well after the treatment, preferably multiple measurements over time.

No party has filed a response to the Joint Petition. Upon review of the Commission's directives in D.12-08-044, the IOUs' progress evidenced in the Energy Education Study - Phase 1 Report, and the IOUs' proposed plan illustrated in the Joint Petition for what is needed to complete the remainder of energy education study, as part of Phase 2 Report, we find IOUs' request for extension of time beyond the current program cycle reasonable.

Therefore, we excuse the IOUs from the August 31, 2013 deadline for submission of the Energy Education Study, Phase 2, as ordered in D.12-08-044 and instead direct the IOUs to propose a Phase 2 Energy Education Study in their 2015-2017 applications to be conducted in the next program cycle, including a proposed schedule and budget sufficient to include a field study component to help assess the benefits of the current energy education offerings, and a before and after test period and household bill analysis that measures any actual energy and bill savings.[27]

4. Revisiting of Measures

4.1. High Efficiency Furnace

D.08-11-031 authorized a SoCalGas pilot (Pilot) that offered natural gas high efficiency (HE) forced-air unit (FAU) furnaces to customers with high winter season space heating needs. The pilot was originally designed to target approximately 250 low-income households with space heating usage at or above 300 therms during the winter season of November through March (winter

[27] *See* Joint Petition, Attachment A.

season). The goal of the pilot was to replace an existing, inefficient operational natural gas FAU furnace, defined as units with an Annual Fuel Utilization Efficiency (AFUE) rating of 65 or lower) with a new high-efficiency FAU furnace (with an AFUE rating ≥ 92).

The Pilot has been completed and SoCalGas reports the below findings:

- Customers were selected to participate in the pilot based on the following criteria: 1) customers who already had an existing, working furnace; 2) customers who lived in single-family households and customers who owned their home; 3) customers with space heating usage of 300 therms or above during the 2008-2009 winter season; and, 4) customers with furnaces that had an Annual Fuel Utilization Efficiency (AFUE) rating of 65 or lower. In SoCalGas's territory, this selection criterion produced a list of approximately 500 customers from which the pilot participants were recruited, however only fifty opted to participate.
- The average installation and equipment cost for each furnace was very high, totaling **$2,680 per each unit**, resulting in total installation costs for the pilot of $109,834 for 41 customers who participated in the pilot program. The replacement of these high-use inefficient FAU furnaces with the high-efficiency units was expected to produce a lower bill for the customer and also provide long-term energy savings. Expected energy efficiency gains were estimated at 29% per FAU installed, and anticipated energy savings were an average of 88 therms per customer during the 4 month winter season.
- Final Results:
  - (1) The participating customers did not see a significant reduction in gas consumption with energy savings of 100-125 therms during the winter months.
  - (2) The measure's cost-effectiveness values were low as shown in Table 8:

Table 8: Benefit Cost Ratios for SoCalGas Furnace Pilot[28]

MPT	UCT	TRC
0.57	0.37	0.28

(3) Given these results, SoCalGas did not recommend that the HE FAU replacement be added to the ESA Program furnace repair and replacement measure; and SoCalGas also noted the recent development of newer and more energy efficient (95 AFUE) forced-air units and the phasing-out of the 92 AFUE units used in the pilot.

(4) Uncertainties around the cost of new 95 AFUE FAUs and the availability of the units used in the pilot make it difficult if not impossible to determine the feasibility of HE FAU replacement as a full measure.

(5) Because high efficiency FAUs continue to increase in efficiency, SoCalGas would also need to continue to conduct cost-effectiveness tests to verify that new models would still be eligible for the ESA program.

(6) SoCalGas faced many unexpected obstacles during the pilot even though a diligent effort was made to find and provide customers with this service.

In Phase I of this proceeding, ORA recommended that the HE FAU be added to the IOUs' portfolios based on the 2009-2011 SoCalGas pilot results. SoCalGas estimated that adding the measure would add an additional $1.7 million to its 2012-2014 budgets. NRDC correctly pointed out that the record lacked cost-effectiveness values for this measure of each of the gas fueled IOUs.

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[28] Final Report on SoCalGas's 2009 – 2010 High Efficiency Forced-Air Furnace Pilot, December 6, 2010: http://www.liob.org/docs/SoCalGas%20Final%20Report%20on%202009-2011%20HE%20FAU%20Pilot.pdf

In the Phase I Decision, D.12-08-044, the Commission determined that ORA's request was premature and directed the gas IOUs to provide cost-effectiveness values for this measure, and develop program cycle cost estimates/projections to be submitted for Commission review. PG&E, SDG&E and SoCalGas filed their reports on October 29, 2012, which is summarized below.

PG&E's report states:

- Quantity Eligible: 22,580 households per year will be eligible.
- Cost: $5,000 per unit in 2013, and $5,200 per unit in 2014, with annual budget of $113 million in 2013 and $117 million in 2014.
- CE values: Ranges from 0.06-0.26 for Utility Cost Test (UCT), and 0.04-0.20 for Modified Participant Cost Test (MPT).
- However, of all the households identified for a HE FAU replacement under the above criteria, 0 households would meet adopted cost-effectiveness (CE) test.
- PG&E strongly urges this Commission to refrain from embarking on any major modifications to D.12-08-044 in this area at this time.

SoCalGas's report states:

- Quantity Eligible: 91 households per year will be eligible.
- Cost: $4,600 per unit, or $418,600 annually.
- CE values: Ranges from 0.06-0.35 for UCT, and 0.22-1.27 for MPT.
- However, of all the households identified for a HE FAU replacement under the above criteria, only 3 households would meet adopted CE test.

SDG&E's report states:

- Quantity Eligible: 3 households per year will be eligible in 2014 (none identified for 2013).
- Cost: $4,600 per unit, or $13,800 annually.
- CE values: Ranges from 0.15-0.23 for UCT, and 0.58-.88 for MPT.
- However, of all the households identified for a HE FAU replacement under the above criteria, 0 households would meet adopted CE test.

4.1.1. PG&E

For PG&E, allowing the high efficiency furnace measure would increase its annual budget by $117 million in 2014 alone, with 45,160 installations, but none of the households in any of the climate zones would meet the adopted CE test. As currently authorized, PG&E's energy efficiency measures budget is $126.9 million for 2013, and $131.4 million for 2014. Adding this one measure to the program would nearly double PG&E's currently authorized budget for energy efficiency measures, annually.

In addition, based on PG&E's estimates, those households that may be eligible for this measure represent only about 19% of PGE's annual households treated goal. Yet, this measure would consume 47% of that year's annual energy efficiency measures budget for this one measure alone (not accounting for any other energy efficiency measures to be installed in the same household).

PG&E also estimates that 22,580 households per year will be eligible for a HE furnace replacement, but none of those households would meet the CE test, making none of these installations "cost effective."

For all the above data regarding budget share and treatment rates for this measure, in addition to the high cost and lower than expected energy savings, we agree with PG&E that the costs of such an undertaking would be staggering

and imprudent. We also acknowledge the report's finding that noted numerous challenges in finding customers to agree to participate in the pilot, as well as the unexpected obstacles and challenges faced by SoCalGas during the pilot implementation in finding and providing customers with this service. Based on the foregoing, we have revisited the issue of whether to add this as a measure in PG&E's portfolio for the 2013-2014 program years and find that it would be imprudent and unreasonable to do so.

4.1.2. SoCalGas

For SoCalGas, allowing this measure would increase its annual budget by $418,600, with 91 installations each year. Only three of those households/units are likely to meet the ESA Program's CE test. As currently authorized, SoCalGas's energy efficiency measures budget is $85.1 million for 2014. Although adding this measure to SoCalGas's currently authorized budget would not have the dramatic impact as we see with PG&E's territory, $416,600 is still a significant annual budget increase.

In addition, based on SoCalGas's estimates, those that may be eligible for this measure (91 units each year) in its territory represent only 0.07% of its annual households treated goal, meaning this costly energy efficiency measure would benefit extremely few households. In turn, by directing use of ESA Program funds to such costly measures, the Commission would have more difficulty reaching its Strategic Plan goal and statutory duty to treat 100% of eligible and willing low-income households in California by 2020.

As we discussed in the previous section of this decision, we again acknowledge the report's finding that noted numerous challenges in finding customers to agree to participate in the pilot, as well as the unexpected obstacles and challenges faced by SoCalGas during the pilot implementation in finding

and providing customers with this service. Based on the foregoing, we have revisited the issue of whether to add this as a measure in SoCalGas's portfolio for the 2013-2014 program years but find that it would be imprudent and unreasonable to add this measure to SoCalGas's portfolio for the 2013-2014 program years.

4.1.3. SDG&E

While SDG&E estimates that it has far fewer households in its service territory eligible for this measure, based on our reasoning as discussed in the previous two sections of this decision, we find that it would be imprudent and unreasonable to add this measure to SDG&E's portfolio for the 2013-2014 program years.

4.1.4. Future Consideration for High Efficiency Furnaces

At this time, we find the IOUs have provided sufficient data to serve as basis for a meaningful analysis in evaluating the implications, propriety and feasibility of these measures for the ESA Program. We therefore find that no further pilots are needed for these measures. As set forth in Attachment Q to this decision, Section E (Measure Portfolio Composition), the IOUs may propose new measure offerings in their future budget applications, including high efficiency forced air-unit furnaces with the relevant cost effectiveness ratios or justification for deviations as described therein.

4.2. Smart Strips (PG&E)

Ordering Paragraph 60 of D.12-08-044 provided as follows:

> Within 60 days after this decision is issued, Pacific Gas and Electric Company shall file (a) cost effectiveness values for the smart power strip measure for each of the different housing types and climate zones that they cover, to see if they meet the

> Cost-effectiveness Test, and (b) an estimate for the costs, energy savings values, as well as the projected quantity (by housing type and climate zone) of this measure to be installed for each program year.

PG&E submitted the below data, in compliance with the Ordering Paragraph 60 of D.12-08-044:

- Smart Power Strips Utility Cost Test (UCT) result is 0.66, for all climate zones.
- Modified Participant Cost Test (PCm) result is 0.72, for all climate zones.
- Total Resource Cost Test result is 0.55, for all climate zones.
- Estimated annual energy savings of 3,056,039 kilowatt hours.
- Estimated annual number of units 104,124.
- Estimated annual cost of $2,929,008,

The above data show that Smart power strips meet the ESA Program's adopted CE test, which states:

> Measures that have both a PCm and a UCT benefit-cost ratio greater than or equal to 0.25 (taking into consideration the housing type and climate zone for that measure) for that utility pass the CE Test and shall be included in the ESA Program. This rule applies for both existing and new measures.

Based on the foregoing, we direct PG&E to add Smart power strips to its 2012-2014 ESA program portfolio for all CZs and Housing Types that meet the ESA Program's adopted CE Test in PG&E's service territory. Based on the review of PG&E's monthly and annual reports, PG&E has adequate budget for the remainder of this program cycle to add this measure to its measures list

without a need to increase its budget for this current cycle. Therefore, no additional budget is approved for Smart strips for PG&E for the 2012-2014 cycle.

5. Audit of SoCalGas

During the tail end of the prior program cycle, SoCalGas experienced a sudden budget shortfall in its ESA Program budget and was facing the possibility of ESA Program suspension. An order to show cause (OSC) hearing was held in December of 2011, and the Commission's review of that issue was carried over and continued to this current 2012-2014 cycle and herein proceeding. The outcome of the OSC hearing was a ruling which directed SoCalGas to conduct an audit to:

- Examine SoCalGas's records of ESA Program to determine what causes, precursors, or contributory factors affected and otherwise triggered the "sudden spike" in contractors' invoicing in November of 2011;
- Identify and examine all of SoCalGas's management actions relating to the ESA Program activities during the timeframe subject to the audit;
- Review SoCalGas's then-existing ESA Program related management practices, protocols and contract management tools in place in November 2011;
- Conduct random verifications of 10% of the contractors' actual November 2011 invoices with the concluded ESA Program work during the same month to ascertain whether ESA Program measures were actually installed, whether such work was completed in compliance with the ESA Program rules and standards, and to see a random profile of the ESA Program activities during that anomalous period to better understand the "sudden spike";
- Prepare and submit recommendations based on the audit for how those practices and tools should be enhanced to

prevent recurrence of any potential stoppage of future ESA Program activities.

The final audit report ordered as a result of that OSC hearing has been submitted and attached to this decision as Attachments P-1 and P-2 and highlights of the findings and recommendations are summarized below:

Audit Findings

- While the program did go over budget by $23.9 million for PY2011 (of which $20.9 million was covered by carry over funds), the number of actual November-December 2011 invoices paid by ESA Program was significantly lower than projected.
- Actual expenditures that occurred in the months of November and December were not significantly higher than in other months in program year 2011.
- Regarding ESA Program management practices, limited management oversight led to budget overruns.
- Other Reasons for Overrun include:
  - Households treated increased over the years (from '09-11)
  - Increase in measures installed (not originally budgeted for) and increased measure cost, leading to an increase in dollars per unit treated increased from $577 in 2009 to $635 in 2011
  - SoCalGas entered into contracts with contractors whose total aggregated spending limits were greater that authorized ESA Program budgets
  - SoCalGas entered into contracts with contractors which did not set max spending limits and households treated goals and those terms could not be changed without contractor agreement
  - SoCalGas's management did not enforce provision in contract to require invoice submissions within 14 days

(allowed contractors to take up to 35 days, leading to poor budget management)

- 6.7% of the enrollment and assessment invoiced accounts tested had incomplete income documentation for customer enrollments.
- Per the 10% sampling requirement, 62 sample invoices were reviewed with 45 in-home visits conducted. In home verification tests included whether:
  - The measure was installed and if so, if it was installed in accordance with applicable California Weatherization Installation Standards;
  - The quantity listed on the invoice of the measure installed was accurate; and
  - The measure appeared to have been installed on the installation date indicated on the invoice.
- The audit concluded that no exceptions were found, meaning all measures were installed within compliance

Recommendations:

- SoCalGas's management should manage and ensure that the aggregate contractual maximum spending limits are within budget.
- SoCalGas's management should change the contract language with vendors to allow SoCalGas to unilaterally change unit treated goals and maximum spending limit during the program year.
- SoCalGas's management should change the language in its vendor contracts to allow SoCalGas the ability to change maximum spending limits and unit treated goals, without vendor agreement.
- SoCalGas's management should enforce the contract provision requiring that vendors submit invoices within 14 calendar days of work completion to ensure SoCalGas's

Home Energy Assistance Tracking system's data is timely and accurate.

- SoCalGas's management should develop a projection methodology that is data-driven, produced on a frequent basis (quarterly), consistently evaluated for its accuracy and easily visible by ESA Program management.
- SoCalGas's management should provide Outreach Workers with clear training on how to complete the Income Worksheet and what supporting documentation is appropriate and necessary.

We adopt the final audit report (Attachments P-1 and P-2). We generally concur with the recommendations above and direct SoCalGas to implement those recommendations immediately. However, those recommendations do not fully address all of the findings of the audit.

The audit found that 6.7% of the enrollment and assessment accounts tested had incomplete income documentation for customer enrollments, leading to the potential enrollments of unqualified participants/households. Households treated without following program enrollment rules should not be reimbursed by the ESA Program, and the installation/enrollment contractor should have to incur the costs, if they fail to diligently perform the income documentation/verification portion of their enrollment screening process. SoCalGas's management must adapt its management practices to ensure only eligible program enrollments occur, going forward.

In addition, the audit findings and recommendations seem to suggest that the budget overrun is somewhat justified because SoCalGas exceeded the households treated goals for 2011, and the coverage from SoCalGas's carry over funds from 2009-2010 ($20 million) lessens the total overage. This reasoning is flawed. The audit fails to acknowledge that the increased activities in 2011 and

overrun were results of SoCalGas's catch-up efforts. SoCalGas had failed to meet its households treated goals in 2009 or 2010, and if we examine SoCalGas's overall 3-year program cycle, the households treated goal was not met (92%), and the budget was still overrun. That said, SoCalGas must ensure in the future that program delivery is carefully overseen to avoid recurrence of similar budget shortfalls.

6. Phase II Status and Context Leading to the 2015-2017 Program Cycle Applications

6.1. Studies and Working Groups' Reports

In D.12-08-044, the Commission directed the IOUs to conduct four studies during Phase II:

- An updated Low Income Needs Assessment Study;
- An updated Impact Evaluation Report;
- Multifamily Segment Study; and
- Energy Education Study.

In D.12-08-044, the Commission also ordered that three working groups be established, and each group was charged with examining issues relating to the following three subject areas: (1) workforce education and training, (2) the ESA Program cost-effectiveness, and (3) the miscellaneous mid-cycle program administration issues.

During the Phase II of the Consolidated Proceeding, the studies ordered in D.12-08-044 have been completed, with the exception of the Energy Education Study for which only the Phase 1 Report has been completed, as further discussed in Section 3.4 of this decision. Likewise, the three working groups (the Workforce Education and Training Working Group, the Cost-Effectiveness Working Group, and the Mid-cycle Working Group) were established, as

ordered in D.12-08-044, and these working groups have prepared and submitted their final reports and recommendations.

We adopt the four above-referenced studies and three final working groups' reports that have been completed and submitted in this Consolidated Proceeding. The IOUs are directed to thoroughly review these studies and working groups' reports. As discussed below, these studies and working groups' reports, as well as the findings and recommendations therein shall inform and guide the IOUs in their preparation of their 2015-2017 ESA and CARE Program applications. The IOUs shall incorporate, in their respective strategies, findings and recommendations from these studies to propose ways to improve the ESA and CARE Programs in the future cycles.

We address the individual studies and working groups' reports below. More importantly, we direct the IOUs to implement the key recommendations we approve in this decision and provide attendant directions to the IOUs to implement those specific recommendations. In addition to our directions below, we provide, in Attachment Q, further and more particularized directions guided by the above-referenced studies and working groups' reports.

Finally, we acknowledge the recommendations of the Cost-Effectiveness Working Group, the Mid-cycle Working Group, the Workforce Education and Training Working Group, Energy Education Study (Phase 1 Report) and Multifamily Segment Study that seek the Commission's continued and further review of some aspects of those issues beyond this 2012-2014 program cycle. Parties have filed comments noting that some of the finding and recommendations of these studies and working groups' reports require further review and vetting and therefore are not actionable at this time.

We agree. Some aspects of those issues or subject areas, including some of the related recommendations require further vetting, are not yet poised for full resolution at this junction and our review of those issues or subject areas should therefore be continued to the next cycle proceeding. Thus, on recommendations of the studies and working groups' reports for which (1) parties have raised objections or concerns and (2) we do not explicitly direct implementation of the specific recommendation in this decision, including the Attachment Q to this decision, we are specifically reserving those recommendations for further deliberation during the upcoming cycle.

6.1.1. Studies

6.1.1.1. Low Income Needs Assessment Study

In 2013, AB 327 was passed and amended the California Public Utilities Code Section 382(d) which now requires that "A periodic assessment shall be made not less often than every third year." Accordingly, the IOUs are directed to propose an attendant scope, schedule and budget for said study to be completed by no later than 2016.[29]

In D.12-08-044, the Commission directed the IOUs to conduct an updated Low Income Needs Assessment Study (2013 LINA Study). The 2013 LINA Study was recently released. The 2013 LINA Study is adopted and supersedes the 2007 LINA Study.[30]

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[29] *Id.*

[30] The 2013 Low Income Needs Assessment Study can be seen at the following link: http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=100255063.

The objectives of 2013 LINA Study were to provide updated information to support program and regulatory decisions related to better addressing the needs of CARE/ESA eligible customers by:

- Reporting the most recently available estimates of eligible households;
- Exploring the accessibility of the programs to eligible low-income customers;
- Obtaining participating customers' perceptions of the programs;
- Assessing eligible non-participating low-income customers' willingness and barriers to participate;
- Assessing the energy-related needs of low-income customers, which includes an examination of customers' needs for specific energy efficiency measures;
- Providing data that can be used to support updates of estimates of the energy savings potential remaining among eligible low-income customers' homes;
- Collecting data on energy burden and insecurity from eligible low-income customers; and
- Assessing the non-energy benefits that participants receive from participating in the ESA program.

Some of the key recommendations on improvements that can be made to the ESA and CARE programs to better meet the needs of the low income population and to improve participation are to apply a tailored approach to certain underserved communities by:

- Easing enrollment for renters;
- Better targeting and enrolling in rural areas;

- Ensuring that the newly low-income households are aware of the program, (work with social workers, hospitals, low-income law centers and other agencies that interact with individuals who are going through life changes that might be associated with reductions in household income);
- Focusing on very high poverty areas, where CARE penetration is lower;
- Targeting households for ESA that re-enroll in CARE after moving to ensure that the highly transient population participates;
- Refining outreach strategies to enroll households who do not want a "hand out";
- Reducing the number of visits to a home for measure implementation;
- Coordinating with CBOs to conduct outreach to overcome lack of trust in contractors;
- Establishing a clearer identity and brand for ESA; and
- Continuing the use of targeted PEV to reduce incidences of unqualified households.

The 2013 LINA Study also provides more current statewide data reflecting the eligible population at various poverty levels and other informative study findings and results applicable to the IOUs' territories. This study is an important step toward accurately accounting for those already served by the CARE and ESA Programs, as well as those that remain eligible (and not yet treated or enrolled) for these programs. Therefore, this study will assist the IOUs

in determining whether they are on track to treat 100% of all eligible and willing households by 2020.[31]

As such, the IOUs are directed to thoroughly review the 2013 LINA Study. The findings and recommendations therein shall inform and guide the IOUs in their preparation of their 2015-2017 ESA and CARE Program applications. The IOUs shall incorporate, in their respective strategies, findings and recommendations from the 2013 LINA Study to propose ways to improve the ESA and CARE Programs in the upcoming 2015-2017 cycle. In Attachment Q, we provide additional and more particularized directions based on the 2013 LINA Study recommendations.

6.1.1.2. Impact Evaluation Report

In D.12-08-044, the Commission directed the IOUs to conduct an updated Impact Evaluation Report (2013 Impact Report). For the 2012-2014 program cycle applications, we recognize that the projected energy savings estimates were based on the draft impact evaluation report because of the delay and unavailability of the final impact evaluation report results. We share the concerns raised by ORA as they relate to the 2009 impact evaluation results and associated energy savings estimates.

To alleviate similar concerns for the 2015-2017 program cycles, D.12-08-044 ordered the timely release of a joint Impact Evaluation and directed Energy Division and the IOUs to complete and publish the Final Report no later than August 31, 2013 in order to allow adequate time for the IOUs to incorporate it

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[31] *See* Strategic Plan (http://www.cpuc.ca.gov/NR/rdonlyres/D4321448-208C-48F9-9F62-1BBB14A8D717/0/EEStrategicPlan.pdf); see also January 2011 Update to Strategic Plan (http://www.cpuc.ca.gov/NR/rdonlyres/A54B59C2-D571-440D-9477-3363726F573A/0/CAEnergyEfficiencyStrategicPlan_Jan2011.pdf).

into the utilities' 2015-2017 budget applications.[32] The 2013 Impact Report was completed and released on August 30, 2013.

The objectives of the 2013 Impact Report was to estimate first-year gas and electric energy savings, and coincident peak demand reduction attributable to the ESA Program, based on 2011 program year data.

Some of the key results of the 2013 Impact Report are as follows:

- Savings from the ESA Program measures is a small fraction of overall household energy consumption;
- A significant number of ESA participant households are using more energy after participation; and
- Customers may be unaware that they are using more energy. The phone survey targeting households with increased energy use did not provide any clear answers on what might be driving the higher consumption. Respondents generally reported that they were using their heating and cooling systems about the same as they did prior to participation. For those that said they used the systems more, the most common reason for using heating and cooling systems more had to do with changes in weather (e.g., hotter or cooler weather).

The 2013 Impact Report is adopted.[33] The IOUs are directed to thoroughly review the 2013 Impact Report. The findings and recommendations therein shall inform and guide the IOUs in their preparation of their 2015-2017 ESA and CARE Program applications. The IOUs shall incorporate, in their respective strategies, findings and recommendations from the 2013 Impact Report to

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[32] D.12-08-044 at 13.

[33] The 2013 Impact Evaluation Report can be seen at the following link: http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=100354179.

propose ways to improve the ESA Program in the upcoming 2015-2017 cycle. In Attachment Q, we provide additional and more particularized directions based on the 2013 Impact Report.

6.1.1.3. Multifamily Segment Study

In D.12-08-044, the Commission directed the IOUs to conduct the Multifamily Segment Study (Multifamily Segment Study) during the Phase II of the Consolidated Proceeding. The Multifamily Segment Study was conducted, recently released and is now adopted.[34] While there are aspects of the Multifamily Segment Study and its recommendations that require further review, we find that several of its recommendations are sound and poised to be rolled out. In general, these recommendations enhance the ESA Program by removing barriers to ESA Program participation for the low income households residing in multifamily housing. We therefore adopt the some of the key recommendations from the Multifamily Segment Study, and they are summarized and highlighted below:

(1) The IOUs serving multifamily properties shall work directly with property owners where this approach reduces barriers to participation;

(2) The Commission's "80/20" rule is modified so that an IOU may treat the entire multifamily building, whether or not a particular unit is occupied or income qualified, if at least 80% of the building's units are income-qualified;[35]

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[34] The 2013 Multifamily Segment Study can be seen at the following link: http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=100255060.

[35] Multifamily Segment Study at 191.

(3) Housing subsidies should not be counted as income;[36]

(4) The IOUs shall propose an expedited enrollment process for the United States Department of Housing and Urban Development assisted multifamily housing wherein at least 80% of the tenants have incomes at or below 200% of federal poverty level (FPL);[37]

(5) The IOUs shall appoint a single point of contact for the ESA Program, as is already the case for the Energy Upgrade California program; and

(6) The IOUs shall coordinate among ESA, CARE, and Energy Upgrade California, including any potential pooling of funds among programs where such pooling maximizes energy efficiency treatment of multifamily housing and ensures that more potential eligible customers are enrolled.

In general, the IOUs are directed to thoroughly review the Multifamily Segment Study. The findings and recommendations therein shall inform and guide the IOUs in their preparation of their 2015-2017 ESA and CARE Program applications. The IOUs shall incorporate, in their respective strategies, findings and recommendations from this study to propose ways to improve the ESA Program in the upcoming 2015-2017 cycle. The IOUs are directed to prepare

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[36] The IOUs, in their 2015-2017 Applications for ESA and CARE Programs and Budgets, may propose specific exemptions to this rule, with factual and legal justifications, demonstrating compelling reasons as to why a particular or specific category(ies) of housing subsidies should be excluded from this rule and instead be counted as income. The compelling reasons must include demonstration that the particular or specific category(ies) of housing subsidies are being received by households that do not meet the 200% federal poverty guidelines income requirement for the ESA and CARE Programs.

[37] Expedited enrollment is a process wherein HUD provides the IOUs with a list of HUD supported properties in which at least 80% of the tenants have been verified to have incomes at or below 200% of FPL, fulfilling the income verification requirements for these properties and their tenants for participating in the ESA Program.

their 2015-2017 ESA and CARE Program applications which clearly reflect the above key and highlighted recommendations and propose modifications to the 2015-2017 ESA Program accordingly.

We believe these changes will significantly enhance the ESA Program going forward. We also believe a single point of contact and coordination will enable the IOUs to provide technical support to building owners to ensure that funds from different programs are spent cost-effectively and without redundancy.

With the rollout of the above adopted highlighted recommendations, the ESA Program will also be in a better position to coordinate with multifamily energy efficiency offerings to deliver full-building measures where those measures are cost-effective and where the energy savings and benefits can be directly linked to low income tenants.

Based on the foregoing, the IOUs are directed to incorporate the above adopted recommendations in the 2015-2017 applications and should propose new, cost-effective measures for the multifamily sector, including common area measures and central heating, cooling, and hot water systems. The IOUs' proposals for the new multifamily measures, which may be expensive on a per-unit basis, should include (1) a total budget for the measure and a proposed budget allocation, (2) an explanation of why the proportion proposed to be used for these measures is reasonable, and (3) a description of how other energy efficiency program funds, such as Energy Upgrade California and federal energy efficiency programs, will be leveraged.

Finally, we also adopt other recommendations from the Multifamily Segment Study, which we discuss in Attachment Q and provide more particularized and related directions therein.

6.1.1.4. Energy Education Study - Phase I Report

Refer to Section 3.4.1 of this decision for full background, status and summary of key findings, conclusions and recommendations on the Energy Education Study – Phase 1 Report (Phase 1 Report). The Phase 1 Report, filed in the herein proceeding docket on October 31, 2013 is adopted.[38] As we discuss in Section 3.4.2 of this decision, there remain numerous issues that must be examined in the Energy Education Study – Phase 2 Report. Thus, our review of the overall Energy Education Study, Phase 1 and Phase 2 Reports, will be continued to the next cycle proceeding.

6.1.2. Working Group's Report

6.1.2.1. Cost-Effectiveness Working Group's Report

In response to the directives set forth in D.12-08-044, the Cost-effectiveness Working Group has prepared and submitted two reports (Two Reports):

- Energy Savings Assistance Program Cost-Effectiveness White Paper dated February 15, 2013; and
- The Addendum to ESAP Cost-Effectiveness Working Group White Paper dated July 15, 2013 (Final Report).

The Final Report presents four consensus-based recommendations of the Cost-Effectiveness Working Group. As discussed below, the four recommendations are reasonable and are adopted.[39] The adopted recommendations are: (1) the Commission shall base program approval for the

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[38] The 2013 Energy Education Study (Phase 1 Report) can be seen at the following link: http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=100255062.

[39] The Cost-effectiveness Working Group's Final Report can be seen at the following link: http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=99753158.

2015-2017 cycle and beyond on the cost-effectiveness results at the program level, rather than at the measure level; (2) in the 2015-2017 applications, the IOUs shall categorize measures as "resource" or "non-resource" based on the measure's ability to provide energy savings; (3) the IOUs shall apply the two proposed new cost effectiveness tests, the Energy Savings Assistance Cost-Effectiveness Test (ESACET) and the Total Resource Cost (TRC) test, replacing the existing tests; and (4) during the 2015-2017 cycle, for informational purposes, the IOUs shall conduct a preliminary, qualitative Equity Evaluation, with opportunity for party comment on the preliminary results.

These recommendations and associated methodologies are further elaborated and discussed in the Two Reports. The IOUs shall incorporate these recommendations and methodologies into their 2015-2017 program applications.

We do not adopt a cost-effectiveness threshold to be used for program approval at this time. To build on the consensus already developed in the Cost-Effectiveness Working Group, we order Energy Division to reconvene a working group for the narrow purpose of developing a program-level cost-effectiveness threshold as expeditiously as possible.

Should the working group develop a consensus-based recommendation on a threshold in time for the filing of the 2015-2017 applications, the IOUs shall use that threshold. However, should the working group not achieve consensus by the time the 2015-2017 applications are filed, the lack of consensus shall not delay the filings. In the event that the working group does not achieve consensus by the time the 2015-2017 applications are filed, the reconvened working group shall continue its efforts toward developing a consensus-based recommendation on a threshold and submit its progress report by serving it to the service list, by

March 1, 2015. In the meantime, the IOUs are directed to make every effort to achieve a higher level of cost efficiency as possible for the 2015-2017 applications.

6.1.2.2. Workforce Education and Training Working Group's Report

In response to the directives set forth in D.12-08-044, the Workforce Education and Training Working Group has prepared and submitted a final report and recommendation, and we adopt it today.[40] In it, the Workforce Education and Training Working Group presents and recommends a list of researchable questions that should be addressed by a consultant to form the future direction of workforce data collection and determine the workforce needs and successes within the ESA Program. This is a reasonable recommendation and we adopt it. In the 2015-2017 program cycle, we intend to examine the list and consider and revise it as appropriate to reconcile the workforce needs and successes within the Mainstream Energy Efficiency portfolio.

6.1.2.3. Mid-cycle Working Group's Report

In response to the directives set forth in D.12-08-044, the Mid-cycle Working Group has revised and updated the ESA Program Statewide Policy and Procedure (P&P) and California Installation Standards (IS) Manuals. The Mid-cycle Working Group recommends the Commission's approval of the Working Group's proposed revised P&P Manual, attached to its Final Working Group Report, as Appendix D thereto. We agree with the proposed revisions and updates generally, and approve the Working Group's proposed revised P&P

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[40] The Workforce Education and Outreach Working Group's Final Report can be seen at the following link: http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=100255059.

Manual, with some modifications[41] and added clarity. The approved P&P Manual, as modified, is attached to this decision as Attachment R.

A summary of the working group's proposed revisions to the IS Manual is provided in Appendix E of the Working Group's Final Report. The Mid-cycle Working Group's Final Report represents that the group has made the necessary revisions and updates to the IS Manual with Energy Division's review to ensure that the IS Manual, as revised, is consistent with programmatic changes and updates set forth in D.12-08-044. Due, in part, to the size of the IS Manual (which exceeds 700 pages) it is not attached to this decision. Moreover, unlike the P&P Manual, the IS Manual is a highly technical and detailed manual used by the ESA Program contractors that does not require review and approval by the Commission. Therefore, the IS Manual is neither attached to this decision nor expressly approved. However, we acknowledge the efforts of the Mid-cycle Working Group and Energy Division. The IS Manual, as revised by the Mid-cycle Working Group, should be rolled out immediately.

The Mid-cycle Working Group's Final Report also recommends that there should be continued efforts, beyond Phase II of the Consolidated Proceeding, to streamline the IOUs' reporting requirements and to continue to examine and share best practices and process improvements by exploring, sharing and recommending alternatives to the existing practices, including income verification process, contractor licensing requirements, and investigation of the feasibility of uploading utility usage data for residential master-metered

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[41] We decline to adopt the Mid-cycle Working Group's recommendation to eliminate caps on Minor Home Repairs. The Commission may consider any increase to those caps based on justifications and responses to Section F-1 of the Attachment Q to this decision for program cycle 2015-2017.

buildings/multifamily properties. In general, this recommendation and the final report of the Working Group are reasonable and we adopt them.[42]

6.2. Assigned Commissioner's Ruling dated February 25, 2014

On February 25, 2014, the assigned Commissioner issued a ruling concerning categorical eligibility enrollment process and definition of income. The ruling solicited comments from parties on those two enrollment related issues pending in Phase II of the Consolidated Proceeding.

The Phase I Decision provided, in part, as follows:

> By January 31st of each year, the Utilities are directed to jointly and annually review and submit, by Tier 2 Advice Letter, an updated list of proposed categorical eligible low-income programs for the upcoming year. The list must propose to retain and add categorically eligible programs for enrollment in low-income programs, as appropriate, and must include only programs with income thresholds consistent with the California Alternate Rates for Energy and Energy Savings Assistance Program Programs….[43]

Pursuant to D.12-08-044, the Utilities filed a joint advice letter (Joint Advice Letter).[44] Thereafter, on April 30, 2013, the Commission's Energy Division rejected the protested Joint Advice Letter stating that it raised significant unforeseen policy issues relating to the Commission's categorical eligibility enrollment and post-enrollment verification programs. Energy Division rejected the protested Joint Advice Letter without prejudice and

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[42] The Mid-cycle Working Group's Final Report can be seen at the following link: http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=ALL&docid=100354171.

[43] Ordering paragraph 88 (b) of D.12-08-044.

[44] SoCalGas (AL 4457-G), SDG&E (AL 2455-E-2170-G), Southern California Edison SCE (AL 2849-E), and PG&E (AL 3361-G-4186-E).

recommended that the issues raised in the Joint Advice Letter be further examined by the Commission in the herein proceeding.

The Joint Second Amended Scoping Memo of the Assigned Commissioner and ALJ (Scoping Ruling) dated July 24, 2013 confirmed that categorical eligibility enrollment issue should be examined in this proceeding. On February 25, 2015, the assigned Commissioner issued a ruling to seek comments from the parties on those and related issues (Assigned Commissioner's Ruling).

The Joint Advice Letter reflected the Utilities' study of the previously-qualifying public assistance programs in the categorical eligibility enrollment program. The study contended that the majority of those previously-qualifying public assistance programs no longer qualify as their income thresholds or methodologies for calculating income resulted in misalignments with the qualification thresholds that are consistent with CARE and ESA Program income guidelines. Public Utilities Code Section 739.1, subsection (f)(1), provides the Commission with some discretion on this issue, as follows:

> …The commission may determine that gas and electric customers are categorically eligible for CARE assistance if they are enrolled in other public assistance programs with substantially the same income eligibility requirements as the CARE program….
>
> In turn and as identified in the Scoping Ruling, the resulting policy issue for the Commission's review and resolution here would be to determine which of the public assistance programs has/have income eligibility requirements that is/are "substantially the same" as the CARE Program and therefore should be approved as qualifying public assistance program(s) in the CARE categorical eligibility program, consistent with the above Code section.

Related to the above issue of program eligibility and enrollment is the issue of how income is defined in CARE and ESA Programs. In D.12-08-044, we

also decided to examine, during the Phase II of the Consolidated Proceeding, the definition of income used in the CARE and ESA Programs and to determine whether non-cash benefits such as housing subsidies should be included as part of income calculation in determining income eligibility.[45]

The comments to the Assigned Commissioner's Ruling have recently been filed by parties to this proceeding. Those comments raise issues that are complex and require review beyond this proceeding. We will, therefore, refer the review of those issues to the next program cycle and docket. Until such resolution, the income definition remains unchanged with one exception. As discussed in Section 6.1.1.3 of this decision, housing subsidies will not be considered income. Similarly, until such resolution, nothing proposed by the IOUs in their 2015-2017 program applications shall alter the current list of Categorical Eligibility programs, nor shall the program design reduce customer participation in the CARE and ESA Programs via Categorical Eligibility. In addition, until such resolution, the annual advice letter filing process ordered in this proceeding identifying Categorical Eligibility programs is suspended.

6.3. Phase II Monitoring Issues

6.3.1. High Usage Customer Rules

Based on the Utilities' monthly and annual reports, during Phase II of this Consolidated Proceeding, we have monitored the progress and findings being reported by the Utilities in their implementation of the High Usage Customer Rule set forth in D.12-08-044. Those reported progresses are summarized below.

[45] D.12-08-044 at 13.

The number of CARE customers, with electric usage above 600% of baseline in any monthly billing cycle, who have been removed from the CARE rate under the CARE High Usage Customer Rules set forth in D.12-08-044 to date are as follows:

- SCE - 4,222 CARE customers.
- SDG&E - 179 CARE customers.
- PG&E - 9,039 CARE customers.

CARE customers with electric usage above 600% of baseline in any monthly billing cycle, who have been found to have "necessary, basic and legitimate household energy usage" are as follows:

- SCE reports that its IT Systems have not been in place yet to institute this process. Within the next few months, customers that received verification requests in December 2013 and failed to reduce usage will be removed from CARE, at which time they can initiate an appeal. Prior to December 2013, SCE issued traditional verification requests to customers with usage above 600% of baseline in any monthly billing cycle. Such customers were not removed from CARE due to excess usage, but were removed due to excess income, failure to respond to a PEV request, or based on a request to be removed from the rate.
- SDG&E reports that zero CARE customers fall into this category. Of the CARE customers requested to complete the High Usage Verification (HUV) process, SDG&E has not had any customers fully comply with the process. Therefore, SDG&E had not determined any customers to have "necessary, basic and legitimate household usage."
- PG&E reports that zero CARE customers fall into this category.

The number of CARE electric customers with electric usage at 400%-600% of baseline in any monthly billing cycle who have applied for the ESA Program within 45 days of notice is as follows:

- SCE reports that 965 CARE customers fall into this category.
- SDG&E reports that it has not begun implementing this practice yet, but expects to fully implement the HUV process for customers with electric usage greater than 400% of baseline in April of 2014.
- PG&E reports that 867 CARE Customers applied for the ESA Program, and 213 did not apply for the ESA Program.

The total number of CARE electric customers with electric usage at 400%-600% of baseline in any monthly billing cycle who have NOT applied for ESA within 45 days of notice and maybe removed from the program is as follows:

- SCE has identified 22,526 CARE customers with electric usage at 400%-600% of baseline in three consecutive billing cycles that have not been enrolled in ESA during 2013 while the IT infrastructure was being developed to support the High-Use Verification Process.
- PG&E and SDG&E do not have corresponding reported figures.

The CARE electric customers with electric usage above 400% of baseline in any monthly billing cycle who have successfully completed a PEV request and remained on the CARE rate are as follows:

- SCE reports 1,585 CARE customers with electric usage at 400%-600% of baseline in three consecutive billing cycles have successfully completed a PEV request and remained on the CARE rate, and 2,651 CARE customers with electric usage above 600% of baseline in any monthly billing cycle have successfully completed a PEV request and remained on the CARE rate.[46]

[46] Those who have been post enrollment income verified are then in queue for ESA Program.

- PG&E reports 2,266 CARE customers with electric usage at 400%-600% of baseline in three consecutive billing cycles have successfully completed a PEV request and remained on the CARE rate.

The total number of CARE electric customers with electric usage above 400% of baseline in any monthly billing cycle who have failed a PEV or failed to respond to a PEV request are as follows:

- SCE reports 1,969 CARE customers with electric usage at 400%-600% of baseline in three consecutive billing cycles have failed a PEV or failed to respond to a PEV request and 4,190 CARE customers with electric usage above 600% of baseline in any monthly billing cycle have failed a PEV or failed to respond to a PEV request.
- PG&E 16,181 CARE customers with electric usage above 400%-600% of baseline in any monthly billing cycle have failed a PEV or failed to respond to a PEV request.

SDG&E reports it has not yet implemented the HUV process for customer with monthly baseline usage between 400%-600%. SDG&E expects to fully implement the HUV process for customer with electric usage greater than 400% of baseline in April of 2014.

Based on these preliminary implementation reports, we are heartened to note (1) the relatively smooth roll out of the rule, (2) no evidence of de-enrollment of legitimate high usage customers leading to appeals, and (3) the increased ESA Program enrollments for those customers with legitimate high usage.

Going forward, we note that customers with usage of 400%-600% of baseline generally appear more likely to successfully complete PEV process than customers whose usage exceed 600% of baseline. This suggests that higher priority should be given to post enrollment verifying the customers whose usage

are 600% above baseline than those customers with 400%-600% of baseline usage. As we directed SDG&E, other IOUs may, if necessary, also give higher priority to PEVs of 400%-600% baseline high usage customers who repeatedly exceed 400% usage limit. Since the high usage customer rule does not set a mandatory timeline on the post enrollment verification of the customer who exceeds 400% baseline usage, we clarify that the IOUs have the necessary discretion on how and when they conduct the post-enrollment verifications of the customers. Specifically, as we noted with SDG&E, other IOUs too may place the first time customers that exceed 400% baseline usage as their last PEV priority group. In all cases, be it 400%-600% baseline users or over 600% baseline users, the IOUs must take all reasonable actions necessary to assist each eligible CARE customers with legitimate household usage achieve energy efficiency while taking reasonable steps to ensure that only eligible households are enrolled. We applaud the Utilities' diligent implementation, cooperation with Energy Division and reporting.

6.3.2. Probability Modeling and Post Enrollment Verifications

Under D.12-08-044, the IOUs have been directed as follows:

> …The IOUs are directed to develop and implement interim and long term stratified probability Post Enrollment and Post Re-certification Income Verification models as directed in this decision to cost-effectively identify and income verify those enrollees who have the probability of being ineligible in the program, while tailoring the models to each of the IOUs' territory that incorporate basic probability factors, inputs, populations and costs. Each IOU shall develop and begin implementing its interim probability model within 60 days of this decision. The IOUs are directed to track, monitor and report the number and specific reasons for each CARE customer de-enrolled during the Post Enrollment and Post

> Re-certification Income Verification process (e.g., customer non-response to the IOUs' request for income verification, deemed ineligible for the program, etc.) as well as how that customer was initially enrolled in the CARE Program (e.g., capitation agency, self-certification, categorical enrollment, etc.). Each IOU shall, based on the lessons learned through implementation of the interim models, devise a long term Post Enrollment and Post Re-certification Income Verification probability model as well as optimal verification rate and submit them for review by September 2013, by Tier 2 Advice Letter.[47]

In compliance with the foregoing directives, the IOUs have developed and implemented interim probability models. The IOUs tracked, monitored and reported the data required. Each IOU has, based on lessons learned through implementation of the interim models, devised a long term Post Enrollment and Post Re-certification Income Verification probability model and has begun implementation.

Based on the Utilities' monthly and annual reports, during the Phase II of this Consolidated Proceeding, we have monitored the progress and findings being reported by the Utilities in their implementation of the interim and long term probability models and PEVs, as directed in D.12-08-044. Those reported progresses are summarized below. In general, we are hopeful to see that most of the IOUs seem to be reporting experiences that their targeted probability model-driven PEVs have proven, in varying degrees, to be successful in focusing PEV efforts on those customers that are less likely to be eligible.

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[47] D.12-08-044 at 16-17.

6.3.2.1. SDG&E

SDG&E uses a process wherein a random group of CARE customers is selected for eligibility review. SDG&E then runs their PEV model on this group of selected customers and the probability model is used to identify customers within the group with a high likelihood of qualifying for the CARE program. These high likelihood customers are then treated as verified and are not required to provide PEV documentation.

SDG&E has been using a model since 2007 and the percentage of customers dropped due to non-response has gone down from roughly 65% (2007) to roughly 46% (2013) (but 2010 is outlier year with 36%). The percentage of customers dropped due to ineligibility has increased to 12%. This figure has increased from an average of 7% since 2010.

SDG&E's future PEV model will use these factors to screen customers to determine the above "likelihood for eligibility:"

- Energy Use
- Home Ownership
- Residence Type
- Neighborhood Characteristics
- CARE program Characteristics (self-certified vs. categorical enrollment, i.e., how household signed up for CARE)

SDG&E found that home ownership has a sizeable effect on CARE program eligibility in SDG&E's service area. Specifically, home ownership reduces eligibility by nearly 20%. Second, energy usage has a relatively small impact on eligibility (e.g., an increase of 100 kWh/month in maximum summer energy usage decreases eligibility by approximately 0.3%). Likewise, a $10,000 change in PRIZM median income reduces eligibility by only 1.4%. Third, the CARE program specific characteristics have surprisingly large impacts on

eligibility. In fact, they exceed income and energy usage impacts. For example, the income self-certification option (compared to categorical eligibility enrollment) reduces eligibility by 28%-29%. Likewise, signing up via the internet or direct mail strongly increases the likelihood that the household is ineligible by 22%. In addition, households with an unlinked application (individuals who have moved over their CARE history) are approximately 18% more likely to be ineligible.

6.3.2.2. PG&E

PG&E only performed random PEV (without probability model) until 2012. Since the implementation of the probability model, PG&E reports that there has been a significant drop (from 50%-60% of customer selected for PEV who are deemed eligible during PG&E's random PEV periods to only 26%-38% of customers selected for PEV who are deemed eligible by use of the probability model). This is all occurring while they have done 10 times more PEVs than in previous years.

PG&E also reports that overall percentage of non-responsive customers does not seem to change from when PG&E performed random PEVs to now when PG&E is performing PEVs based on a probability model.

In early 2012, before D.12-08-044 was issued, PG&E contracted to develop a CARE probability model. That model had 15 inputs, and after D.12-08-044, PG&E added the directed basic factors to the model that it had previously developed as its interim model. After implementation of the interim model, PG&E has since enhanced that model, including adding additional inputs, and submitted its proposed long term model and additional inputs for Energy Division's review.

6.3.2.3. SoCalGas

SoCalGas instituted a probability model in 2008, a "Vintage Model" with three independent variables:

- PrizmHHInc (Prizm median neighborhood income)
- SF (single-family indicator)
- MaxWThm (household's maximum billed gas usage during winter months)

Once D.12-08-044 was issued, SoCalGas combined its Vintage Model and added the D.12-08-044 directed basic factors to devise its interim model. After implementation of the interim model, SoCalGas has since enhanced that model, including adding additional inputs, and submitted its proposed long term model and additional inputs for Energy Division's review.

At this time, it is unclear from SoCalGas's reports whether SoCalGas is experiencing discernable benefits or lessons from the additional inputs (factors) being added to its probability model. We will have to continue to monitor the effectiveness of the model.

6.3.2.4. SCE

In 2011, SCE implemented a probability model with the following inputs:

- Channel – Means of most recent CARE enrollment/recertification
- Household Size
- Usage
- Neighborhood income

SCE has proposed that its long-term model continue, but with minor modifications to these inputs:

- Neighborhood Income
- Usage

- Time on CARE Rate - SCE would oversample (perhaps 1.3 times – 1.5 times larger average probability of selection) among "short-term" households. Long-term households are on rate more than 25 months.
- Household Size
- Channel - SCE would over-sample customers enrolling through Capitation since data shows these customers are more likely to fail a verification request. SCE likely will under-sample customers enrolling via categorical enrollment or data exchange, as these customers are more likely to pass a verification request. SCE would merge the Data Exchange and Categorical Enrollment channels in order to maintain the same number of channels.

For SCE, other than 2010 (2011 is when they switched to a probability model driven PEV), the percentage of customers dropped for non-response and those found ineligible both increased and decreased. SCE has however significantly increased the number of PEVs by more than fivefold, and this has not led to an increase in the number of post enrollment verified customers who are in fact eligible for the program. This suggests that SCE's modeling is effectively targeting the PEVs to customers that have high probability of ineligibility. This was the goal of the modeling.

6.3.2.5. Non-responsive Customers

While the IOUs' long-term PEV modeling efforts continue, we note in Attachment Q that much is still unknown as to why some CARE customers fail to respond to PEV requests. The IOUs are directed, in Attachment Q, to discuss their efforts and strategies in the 2015-2017 budget cycle to learn more about this non-responding customer segment and outline plans to decrease the number of CARE customers who fail to respond to income verification requests during the PEV process.

6.3.3. Community Help and Awareness of Natural Gas and Electricity Services Pilot Program

D.12-08-044 anticipated further monitoring of the Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) pilot program during Phase II of the Consolidated Proceeding. The purpose of monitoring this pilot program during Phase II was to determine whether there is sufficient justification to make the pilot a permanent program going forward and to continue to fund the program through CARE funds in the upcoming 2015-2017 program cycle.

Specifically, in D.12-12-011, the Commission directed that Consumer Service and Information Division (CSID) work with Energy Division, the IOUs and the CHANGES contractor to develop additional program data tracking and reporting requirements and to include the resulting data in the IOUs' monthly CARE reports which the IOUs file in this Consolidated Proceeding. Those reports are expected to be reviewed as part of the upcoming 2015-2017 program cycle applications for the CARE Program. That review will include examination of whether the Commission should approve CHANGES as an ongoing program, what its budget should be and whether it is appropriate to continue the funding of the CHANGES through the CARE Program.

Meanwhile, it is reasonable to continue to fund the CHANGES pilot program pending further pilot review and during the bridge period authorized by this decision. We therefore authorize continued bridge funding for the CHANGES pilot program of $61,200 a month until December 31, 2015. This bridge funding level for CHANGES reflects a 2% cost of living increase from the authorized 2014 funding level.

6.4. Water Energy Nexus

For a number of years, the Commission has been looking at various joint water-energy efficiency programs and examining the nexus between water and energy conservation as well as the potential benefits to both the IOU ratepayers and the publicly-owned water ratepayers.[48]

In 2005, the Commission adopted the Water Action Plan (Plan) which established specific goals and objectives designed to increase water conservation and strengthen energy efficiency. In its 2010 revision to the Plan, the Commission emphasized the importance of water-energy nexus issue and water and energy conservation programs. In response to the Plan, the IOUs have developed and implemented various plans and programs to reduce electricity consumption to implement the Plan's action items.

In early 2014, Governor Brown declared a state of emergency due to the drought and directed state officials to take all necessary actions to prepare for these drought conditions. Consistent with the Governor's declaration and direction, in the upcoming applications for the next program cycle, the IOUs should prepare and propose ways to prioritize measures that have been approved in the existing ESA Program, that also save water and could contribute to alleviating the drought emergency.

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[48] The Commission has examined energy usage by the water sector in California in several energy proceedings, including Rulemaking R.09-11-014, and its predecessor R.06-04-010, the Commission's Rulemaking to examine energy efficiency policies, programs, evaluation and related issues. In D.07-12-050 and D.08-11-057, the Commission authorized a set of water-energy efficiency pilot projects as well as studies of the embedded energy use in water to attempt to quantify energy savings from water efficiency projects. In D.12-05-015, the Commission directed staff and the IOUs to build upon past efforts on water-energy analysis and pilot projects.

7. 2015-2017 Program Cycle Applications

In general, we direct the IOUs to follow developments in the Commission's energy efficiency proceeding, A.12-07-001, especially concerning multifamily segment, marketing, education and outreach, and cost effectiveness issues, to ensure that the IOUs' planning and strategies for the ESA and CARE Programs and the IOUs' 2015-2017 cycle applications are consistent with and mindful of the how those issues are developing in that proceeding and/or directions we give in that proceeding.

Similarly, we direct the IOUs to follow developments in the Commission's rate redesign proceeding, R.12-06-013, concerning the CARE rate redesign following the passage of Assembly Bill (AB) 327, CARE rate redesign related marketing education and outreach, and CARE rate redesign related budget implication issues, to ensure that the IOUs' planning and strategies for the CARE Programs and the next cycle applications are consistent with and mindful of the how those issues are developing in that proceeding and/or directions we give in that proceeding.

We also direct the IOUs to follow the developments in the Commission's proceeding, Docket R.09-11-014 which is examining the cost effectiveness framework for demand side programs, to ensure that the IOUs' planning and strategies for the ESA Program and next cycle applications are consistent with and mindful of the how some of those issues are developing in that proceeding and/or directions we give in that proceeding.

7.1. Application Due Date

The IOUs' 2015-2017 ESA and CARE applications are due 90 days after this decision is issued.

7.2. Application Framework, Content and Templates

The IOUs are directed to prepare the their 2015-2017 ESA and CARE Programs and Budgets applications by using the attached framework and templates, attached to this decision as Attachment Q, as part of their next cycle applications and must complete each section as instructed, including all of the contents required therein. The Attachment Q includes and reflects specific directions and guidance to the IOUs on key recommendations from the various studies and reports we adopt today.

8. Minor Corrections and Clarifications to Decision 12-08-044

8.1. Numbering of Ordering Paragraphs

Currently, D.12-08-044 contains errors in several ordering paragraphs, as listed below.

- Two ordering paragraphs are numbered "10" but with different directives.
- Ordering Paragraphs 140 and 141 are identical.

This decision corrects these numbering errors by (1) deleting Ordering Paragraph 141, (2) retaining the first Ordering Paragraph 10 in D.12-08-044 as Ordering Paragraph 10 and (3) renumbering the second Ordering Paragraph 10 of D.12-08-044 as the new Ordering Paragraph 141. The affected Ordering Paragraphs, as corrected, are reflected below:

> 10. By April 15, 2013, the Energy Savings Assistance Program Workforce Education and Training Working Group shall evaluate the data gathered and submitted by the Utilities and develop and submit to the assigned Administrative Law Judge their Progress Reports of findings and recommendation(s), if any, and if no agreed upon recommendation(s) is/are reached by then, the working group shall submit a progress report nonetheless of its

> activities since inception and a detailed description of the status of its efforts in each of the subject areas it is charged to review in this decision with justification showing good cause for any additional and estimated time it may require.
>
> 141. By July 15, 2013, the Energy Savings Assistance Program Workforce Education and Training Working Group shall submit their Final Reports and Recommendations to the assigned Administrative Law Judge.

8.2. Ordering Paragraph 84

Ordering Paragraph 84 of D.12-08-044 directs all IOUs to post cooling center locations, including the days and hours of operations to their websites. Since SoCalGas does not have cooling centers, the Ordering Paragraph is being corrected, as follows:

> Within 30 days after this decision is issued, Pacific Gas & Electric Company, Southern California Edison Company, <u>and</u> San Diego Gas & Electric Company~~, and Southern California Gas Company,~~ shall post on their websites a list of designated cooling center locations as well as days and hours of operation.

8.3. Ordering Paragraph 86

Ordering Paragraph 86 of D.12-08-044 is corrected as reflected below to eliminate directive to SoCalGas since SoCalGas does not have cooling centers and did not request a budget for cooling centers. In addition, consistent with the cooling center budgets authorized and reflected in Appendix M and page 201 of D.12-08-044, Ordering Paragraph 86 is corrected to include an inadvertently omitted 2012 authorized budgets column and attendant calculation corrections/adjustments as reflected in the corrected Ordering Paragraph 86 of D.12-08-044 below.

> 86. The proposed cooling center budgets of Pacific Gas and Electric Company, Southern California Edison Company,

Company and San Diego Gas & Electric Company are approved with some modifications as follows:

Approved Prorated Cooling Center Budgets 2012-2014

Utility	IOUs' Adopted 2012-2014 Cooling Center Budgets	IOU Adopted 2013 Budget (Prorated)	IOU Adopted 2013 Budget (Prorated)	IOU Adopted 2014 Budget (Prorated)
SCE	$978,166	$768,000	$105,083	$105,083
PG&E	$712,692	$450,000	$127,846	$134,846
SDG&E	$126,314	$56,000	$34,329	$35,985

8.4. Ordering Paragraph 129

Currently, Ordering Paragraph 129 of D.12-08-044 provides as follows:

> 129. Once data sharing with water Utilities begins, Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company are directed to file a Tier 2 Advice Letter, and these Tier 2 Advice Letters must report on the corresponding costs borne by partnering water Utilities that are filed in accordance with Decision 11-05-020.

The above directive was in error. It was not the intent of D.12-08-044 to direct the IOUs to report cost data that were solely in the water utilities' possession and control. It was to track IOUs' costs associated with complying with D.11-05-020. Ordering Paragraph 129 of D.12-08-044, therefore, should be corrected as reflected below.

> 129. Once data sharing with water utilities begins, Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company shall each file a Tier 2 Advice Letter, and these Tier 2 Advice Letters must report on the corresponding costs borne by respective electric or gas utility in conjunction with the data sharing activities directed in Decision 11-05-020.

8.5. Page 25 of D.12-08-044 Legibility

Table on page 25 of D.12-08-044 showing the IOU's proposed CARE budgets for 2012-2014 is not legible and blacked out in the Word version of the published decision. It should be corrected and updated with a legible table and republished.

8.6. Page 115 of D.12-0-044

Page 115 of D.12-08-044, in relevant part, provides:

> The IOUs shall consider the following central issues in the Final Report:
>
> (1) Duct Test and Seal: Duct Test and Seal is a logical component of any comprehensive HVAC QM program, however recent evaluations from the 2006-2008 mainstream energy efficiency program cycle raised serious questions about the cost-effectiveness of Duct Test and Seal as a standalone measure and about the effectiveness of past program designs. In this decision we have denied Duct Test and Seal as a standalone measure, and only allow it only in conjunction with an HVAC installation or only in those climate zones and dwelling types under conditions when required under Title 24. In this report, we ask whether it is appropriate to consider Duct Test and Seal as a measure in conjunction with the maintenance service the ESA Program. If not, what is an appropriate package of maintenance measures for the low-income market segment?

The above paragraph contains an inadvertent error that must be corrected and attendant clarifications that must be made, consistent with Ordering Paragraph 50 of D.12-08-044. The revised paragraph below corrects and clarifies that the Duct Test and Seal measure was approved by D.12-08-044, and that

despite its approval in D.12-08-044, the Commission still has some concerns for its future approval as a standalone measure. Corrected paragraph now reads:

> The IOUs shall consider the following central issues in the Final Report:
>
> (1) Duct Test and Seal: Duct Test and Seal is a logical component of any comprehensive HVAC QM program, however recent evaluations from the 2006-2008 mainstream energy efficiency program cycle raised serious questions about the cost-effectiveness of Duct Test and Seal as a standalone measure and about the effectiveness of past program designs. In this decision we have ~~denied~~ approved Duct Test and Seal as an added back standalone measure, with additional reporting requirements. Meanwhile, it is unclear whether it should continue to be approved in the future program cycles as a standalone measure ~~and~~ or only be approved ~~llow it only~~ in conjunction with an HVAC installation or only be approved in those climate zones and dwelling types under conditions when required under Title 24. In this report, we first ask whether Duct Test and Seal should continue to be approved in the future program cycles as a standalone measure. We also ask whether it is appropriate to consider Duct Test and Seal only as a measure in conjunction with the maintenance service the ESA Program. If not, what is an appropriate package of maintenance measures for the low-income market segment?

8.7. Corrections to Appendices to D.12-08-044

Corrections to Appendices J-1, J-2, K-1 and K-2 of D.12-08-044 are warranted. These appendices do not accurately reflect all of the measures authorized in the final adopted decision, D.12-08-044. This decision corrects and updates the attached Tables and accordingly incorporates the comprehensive list of all of the measures authorized for the IOUs by housing type and climate zone.

8.8. Ordering Paragraph 113

Ordering Paragraph 113 of D.12-08-044 which directs the IOUs' allocation split for the Impact Evaluation Study is being corrected to be consistent with Ordering Paragraph 106 and Appendix L of D.12-08-044 which reflect the correct allocation split.

Therefore, Ordering Paragraph 113 is corrected and updated as follows:

> Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company shall jointly fund the new Impact Evaluation study, not to exceed $600,000 in total combined expenditure from the Energy Savings Assistance Program budgets, with the four Utilities sharing the costs based on the following split: PG&E: 30%; SCE: 30%; SCG: 25%; and SDG&E: 15%.

9. Comments on Proposed Decision

The proposed decision of the ALJ in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed by the ORA, EEC, C4AT, TELACU *et al.*, CSD, NCLC, CHPC, NHLP, TURN, Greenlining, NRDC, La Cooperativa, PG&E, SCE, SDG&E, and SoCalGas, and reply comments were filed by ORA, EEC, C4AT, TELACU *et al.*, NRDC, Proteus, La Cooperativa, PG&E, SCE, SDG&E, and SoCalGas.

In response to the comments filed in response to the proposed decision, we have reconsidered all of the issues raised in those comments. The proposed decision has been revised to reflect revisions addressing some of the concerns raised by those comments which we found to have shown merit. The noteworthy revisions are summarized below.

D.12-08-044, Ordering Paragraph 146, directed the IOUs to file the 2015-2017 Applications for the ESA and CARE Programs by July 1, 2014. On June 16, 2014, the Assigned Commissioner issued a ruling granting the IOUs' joint motion for extension of time to file the IOUs' 2015-2017 Applications for the ESA and CARE Programs (ACR). The ACR was based on the anticipated delay of the issuance of the Phase II decision in the herein Consolidated Proceeding (Phase II Decision) and in recognition of the fact that the Phase II Decision, once issued, will guide the IOUs' final preparation of the 2015-2017 Applications for the ESA and CARE Programs. Therefore, the ACR relieved the IOUs from the July 1, 2014 filing deadline and directed the IOUs to file the IOUs' 2015-2017 Applications for ESA and CARE Programs within 90 days of the Commission's issuance of the Phase II Decision. Consistent with this ACR, the proposed decision has been revised to reflect the new due date which now directs the IOUs to file the 2015-2017 Applications for ESA and CARE Programs within 90 days from the issuance of the Phase II Decision, which would occur once this proposed decision is adopted.

Based on the delay in the issuance of the Phase II Decision and the new filing date for the IOUs' 2015-2017 Applications for the ESA and CARE Programs as set forth in the ACR and this revised proposed decision, it is now more reasonable to approve bridge funding for 12 months as requested by the IOUs. This bridge period and attendant bridge funding are necessary to afford the IOUs adequate time to prepare their 2015-2017 Applications for the ESA and CARE Programs based on the Phase II Decision, once it is issued, and to allow the Commission the necessary time to meaningfully review, deliberate and render its decision based on the IOUs' 2015-2017 Applications for the ESA and CARE Program. In the comments, parties generally support the bridge funding,

and the IOUs have also demonstrated the need for budget certainty during the bridge period to minimize program disruptions and to ensure seamless program implementation (e.g., administration, contracting, etc.) during the bridge period. Based on the foregoing considerations, we grant the IOUs' request and authorize 12 months of bridge funding starting January 1, 2015 to December 31, 2015 at the Commission authorized 2014 budget level for the IOUs' ESA and CARE Programs.

Based on comments, the proposed decision has been revised to adopt the studies and reports completed in Phase II of this Consolidated Proceeding and further address some of the key recommendations from them. These revisions are principally reflected in revised Sections 6.1 of this decision and the new corresponding Findings of Fact, Conclusions of Law and Ordering Paragraphs herein.

Also in response to the comments to the proposed decision, this revised proposed decision incorporates a new section, Section 6.3.3 in this revised proposed decision, which addresses the status and bridge funding for the CHANGES pilot program.

Finally, this revised proposed decision, including its attachments, reflects other minor revisions based on comments, clarifications, corrections and updates to attachments to correspond to the revisions in this proposed this decision.

10. Assignment of Proceeding

Catherine J.K. Sandoval is the assigned Commissioner and Kimberly H. Kim is the assigned ALJ in this proceeding.

Findings of Fact

1. D.12-08-044 identified that the issues to be further examined during the second phase of this Consolidated Proceeding include: (1) Development of a

comprehensive multifamily segment strategy including the review of potential expedited enrollment process, (2) Review of the ESA Program cost-effectiveness methodology, (3) Review of several critical low-income program studies and reports, and (4) Review of any pilot program evaluation as well as several other working group activities ordered in D.12-08-044.

2. Project study teams have been established and consultants have been selected for each of the studies ordered in D.12-08-044; and the 2012-2014 program activities, including the studies ordered in D.12-08-044, have successfully wrapped up.

3. During Phase II of the Consolidated Proceeding, SoCalGas, SDG&E and SCE filed petitions to modify the Phase I Decision.

4. SDG&E's PTM attributes the overall increase in the costs of ESA measure installations and inspections to increased enrollment in the ESA Program and increased number of households treated due to successful program promotion and enrollment; and SDG&E also notes that costs associated with installing ESA measures has continued to increase each year.

5. It is our intent to continue to encourage enrollment through both of self-certification and categorical eligibility enrollment processes, as alternative enrollment processes.

6. SoCalGas's requested budget increase of $3,139,726 to its 2012-2014 budget cycle reflects the deficit in SoCalGas's 2012-2014 program cycle budget, having no relation to its 2012-2014 programs and activities ordered in D.12-08-044.

7. Domestic hot water, enclosure, and HVAC are the three additional measures approved and ordered in D.12-08-044; but SoCalGas, in its Application for 2012-2014 program cycle, did not anticipate and propose associated budgets for these measures.

8. D.12-08-044 authorized add backs for all water measures for multifamily renters, which SoCalGas did not originally forecast in its Application for 2012-2014 program cycle.

9. SoCalGas does not have cooling centers.

10. In support of its request to reallocate $1,004,493 to train and pay capitation contractors to aid in the PEV process ordered in D.12-08-044, SCE did not adequately demonstrate the number of PEVs proposed for processing through the CARE capitation contractors, and the program cycle is nearly completed.

11. Dealing with the ebb and flow of program delivery activities and effectively managing those concerns are the essence of the IOUs' administrative role.

12. SCE explains that it is unable to verify the accuracy of the data the cooling centers provide and must rely on the unverified reports by the cooling centers to prepare and submit the reports, as ordered in D.12-08-044.

13. SCE is an electric only utility and therefore does not need to comply with the directives in D.12-08-044 concerning high efficiency forced air unit measure, which is a gas measure.

14. The IOUs' progress is evidenced in the Energy Education Study - Phase 1 Report, and the IOUs' proposed a plan, as illustrated in the Joint Petition, for what is needed to complete the remainder of energy education study, as part of Phase 2 Report.

15. Allowing the high efficiency furnace measure by adding it to the ESA program would nearly double the currently authorized PG&E's budget for energy efficiency measures, annually.

16. For PG&E, the addition of the high efficiency furnace measure would consume 47% of that year's annual energy efficiency measures budget for this

one measure alone (not accounting for any other energy efficiency measures to be installed in the same home).

17. For SoCalGas, those that may be eligible for the high efficiency furnace measure (91 units each year) in its territory represent only 0.07% of its annual households treated goal, meaning this significantly high budget energy efficiency measure would benefit extremely few households.

18. The audit of the SoCalGas fails to acknowledge that the increased activities in 2011 and overrun were results of SoCalGas's catch-up efforts.

19. R.09-11-014 is not examining cost-effectiveness issues in the context of low-income proceeding.

20. It is important for this proceeding to examine the cost-effectiveness issues through the filter and focus of this proceeding.

21. In part, one of the purposes of the high usage customer rule was to eliminate the customers who are ineligible for the CARE Program and/or are purposefully misdirecting CARE program discount for purposes other than legitimate household needs and to de-enroll them; however, the more important aim of the rule was to also help the high usage customers with legitimate high uses with enrollment in the ESA Program and to help with lowering energy usage while achieving bill savings going forward.

22. To modify the rule to ignore those who only exceed the 400% baseline usage once in a 12-month period would be contrary to that latter purpose of helping the high usage customers with legitimate high uses with enrollment in the ESA Program and lowering of their energy usage.

23. Those customers who are generally within a reasonable usage range, but exceed the 400% baseline usage infrequently, may very well be in an optimal

position to take advantage of the ESA Program to benefit from energy savings to drop below that 400% baseline range.

24. D.12-08-044 contains several inadvertent errors, including some numbering errors in the Ordering Paragraphs, as listed below.

    (a) Two Ordering Paragraphs are numbered "10" but with different directives.

    (b) Ordering Paragraphs 140 and 141 are identical.

25. D.08-11-031 authorized a SoCalGas's Pilot that offered natural gas HE FAU furnaces to customers with high winter season space heating needs. That Pilot has since been completed.

26. PG&E submitted data, in compliance with Ordering Paragraph 60 of D.12-08-044 that confirms that Smart power strips meet the ESA Program's adopted CE test.

27. During the end of the prior program cycle, SoCalGas experienced a sudden budget shortfall in its ESA Program budget and was facing the possibility of ESA Program suspension. As a result, an OSC hearing was held in December of 2011, and the Commission's review of that issue was thereafter carried over and continued to this current 2012-2014 cycle and herein proceeding.

28. The final audit report of SoCalGas ordered as a result of that OSC hearing has been submitted and attached to this decision as Attachments P-1 and P-2, and makes several recommendations.

29. The final audit report of SoCalGas found that 6.7% of the enrollment and assessment accounts tested had incomplete income documentation for customer enrollments, leading to potential enrollments of unqualified participants.

30. The 2013 LINA Study, the 2013 Impact Report, the Multifamily Segment Study, and the Energy Education Study, Phase 1 Report, have been completed, with the exception of Energy Education Study for which only Phase 1 Report has been completed.

31. During Phase II of this Consolidated Proceeding, three working groups (the Workforce Education and Training Working Group, the Cost-Effectiveness Working Group, and the Mid-cycle Working Group) were established, and these working groups have prepared and submitted their final reports and recommendations.

32. The Cost-Effectiveness Working Group's recommendations, the Mid-cycle Working Group's recommendations, the Workforce Education and Training Working Groups' Recommendations, the Energy Education Study (Phase 1 Report) recommendations and the Multifamily Segment Study recommendations request review of some of the subject matter of the study or working group beyond this program cycle.

33. Some of the finding and recommendations of the studies and working groups' reports we adopt in this decision require further review and vetting and therefore are not actionable and poised for full resolution at this junction.

34. In 2013, AB 327 was passed and amended the California Public Utilities Code Section 382(d) which now requires that "A periodic assessment shall be made not less often than every third year."

35. The CHANGES pilot program will need to be reviewed as part of the upcoming 2015-2017 program cycle applications for CARE Program to determine whether the Commission should approve CHANGES as an ongoing program, what its continued budget should be, if any, and whether it is appropriate to continue the funding of the CHANGES through the CARE Program.

36. The Commission has addressed all Phase II issues or otherwise continues the remaining Phase II issues requiring further review to the next cycle proceeding.

37. The IOUs require tools and guidance in preparing for the IOUs' next program cycle applications.

38. Bridge funding for ESA and CARE Programs for program year 2015 is necessary.

39. Parties generally support the bridge funding, and the IOUs have also demonstrated the need for budget certainty during the bridge period to ensure that there is smooth and efficient implementation (e.g., administration, contracting, etc.) of the ESA and CARE Programs during the bridge period.

Conclusions of Law

1. SDG&E's net budget augmentation request of $3.7 million in its PTM is reasonable and justified in order to offset the outstanding budget shortfall until the end of 2012-2014 program cycle.

2. The language on pages 310-311 of D.12-08-044 should be revised to clarify the Commission's intent to retain both self-certification and categorical eligibility enrollment processes, as alternative enrollment processes.

3. SDG&E's and SoCalGas's requests for the Commission to modify D.12-08-044 to set forth explicit language requiring the utilities to engage in joint contracting for statewide program activities are reasonable, and to the extent that there is any need for the four utilities to engage in further collaborative activities during the remainder of the 2012-2014 low-income programs, the Commission should grant the requests and adopt the same directive we did in Ordering Paragraph 7 of D.10-12-054.

4. SDG&E's and SoCalGas's requests to limit the scope, focus and examination of the Cost-Effectiveness Working Group to only to two of the four issues outlined in D.12-08-044 are unpersuasive.

5. The Cost-Effectiveness Working Group should examine all four issues outlined in D.12-08-044 as ordered in that decision.

6. All of the cost-effectiveness issues, as examined in the Cost-Effectiveness Working Group's Final Report in this proceeding, should be considered while reconciling them, where appropriate, with the overall approach the Commission takes going forward, in R.09-11-014 which is examining the cost effectiveness framework for demand side programs and any other proceeding that may undertake the review of related policy concerns.

7. SDG&E's request to modify the CARE high usage customer rule ordered in Ordering Paragraph 101(c) of D.12-08-044 by targeting only the customers who repeatedly exceed 400% of baseline usage (three times or more out of 12 months) is unpersuasive and should be denied.

8. SoCalGas's first requested budget increase of $35,463,958 to ensure that it can adequately deliver all of the ESA Program services ordered in D.12-08-044 to its customers throughout the 2012-2014 program cycle is reasonable and justified.

9. SoCalGas's second requested budget increase of $3,139,726 to replenish its 2012-2014 program cycle budget is reasonable and justified.

10. SoCalGas's request for authorization to add back Domestic Hot Water measures, water heater blankets and pipe insulation, for owner-occupied multifamily dwellings is reasonable and should be authorized.

11. It would be imprudent and unreasonable to add the high efficiency furnace measure to SoCalGas's portfolio for the 2013-2014 program years.

12. SCE's request for a reduction in the CARE Administration budget to align with the actual approved reduced PEV rates ordered in the adopted final decision, D.12-08-044 is reasonable.

13. SCE's request to reallocate some of the excess funds is not supported with adequate justifications and therefore only partly reasonable; thus, the Commission should only approve those proposed reallocations that have been adequately justified and deny the remainder.

14. SCE's request to reallocate $1,013,110 for PEVs in 2013 and 2014 is reasonable and is consistent with the directives of D.12-08-044 and Energy Division's approval of SCE's Advice Letter 2814-E, setting SCE's increased PEV rates at 7% in 2013 and 10% in 2014.

15. SCE's request to reallocate $40,000 to its general administration category to pay for the contract with its independent consultant, ICF International, to perform the comprehensive assessment of the current list of categorically eligible programs is insufficiently justified and unreasonable.

16. SCE's request to reallocate $1,004,493 to train and pay capitation contractors to aid in the PEV process ordered in D.12-08-044 is insufficiently justified and lacks merit.

17. SCE's request to reallocate $50,000 to ensure that CARE capitation contractors are not hindered by a restrictive budget is reasonable.

18. SCE's request to reallocate $500,000 to "Total additional Cost of IT Enhancements" to implement the high usage post enrollment verification process is reasonable.

19. SCE's request to reallocate $500,000 to increase CARE Outreach "to offset attrition (events, campaigns, collateral)" is reasonable.

20. SCE's request to reallocate $366,000 for its call centers to enroll an additional 50,000 customers in both 2013 and 2014 (a total of 100,000 customers) is reasonable.

21. SCE's request to modify D.12-08-044 to set a ceiling limit on the number of PEVs SCE must perform under the high usage customer rule is unreasonable.

22. For purposes of clarification, Ordering Paragraph 83 of D.12-08-044 should be modified.

23. SCE's request for waiver from complying with Ordering Paragraph 61 of D.12-08-044 is reasonable.

24. The IOUs' request for extension of time to complete and submit the Energy Education Study – Phase 2 beyond the current program cycle is reasonable.

25. The IOUs should be excused from the August 31, 2013 deadline for submission of the Energy Education Study, Phase 2, as ordered in D.12-08-044, and instead the IOUs should propose a Phase 2 Energy Education Study in their 2015-2017 applications to be conducted in the next program cycle, 2015-2017, including a proposed schedule and budget sufficient to include a field study component to help assess the benefits of the current energy education offerings, and a before and after test period and household bill analysis that measures any actual energy and bill-savings.

26. Appendix I.1 of D.12-08-044 should be corrected to allow room air conditioners in all housing types for CZ 10 and CZ 13, consistent with Ordering Paragraph 46 of that decision.

27. Appendix I.1 of D.12-08-044 should be corrected to remove "add back" from the Evaporative Cooler Maintenance Measure row, consistent with Ordering Paragraph 53 of that decision.

28. This decision should correct the numbering errors in D.12-08-044 by (1) deleting Ordering Paragraph 141, (2) retaining the first Ordering Paragraph 10 in D.12-08-044 as Ordering Paragraph 10 and (3) renumbering the second Ordering Paragraph 10 of D.12-08-044 as the new Ordering Paragraph 141.

29. Ordering Paragraph 84 of D.12-08-044 directing all IOUs to post cooling center locations, including the days and hours of operations to their websites should be corrected to delete SoCalGas from the text of that Ordering Paragraph.

30. Ordering Paragraph 86 of D.12-08-044 should be corrected to eliminate that directive to SoCalGas since SoCalGas does not have cooling centers.

31. Ordering Paragraph 129 should be corrected to track the IOUs' costs associated with D.11-05-020 compliance.

32. The table on page 25 of D.12-08-044 is not legible and blacked out in the word published decision, and this error should be corrected and a legible table should be republished.

33. Page 115 of D.12-08-044 contains some inadvertent errors which should be corrected.

34. Corrections to Appendices J-1, J-2, K-1 and K-2 of D.12-08-044 are warranted, as these appendices do not accurately reflect all of the measures authorized in the final adopted decision, D.12-08-044.

35. Ordering Paragraph 113 of D.12-08-044 should be corrected to be consistent with Ordering Paragraph 106 and Appendix L of the same decision.

36. Based on the findings in SoCalGas's HE FAU furnaces pilot and the reports filed on October 29, 2012, by PG&E, SDG&E and SoCalGas, it would be imprudent and unreasonable to add this measure to the portfolio for 2013-2014; thus, the Commission should not add the high efficiency furnace measure in the portfolios of PG&E, SoCalGas and SDG&E for the 2013-2014 PYs.

37. SoCalGas should adopt and implement the recommendations made by the independent auditors, Macias Consulting Group (MACIAS).

38. SoCalGas should improve its management practices to ensure the incomplete income documentation issue found in the report prepared by the independent auditor MACIAS is eliminated, going forward.

39. SoCalGas should ensure that its program delivery is carefully overseen not to avoid recurrence of similar budget shortfalls in the future.

40. Households treated without obtaining a full income documentation should not be reimbursed by the ESA Program, and the installation/enrollment contractor should have to incur the costs, if they fail to diligently perform the income documentation/verification portion of their enrollment screening process.

41. The Commission should adopt the 2013 LINA Study, the 2013 Impact Report, the Multifamily Segment Study, and the Energy Education Study, Phase 1 Report.

42. The final reports prepared and submitted by the Workforce Education and Training Working Group, the Cost-Effectiveness Working Group, and the Mid-cycle Working Group should be adopted.

43. Following key recommendations from the Multifamily Segment Study are reasonable and should be adopted:

(a) The IOUs serving multifamily properties shall work directly with property owners where this approach reduces barriers to participation;

(b) The Commission's "80/20" rule is modified so that an IOU may treat the entire multifamily building, whether or not a particular unit is occupied or income qualified, if at least 80% of the building's units are income-qualified;

(c) Housing subsidies should not be counted as income;[49]

(d) The IOUs shall propose an expedited enrollment process for the United States Department of Housing and Urban Development assisted multifamily housing wherein at least 80% of the tenants have incomes at or below 200% of federal poverty level (FPL);

(e) The IOUs shall appoint a single point of contact for the ESA Program, as is already the case for the Energy Upgrade California program; and

(f) The IOUs shall coordinate among ESA, CARE, and Energy Upgrade California, including any potential pooling of funds among programs where such pooling maximizes energy efficiency treatment of multifamily housing and ensures that more potential eligible customers are enrolled.

44. Based on the recommendations of the Multifamily Segment Study, is it reasonable to direct the IOUs to implement those recommendations and propose new, cost-effective measures for the multifamily sector, including common area measures and central heating, cooling, and hot water systems.

45. The four recommendations of the Cost-Effectiveness Working Group listed below are reasonable and should be adopted:

(a) The Commission shall base program approval for the 2015-2017 cycle and beyond on the cost-effectiveness results at the program level, rather than at the measure level;

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[49] The IOUs, in their 2015-2017 Applications for ESA and CARE Programs and Budgets, may propose specific exemptions to this rule, with factual and legal justifications, demonstrating compelling reasons as to why a particular or specific category(ies) of housing subsidies should be excluded from this rule and instead be counted as income. The compelling reasons must include demonstration that the particular or specific category(ies) of housing subsidies are being received by households that do not meet the 200% federal poverty guidelines income requirement for the ESA and CARE Programs.

(b) In the 2015-2017 applications, the IOUs shall categorize measures as "resource" or "non-resource" based on the measure's ability to provide energy savings;

(c) The IOUs shall apply the two proposed new cost effectiveness tests, the Energy Savings Assistance Cost-Effectiveness Test (ESACET) and the Total Resource Cost (TRC) test, replacing the existing tests; and

(d) During the 2015-2017 cycle, for informational purposes, the IOUs shall conduct a preliminary, qualitative Equity Evaluation, with opportunity for party comment on the preliminary results.

46. The IOUs should be directed to implement the four consensus-based recommendations of the Cost-Effectiveness Working Group.

47. Energy Division should reconvene the Cost-effectiveness (CE) Working Group for the narrow purpose of developing a program-level cost-effectiveness threshold as expeditiously as possible, and should the CE Working Group develop a consensus on a CE threshold in time for the filing of the 2015-2017 applications, the Utilities should be directed to use that threshold. However, should the Working Group not achieve consensus by the time the applications are filed, the IOUs are directed to make every effort to achieve as higher a level of cost efficiency as possible for the 2015-2017 applications.

48. Some aspects of the subject areas examined by the Cost-Effectiveness Working Group, the Mid-cycle Working Group, the Workforce Education and Training Working Groups, the Energy Education Study (Phase 1 Report) and the Multifamily Segment Study are not yet poised for full resolution at this junction and our review of those issues or subject areas should be continued to the next cycle proceeding.

49. On recommendations of the studies and working groups' reports for which (1) parties have raised objections or concerns and (2) we do not explicitly direct implementation of the specific recommendation in this decision, including the Attachment Q to this decision, we should specifically reserve those recommendations for further deliberation during the upcoming cycle.

50. The IOUs should prepare to comply with AB 327 requirement for a new updated low income needs assessment study to be completed by no later than 2016; and therefore, the IOUs should, in their 2015-2017 applications, propose an attendant scope, schedule and budget for said study.

51. It is reasonable for the IOUs to ensure that the 2015-2017 applications do not alter the current list of Categorical Eligibility programs nor reduce customer participation in the CARE and ESA Programs via Categorical Eligibility, and for the annual advice letter filing process ordered in D.12-08-044 to be suspended until the issue is resolved.

52. It is reasonable to continue to fund the CHANGES pilot program pending further pilot review and during the bridge period authorized by this decision.

53. Because comments responsive to the Assigned Commissioner's Ruling have recently been filed by parties to this proceeding, the Commission will refer the remainder of our review of the issues raised by the Assigned Commissioner's Ruling and the responsive comments into the next program cycle to further review of those issues beyond this current proceeding, as those issues are not yet poised for immediate resolution.

54. The Mid-cycle Working Group's proposed revised P&P Manual, attached to its Final Working Group Report, as Appendix D thereto, should be adopted and approved with some minor modifications.

55. It is reasonable to approve a bridge funding for the 12 months as requested by SCE on behalf of itself and several other parties in a motion, dated March 28, 2014.

56. This bridge period and attendant bridge funding are reasonable and necessary to afford the IOUs adequate time to prepare their 2015-2017 Applications for the ESA and CARE Programs based on the Phase II Decision, once it is issued, and to allow the Commission the necessary time to meaningfully review, deliberate and render the decision based on the IOUs' 2015-2017 Applications for the ESA and CARE Program.

57. It is reasonable to authorize continued funding for the ESA and CARE Programs, at the 2014 authorized budgets level shown below, during the 2015 bridge period.

Adopted Budget for 2014 ESA and CARE Programs	
Utility	**ESAP**
PG&E	$161,862,111
SCE	$72,736,631
SDG&E	$23,772,250
SoCalGas	$132,417,191
Total	***$390,788,183***
	CARE
PG&E	$620,892,512
SCE	$423,819,650
SDG&E	$89,098,739
SoCalGas	$147,506,690
Total	***$1,281,317,592***

58. It is reasonable to maintain the 2014 homes treated target for the ESA Program during the 2015 bridge fund period which is shown below.

Utility	Adopted Number of Homes to be Treated for 2014
PG&E	119,940
SCE	87,389
SDG&E	20,316
SoCalGas	136,836
Total	**364,481**

59. It is reasonable to authorize the IOUs to use the unspent funds from 2012-2014 program cycle in the 2015 bridge year to minimize program disruptions and to allow administrative flexibility to meet any unforeseen program needs during the bridge period.

60. The current due date for the 2015-2017 application for the ESA and CARE Programs should be changed.

61. A.11-05-017, A.11-05-018, A.11-06-019, and A.11-05-020 should be closed.

O R D E R

IT IS ORDERED that:

1. Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company and San Diego Gas & Electric Company are authorized an updated budget for 2012-2014 program cycle, including the associated homes treated goals, which reflects the authorizations set forth in this decision for the Utilities' Energy Savings Assistance and California Alternate Rates for Energy Programs, as summarized below:

Updated Budget Summary 2012-2014				
	ESAP			
Utility	2012	2013	2014	Cycle Total
PG&E	$150,982,212	$156,363,352	$161,862,111	$469,207,675
SCE	$72,461,946	$72,640,016	$72,736,631	$217,838,592
SDG&E	$22,972,638	$23,397,174	$23,772,250	$70,142,062
SoCalGas	$127,199,269	$130,346,135	$132,417,191	$389,962,594
Total	**$373,616,065**	**$382,746,676**	**$390,788,183**	**$1,147,150,924**

	CARE			
	2012	2013	2014	Cycle Total
PG&E	$675,973,667	$647,622,512	$620,892,512	$1,944,488,691
SCE	$335,291,000	$384,329,460	$423,819,650	$1,143,440,110
SDG&E	$79,100,350	$88,060,980	$89,098,739	$256,260,069
SoCalGas	$145,502,691	$146,016,933	$147,506,690	$439,026,314
Total	**$1,235,867,708**	**$1,266,029,885**	**$1,281,317,592**	**$3,783,215,185**

	Adopted Number of Homes to be Treated			
Utility	2012	2013	2014	Total Cycle
PG&E	119,940	119,940	119,940	359,820
SCE	87,389	87,389	87,389	262,166
SDG&E	20,316	20,316	20,316	60,948
SoCalGas	136,836	136,836	136,836	410,508
Total	**364,481**	**364,481**	**364,481**	**1,093,442**

2. Southern California Edison Company's Motion for an Extension of Time to file the Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets Applications for the 2015-2017 Program Cycle and for Bridge Funding, filed on March 28, 2014 on behalf of itself, Pacific Gas and Electric Company, Southern California Gas Company, San Diego Gas & Electric Company, Natural Resources Defense Council, The Utility Reform Network, Office of Ratepayer Advocates, Proteus Incorporated, The East Los Angeles Community Union, Energy Efficiency Council, Maravilla Foundation, and the Association of California Community and Energy Services, is granted in part as follows:

(a) Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company, and San Diego Gas & Electric Company shall file their 2015-2017 Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets applications within 90 days of issuance of this decision; and

(b) Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company and San Diego Gas & Electric Company are authorized a 12 month bridge

funding, starting January 1, 2015 to December 31, 2015 at the Commission authorized 2014 budget level for the Utilities' Energy Savings Assistance and California Alternate Rates for Energy Programs, as summarized below.

Utility	CARE 2015 Adopted Bridge Funding Budget*	ESA 2015 Adopted Bridge Funding Budget
PG&E	$620,896,832	$161,862,111
SCE	$423,823,970	$72,736,631
SDG&E	$89,102,339	$23,772,250
SoCalGas	$147,508,850	$132,417,191
Total	**$1,281,331,992**	**$390,788,183**

*This budget includes the Community Help and Awareness of Natural Gas and Electricity Services pilot program budget during the bridge period

3. Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company and San Diego Gas & Electric Company are authorized to use the unspent funds from 2012-2014 program cycle in the 2015 bridge year to minimize disruptions to the Energy Savings Assistance and California Alternate Rates for Energy Programs and to allow administrative flexibility to meet any unforeseen program needs during the bridge period, subject to the fund shifting rules, and to treat 2015 as the fourth program year and continuation of 2012-2014 program cycle for purposes of shifting funds.

4. We adopt the 2015 Energy Savings Assistance Program homes treated target for Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company and San Diego Gas & Electric Company as follows:

Utility	2015 Adopted Homes to be Treated
PG&E	119,940
SCE	87,389
SDG&E	20,316
SoCalGas	136,836
Total	**364,481**

5. San Diego Gas & Electric Company's net budget augmentation request of $3.7 million in the petition to modify Decision 12-08-044 is granted.

6. San Diego Gas & Electric Company's and Southern California Gas Company's requests, in their petitions to modify Decision 12-08-044, to strike the proposed words, at 310-311 of Decision 12-08-044, as shown below, are granted.

> In this decision, we make no changes and approve continuation of self-certification for the ESA Program in areas where 80% of the households are at or below 200% of the federal poverty guideline. Consistent with prior Commission decisions, we also approve continuation of categorical enrollment of ESA Program ~~in these targeted areas~~.

7. San Diego Gas & Electric Company's and Southern California Gas Company's requests, in their petitions to modify Decision 12-08-044, to set forth explicit language requiring the utilities to engage in joint contracting for statewide program activities are granted, and Southern California Edison Company, Pacific Gas & Electric Company, Southern California Gas Company, and San Diego Gas & Electric Company are authorized to engage in the following activities:

(a) Joint and cooperative consultations between and among these utilities and energy efficiency contractors to assist with determination of the contract requirements of their jointly administered and jointly funded energy efficiency programs;

(b) Joint cooperative process among the four utilities for the sourcing and negotiation (including program requirements, performance, price, quantity, and specifications) of joint contracts for energy efficiency to be managed and run by one lead utility, subject to the approval and review by the other utilities;

(c) Joint submission to the Commission for its approval of proposed energy efficiency contracts pertaining to implementation of statewide programs; and

(d) Other joint and collaborative activities pertaining to the collaboration and joint contracting for statewide energy efficiency programs as the four utilities may determine is necessary for implementation of statewide programs, subject to the Commission's oversight.

8. San Diego Gas & Electric Company's and Southern California Gas Company's requests, in their petitions to modify Decision 12-08-044, to limit the Cost-Effectiveness Working Group's focus are denied.

9. San Diego Gas & Electric Company's request, in its petition to modify Decision 12-08-044, to modify the California Alternate Rates for Energy Program high usage customer rule ordered in Ordering Paragraph 101(c) of Decision 12-08-044 by targeting only the customers who repeatedly exceed 400% of baseline usage (three times or more out of 12 months) is denied.

10. Southern California Gas Company's request, in its petition to modify Decision 12-08-044, seeking authorization for budget augmentation is granted, as summarized below:

High efficiency clothes washers	+ $31,988,985
Domestic Hot Water[50]	+ $2,711,572
Enclosure measures	+ $1,131,817
HVAC	+ $2,013,888
Inspections	+ $614,500
General Admin	- $1,670,327
Maintenance	- $1,283,093
Customer Enrollment	- $39,514
Home Education	- $3,869
Replenishment of Budget	+$3,139,726
TOTAL	**$38,603,684**

[50] This approved augmentation amount includes additional approval discussed in Section 1.2.2. of this decision.

11. Southern California Gas Company's request, in its petition to modify Decision 12-08-044, requesting authorization to add back Domestic Hot Water measures, water heater blankets and pipe insulation, for owner-occupied multifamily dwellings is granted.

12. Southern California Edison's request, in its petition to modify Decision (D.) 12-08-044, to reallocate $40,000 to its general administration category to pay for the contract with the independent consultant, ICF International, to perform the comprehensive assessment of the current list of categorically eligible programs pursuant to Ordering Paragraph 88 of D.12-08-044, is denied.

13. Southern California Edison's request, in its petition to modify Decision 12-08-044, to reallocate $1,013,110 for post enrollment verifications in 2013 and 2014 is granted.

14. Southern California Edison's request, in its petition to modify Decision (D.) 12-08-044, to reallocate $1,004,493 to train and pay capitation contractors to aid in the post enrollment verification process ordered in D.12-08-044 is denied.

15. Southern California Edison's request, in its petition to modify Decision 12-08-044, to reallocate $50,000 to its California Alternate Rates for Energy Outreach budget to ensure that capitation contractors are not hampered by restrictive budget, is granted.

16. Southern California Edison's request, in its petition to modify Decision 12-08-044, to reallocate $500,000 to its IT Programming budget for "Total additional Cost of IT Enhancements" required to implement the high usage PEV process is granted.

17. Southern California Edison's request, in its petition to modify Decision 12-08-044, to reallocate $500,000 to increase CARE Outreach of offset attrition is granted.

18. Southern California Edison's request, in its petition to modify Decision 12-08-044, to reallocate $366,000 for its call centers to enroll an additional 50,000 customers in both 2013 and 2014 (a total of 100,000 customers) is granted.

19. Southern California Edison's request, in its petition to modify Decision 12-08-044, seeking authorization for budget augmentation is granted as summarized below:

Summary of SCE's Approved CARE Budget Adjustments

Issue	CARE Budget Category	2012	2013	2014	Cycle
Authorized CARE Management Budget Approved by D.12-08-044		$12,357,000	$12,256,000	$12,412,000	$37,025,000
(reverse) 2% Monthly PEV Budget Requirement Increases	Post Enrollment Verification	($2,756,000)	($2,756,000)	($2,756,000)	($8,268,000)
(reverse) Eligibility Proof at time of Recertification	Processing, Certification, Recertification	($3,994,000)	($3,994,000)	($3,994,000)	($11,982,000)
Annual PEV @ $10.15 per request (5% requested in 2012, 7% in 2013 & 10% in 2014).	Post Enrollment Verification	-$	$289,460	$723,650	$1,013,110
Increase in the capitation fee to "up to $20.00" (5K annual enrollments @ $5 incremental cost per enrollment)	Outreach	-$	$25,000	$25,000	$50,000
Total additional Cost of IT Enhancements	IT Programming	($500,000)	$1,000,000	-$	$500,000
Increase in Outreach to offset attrition (events, campaigns, collateral)	Outreach	-$	$250,000	$250,000	$500,000
Incremental Cost to Pay SCE Call Center per CARE enrollment (50K enrollments @ $3.66 incremental cost per enrollment)	Outreach	-$	$183,000	$183,000	$366,000
SCE's Proposed Adjusted CARE Management Budget		$5,127,000	$7,732,957	$7,388,646	**$20,248,603**
SCE's Approved Adjusted CARE Management Budget		$5,107,000	$7,253,460	$6,593,650	**$19,204,110**

20. Southern California Edison's request, in its petition to modify Decision 12-08-044, to set a ceiling limit on the number of post enrollment verifications it must perform under the high usage customer rule is denied.

21. Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company and San Diego Gas & Electric Company are excused from the August 31, 2013 deadline for submission of the Energy Education Study, Phase 2, as ordered in Decision 12-08-044.

22. Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company and San Diego Gas & Electric Company shall propose in their 2015-2017 Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets applications a Phase 2 Energy Education Study, to be conducted in the next program cycle, 2015-2017, including a proposed scope, schedule and budget sufficient to include a field study component to help assess the benefits of the current energy education offerings, and a before and after test period and household bill analysis that measures any actual energy and bill savings.

23. Ordering Paragraph 83 of Decision 12-08-044 is modified, as follows:

> 83. By December 21st of each year, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company ~~and Southern California Gas Company~~ shall file their reports, based on best information available to the utility on cooling center facility activities including, attendance, low-income program enrollments, and itemized expenses. These annual cooling center reports shall ~~and~~ describe, based on best information available to the utility, ~~ing~~ the energy education and marketing materials provided at each cooling center facility and provide attendance and enrollment tracking data for all cooling centers with annual expenses that exceed $5,000.

24. Southern California Edison's request, in its petition to modify Decision (D.) 12-08-044, to be excused from complying with Ordering Paragraph 61 of D.12-08-044 is granted and Ordering Paragraph 61 of D.12-08-044 is modified to exclude Southern California Edison, as reflected below:

> 61. Within 60 days after this decision is issued, Pacific Gas and Electric Company, , San Diego Gas & Electric Company, and Southern California Gas Company shall file (a) the cost-effectiveness values for the high efficiency forced air unit measure for each of the different housing types and climate zones that they cover, to see if they pass the Cost-Effectiveness Test, and (b) an estimate for the costs, energy savings values, as well as the projected quantity (by housing type and climate zone) of this measure to be installed for each program year.

25. Appendix I.1 of Decision (D.) 12-08-044 shall be corrected to allow room air conditioners in all housing types for climate zones 10 and 13, consistent with Ordering Paragraph 46 of D.12-08-044 and to remove "add back" from the Evaporative Cooler Maintenance Measure row, consistent with Ordering Paragraph 53 of that decision. Attachment I-1 of this decision reflects the corrections to Appendix I-1 of D.12-08-044.

26. The numbering errors in Decision (D.) 12-08-044 are corrected and the affected Ordering Paragraphs of D.12-08-044, as corrected, are reflected below:

> 10. By April 15, 2013, the Energy Savings Assistance Program Workforce Education and Training Working Group shall evaluate the data gathered and submitted by the Utilities and develop and submit to the assigned Administrative Law Judge their Progress Reports of findings and recommendation(s), if any, and if no agreed upon recommendation(s) is/are reached by then, the working group shall submit a progress report nonetheless of its activities since inception and a detailed description of the status of its efforts in each of the subject areas it is charged to

> review in this decision with justification showing good cause for any additional and estimated time it may require.
>
> 141. By July 15, 2013, the Energy Savings Assistance Program Workforce Education and Training Working Group shall submit their Final Reports and Recommendations to the assigned Administrative Law Judge.

27. Ordering Paragraph 84 of Decision 12-08-044 is corrected, as reflected below:

> Within 30 days after this decision is issued, Pacific Gas & Electric Company, Southern California Edison Company, <u>and</u> San Diego Gas & Electric Company~~, and Southern California Gas Company,~~ shall post on their websites a list of designated cooling center locations as well as days and hours of operation.

28. Ordering Paragraph 86 of Decision (D.) 12-08-044 is corrected to include an inadvertently omitted 2012 authorized budgets column and attendant calculation corrections/adjustments, as reflected in the corrected Ordering Paragraph 86 of D.12-08-044 below.

> 86. The proposed cooling center budgets of Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company are approved with some modifications as follows:

Approved Prorated Cooling Center Budgets 2012-2014

Utility	IOUs' Adopted 2012-2014 Cooling Center Budgets	IOU Adopted 2013 Budget (Prorated)	IOU Adopted 2013 Budget (Prorated)	IOU Adopted 2014 Budget (Prorated)
SCE	$978,166	$768,000	$105,083	$105,083
PG&E	$712,692	$450,000	$127,846	$134,846
SDG&E	$126,314	$56,000	$34,329	$35,985

29. Ordering Paragraph 129 of Decision 12-08-044 is corrected, as reflected below.

> 129. Once data sharing with water utilities begins, Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas &

> Electric Company shall each file a Tier 2 Advice Letter, and these Tier 2 Advice Letters must report on the corresponding costs borne by respective electric or gas utility in conjunction with the data sharing activities directed in Decision 11-05-020.

30. The table on page 25 of Decision 12-08-044, which was not legible and blacked out in the published PDF version of the decision, is republished below:

	2011	2012	2013	2014	2012-2014 Total
PG&E	$9,521,000	$12,081,000	$11,287,000	$11,650,000	$35,018,000
SCE	$5,485,000	$5,351,000	$5,465,000	$5,622,000	$16,438,000
SoCalGas	$6,587,988	$7,991,640	$7,747,118	$7,864,477	$23,603,235
SDG&E	$3,200,517	$3,732,059	$3,957,106	$3,973,368	$11,662,534
	$24,794,505	**$29,155,699**	**$28,456,225**	**$29,109,845**	**$86,721,768**
CARE Program Subsidies and Benefits					
	2011	**2012**	**2013**	**2014**	**2012-2014 Total**
PG&E	$479,707,435	$660,220,000	$633,029,000	$605,950,000	$1,899,199,000
SCE	$211,400,000	$330,200,000	$376,900,000	$416,800,000	$1,123,900,000
SoCalGas	$135,901,649	$128,773,189	$129,892,840	$131,142,177	$389,808,206
SDG&E	$48,231,658	$73,857,625	$82,630,988	$83,614,933	$240,103,546
	$875,240,742	**$1,193,050,814**	**$1,222,452,828**	**$1,237,507,110**	**$3,653,010,752**

31. A paragraph on page 115 of Decision 12-08-044 is corrected, and the corrected paragraph now reads:

> …The IOUs shall consider the following central issues in the Final Report:
>
> (1) Duct Test and Seal: Duct Test and Seal is a logical component of any comprehensive HVAC QM program, however recent evaluations from the 2006-2008 mainstream energy efficiency program cycle raised serious questions about the cost-effectiveness of Duct Test and Seal as a standalone measure and about the effectiveness of past program designs. In this decision we have ~~denied~~approved Duct Test and Seal as an added back standalone measure, with additional reporting requirements. Meanwhile, it is unclear whether it should continue to be approved in the future program cycles as a

> standalone measure ~~and~~or only be approved~~llow it only~~ in conjunction with an HVAC installation or only be approved in those climate zones and dwelling types under conditions when required under Title 24. In this report, we first ask whether Duct Test and Seal should continue to be approved in the future program cycles as a standalone measure. We also ask whether it is appropriate to consider Duct Test and Seal only as a measure in conjunction with the maintenance service the ESA Program. If not, what is an appropriate package of maintenance measures for the low-income market segment?

32. Appendices J-1, J-2, K-1 and K-2 of D.12-08-044 are corrected and attached to this decision as Attachments J-1, J-2, K-1 and K-2.

33. Ordering Paragraph 113 of Decision 12-08-044 is corrected and updated as follows:

> Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company shall jointly fund the new Impact Evaluation study, not to exceed $600,000 in total combined expenditure; and we direct that it be funded by the Energy Savings Assistance Program budgets, with the four Utilities sharing costs with equal the following split: PG&E: 30%; SCE: 30%; SCG: 25%; and SDG&E: 15%.

34. The updated Low Income Needs Assessment Study (commonly referred to as the 2013 LINA Study), the updated Impact Evaluation Report (commonly referred to as the 2013 Evaluation Report), the Multifamily Segment Study, and the Energy Education Study, Phase 1 Report are adopted.

35. Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company shall thoroughly review the updated Low Income Needs Assessment Study (commonly referred to as the 2013 LINA Study), the updated Impact Evaluation

Report (commonly referred to as the 2013 Evaluation Report), the Multifamily Segment Study, and the Energy Education Study, Phase 1 Report, and these studies and findings and recommendations therein shall inform and guide them in their preparation of their 2015-2017 applications for the Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets.

36. Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company shall incorporate, in their respective strategies for the 2015-2017 program cycle in their 2015-2017 applications, the findings and recommendations from the updated Low Income Needs Assessment Study (commonly referred to as the 2013 LINA Study), the updated Impact Evaluation Report (commonly referred to as the 2013 Evaluation Report), the Multifamily Segment Study, and the Energy Education Study, Phase 1 Report, to propose ways to improve the Energy Savings Assistance and California Alternate Rates for Energy Programs in the future cycles.

37. The final reports submitted by the Workforce Education and Training Working Group, the Cost-Effectiveness Working Group, and the Mid-cycle Working Group are adopted.

38. Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company shall thoroughly review the reports of the Workforce Education and Training Working Group, the Cost-Effectiveness Working Group, and the Mid-cycle Working Group, and the findings and recommendations therein shall inform and guide them in their preparation of their 2015-2017 applications for the Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets.

39. Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company shall incorporate, in their respective strategies for the 2015-2017 program cycle in their 2015-2017 applications, the findings and recommendations from the reports, submitted by the Workforce Education and Training Working Group, the Cost-Effectiveness Working Group, and the Mid-cycle Working Group, to propose ways to improve the Energy Savings Assistance and California Alternate Rate for Energy Programs in the future cycles.

40. Following key recommendations from the Multifamily Segment Study are adopted, and Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company (Utilities) shall implement them:

(1) The Utilities serving multifamily properties shall work directly with property owners where this approach reduces barriers to participation;

(2) The Commission's "80/20" rule is modified so that a utility may treat the entire multifamily building, whether or not a particular unit is occupied or income qualified, if at least 80% of the building's units are income-qualified;

(3) Housing subsidies are not counted as income;

(4) The Utilities shall propose an expedited enrollment process for the United States Department of Housing and Urban Development assisted multifamily housing wherein at least 80% of the tenants have incomes at or below 200% of federal poverty level (FPL);

(5) The Utilities shall appoint a single point of contact for the Energy Savings Assistance Program, as is already the case for the Energy Upgrade California program; and

(6) The Utilities shall coordinate among Energy Savings Assistance, California Alternate Rates for Energy and Energy Upgrade

California, including any potential pooling of funds among programs where such pooling maximizes energy efficiency treatment of multifamily housing and ensures that more potential eligible customers are enrolled.

41. Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company, in the 2015-2017 applications for the Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets, shall propose new, cost-effective measures for the multifamily sector, including common area measures and central heating, cooling, and hot water systems.

42. The proposals for the new multifamily measures by Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company, which may be expensive on a per-unit basis, shall include (a) a total budget for the measure and a proposed budget allocation, (b) an explanation of why the proportion proposed to be used for these measures is reasonable, and (c) a description of how other energy efficiency program funds, such as Energy Upgrade California and federal energy efficiency programs, will be leveraged.

43. The four recommendations of the Cost-Effectiveness Working Group listed below are adopted, and Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company (Utilities) shall implement them:

(a) The Commission shall base program approval for the 2015-2017 cycle and beyond on the cost-effectiveness results at the program level, rather than at the measure level;

(b) In the 2015-2017 applications, the Utilities shall categorize measures as "resource" or "non-resource" based on the measure's ability to provide energy savings;

(c) The Utilities shall apply the two proposed new cost effectiveness tests, the Energy Savings Assistance Cost-Effectiveness Test (ESACET) and the Total Resource Cost (TRC) test, replacing the existing tests; and

(d) During the 2015-2017 cycle, for informational purposes, the Utilities shall conduct a preliminary, qualitative Equity Evaluation, with opportunity for party comment on the preliminary results.

44. Energy Division is directed to reconvene the Cost-effectiveness (CE) Working Group for the narrow purpose of developing a program-level cost-effectiveness threshold as expeditiously as possible, and should the CE Working Group develop a consensus on a threshold in time for the filing of the 2015-2017 applications for the Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets, Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company shall use that threshold. However, should the Working Group not achieve consensus by the time the applications are filed, the IOUs are directed to make every effort to achieve as higher a level of cost efficiency as possible for the 2015-2017 applications.

45. In the event that the reconvened Cost-effectiveness (CE) Working Group does not achieve consensus by the time the 2015-2017 applications for the Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets are filed, the reconvened CE Working Group shall continue its efforts toward developing a consensus-based recommendation on a cost-effectiveness threshold and submit its progress report to the assigned Administrative Law Judge by serving it to the service list, by March 1, 2015.

46. Until the issue of categorical eligibility enrollment is resolved in this or a subsequent proceeding, the Energy Savings Assistance and California Alternate

Rates for Energy Programs shall suspend the annual advice letter process addressing qualifying public assistance programs.

47. Until the issue of categorical eligibility enrollment is resolved in this or a subsequent proceeding, Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company, and San Diego Gas & Electric Company shall ensure that their 2015-2017 applications for the Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets do not alter the list of categorical eligibility programs nor reduce customer participation in their programs via categorical eligibility.

48. We authorize continued bridge funding for the Community Help and Awareness of Natural Gas and Electricity Services pilot program of $61,200 a month from January 1, 2015, to December 31, 2015.

49. The Macias Consulting Group's Audit Report of Southern California Gas Company, ordered as a result of the December 2011 Order to Show Cause hearing and attached to this decision as Attachment P-1 and P-2, is adopted.

50. Southern California Gas Company shall adopt and implement the recommendations set forth in the report prepared by the independent auditor Macias Consulting Group, dated December 21, 2012 and February 25, 2013 (and attached to this decision as Attachments P-1 and P-2) immediately.

51. Southern California Gas Company shall take all reasonable actions necessary to improve its management practices to ensure the incomplete income documentation issue found in the report prepared by the independent auditor Macias Consulting Group, Attachments P-1 and P-2 to this decision, is eliminated.

52. Southern California Gas Company shall take actions reasonably necessary to ensure its program delivery is carefully overseen to avoid recurrence of similar budget shortfalls it experienced at the end of 2011.

53. We approve the Mid-cycle Working Group's proposed revised Statewide Policy & Procedures Manual, attached to its Final Working Group Report, as D thereto, with some minor modifications, as reflected in Attachment R to this decision.

54. Pacific Gas and Electric Company shall add Smart power strips to its 2012-2014 Energy Savings Assistance Program portfolio for all climate zones and housing types that meet the Energy Savings Assistance Program's adopted Cost-effectiveness Test in its service territory.

55. The recommendations of the studies and working groups' reports for which (1) parties have raised objections or concerns and (2) we do not explicitly direct implementation of the specific recommendation in this decision, including the Attachment Q to this decision, shall be reserved for further deliberation during the upcoming 2015-2017 program cycle.

56. In their 2015-2017 application, Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company and San Diego Gas & Electric Company shall propose the scope, schedule and budget for the new needs assessment study required by Assembly Bill 327 which must be completed by no later than 2016.

57. Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company and San Diego Gas & Electric Company shall follow developments in the Commission's energy efficiency proceeding, Application 12-07-001, especially concerning the multifamily segment, marketing, education and outreach, and cost effectiveness issues, to ensure that

the utilities' planning and strategies for the Energy Savings Assistance and California Alternate Rates for Energy Programs and next cycle applications are consistent with and mindful of the how those issues are developing in that proceeding and/or directions we give in that proceeding.

58. Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company and San Diego Gas & Electric Company shall follow developments in the Commission's rate redesign proceeding, Rulemaking 12-06-013, concerning the California Alternate Rates for Energy (CARE) Program rate redesign following the passage of Assembly Bill 327, CARE rate redesign related marketing education and outreach, and CARE rate redesign related budget implication issues, to ensure that the utilities' planning and strategies for the CARE Programs and next cycle applications are consistent with and mindful of the how those issues are developing in that proceeding and/or directions we give in that proceeding.

59. Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company and San Diego Gas & Electric Company shall follow developments in the Commission's proceeding, Docket R.09-11-014 which is examining the cost effectiveness framework for the demand side programs, to ensure that the utilities' planning and strategies for the Energy Savings Assistance Program and next cycle applications are consistent with those issues that are developing in that proceeding and/or directions we give in that proceeding.

60. Pacific Gas and Electric Company, Southern California Edison, Southern California Gas Company and San Diego Gas & Electric Company shall prepare their 2015-2017 Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets applications by using the framework and

templates, attached to this decision as Attachment Q, as part of their next cycle applications and must complete each section as instructed, including all of the contents required therein.

61. Any pending petitions, motions or requests in this proceeding, which are not expressly granted in this decision, are deemed denied.

62. Application (A.) 11-05-017, A.11-05-018, A.11-06-019, and A.11-05-020 are closed.

This order is effective today.

Dated _____, San Francisco, California.

Attachment A

ESA and CARE Program 2012-2014 Budget Summary

Attachment A

Proposed Budgets 2012-2014				
	ESAP			
Utility	2012	2013	2014	Cycle Total
PG&E	$157,023,000	$162,622,000	$168,347,000	$487,992,000
SCE	$57,717,000	$64,528,000	$62,971,000	$185,216,000
SDG&E	$22,044,929	$22,462,163	$22,832,030	$67,339,122
SoCalGas	$99,909,056	$82,121,475	$84,178,885	$266,209,415
Total	**$336,693,984**	**$331,733,638**	**$338,328,915**	**$1,006,756,537**
	CARE			
	2012	2013	2014	Cycle Total
PG&E	$672,301,000	$644,316,000	$617,600,000	$1,934,217,000
SCE	$335,551,000	$382,365,000	$422,422,000	$1,140,338,000
SDG&E	$77,589,684	$86,588,094	$87,588,301	$251,766,080
SoCalGas	$136,764,829	$137,639,959	$139,006,654	$413,411,441
Total	**$1,222,206,513**	**$1,250,909,053**	**$1,266,616,955**	**$3,739,732,521**

Adopted Budget Summary 2012-2014 per D1208044				
	ESAP			
Utility	2012	2013	2014	Cycle Total
PG&E	$150,982,212	$156,363,352	$161,862,111	$469,207,675
SCE	$72,461,946	$72,640,016	$72,736,631	$217,838,592
SDG&E	$21,716,006	$22,140,542	$22,515,618	$66,372,165
SoCalGas	$113,292,891	$117,559,854	$120,506,165	$351,358,910
Total	**$358,453,054**	**$368,703,763**	**$377,620,525**	**$1,104,777,343**
	CARE			
	2012	2013	2014	Cycle Total
PG&E	$675,973,667	$647,622,512	$620,892,512	$1,944,488,691
SCE	$342,541,000	$389,332,000	$429,388,000	$1,161,261,000
SDG&E	$79,100,350	$88,060,980	$89,098,739	$256,260,069
SoCalGas	$145,502,691	$146,016,933	$147,506,690	$439,026,314
Total	**$1,243,117,708**	**$1,271,032,425**	**$1,286,885,942**	**$3,801,036,075**

New Adopted Budget Summary 2012-2014 (Phase II)				
	ESAP			
Utility	2012	2013	2014	Cycle Total
PG&E	$150,982,212	$156,363,352	$161,862,111	$469,207,675
SCE	$72,461,946	$72,640,016	$72,736,631	$217,838,592
SDG&E	$22,972,638	$23,397,174	$23,772,250	$70,142,062
SoCalGas	$127,199,269	$130,346,135	$132,417,191	$389,962,594
Total	**$373,616,065**	**$382,746,676**	**$390,788,183**	**$1,147,150,924**
	CARE			
	2012	2013	2014	Cycle Total
PG&E	$675,973,667	$647,622,512	$620,892,512	$1,944,488,691
SCE	$335,291,000	$384,329,460	$423,819,650	$1,143,440,110
SDG&E	$79,100,350	$88,060,980	$89,098,739	$256,260,069
SoCalGas	$145,502,691	$146,016,933	$147,506,690	$439,026,314
Total	**$1,235,867,708**	**$1,266,029,885**	**$1,281,317,592**	**$3,783,215,185**

	Proposed Number of Homes to be Treated			
Utility	2012	2013	2014	Total Cycle
PG&E	125,000	125,000	125,000	375,000
SCE	68,200	77,000	74,800	220,000
SDG&E	20,000	20,000	20,000	60,000
SoCalGas	129,106	100,249	100,249	329,604
Total	**342,306**	**322,249**	**320,049**	**984,604**
	Adopted Number of Homes to be Treated			
Utility	2012	2013	2014	Total Cycle
PG&E	119,940	119,940	119,940	359,820
SCE	87,389	87,389	87,389	262,166
SDG&E	20,316	20,316	20,316	60,948
SoCalGas	136,836	136,836	136,836	410,508
Total	**364,481**	**364,481**	**364,481**	**1,093,442**

(End of Attachment A)

Attachment B

ESA Program Authorized Budget - PG&E

PY 2012-2014 ESAP Proposed Electric & Gas Budget
Pacific Gas and Electric Company Based on 125,000 Homes/Year***

	PY2011 Authorized	PY 2012 Proposed	PY 2013 Proposed	PY 2014 Proposed	3-Year Request PY 2012 - 2014
Energy Savings Assistance Program					
Energy Efficiency	$126,597,157				
Appliances [1]		$36,476,000	$37,774,000	$39,118,000	$113,368,000
Domestic Hot Water [2]		$10,382,000	$10,751,000	$11,133,000	$32,266,000
Enclosure [3]		$38,209,000	$39,569,000	$40,978,000	$118,756,000
HVAC [4]		$4,305,000	$4,454,000	$4,611,000	$13,370,000
Maintenance		$0	$0	$0	$0
Lighting [5]		$27,769,000	$28,757,000	$29,781,000	$86,307,000
Miscellaneous [6]		$10,549,000	$10,923,000	$11,312,000	$32,784,000
Customer Enrollment	$1,654,446	$1,728,000	$1,788,000	$1,852,000	$5,368,000
In Home Education	$14,890,018	$14,827,000	$15,355,000	$15,902,000	$46,084,000
Pilot	$516,666	$0	$0	$0	$0
Energy Efficiency Total	**$143,658,287**	**$144,245,000**	**$149,371,000**	**$154,687,000**	**$448,303,000**
Training Center	$942,706	$914,000	$944,000	$976,000	$2,834,000
Inspections	$5,917,128	$5,847,000	$6,046,000	$6,252,000	$18,145,000
Marketing and Outreach	$1,988,195	$1,856,000	$1,913,000	$1,980,000	$5,749,000
Statewide Marketing Education and Outreach	$0	$120,000	$123,000	$127,000	$370,000
Measurement and Evaluation Studies [7]	$0	$90,000	$93,000	$95,000	$278,000
Regulatory Compliance	$289,752	$346,000	$404,000	$371,000	$1,121,000
General Administration [8]	$3,892,750	$3,550,000	$3,673,000	$3,804,000	$11,027,000
CPUC Energy Division [9]	$100,220	$55,000	$55,000	$55,000	$165,000
TOTAL PROGRAM COSTS	**$156,789,038**	**$157,023,000**	**$162,622,000**	**$168,347,000**	**$487,992,000**
Funded Outside of Energy Savings Assistance Program Budget					
Indirect Costs [10]	N/A	N/A	N/A	N/A	N/A
NGAT Costs [11]	N/A	N/A	N/A	N/A	N/A

PY 2012-2014 ESAP AUTHORIZED Electric & Gas Budget
Pacific Gas and Electric Company

	PY 2012 Authorized	PY 2013 Authorized	PY 2014 Authorized	3-Year Authorized PY 20012- 2014
Energy Savings Assistance Program				
Energy Efficiency				
Appliances [1]	$34,999,468	$36,244,925	$37,534,521	$108,778,914
Domestic Hot Water [2]	$9,961,741	$10,315,804	$10,682,341	$30,959,887
Enclosure [3]	$36,662,317	$37,967,264	$39,319,229	$113,948,810
HVAC [4]	$4,130,736	$4,273,704	$4,424,349	$12,828,788
Maintenance	$0	$0	$0	$0
Lighting [5]	$26,644,923	$27,592,929	$28,575,478	$82,813,331
Miscellaneous [6]	$10,121,981	$10,480,842	$10,854,095	$31,456,918
Customer Enrollment	$1,658,051	$1,715,623	$1,777,032	$5,150,706
In Home Education	$14,226,810	$14,733,436	$15,258,294	$44,218,540
Pilot	$0	$0	$0	$0
Energy Efficiency Total	**$138,406,027**	**$143,324,528**	**$148,425,339**	**$430,155,894**
Training Center	$914,000	$944,000	$976,000	$2,834,000
Inspections	$5,610,316	$5,801,261	$5,998,922	$17,410,498
Marketing and Outreach	$1,780,870	$1,835,563	$1,899,850	$5,516,283
Statewide Marketing Education and Outreach	$120,000	$123,000	$127,000	$370,000
Measurement and Evaluation Studies [7]	$200,000	$203,000	$205,000	$608,000
Regulatory Compliance	$346,000	$404,000	$371,000	$1,121,000
General Administration [8]	$3,550,000	$3,673,000	$3,804,000	$11,027,000
CPUC Energy Division [9]	$55,000	$55,000	$55,000	$165,000
TOTAL PROGRAM COSTS	**$150,982,212**	**$156,363,352**	**$161,862,111**	**$469,207,675**
Funded Outside of Energy Savings Assistance Program Budget				
Indirect Costs [10]	N/A	N/A	N/A	N/A
NGAT Costs [11]	N/A	N/A	N/A	N/A

Footnotes
1 Includes: Refrigerators, Evaporative coolers, Room & Window AC, LIHEAP Leveraging, and Microwaves
2 Includes: Water heater repair, water heater replacement, water heater blanket, water heater pipe wrap, faucet aerators, shower start
3 Includes: Weatherization/ Minor Home Repairs
4 Includes: Central AC Tune-Up, Central AC, Furnace Repair, Furnace Replacement, R&R Service Calls
5 Includes: Occupancy sensors, interior hardwire fixtures, CFLs, hard wired porch lights, torchieres
6 Includes: Attic insulation, and SmartFan Delay
7 M&E includes funding for the two Joint Utility Studies - the Impact Evaluation and the Energy Education Study.
8 Includes PG&E costs such as Smarter Energy Line. Cost escalation was applied using labor escalation rates from the union contract and non-labor escalation rates developed by Global insights in Q2 2010
9 CPUC Energy Division budget was developed based on historical spend 2009-2010
10 Indirect costs are funded outside of the ESA Program budget.
11 NGAT costs are funded outside of the ESA Program budget

(End of Attachment B)

Attachment C

ESA Program Authorized Budget - SCE

PY 2012-2014 ESAP Proposed Electric & Gas Budget
Southern California Edison

	PY2011 Authorized	PY 2012 Proposed	PY 2013 Proposed	PY 2014 Proposed	3-Year Request PY 2012 - 2014
Energy Savings Assistance Program					
Energy Efficiency					
Appliances		$16,404,000	$18,521,000	$17,991,000	$ 52,916,000
Domestic Hot Water		$40,000	$45,000	$44,000	$ 129,000
Enclosure		$210,000	$237,000	$229,000	$ 676,000
HVAC		$21,302,000	$24,049,000	$23,373,000	$ 68,724,000
Maintenance		$0	$0	$0	$ -
Lighting		$2,554,000	$2,884,000	$2,801,000	$ 8,239,000
Miscellaneous		$3,689,000	$4,165,000	$4,046,000	$ 11,900,000
Customer Enrollment		$4,381,000	$4,947,000	$4,805,000	$ 14,133,000
In Home Education		$972,000	$1,098,000	$1,066,000	$ 3,136,000
Pilot		$0	$0	$0	$ -
Energy Efficiency Total		**$49,552,000**	**$55,946,000**	**$54,355,000**	**$ 159,853,000**
Training Center		$315,000	$306,000	$279,000	$ 900,000
Inspections		$1,319,000	$1,329,000	$1,352,000	$ 4,000,000
Marketing and Outreach		$1,252,000	$1,414,000	$1,373,000	$ 4,039,000
Statewide Marketing Education and Outreach		$120,000	$120,000	$120,000	$ 360,000
Measurement and Evaluation Studies		$90,000	$90,000	$90,000	$ 270,000
Regulatory Compliance		$581,000	$594,000	$606,000	$ 1,781,000
General Administration		$4,428,000	$4,669,000	$4,736,000	$ 13,833,000
CPUC Energy Division		$60,000	$60,000	$60,000	$ 180,000
TOTAL PROGRAM COSTS	**$63,414,000**	**$57,717,000**	**$64,528,000**	**$62,971,000**	**$ 185,216,000**
Not Subject to This Application - Funded Outside of ESAP Program Budget					
Indirect Costs	N/A	N/A	N/A	N/A	N/A
NGAT Costs	N/A	N/A	N/A	N/A	N/A

PY 2012-2014 ESAP AUTHORIZED Electric & Gas Budget
Southern California Edison

	PY 2012 Authorized	PY 2013 Authorized	PY 2014 Authorized	3-Year Authorized PY 20012- 2014
Energy Savings Assistance Program				
Energy Efficiency				
Appliances	$21,019,404	$21,019,806	$21,018,838	$ 63,058,048
Domestic Hot Water	$51,254	$51,071	$51,405	$ 153,731
Enclosure	$269,085	$268,975	$267,540	$ 805,601
HVAC	$27,295,497	$27,293,630	$27,306,615	$ 81,895,742
Maintenance	$233,333	$233,333	$233,333	$ 700,000
Lighting	$3,272,589	$3,273,102	$3,272,401	$ 9,818,092
Miscellaneous	$4,726,931	$4,726,931	$4,726,931	$ 14,180,794
Customer Enrollment	$5,613,631	$5,614,437	$5,613,669	$ 16,841,737
In Home Education	$1,245,480	$1,246,139	$1,245,405	$ 3,737,025
Pilot	$0	$0	$0	$ -
Energy Efficiency Total	**$63,727,206**	**$63,727,426**	**$63,736,138**	**$ 191,190,769**
Training Center	$403,628	$347,285	$325,955	$ 1,076,868
Inspections	$1,690,112	$1,508,305	$1,579,538	$ 4,777,955
Marketing and Outreach	$1,252,000	$1,414,000	$1,373,000	$ 4,039,000
Statewide Marketing Education and Outreach	$120,000	$120,000	$120,000	$ 360,000
Measurement and Evaluation Studies	$200,000	$200,000	$200,000	$ 600,000
Regulatory Compliance	$581,000	$594,000	$606,000	$ 1,781,000
General Administration	$4,428,000	$4,669,000	$4,736,000	$ 13,833,000
CPUC Energy Division	$60,000	$60,000	$60,000	$ 180,000
TOTAL PROGRAM COSTS	**$72,461,946**	**$72,640,016**	**$72,736,631**	**$ 217,838,592**
Not Subject to This Application - Funded Outside of ESAP Program Budget				
Indirect Costs	N/A	N/A	N/A	N/A
NGAT Costs	N/A	N/A	N/A	N/A

The budget categories and subcategories for 2012-2014 were revised by the Commission and do not fully align with the categories and subcategories that were authorized for 2009 – 2011. Therefore, SCE has provided only the total authorized annual funding for 2011

(End of Attachment C)

Attachment D

ESA Program Authorized Budget - SDGE

PY 2009-2011 ESAP Proposed Electric & Gas Budget
San Diego Gas & Electric Company

	PY2011 Authorized	PY 2012 Proposed	PY 2013 Proposed	PY 2014 Proposed	3-Year Request PY 2009 - 2011
Energy Savings Assistance Program					
Energy Efficiency [1]					
Appliances	-	$4,701,644	$4,523,692	$4,443,374	$ 13,668,709
Domestic Hot Water	-	$1,557,722	$1,603,093	$1,651,185	$ 4,812,000
Enclosure	-	$3,138,071	$3,229,471	$3,326,355	$ 9,693,898
HVAC	-	$1,474,200	$1,517,424	$1,562,945	$ 4,554,569
Maintenance	-	$530,185	$545,627	$561,996	$ 1,637,808
Lighting	-	$2,577,454	$2,652,526	$2,732,101	$ 7,962,082
Miscellaneous	-	$450,000	$463,500	$477,000	$ 1,390,500
Customer Enrollment	-	$3,549,357	$3,929,832	$4,014,925	$ 11,494,114
In Home Education	-	$399,658	$411,299	$423,638	$ 1,234,595
Pilot	-	$0	$0	$0	$ -
Energy Efficiency Total	$17,196,378	$18,378,291	$18,876,463	$19,193,519	$ 56,448,274
Training Center	$0	$0	$0	$0	$ -
Inspections	$62,694	$54,877	$56,581	$58,284	$ 169,743
Marketing and Outreach	$714,341	$1,173,730	$1,135,788	$1,146,595	$ 3,456,113
Statewide Marketing Education and Outreach	$100,000	$60,000	$60,000	$0	$ 120,000
Measurement and Evaluation Studies	-$45,864	$135,000	$0	$60,000	$ 195,000
Regulatory Compliance	$286,006	$306,554	$339,384	$322,214	$ 968,152
General Administration	$1,969,103	$1,891,477	$1,948,947	$2,006,417	$ 5,846,841
CPUC Energy Division	$44,948	$45,000	$45,000	$45,000	$ 135,000
TOTAL PROGRAM COSTS	**$20,327,606**	**$22,044,929**	**$22,462,163**	**$22,832,030**	**$ 67,339,122**
Funded Outside of ESAP Program Budget					
Indirect Costs [2]	-	-	-	-	$ -
					$ -
NGAT Costs	$300,000	$535,000	$535,000	$535,000	$ 1,605,000

PY 2009-2011 ESAP AUTHORIZED Electric & Gas Budget- D1208044
San Diego Gas & Electric Company

	PY 2012 Authorized	PY 2013 Authorized	PY 2014 Authorized	3-Year Authorized PY 20012- 2014
Energy Savings Assistance Program				
Energy Efficiency [1]				
Appliances	$4,775,958	$4,595,194	$4,513,607	$ 13,884,759
Domestic Hot Water	$1,582,344	$1,628,431	$1,677,284	$ 4,888,059
Enclosure	$3,187,672	$3,280,517	$3,378,932	$ 9,847,121
HVAC	$1,609,636	$1,653,543	$1,699,783	$ 4,962,962
Maintenance	$538,565	$554,251	$570,879	$ 1,663,695
Lighting	$2,618,194	$2,694,452	$2,775,285	$ 8,087,931
Miscellaneous	$457,113	$470,826	$484,540	$ 1,412,478
Customer Enrollment	$2,799,492	$3,185,982	$3,272,419	$ 9,257,893
In Home Education	$405,975	$417,800	$430,334	$ 1,254,109
Pilot	$0	$0	$0	$ -
Energy Efficiency Total	$17,974,949	$18,480,995	$18,803,063	$ 55,259,006
Training Center	$0	$0	$0	$ -
Inspections	$55,745	$57,475	$59,206	$ 172,426
Marketing and Outreach	$1,192,282	$1,153,740	$1,164,718	$ 3,510,741
Statewide Marketing Education and Outreach	$60,000	$60,000	$0	$ 120,000
Measurement and Evaluation Studies	$190,000	$55,000	$115,000	$ 360,000
Regulatory Compliance	$306,554	$339,384	$322,214	$ 968,152
General Administration	$1,891,477	$1,948,947	$2,006,417	$ 5,846,841
CPUC Energy Division	$45,000	$45,000	$45,000	$ 135,000
TOTAL PROGRAM COSTS	**$21,716,006**	**$22,140,542**	**$22,515,618**	**$ 66,372,165**
Funded Outside of ESAP Program Budget				
Indirect Costs [2]	-	-	-	$ -
				$ -
NGAT Costs	$535,000	$535,000	$535,000	$ 1,605,000

[1] The budget for 2011 was not authorized using the new 2012-2014 reporting categories, therefore SDG&E is unable to allocate the budgeted dollars for the subcategories under the Energy Efficiency category.
[2] SDG&E does not budget or project indirect costs.

PY 2009-2011 ESAP AUTHORIZED Electric & Gas Budget- PHASE II
San Diego Gas & Electric Company

	PY2011 Authorized	PY 2012 Authorized	PY 2013 Authorized	PY 2014 Authorized	3-Year Authorized PY 20012- 2014
Energy Savings Assistance Program					
Energy Efficiency [1]					
Appliances	-	$5,194,884	$5,014,120	$4,932,533	$ 15,141,537
Domestic Hot Water	-	$1,960,578	$2,006,666	$2,055,518	$ 6,022,762
Enclosure	-	$4,398,587	$4,491,432	$4,589,847	$ 13,479,866
HVAC	-	$3,837,709	$3,881,616	$3,927,857	$ 11,647,183
Maintenance	-	$538,565	$554,251	$570,879	$ 1,663,695
Lighting	-	$2,618,194	$2,694,452	$2,775,285	$ 8,087,931
Miscellaneous	-	$457,113	$470,826	$484,540	$ 1,412,478
Customer Enrollment	-	$2,912,714	$3,299,204	$3,385,641	$ 9,597,559
In Home Education	-	$405,975	$417,800	$430,334	$ 1,254,109
Pilot	-	$0	$0	$0	$ -
Fund shifting Offset'		-$3,132,739	-$3,132,739	-$3,132,739	$ (9,398,216)
Energy Efficiency Total	$17,196,378	$19,191,581	$19,697,627	$20,019,695	$ 58,908,903
Training Center	$0	$0	$0	$0	$ -
Inspections	$62,694	$95,745	$97,475	$99,206	$ 292,426
Marketing and Outreach	$714,341	$1,192,282	$1,153,740	$1,164,718	$ 3,510,741
Statewide Marketing Education and Outreach	$100,000	$60,000	$60,000	$0	$ 120,000
Measurement and Evaluation Studies	-$45,864	$190,000	$55,000	$115,000	$ 360,000
Regulatory Compliance	$286,006	$306,554	$339,384	$322,214	$ 968,152
General Administration	$1,969,103	$1,891,477	$1,948,947	$2,006,417	$ 5,846,841
CPUC Energy Division	$44,948	$45,000	$45,000	$45,000	$ 135,000
TOTAL PROGRAM COSTS	**$20,327,606**	**$22,972,638**	**$23,397,174**	**$23,772,250**	**$ 70,142,062**
Funded Outside of ESAP Program Budget					
Indirect Costs [2]	-	-	-	-	$ -
					$ -
NGAT Costs	$300,000	$535,000	$535,000	$535,000	$ 1,605,000

(End of Attachment D)

Attachment E

ESA Program Authorized Budget - SoCalGas

PY 2012-2014 ESAP Proposed Electric & Gas Budget
Southern California Gas Company

	PY2011 Authorized	PY 2012 Proposed	PY 2013 Proposed	PY 2014 Proposed	3-Year Request PY 2012 - 2014
Energy Savings Assistance Program					
Energy Efficiency					
Appliances	$3,963,911.00	$4,273,045	$4,725,254	$5,069,638	$ 14,067,937
Domestic Hot Water	$4,298,090.00	$14,053,437	$11,084,205	$11,260,521	$ 36,398,164
Enclosure	$18,725,309.00	$29,982,892	$23,940,183	$24,599,087	$ 78,522,163
HVAC	$17,345,119	$16,053,624	$12,780,810	$13,073,791	$ 41,908,225
Maintenance	$5,800,598	$2,303,685	$1,828,838	$1,868,898	$ 6,001,421
Lighting	$0.00	$0	$0	$0	$ -
Miscellaneous	$0.00	$0	$0	$0	$ -
Customer Enrollment	$17,211,246.00	$20,368,129	$16,032,969	$16,235,643	$ 52,636,741
In Home Education	$2,188,110.00	$2,427,634	$1,844,475	$1,854,400	$ 6,126,510
Pilot	$28,127.00	$0	$0	$0	$ -
Energy Efficiency Total	**$69,560,510**	**$89,462,446**	**$72,236,735**	**$73,961,979**	**$ 235,661,160**
Training Center	$320,587	$505,117	$486,403	$498,992	$ 1,490,512
Inspections	$1,701,533	$2,618,378	$2,093,899	$2,156,375	$ 6,868,652
Marketing and Outreach	$1,050,293	$1,013,000	$931,900	$878,000	$ 2,822,900
Statewide Marketing Education and Outreach	$0	$100,000	$100,000	$100,000	$ 300,000
Measurement and Evaluation Studies	$0	$225,000	$0	$0	$ 225,000
Regulatory Compliance	$272,837	$295,333	$295,333	$295,333	$ 886,000
General Administration	$5,264,735	$5,603,781	$5,891,204	$6,202,206	$ 17,697,191
CPUC Energy Division	$85,774	$86,000	$86,000	$86,000	$ 258,000
TOTAL PROGRAM COSTS	**$78,256,269**	**$99,909,056**	**$82,121,475**	**$84,178,885**	**$ 266,209,415**
Funded Outside of ESAP Program Budget					
NGAT Costs	$1,600,000	$4,200,000	$4,200,000	$4,200,000	$ 12,600,000

PY 2012-2014 ESAP AUTHORIZED Electric & Gas Budget-D1208044
Southern California Gas Company

	PY 2012 Authorized	PY 2013 Authorized	PY 2014 Authorized	3-Year Authorized PY 20012- 2014
Energy Savings Assistance Program				
Energy Efficiency				
Appliances	$4,528,886	$6,449,788	$6,919,859	$ 17,898,534
Domestic Hot Water	$15,216,788	$15,460,812	$15,710,853	$ 46,388,452
Enclosure	$39,298,898	$40,418,299	$41,537,596	$ 121,254,792
HVAC	$17,559,517	$18,006,083	$18,422,053	$ 53,987,652
Maintenance	$2,441,614	$2,496,293	$2,550,973	$ 7,488,880
Lighting	$0	$0	$0	$ -
Miscellaneous	$0	$0	$0	$ -
Customer Enrollment	$20,704,408	$20,746,914	$21,023,556	$ 62,474,878
In Home Education	$2,572,984	$2,517,638	$2,531,184	$ 7,621,806
Pilot	$0	$0	$0	$ -
Energy Efficiency Total	**$102,323,095**	**$106,095,825**	**$108,696,075**	**$317,114,995**
Training Center	$535,360	$663,921	$681,105	$ 1,880,386
Inspections	$2,959,003	$3,063,896	$3,155,344	$ 9,178,243
Marketing and Outreach	$1,073,652	$1,272,007	$1,198,436	$ 3,544,095
Statewide Marketing Education and Outreach	$100,000	$100,000	$100,000	$ 300,000
Measurement and Evaluation Studies	$316,667	$91,667	$91,667	$ 500,000
Regulatory Compliance	$295,333	$295,333	$295,333	$ 886,000
General Administration	$5,603,781	$5,891,204	$6,202,206	$ 17,697,191
CPUC Energy Division	$86,000	$86,000	$86,000	$ 258,000
TOTAL PROGRAM COSTS	**$113,292,891**	**$117,559,854**	**$120,506,165**	**$351,358,910**
Funded Outside of ESAP Program Budget				
NGAT Costs	$4,200,000	$4,200,000	$4,200,000	$ 12,600,000

PY 2012-2014 ESAP AUTHORIZED Electric & Gas Budget-Phase II
Southern California Gas Company

	PY2011 Authorized	PY 2012 Authorized	PY 2013 Authorized	PY 2014 Authorized	3-Year Authorized PY 20012- 2014
Energy Savings Assistance Program					
Energy Efficiency					
Appliances	$3,963,911.00	$16,410,368	$16,738,575	$16,738,575	$ 49,887,519
Domestic Hot Water	$4,298,090.00	$15,889,976	$16,366,675	$16,843,374	$ 49,100,024
Enclosure	$18,725,309.00	$39,607,317	$40,795,537	$41,983,756	$ 122,386,609
HVAC	$17,345,119	$18,123,476	$18,667,180	$19,210,885	$ 56,001,540
Maintenance	$5,800,598	$2,008,345	$2,068,596	$2,128,846	$ 6,205,787
Lighting	$0.00	$0	$0	$0	$ -
Miscellaneous	$0.00	$0	$0	$0	$ -
Customer Enrollment	$17,211,246.00	$20,775,400	$20,825,610	$20,834,354	$ 62,435,364
In Home Education	$2,188,110.00	$2,569,098	$2,517,646	$2,531,192	$ 7,617,936
Pilot	$28,127.00	$0	$0	$0	$ -
Energy Efficiency Total	$69,560,510	**$115,383,980**	**$117,979,817**	**$120,270,983**	**$353,634,780**
Training Center	$320,587	$535,360	$663,921	$681,105	$ 1,880,386
Inspections	$1,701,533	$3,168,321	$3,263,371	$3,361,051	$ 9,792,743
Marketing and Outreach	$1,050,293	$1,073,652	$1,272,007	$1,198,436	$ 3,544,095
Statewide Marketing Education and Outreach	$0	$100,000	$100,000	$100,000	$ 300,000
Measurement and Evaluation Studies	$0	$316,667	$91,667	$91,667	$ 500,000
Regulatory Compliance	$272,837	$295,333	$295,333	$295,333	$ 886,000
General Administration	$5,264,735	$5,193,381	$5,547,442	$5,286,041	$ 16,026,864
CPUC Energy Division	$85,774	$86,000	$86,000	$86,000	$ 258,000
Carry Back Funding*		$1,046,575	$1,046,575	$1,046,575	$ 3,139,726
TOTAL PROGRAM COSTS	$78,256,269	**$127,199,269**	**$130,346,135**	**$132,417,191**	**$ 389,962,594**
Funded Outside of ESAP Program Budget					
Indirect Costs[1]					
NGAT Costs	$1,600,000	$4,200,000	$4,200,000	$4,200,000	$ 12,600,000

(End of Attachment E)

Attachment F

ESA Projected Homes to be Treated

Projected Number of Homes to be Treated 2012-2014

Utility	2012 IOU Proposed	2012 CPUC Projection	2013 IOU Proposed	2013 CPUC Projection	2014 IOU Proposed	2014 CPUC Projection	2012-2014 IOU Proposed	2012-2014 CPUC Projection	Remaining Homes to be treated 2012-2020 (IOU Proposed)	Remaining Homes to be treated 2012-2020 (CPUC Projection)
PG&E	125,000	119,940	125,000	119,940	125,000	119,940	375,000	359,820	862,552	1,079,461
SCE	68,200	87,389	77,000	87,389	74,800	87,389	220,000	262,166	625,429	786,498
SDG&E	20,000	20,316	20,000	20,316	20,000	20,316	60,000	60,948	144,243	182,845
SoCalGas	129,106	136,836	100,249	136,836	100,249	136,836	329,604	410,508	902,237	1,231,521
Total	342,306	364,481	322,249	364,481	320,049	364,481	984,604	1,093,442	2,534,462	3,280,324

SUPPORT: Delta Between Proposed and 5% Ineligibility Factor

PG&E (App 1-17)

	15%	5%
Filed 12/30/2010 Estimated Eligible Homes	1,983,285	1,983,285
Filed 12/30/2010 estimated eligible escalated by 1% to 2020	2,169,090	2,169,090
Less % of 2020 estimate due to unwilling or unable to participat	325,364	108,455
Less PG&E Homes Treated 2002 - 2010	629,143	629,143
Less PG&E Estimated Homes Treated 2011	126,248	126,248
Less LIHEAP Homes Treated 2002-2007 (D08-11-031)	76,537	76,537
Less LIHEAP Homes Treated 2008-2020 (90% of 2002-2007 A	149,247	149,247
Remaining to be Treated 2012-2020	862,552	1,079,461
2012-2014 Minimum Homes Treated =1/3 of homes remaining	287,517	359,820
per yr	95,839	119,940

SCE (App- p24)

	15%	5%
Filed 12/30/2010 Estimated Eligible Homes	1,458,131	1,458,131
Filed 12/30/2010 estimated eligible escalated by 1% to 2020	1,610,684	1,610,684
Less % of 2020 estimate due to unwilling or unable to participat	241,603	80,534
Less SCE Homes Treated 2002 - 2010	474,916	474,916
Less SCE Estimated Homes Treated 2011	73,800	73,800
Less LIHEAP Homes Treated 2002-2007 (D08-11-031)	66,080	66,080
Less LIHEAP Homes Treated 2008-2020 (90% of 2002-2007 A	128,856	128,856
Remaining to be Treated 2012-2020	625,429	786,498
2012-2014 Minimum Homes Treated =1/3 of homes remaining	208,476	262,166
per yr	69,492	87,389

SDG&E (SW-14)

	15%	5%
Filed 12/30/2010 Estimated Eligible Homes	352,952	352,952
Filed 12/30/2010 estimated eligible escalated by 1% to 2020	386,018	386,018
Less % of 2020 estimate due to unwilling or unable to participat	57,903	19,301
Less SDG&E Homes Treated 2002 - 2010	138,398	138,398
Less SDG&E Estimated Homes Treated 2011	20,384	20,384
Less LIHEAP Homes Treated 2002-2007 (D08-11-031)	7,700	7,700
Less LIHEAP 2008 100% of 2002-2007 LIHEAP average	1,283	1,283
LIHEAP 2009-2010 Actual	3,277	3,277
Less LIHEAP Homes Treated 2008-2020 (90% of 2002-2007 A	12,830	12,830
Remaining to be Treated 2012-2020	144,243	182,845
2012-2014 Minimum Homes Treated =1/3 of homes remaining	48,081	60,948
per year	16,027	20,316

SCG (DM 16)

	19%	5%
Filed 2/16/2012 Estimated Eligible Homes	2,106,758	2,106,758
Filed 2/16/2012 estimated eligible escalated by 1% to 2020	2,304,130	2,304,130
Less % of 2020 estimate due to unwilling or unable to participat	437,785	115,207
Less SCG Homes Treated 2002 - 2010	548,110	545,385
Less SCG Estimated Homes Treated 2011	165,000	161,020
Less LIHEAP Homes Treated 2002-2007 (D08-11-031)	73,780	73,780
Less LIHEAP 2008 100% of 2002-2007 LIHEAP average	12,297	12,297
Less LIHEAP 2009-2010 LIHEAP 2009-2010 actual	41,954	41,954
Less LIHEAP Homes Treated 2011-2020 (90% of 2002-2007 A	122,967	122,967
Remaining to be Treated 2012-2020	902,237	1,231,521
2012-2014 Minimum Homes Treated =1/3 of homes remaining	300,746	410,507
per year	100,249	136,836

(End of Attachment F)

Attachment G

ESA Program Budget Impacts Calculation

BUDGET ADJUSTMENTS per D1208044	PGE				SCE				SDGE				SoCalGas				Total
Issue	2012	2013	2014	Cycle	2012	2013	2014	Cycle	2012	2013	2014	Cycle	2012	2013	2014	Cycle	
ORIGINAL ESAP BUDGET	**$ 157,023,000.00**	**$ 162,622,000.00**	**$ 168,347,000.00**	**$ 487,992,000.00**	**$ 57,717,000.00**	**$ 64,528,000.00**	**$ 62,971,000.00**	**$ 185,216,000.00**	**$ 22,044,928.55**	**$ 22,462,163.02**	**$ 22,832,030.32**	**$ 67,339,121.89**	**$ 99,909,055.86**	**$ 82,121,474.95**	**$ 84,178,884.50**	**$ 266,209,415.31**	**$ 1,006,756,537.20**
Contractor Customer Referral Incentive	$0	$0	$0	**$0**	$0	$0	$0	**$0**	($43,425)	($43,425)	($43,425)	**($130,275)**	$0	$0	$0	**$0**	**($130,275)**
Customer Referral Incentive (Gift Card)	$0	$0	$0	**$0**	$0	$0	$0	**$0**	($750,000)	($750,000)	($750,000)	**($2,250,000)**	($833,333)	($833,333)	($833,333)	**($2,500,000)**	**($4,750,000)**
SCE Maintenance Measure Costs-ADD BACK	$0	$0	$0	**$0**	$233,333	$233,333	$233,333	**$700,000**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	**$700,000**
SDGE Duct, Test, and Seal - ADD BACK (HVAC)	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$112,134	$112,134	$112,134	**$336,403**	$0	$0	$0	**$0**	**$336,403**
SoCalGas- Domestic Hot Water, MF- ADD BACK	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$321,925	$331,301	$340,678	**$993,904**	**$993,904**
SoCalGas- Enclosures, MF (attic Insulation)- ADD BACK	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$186,497	$191,932	$197,364	**$575,793**	**$575,793**
SoCalGas- Enclosures, SF (attic Insulation)- ADD BACK	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$7,334,334	$7,548,944	$7,763,431	**$22,646,709**	**$22,646,709**
SoCalGas- HVAC (Duct, Test & Seal) ADD BACK	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$544,710	$560,772	$576,835	**$1,682,317**	**$1,682,317**
SoCalGas- Inspections (Due to Add back of Attic Insulation)	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$183,854	$205,805	$211,976	**$601,635**	**$601,635**
Needs Assessment	$70,000	$70,000	$70,000	**$210,000**	$70,000	$70,000	$70,000	**$210,000**	$35,000	$35,000	$35,000	**$105,000**	$58,333	$58,333	$58,333	**$175,000**	**$700,000**
Multifamily Study	$40,000	$40,000	$40,000	**$120,000**	$40,000	$40,000	$40,000	**$120,000**	$20,000	$20,000	$20,000	**$60,000**	$33,333	$33,333	$33,333	**$100,000**	**$400,000**
PHASE II Adjustments																	
SDGE- Upward Trend in HVAC- Furnace R&R costs	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$2,228,074	$2,228,074	$2,228,074	**$6,684,221**	$0	$0	$0	**$0**	**$6,684,221**
SDGE- Upward Trend in Domestic Hot Water - Water Heater R&R costs	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$378,234	$378,234	$378,234	**$1,134,703**	$0	$0	$0	**$0**	**$1,134,703**
SDGE- Upward Trend in Appliances - Clothes Washers costs	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$418,926	$418,926	$418,926	**$1,256,778**	$0	$0	$0	**$0**	**$1,256,778**
SDGE- Upward Trend in Enclosures costs	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$1,210,915	$1,210,915	$1,210,915	**$3,632,745**	$0	$0	$0	**$0**	**$3,632,745**
SDG&E- Customer Enrollment	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$113,222	$113,222	$113,222	**$339,666**	$0	$0	$0	**$0**	**$339,666**
SDG&E- Inspections	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$40,000	$40,000	$40,000	**$120,000**	$0	$0	$0	**$0**	**$120,000**
SDG&E- Fund shift of unspent Gas funds to Provide more Gas measures approved per ALJ Ruling 3/30/12	$0	$0	$0	**$0**	$0	$0	$0	**$0**	($611,000)	($611,000)	($611,000)	**($1,833,000)**	$0	$0	$0	**$0**	**($1,833,000)**
SDG&E- Fund shift of unspent Gas funds to Provide more Gas measures	$0	$0	$0	**$0**	$0	$0	$0	**$0**	($55,667)	($55,667)	($55,667)	**($167,000)**	$0	$0	$0	**$0**	**($167,000)**
SDG&E- Fund shift of unspent Electric funds to Provide more Gas measures	$0	$0	$0	**$0**	$0	$0	$0	**$0**	($1,400,000)	($1,400,000)	($1,400,000)	**($4,200,000)**	$0	$0	$0	**$0**	**($4,200,000)**
SDG&E- Fund shift of unspent Electric funds to Provide more Gas measures approved per ALJ Ruling 3/30/12	$0	$0	$0	**$0**	$0	$0	$0	**$0**	($566,667)	($566,667)	($566,667)	**($1,700,000)**	$0	$0	$0	**$0**	**($1,700,000)**
SDG&E- Fund shift of unspent Electric funds to Provide more Electric measures	$0	$0	$0	**$0**	$0	$0	$0	**$0**	($499,405)	($499,405)	($499,405)	**($1,498,216)**	$0	$0	$0	**$0**	**($1,498,216)**
SoCalGas- Upward Trend in HE Washers	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$11,881,482	$10,288,787	$9,818,716	**$31,988,985**	**$31,988,985**
SoCalGas- Upward Trend in Domestic Hot Water	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$673,188	$905,863	$1,132,521	**$2,711,572**	**$2,711,572**
SoCalGas- Upward Trend in Enclosure	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$308,419	$377,238	$446,160	**$1,131,817**	**$1,131,817**
SoCalGas- Upward Trend in HVAC	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$563,959	$661,097	$788,832	**$2,013,888**	**$2,013,888**
SoCalGas- Downward Adjustment in Maintenance	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	($433,269)	($427,697)	($422,127)	**($1,283,093)**	**($1,283,093)**
SoCalGas- Adjustment in Customer Enrollment	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$70,992	$78,696	($189,202)	**($39,514)**	**($39,514)**
SoCalGas- Adjustment in Home Education	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	($3,886)	$8	$8	**($3,870)**	**($3,870)**
SoCalGas- Upward Trend in Inspections	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$209,318	$199,475	$205,707	**$614,500**	**$614,500**
SoCalGas- Adjustment in General Admin (Removal of PC Tablets + HEAT system upgrades)	$0	$0	$0	**$0**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	($410,400)	($343,762)	($916,165)	**($1,670,327)**	**($1,670,327)**
SoCalGas- 2012 Bridge funding used to cover the 2011 shortfall, and needed to cover 2012-2014 cycle					$0	$0	$0	**$0**	$0	$0	$0	**$0**	$1,046,575	$1,046,575	$1,046,575	**$3,139,726**	**$3,139,726**
Total Deduction/Addition	$110,000	$110,000	$110,000	$330,000	$343,333	$343,333	$343,333	$1,030,000	$630,342	$630,342	$630,342	$1,891,025	$21,736,032	$20,883,368	$20,259,643	$62,879,042	$66,130,067
Orig Budget+ Total Deduction/Addition	$157,133,000	$162,732,000	$168,457,000	**$488,322,000**	$58,060,333	$64,871,333	$63,314,333	**$186,246,000**	$22,675,270	$23,092,505	$23,462,372	**$69,230,147**	$ 121,645,087.53	$103,004,843	$104,438,527	**$329,088,457**	**$1,072,886,604**
Original Budget $ per Orig Number of Home Est.	$1,256	$1,301	$1,347	$1,301	$846	$838	$842	$842	$1,102	$1,123	$1,142	$1,122	$774	$819	$840	$808	$1,022
New Budget $ per Orig Number of Home Est.	$1,259	$1,304	$1,350	$1,304	$829	$831	$832	$831	$1,069	$1,090	$1,108	$1,089	$828	$859	$881	$856	$1,010
New Authorized Budgets Based on New Projected Homes to be Treated	**$150,982,212**	**$156,363,352**	**$161,862,111**	**$469,207,675**	**$72,461,946**	**$72,640,016**	**$72,736,631**	**$217,838,592**	**$21,716,006**	**$22,140,542**	**$22,515,618**	**$66,372,165**	**$113,292,891**	**$117,559,854**	**$120,506,165**	**$351,358,910**	**$1,104,777,343**
Projected Difference Between Proposed and Authorized Budget	($6,040,788)	($6,258,648)	($6,484,889)	**($18,784,325)**	$14,744,946	$8,112,016	$9,765,631	**$32,622,592**	($328,923)	($321,621)	($316,412)	**($966,957)**	$113,292,891	$35,438,379	$36,327,281	**$85,149,495**	**$98,020,806**
WORK AREA																	
IOU Proposed Budgets	$157,023,000	$162,622,000	$168,347,000	$487,992,000	$57,717,000	$64,528,000	$62,971,000	$185,216,000	$22,044,929	$22,462,163	$22,832,030	$67,339,122	$ 99,909,055.86	$ 82,121,474.95	$84,178,885	$266,209,415	$1,006,756,537
IOU Original Proposed Elig. Customers	125,000	125,000	125,000	**375,000**	68,200	77,000	74,800	**220,000**	20,000	20,000	20,000	**60,000**	129,106	100,249	100,249	**329,604**	**984,604**
CPUC New Projected Elig. Customers	119,940	119,940	119,940	**359,820**	87,389	87,389	87,389	**262,166**	20,316	20,316	20,316	**60,948**	136,836	136,836	136,836	**410,508**	**1,093,442**
Escalation Factor	96%	96%	96%	96%	128%	113%	117%	119%	102%	102%	102%	102%	106%	136%	136%	125%	111%
Proportion of Total ESAP Budget	15.60%	16.15%	16.72%	**48.47%**	5.73%	6.41%	6.25%	**18.40%**	2.19%	2.23%	2.27%	**6.69%**	9.92%	8.16%	8.36%	**26.44%**	**100.00%**

(End of Attachment G)

Attachment H

Approved Measures - PG&E

Energy Savings Assistance Program Cost-Effectiveness - Weather Sensitive Measures
Pacific Gas and Electric Company

	Measure	Measure Group	Type of Home	Electric or Gas	Climate Zone	Ratio of Benefits Over Costs*			Add Back *A	Add Back *B
						Utility Cost Test	Modified Participant Test	Total Resource Cost Test		
			(SF, MH, MF)	(E,G)	(Number)					
New	AC TIME DELAY MH/CZ13	HVAC	MH	E	13	2.03	6.43	1.73		
New	AC TIME DELAY MH/CZ14	HVAC	MH	E	14	2.02	6.43	1.73		
New	AC TIME DELAY MH/CZ11	HVAC	MH	E	11	1.95	5.34	1.68		
New	AC TIME DELAY MH/CZ12	HVAC	MH	E	12	1.87	4.35	1.62		
New	AC TIME DELAY MH/CZ4	HVAC	MH	E	4	1.65	3.09	1.42		
	A/C Tune-up- Central w/CZ14 w/SF	HVAC	SF	E	14	1.64	3.08	1.40		
New	AC TIME DELAY MH/CZ16	HVAC	MH	E	16	1.64	3.06	1.42		
	A/C Tune-up- Central w/CZ14 w/MH	HVAC	MH	E	14	1.62	3.00	1.39		
New	AC TIME DELAY MH/CZ2	HVAC	MH	E	2	1.55	2.56	1.34		
New	AC TIME DELAY SF/CZ13	HVAC	SF	E	13	1.54	2.55	1.32		
New	AC TIME DELAY SF/CZ14	HVAC	SF	E	14	1.53	2.55	1.31		
New	AC TIME DELAY SF/CZ11	HVAC	SF	E	11	1.45	2.14	1.25		
	A/C Tune-up- Central w/CZ14 w/MF	HVAC	MF	E	14	1.37	2.01	1.18		
	A/C Tune-up- Central w/CZ13 w/SF	HVAC	SF	E	13	1.36	1.96	1.17		
	A/C Tune-up- Central w/CZ11 w/SF	HVAC	SF	E	11	1.30	1.71	1.12		
New	AC TIME DELAY MH/CZ5	HVAC	MH	E	5	1.20	1.66	1.02		
New	AC TIME DELAY MH/CZ6	HVAC	MH	E	6	1.20	1.66	1.02		
	A/C Tune-up- Central w/CZ13 w/MH	HVAC	MH	E	13	1.25	1.63	1.07		
New	AC TIME DELAY MF/CZ14	HVAC	MF	E	14	1.23	1.59	1.06		
New	AC TIME DELAY MF/CZ13	HVAC	MF	E	13	1.24	1.59	1.06		
New	AC TIME DELAY MH/CZ3	HVAC	MH	E	3	1.19	1.44	1.03		
	A/C Tune-up- Central w/CZ11 w/MH	HVAC	MH	E	11	1.18	1.42	1.02		
	A/C Tune-up- Central w/CZ13 w/MF	HVAC	MF	E	13	1.14	1.38	0.98		
New	AC TIME DELAY SF/CZ12	HVAC	SF	E	12	1.18	1.35	1.03		
New	AC TIME DELAY MF/CZ11	HVAC	MF	E	11	1.13	1.30	0.98		
	A/C Tune-up- Central w/CZ12 w/SF	HVAC	SF	E	12	1.11	1.22	0.96		
	A/C Tune-up- Central w/CZ11 w/MF	HVAC	MF	E	11	1.05	1.15	0.91		
	Evap Coolers SF/CZ13	HVAC	SF	E	13	1.03	1.15	0.88		
	Evap Coolers SF/CZ14	HVAC	SF	E	14	1.02	1.15	0.88		
	Evap Coolers SF/CZ16	HVAC	SF	E	16	1.03	1.14	0.88		
	Air Sealing / Envelope MH/CZ13/G-wAC	HVAC	MH	EG	13	0.53	1.08	0.45		
	Air Sealing / Envelope MH/CZ14/G-wAC	HVAC	MH	EG	14	0.52	1.08	0.45		
	A/C Tune-up- Central w/CZ12 w/MH	HVAC	MH	E	12	1.03	1.07	0.89		
New	AC TIME DELAY SF/CZ16	HVAC	SF	E	16	1.00	1.07	0.86		
	Evap Coolers MH/CZ14	HVAC	MH	E	14	0.97	1.06	0.83		
	Evap Coolers MH/CZ13	HVAC	MH	E	13	0.98	1.06	0.83		
	Air Sealing / Envelope SF/CZ13/G-wAC	ENCLOSURE	SF	EG	13	0.52	1.04	0.44		
	Air Sealing / Envelope SF/CZ14/G-wAC	ENCLOSURE	SF	EG	14	0.52	1.04	0.44		
	Air Sealing / Envelope MH/CZ16/G-wAC	ENCLOSURE	MH	EG	16	0.49	0.98	0.41		
	Air Sealing / Envelope SF/CZ16/G-wAC	ENCLOSURE	SF	EG	16	0.48	0.95	0.41		
	Air Sealing / Envelope MH/CZ11/G-wAC	ENCLOSURE	MH	EG	11	0.48	0.94	0.40		
	Air Sealing / Envelope SF/CZ11/G-wAC	ENCLOSURE	SF	EG	11	0.45	0.88	0.38		
New	AC TIME DELAY MF/CZ12	HVAC	MF	E	12	0.91	0.87	0.79		
	Air Sealing / Envelope MH/CZ12/G-wAC	ENCLOSURE	MH	EG	12	0.44	0.84	0.38		
	A/C Tune-up- Central w/CZ16 w/SF	HVAC	SF	E	16	0.84	0.83	0.72		
	Evap Coolers MH/CZ11	HVAC	MH	E	11	0.85	0.81	0.73		
New	AC TIME DELAY SF/CZ4	HVAC	SF	E	4	0.83	0.81	0.71		
	Evap Coolers SF/CZ11	HVAC	SF	E	11	0.84	0.81	0.73		
	Evap Coolers SF/CZ12	HVAC	SF	E	12	0.84	0.78	0.73		
	Air Sealing / Envelope SF/CZ12/G-wAC	ENCLOSURE	SF	EG	12	0.41	0.77	0.35		
	Air Sealing / Envelope MF/CZ14/G-wAC	ENCLOSURE	MF	EG	14	0.40	0.75	0.35		
	Air Sealing / Envelope MF/CZ13/G-wAC	ENCLOSURE	MF	EG	13	0.40	0.75	0.35		
	Evap Coolers MH/CZ12	HVAC	MH	E	12	0.82	0.75	0.71		
	Air Sealing / Envelope MH/CZ13/E-wAC	ENCLOSURE	MH	E	13	0.40	0.74	0.34		
	Air Sealing / Envelope MH/CZ14/E-wAC	ENCLOSURE	MH	E	14	0.40	0.74	0.34		
	Air Sealing / Envelope SF/CZ13/E-wAC	ENCLOSURE	SF	E	13	0.40	0.73	0.34		
	Air Sealing / Envelope SF/CZ14/E-wAC	ENCLOSURE	SF	E	14	0.39	0.73	0.34		
	Air Sealing / Envelope MF/CZ14/E-wAC	ENCLOSURE	MF	E	14	0.39	0.73	0.34		
	Air Sealing / Envelope MF/CZ13/E-wAC	ENCLOSURE	MF	E	13	0.40	0.73	0.34		
	A/C Tune-up- Central w/CZ16 w/MH	HVAC	MH	E	16	0.76	0.72	0.65		
New	AC TIME DELAY MF/CZ16	HVAC	MF	E	16	0.77	0.72	0.66		
	Air Sealing / Envelope MH/CZ1/G-wAC	ENCLOSURE	MH	EG	1	0.34	0.72	0.29		
	Air Sealing / Envelope MH/CZ1/G-noAC	ENCLOSURE	MH	G	1	0.35	0.72	0.29		
	A/C Tune-up- Central w/CZ12 w/MF	HVAC	MF	E	12	0.75	0.66	0.65		
	Air Sealing / Envelope SF/CZ1/G-wAC	ENCLOSURE	SF	EG	1	0.32	0.65	0.27		
	Air Sealing / Envelope SF/CZ1/G-noAC	ENCLOSURE	SF	G	1	0.32	0.65	0.27		
	A/C Tune-up- Central w/CZ4 w/SF	HVAC	SF	E	4	0.70	0.65	0.60		
	Air Sealing / Envelope MF/CZ16/G-wAC	ENCLOSURE	MF	EG	16	0.35	0.64	0.30		
	A/C Tune-up- Central w/CZ6 w/MH	HVAC	MH	E	6	0.63	0.62	0.53		
	Air Sealing / Envelope MH/CZ2/G-wAC	ENCLOSURE	MH	EG	2	0.32	0.62	0.27		
New	AC TIME DELAY MF/CZ4	HVAC	MF	E	4	0.67	0.61	0.58		
	Air Sealing / Envelope MF/CZ16/E-wAC	ENCLOSURE	MF	E	16	0.34	0.61	0.29		
	Air Sealing / Envelope SF/CZ16/E-wAC	ENCLOSURE	SF	E	16	0.33	0.58	0.28		
	Air Sealing / Envelope SF/CZ2/G-wAC	ENCLOSURE	SF	EG	2	0.30	0.57	0.25		
	Air Sealing / Envelope MH/CZ16/E-wAC	ENCLOSURE	MH	E	16	0.32	0.57	0.28		
	Air Sealing / Envelope MH/CZ5/G-wAC	ENCLOSURE	MH	EG	5	0.28	0.57	0.23		
	Air Sealing / Envelope MH/CZ6/G-wAC	ENCLOSURE	MH	EG	6	0.28	0.57	0.23		
	A/C Tune-up- Central w/CZ6 w/SF	HVAC	SF	E	6	0.59	0.57	0.49		
New	AC TIME DELAY SF/CZ2	HVAC	SF	E	2	0.65	0.56	0.56		
	Air Sealing / Envelope MH/CZ4/G-wAC	ENCLOSURE	MH	EG	4	0.28	0.54	0.24		
	Air Sealing / Envelope MH/CZ3/G-wAC	ENCLOSURE	MH	EG	3	0.27	0.53	0.23		
	A/C Tune-up- Central w/CZ4 w/MH	HVAC	MH	E	4	0.61	0.53	0.52		
	Air Sealing / Envelope SF/CZ5/G-wAC	ENCLOSURE	SF	EG	5	0.27	0.53	0.22		
	Air Sealing / Envelope SF/CZ6/G-wAC	ENCLOSURE	SF	EG	6	0.27	0.53	0.22		
New	AC TIME DELAY MH/CZ1	HVAC	MH	E	1	0.59	0.53	0.51		
	Air Sealing / Envelope MF/CZ11/G-wAC	ENCLOSURE	MF	EG	11	0.30	0.52	0.26		
	Air Sealing / Envelope MH/CZ11/E-wAC	ENCLOSURE	MH	E	11	0.30	0.51	0.26		
	Air Sealing / Envelope SF/CZ4/G-wAC	ENCLOSURE	SF	EG	4	0.27	0.50	0.22		
	Air Sealing / Envelope MF/CZ11/E-wAC	ENCLOSURE	MF	E	11	0.29	0.49	0.25		
	A/C Tune-up- Central w/CZ16 w/MF	HVAC	MF	E	16	0.57	0.49	0.49		
	Air Sealing / Envelope MH/CZ3/G-noAC	HVAC	MH	G	3	0.25	0.48	0.20		
	Air Sealing / Envelope SF/CZ11/E-wAC	ENCLOSURE	SF	E	11	0.29	0.48	0.25		
	Air Sealing / Envelope SF/CZ3/G-wAC	ENCLOSURE	SF	EG	3	0.25	0.47	0.21		
	A/C Tune-up- Central w/CZ6 w/MF	HVAC	MF	E	6	0.51	0.47	0.43		
	Air Sealing / Envelope MF/CZ12/G-wAC	ENCLOSURE	MF	EG	12	0.29	0.46	0.25		
	Air Sealing / Envelope MH/CZ2/G-noAC	ENCLOSURE	MH	G	2	0.24	0.46	0.20		
	Air Sealing / Envelope MH/CZ12/E-wAC	ENCLOSURE	MH	E	12	0.29	0.46	0.25		
	Attic Insulation SF/CZ14/G-wAC	ENCLOSURE	SF	EG	14	0.50	0.44	0.43		
	Attic Insulation SF/CZ13/G-wAC	ENCLOSURE	SF	EG	13	0.51	0.44	0.43		
	Air Sealing / Envelope MF/CZ12/E-wAC	ENCLOSURE	MF	E	12	0.27	0.44	0.24		
	A/C Tune-up- Central w/CZ2 w/MH	HVAC	MH	E	2	0.53	0.43	0.45		
	Air Sealing / Envelope SF/CZ12/E-wAC	ENCLOSURE	SF	E	12	0.27	0.43	0.23		
	Air Sealing / Envelope MH/CZ11/G-noAC	ENCLOSURE	MH	G	11	0.22	0.43	0.18		
	A/C Tune-up- Central w/CZ2 w/SF	HVAC	SF	E	2	0.51	0.42	0.44		
	Air Sealing / Envelope MH/CZ16/G-noAC	ENCLOSURE	MH	G	16	0.21	0.41	0.18		
	Air Sealing / Envelope SF/CZ2/G-noAC	ENCLOSURE	SF	G	2	0.21	0.41	0.18		
	Attic Insulation SF/CZ16/G-wAC	ENCLOSURE	SF	EG	16	0.47	0.41	0.40		
	Air Sealing / Envelope MH/CZ5/G-noAC	ENCLOSURE	MH	G	5	0.20	0.41	0.17		
	Air Sealing / Envelope MH/CZ6/G-noAC	ENCLOSURE	MH	G	6	0.20	0.41	0.17		

Energy Savings Assistance Program Cost-Effectiveness - Weather Sensitive Measures
Pacific Gas and Electric Company

	Measure	Measure Group	Type of Home	Electric or Gas	Climate Zone	Ratio of Benefits Over Costs*			Add Back *A	Add Back *B
						Utility Cost Test	Modified Participant Test	Total Resource Cost Test		
	Air Sealing / Envelope SF/CZ11/G-noAC	ENCLOSURE	SF	G	11	0.21	0.40	0.17		
	Air Sealing / Envelope SF/CZ3/G-noAC	ENCLOSURE	SF	G	3	0.20	0.38	0.16		
	Air Sealing / Envelope MH/CZ12/G-noAC	ENCLOSURE	MH	G	12	0.20	0.38	0.16		
	Air Sealing / Envelope SF/CZ16/G-noAC	ENCLOSURE	SF	G	16	0.20	0.38	0.16		
	Attic Insulation SF/CZ11/G-wAC	ENCLOSURE	SF	EG	11	0.45	0.38	0.38		
	Air Sealing / Envelope MH/CZ4/G-noAC	ENCLOSURE	MH	G	4	0.20	0.38	0.16		
	Air Sealing / Envelope SF/CZ5/G-noAC	ENCLOSURE	SF	G	5	0.19	0.37	0.15		
	Air Sealing / Envelope SF/CZ6/G-noAC	ENCLOSURE	SF	G	6	0.19	0.37	0.15		
New	AC TIME DELAY MF/CZ2	HVAC	MF	E	2	0.46	0.36	0.40		
	Attic Insulation MF/CZ14/G-wAC	ENCLOSURE	MF	EG	14	0.43	0.36	0.37		
	Attic Insulation MF/CZ13/G-wAC	ENCLOSURE	MF	EG	13	0.44	0.36	0.37		
	A/C Tune-up- Central w/CZ4 w/MF	HVAC	MF	E	4	0.44	0.36	0.38		
	Air Sealing / Envelope SF/CZ12/G-noAC	ENCLOSURE	SF	G	12	0.18	0.34	0.15		
	Air Sealing / Envelope MH/CZ14/G-noAC	ENCLOSURE	MH	G	14	0.17	0.34	0.15		
	Air Sealing / Envelope MH/CZ13/G-noAC	ENCLOSURE	MH	G	13	0.18	0.34	0.15		
	Air Sealing / Envelope SF/CZ4/G-noAC	ENCLOSURE	SF	G	4	0.18	0.34	0.15		
	Attic Insulation SF/CZ13/E-wAC	ENCLOSURE	SF	E	13	0.39	0.31	0.33		
	Attic Insulation SF/CZ14/E-wAC	ENCLOSURE	SF	E	14	0.39	0.31	0.33		
	Attic Insulation SF/CZ12/G-wAC	ENCLOSURE	SF	EG	12	0.39	0.31	0.33		
	Air Sealing / Envelope SF/CZ13/G-noAC	ENCLOSURE	SF	G	13	0.16	0.31	0.14		
	Air Sealing / Envelope SF/CZ14/G-noAC	ENCLOSURE	SF	G	14	0.16	0.31	0.14		
	Attic Insulation MF/CZ13/E-wAC	ENCLOSURE	MF	E	13	0.39	0.31	0.33		
	Attic Insulation MF/CZ14/E-wAC	ENCLOSURE	MF	E	14	0.39	0.31	0.33		
	A/C Tune-up- Central w/CZ2 w/MF	HVAC	MF	E	2	0.39	0.30	0.33		
	Attic Insulation SF/CZ1/G-wAC	ENCLOSURE	SF	EG	1	0.30	0.27	0.25		
	Attic Insulation SF/CZ1/G-noAC	ENCLOSURE	SF	G	1	0.31	0.26	0.26		
	Attic Insulation SF/CZ16/E-wAC	ENCLOSURE	SF	E	16	0.32	0.25	0.28		
	Attic Insulation MF/CZ12/G-wAC	ENCLOSURE	MF	EG	12	0.33	0.25	0.28		
	Attic Insulation MF/CZ11/G-wAC	ENCLOSURE	MF	EG	11	0.32	0.25	0.27		
	Attic Insulation SF/CZ2/G-wAC	ENCLOSURE	SF	EG	2	0.29	0.24	0.24		
	Air Sealing / Envelope MF/CZ5/G-wAC	ENCLOSURE	MF	EG	5	0.12	0.22	0.10	X	
	Air Sealing / Envelope MF/CZ6/G-wAC	ENCLOSURE	MF	EG	6	0.12	0.22	0.10	X	
	Air Sealing / Envelope MF/CZ4/G-wAC	ENCLOSURE	MF	EG	4	0.13	0.22	0.11	X	
	Attic Insulation SF/CZ11/E-wAC	ENCLOSURE	SF	E	11	0.29	0.21	0.25		
	Attic Insulation SF/CZ4/G-noAC	ENCLOSURE	SF	G	4	0.24	0.21	0.20	X	
	Attic Insulation SF/CZ5/G-noAC	ENCLOSURE	SF	G	5	0.24	0.21	0.20	X	
	Attic Insulation SF/CZ6/G-noAC	ENCLOSURE	SF	G	6	0.24	0.21	0.20	X	
New	AC TIME DELAY SF/CZ3	HVAC	SF	E	3	0.28	0.20	0.24	X	
	Attic Insulation SF/CZ3/G-wAC	ENCLOSURE	SF	EG	3	0.24	0.20	0.21	X	
	Evap Coolers SF/CZ2	HVAC	SF	E	2	0.27	0.20	0.23		
	Evap Coolers SF/CZ3	HVAC	SF	E	3	0.27	0.20	0.23		
	Evap Coolers SF/CZ4	HVAC	SF	E	4	0.26	0.20	0.22		
	Evap Coolers SF/CZ1	HVAC	SF	E	1	0.25	0.20	0.22		
	Attic Insulation MF/CZ12/E-wAC	ENCLOSURE	MF	E	12	0.27	0.19	0.24		
	Attic Insulation MF/CZ11/E-wAC	ENCLOSURE	MF	E	11	0.26	0.19	0.23		
	Air Sealing / Envelope MF/CZ4/E-wAC	ENCLOSURE	MF	E	4	0.12	0.19	0.10	X	
	Air Sealing / Envelope MF/CZ5/E-wAC	ENCLOSURE	MF	E	5	0.11	0.19	0.09	X	
	Air Sealing / Envelope MF/CZ6/E-wAC	ENCLOSURE	MF	E	6	0.11	0.19	0.09	X	
	Air Sealing / Envelope MF/CZ2/G-wAC	ENCLOSURE	MF	EG	2	0.12	0.19	0.10	X	
	Evap Coolers MH/CZ2	HVAC	MH	E	2	0.26	0.19	0.22		
	Evap Coolers MH/CZ3	HVAC	MH	E	3	0.26	0.19	0.22		
	Evap Coolers MH/CZ4	HVAC	MH	E	4	0.25	0.19	0.21		
	Evap Coolers MH/CZ16	HVAC	MH	E	16	0.25	0.19	0.22		
	Attic Insulation SF/CZ12/E-wAC	ENCLOSURE	SF	E	12	0.25	0.17	0.22		
	Attic Insulation SF/CZ2/G-noAC	ENCLOSURE	SF	G	2	0.21	0.17	0.17	X	
	Air Sealing / Envelope SF/CZ4/E-wAC	ENCLOSURE	SF	E	4	0.10	0.17	0.09	X	
	Air Sealing / Envelope SF/CZ5/E-wAC	ENCLOSURE	SF	E	5	0.09	0.17	0.08	X	
	Air Sealing / Envelope SF/CZ6/E-wAC	ENCLOSURE	SF	E	6	0.09	0.17	0.08	X	
	Attic Insulation SF/CZ11/G-noAC	ENCLOSURE	SF	G	11	0.20	0.16	0.17	X	
	Air Sealing / Envelope MH/CZ5/E-wAC	ENCLOSURE	MH	E	5	0.09	0.16	0.08	X	
	Air Sealing / Envelope MH/CZ6/E-wAC	ENCLOSURE	MH	E	6	0.09	0.16	0.08	X	
	Air Sealing / Envelope MH/CZ4/E-wAC	ENCLOSURE	MH	E	4	0.10	0.16	0.09	X	
	Attic Insulation SF/CZ16/G-noAC	ENCLOSURE	SF	G	16	0.19	0.16	0.16	X	
	Air Sealing / Envelope SF/CZ2/E-wAC	ENCLOSURE	SF	E	2	0.10	0.16	0.09	X	
	Air Sealing / Envelope MH/CZ2/E-wAC	ENCLOSURE	MH	E	2	0.10	0.16	0.09	X	
	Air Sealing / Envelope MF/CZ2/E-wAC	ENCLOSURE	MF	E	2	0.10	0.16	0.09	X	
	Attic Insulation SF/CZ3/G-noAC	ENCLOSURE	SF	G	3	0.19	0.15	0.15	X	
	Attic Insulation MF/CZ4/G-wAC	ENCLOSURE	MF	EG	4	0.19	0.14	0.16	X	
	Attic Insulation MF/CZ5/G-wAC	ENCLOSURE	MF	EG	5	0.17	0.14	0.15	X	
	Attic Insulation SF/CZ12/G-noAC	ENCLOSURE	SF	G	12	0.17	0.14	0.14	X	
	Attic Insulation SF/CZ4/G-noAC	ENCLOSURE	SF	G	4	0.17	0.14	0.14	X	
	Attic Insulation SF/CZ5/G-noAC	ENCLOSURE	SF	G	5	0.16	0.14	0.14	X	
	Attic Insulation SF/CZ14/G-noAC	ENCLOSURE	SF	G	14	0.15	0.13	0.13	X	
	Attic Insulation SF/CZ13/G-noAC	ENCLOSURE	SF	G	13	0.16	0.13	0.13	X	
	Attic Insulation MF/CZ2/G-wAC	ENCLOSURE	MF	EG	2	0.17	0.13	0.14	X	
	Attic Insulation MF/CZ3/G-wAC	ENCLOSURE	MF	EG	3	0.16	0.12	0.14	X	
	Air Sealing / Envelope MF/CZ3/G-wAC	ENCLOSURE	MF	EG	3	0.07	0.12	0.06	X	
	Air Sealing / Envelope SF/CZ3/E-wAC	ENCLOSURE	SF	E	3	0.06	0.09	0.05	X	
	Air Sealing / Envelope MF/CZ3/E-wAC	ENCLOSURE	MF	E	3	0.06	0.09	0.05	X	
	Attic Insulation MF/CZ2/G-noAC	ENCLOSURE	MF	G	2	0.09	0.07	0.07	X	
	Attic Insulation MF/CZ3/G-noAC	ENCLOSURE	MF	G	3	0.08	0.06	0.06	X	
	Attic Insulation MF/CZ12/G-noAC	ENCLOSURE	MF	G	12	0.07	0.05	0.06	X	
	Attic Insulation MF/CZ11/G-noAC	ENCLOSURE	MF	G	11	0.07	0.05	0.06	X	
	Air Sealing / Envelope MH/CZ3/E-wAC	ENCLOSURE	MH	E	3	0.03	0.05	0.03	X	
	Air Sealing / Envelope MF/CZ1/G-wAC	ENCLOSURE	MF	EG	1	0.03	0.05	0.02	X	
	Attic Insulation MF/CZ5/G-noAC	ENCLOSURE	MF	G	5	0.06	0.05	0.05	X	
	Attic Insulation MF/CZ4/G-noAC	ENCLOSURE	MF	G	4	0.06	0.05	0.05	X	
	Attic Insulation MF/CZ13/G-noAC	ENCLOSURE	MF	G	13	0.06	0.05	0.05	X	
	Air Sealing / Envelope MF/CZ1/G-noAC	ENCLOSURE	MF	G	1	0.03	0.05	0.02	X	
	Air Sealing / Envelope MF/CZ16/G-noAC	ENCLOSURE	MF	G	16	0.02	0.03	0.01	X	
	Air Sealing / Envelope MF/CZ2/G-noAC	ENCLOSURE	MF	G	2	0.02	0.03	0.01	X	
	Air Sealing / Envelope MF/CZ11/G-noAC	ENCLOSURE	MF	G	11	0.02	0.03	0.01	X	
	Air Sealing / Envelope MF/CZ3/G-noAC	ENCLOSURE	MF	G	3	0.02	0.03	0.01	X	
	Air Sealing / Envelope MF/CZ5/G-noAC	ENCLOSURE	MF	G	5	0.01	0.03	0.01	X	
	Air Sealing / Envelope MF/CZ6/G-noAC	ENCLOSURE	MF	G	6	0.01	0.03	0.01	X	
	Air Sealing / Envelope MF/CZ12/G-noAC	ENCLOSURE	MF	G	12	0.01	0.03	0.01	X	
	Air Sealing / Envelope MF/CZ4/G-noAC	ENCLOSURE	MF	G	4	0.01	0.02	0.01	X	
	Air Sealing / Envelope MF/CZ14/G-noAC	ENCLOSURE	MF	G	14	0.01	0.02	0.01	X	
	Air Sealing / Envelope MF/CZ13/G-noAC	ENCLOSURE	MF	G	13	0.01	0.02	0.01	X	
	Air Sealing / Envelope MF/CZ1/E-wAC	ENCLOSURE	MF	E	1	0.00	0.00	0.00	X	
	Air Sealing / Envelope MH/CZ1/E-wAC	ENCLOSURE	MH	E	1	0.00	0.00	0.00	X	
	Air Sealing / Envelope SF/CZ1/E-wAC	ENCLOSURE	SF	E	1	0.00	0.00	0.00	X	
	Air Sealing / Envelope MF/CZ1/E-noAC	ENCLOSURE	MF	E	1	0.00	0.00	0.00	X	
	Air Sealing / Envelope MF/CZ11/E-noAC	ENCLOSURE	MF	E	11	0.00	0.00	0.00	X	
	Air Sealing / Envelope MF/CZ12/E-noAC	ENCLOSURE	MF	E	12	0.00	0.00	0.00	X	
	Air Sealing / Envelope MF/CZ13/E-noAC	ENCLOSURE	MF	E	13	0.00	0.00	0.00	X	
	Air Sealing / Envelope MF/CZ14/E-noAC	ENCLOSURE	MF	E	14	0.00	0.00	0.00	X	
	Air Sealing / Envelope MF/CZ16/E-noAC	ENCLOSURE	MF	E	16	0.00	0.00	0.00	X	
	Air Sealing / Envelope MF/CZ2/E-noAC	ENCLOSURE	MF	E	2	0.00	0.00	0.00	X	
	Air Sealing / Envelope MF/CZ3/E-noAC	ENCLOSURE	MF	E	3	0.00	0.00	0.00	X	

Energy Savings Assistance Program Cost-Effectiveness - Weather Sensitive Measures
Pacific Gas and Electric Company

Measure	Measure Group	Type of Home	Electric or Gas	Climate Zone	Ratio of Benefits Over Costs*			Add Back *A	Add Back *B
					Utility Cost Test	Modified Participant Test	Total Resource Cost Test		
Air Sealing / Envelope MF/CZ4/E-noAC	ENCLOSURE	MF	E	4	0.00	0.00	0.00	X	
Air Sealing / Envelope MF/CZ5/E-noAC	ENCLOSURE	MF	E	5	0.00	0.00	0.00	X	
Air Sealing / Envelope MF/CZ6/E-noAC	ENCLOSURE	MF	E	6	0.00	0.00	0.00	X	
Air Sealing / Envelope MH/CZ1/E-noAC	ENCLOSURE	MH	E	1	0.00	0.00	0.00	X	
Air Sealing / Envelope MH/CZ11/E-noAC	ENCLOSURE	MH	E	11	0.00	0.00	0.00	X	
Air Sealing / Envelope MH/CZ12/E-noAC	ENCLOSURE	MH	E	12	0.00	0.00	0.00	X	
Air Sealing / Envelope MH/CZ13/E-noAC	ENCLOSURE	MH	E	13	0.00	0.00	0.00	X	
Air Sealing / Envelope MH/CZ14/E-noAC	ENCLOSURE	MH	E	14	0.00	0.00	0.00	X	
Air Sealing / Envelope MH/CZ16/E-noAC	ENCLOSURE	MH	E	16	0.00	0.00	0.00	X	
Air Sealing / Envelope MH/CZ2/E-noAC	ENCLOSURE	MH	E	2	0.00	0.00	0.00	X	
Air Sealing / Envelope MH/CZ3/E-noAC	ENCLOSURE	MH	E	3	0.00	0.00	0.00	X	
Air Sealing / Envelope MH/CZ4/E-noAC	ENCLOSURE	MH	E	4	0.00	0.00	0.00	X	
Air Sealing / Envelope MH/CZ5/E-noAC	ENCLOSURE	MH	E	5	0.00	0.00	0.00	X	
Air Sealing / Envelope MH/CZ6/E-noAC	ENCLOSURE	MH	E	6	0.00	0.00	0.00	X	
Air Sealing / Envelope SF/CZ1/E-noAC	ENCLOSURE	SF	E	1	0.00	0.00	0.00	X	
Air Sealing / Envelope SF/CZ11/E-noAC	ENCLOSURE	SF	E	11	0.00	0.00	0.00	X	
Air Sealing / Envelope SF/CZ12/E-noAC	ENCLOSURE	SF	E	12	0.00	0.00	0.00	X	
Air Sealing / Envelope SF/CZ13/E-noAC	ENCLOSURE	SF	E	13	0.00	0.00	0.00	X	
Air Sealing / Envelope SF/CZ14/E-noAC	ENCLOSURE	SF	E	14	0.00	0.00	0.00	X	
Air Sealing / Envelope SF/CZ16/E-noAC	ENCLOSURE	SF	E	16	0.00	0.00	0.00	X	
Air Sealing / Envelope SF/CZ2/E-noAC	ENCLOSURE	SF	E	2	0.00	0.00	0.00	X	
Air Sealing / Envelope SF/CZ3/E-noAC	ENCLOSURE	SF	E	3	0.00	0.00	0.00	X	
Air Sealing / Envelope SF/CZ4/E-noAC	ENCLOSURE	SF	E	4	0.00	0.00	0.00	X	
Air Sealing / Envelope SF/CZ5/E-noAC	ENCLOSURE	SF	E	5	0.00	0.00	0.00	X	
Air Sealing / Envelope SF/CZ6/E-noAC	ENCLOSURE	SF	E	6	0.00	0.00	0.00	X	
Furnace Repair	MAINTENANCE	All	E/G	System	0.00	0.00	0.00	X	
Furnace Replacement	MAINTENANCE	All	E/G	System	0.00	0.00	0.00	X	
Duct Testing and Sealing - Electric All/CZ-All		All	E	System	-	-	-		X
Duct Testing and Sealing - Gas All/CZ-All		All	G	System	-	-	-		X
Central A/C Replacement SF/CZ14	HVAC	SF	E	14	-	-	-		X
Room A/C Replacement MF/CZ-All Z13 ONLY	HVAC	MF	E	13	-	-	-		X
Room A/C Replacement MH/CZ-All Z13 ONLY	HVAC	MH	E	13	-	-	-		X
Room A/C Replacement SF/CZ13	HVAC	SF	E	13	-	-	-		X

Notes:
2012 Installations, impacts and budgets are post-Bridge Funding forecasts, for October 1 - December 31, 2012.
Add-back Measures: Measures that did not pass the 0.25 Cost Effectiveness Threshold. Existing measures were required to pass one of the two Low Income Cost Effectiveness Tests (either the Utility Cost Test or the Modified Participant Test). New proposed measures were required to pass both the Utility Cost Test and the Modified Participant Test. The TRC Test is included for informational purposes.
Add Back *A: Add-back measures requested by PG&E and included in PG&E's original budget application.
Add Back *B: Add-back measures ordered through D.12-08-044 that were not included in PG&E's original budget application.

Energy Savings Assistance Program Cost-Effectiveness - Non Weather Sensitive Measures
Pacific Gas and Electric Company

	Measure*	Measure Group	Type of Home	Electric or Gas	Ratio of Benefits Over Costs*			Add Back *A	Add Back *B
					Utility Cost Test	Modified Participant Test	Total Resource Cost Test		
			(SF,MH,MF)	(E,G)					
	Water Heater Pipe Insulation SF/CZ-All/Gas	Domestic Hot Water	SF	G	2.41	35.79	1.95		
	Water Heater Pipe Insulation MH/CZ-All/Gas	Domestic Hot Water	MH	G	2.02	12.83	1.63		
	Faucet Aerator SF/CZ-All/Elec	Domestic Hot Water	SF	E	1.63	6.83	1.32		
	Water Heater Blanket MH/CZ-All/Elec	Domestic Hot Water	MH	E	1.47	5.42	1.19		
	Faucet Aerator MH/CZ-All/Elec	Domestic Hot Water	MF	E	1.47	5.36	1.19		
	Water Heater Pipe Insulation MF/CZ-All/Gas	Domestic Hot Water	MF	G	1.45	5.10	1.18		
	Faucet Aerator SF/CZ-All/Gas	Domestic Hot Water	SF	G	1.23	3.68	1.00		
	Faucet Aerator MH/CZ-All/Gas	Domestic Hot Water	MH	G	1.19	3.44	0.96		
	Faucet Aerator MF/CZ-All/Gas	Domestic Hot Water	MF	G	1.19	3.44	0.96		
New	Faucet Aerator MF/CZ-All/Elec	Domestic Hot Water	MF	E				X	
New	Low Flow Shower Head SF/CZ-All/Elec	Domestic Hot Water	SF	E	1.07	2.97	0.87		
New	Microwave-replacing gas oven MF/CZAll	Appliances	MF	G	1.10	2.77	0.89		
New	Microwave-replacing gas oven SF/CZAll	Appliances	SF	G	1.10	2.77	0.89		
	Microwave-replacing gas oven MH/CZAll	Appliances	MH	G	1.10	2.77	0.89		
New	Water Heater Blanket SF/CZ-All/Elec	Domestic Hot Water	SF	E	0.98	2.59	0.80		
	Low Flow Shower Head MH/CZ-All/Elec	Domestic Hot Water	MH	E	0.97	2.54	0.78		
New	Torchiere - 55 W (D03-842 RES00AVTor55) w/CZ w/SF	Lighting	All	E	1.27	2.04	1.03		
New	Microwave-replacing electric oven SF/CZAll	Appliances	SF	E	1.25	1.95	1.03		
New	Microwave-replacing electric oven MH/CZAll	Appliances	MH	E	1.25	1.95	1.03		
New	Microwave-replacing electric oven MF/CZAll	Appliances	MF	E	1.25	1.95	1.03		
	Low Flow Shower Head MH/CZ-All/Gas	Domestic Hot Water	MH	G	0.80	1.85	0.65		
	Water Heater Pipe Insulation MH/CZ-All/Elec	Domestic Hot Water	MH	E	0.75	1.74	0.61		
	CFL - MF/CZ-All	Lighting	MF	E	1.15	1.72	0.94		
	CFL - MH/CZ-All	Lighting	MH	E	1.05	1.46	0.86		
New	CFL - SF/CZ-All	Lighting	SF	E	1.04	1.43	0.85		
	Low Flow Shower Head SF/CZ-All/Gas	Domestic Hot Water	SF	G	0.65	1.39	0.53		
	Water Heater Pipe Insulation SF/CZ-All/Elec	Domestic Hot Water	SF	E	0.54	1.12	0.43		
	Water Heater Blanket MH/CZ-All/Gas	Domestic Hot Water	MH	G	0.54	1.09	0.44		
	Refrigerator SFCZ-All	Appliances	SF	E	0.83	1.04	0.67		
	Refrigerator MHCZ-All	Appliances	MH	E	0.82	1.03	0.67		
	LIHEAP - Appliance SF/CZ-All	Appliances	SF	E	0.77	0.94	0.62		
	LIHEAP - Appliance MH/CZ-All	Appliances	MH	E	0.77	0.93	0.62		
	Exterior Hard wired CFL fixtures MF/CZ-All	Lighting	MF	E	0.69	0.86	0.56		
	Water Heater Blanket SF/CZ-All/Gas	Domestic Hot Water	SF	G	0.43	0.82	0.34		
	Refrigerator MFCZ-All	Appliances	MF	E	0.69	0.82	0.56		
	Exterior Hard wired CFL fixtures SF/CZ-All	Lighting	SF	E	0.67	0.81	0.54		
	Exterior Hard wired CFL fixtures MH/CZ-All	Lighting	MH	E	0.65	0.78	0.52		
	Interior Hard wired CFL fixtures MF/CZ-All	Lighting	MF	E	0.66	0.75	0.54		
	LIHEAP - Appliance MF/CZ-All	Appliances	MF	E	0.64	0.74	0.52		
	Interior Hard wired CFL fixtures SF/CZ-All	Lighting	SF	E	0.63	0.71	0.51		
	Interior Hard wired CFL fixtures MH/CZ-All	Lighting	MH	E	0.61	0.68	0.50		
	Occupancy Sensor All/CZ-All	Lighting	All	E	0.51	0.53	0.41		
New	Water Heater Blanket MF/CZ-All/Gas	Domestic Hot Water	MF	G	0.17	0.29	0.13	X	
	Low Flow Shower Head MF/CZ-All/Gas	Domestic Hot Water	MF	G	0.14	0.24	0.11	X	
New	Faucet Aerator MF/CZ-All/Elec	Domestic Hot Water	MF	E	0.00	0.00	0.00	X	
	Low Flow Shower Head MF/CZ-All/Elec	Domestic Hot Water	MF	E	0.00	0.00	0.00	X	
	Water Heater Blanket MF/CZ-All/Elec	Domestic Hot Water	MF	E	0.00	0.00	0.00	X	
	Water Heater Pipe Insulation MF/CZ-All/Elec	Domestic Hot Water	MF	E	0.00	0.00	0.00	X	
	Water Heater R&R***	Domestic Hot Water	ALL	E/G	0.00	0.00	0.00	X	
New	Smart Power Strips	Miscellaneous	ALL	E	0.66	0.72	0.55		

Notes:

2012 Installations, impacts and budgets are post-Bridge Funding forecasts, for October 1 - December 31, 2012.

Add-back Measures: Measures that did not pass the 0.25 Cost Effectiveness Threshold. Existing measures were required to pass one of the two Low Income Cost Effectiveness Tests (either the Utility Cost Test or the Modified Participant Test). New proposed measures were required to pass both the Utility Cost Test and the Modified Participant Test. The TRC Test is included for informational purposes.

Add Back *A: Add-back measures requested by PG&E and included in PG&E's original budget application.

Add Back *B: Add-back measures ordered through D.12-08-044 that were not included in PG&E's original budget application.

*** Water heater R&R added back in owner occupied homes, consistent with D0811031

(End of Attachment H)

Attachment I

Approved Measures - SCE

Energy Savings Assistance Program Cost-Effectiveness - Weather Sensitive Measures

Southern California Edison

					Ratio of Benefits Over Costs				
Measure	**Measure Group**	**Type of Home** (SF, MH, MF)	**Electric or Gas** (E,G)	**Climate Zone** (Number)	**Utility Cost Test**	**Modified Participant Test**	**Total Resource Cost Test**	**Add Back *A**	**Add Back *B**
Envelope and Air Sealing	Enclosure	SF	E	6	0.02	0.02	0.02	X	
Envelope and Air Sealing	Enclosure	SF	E	8	0.02	0.02	0.02	X	
Envelope and Air Sealing	Enclosure	SF	E	9	0.13	0.13	0.12	X	
Envelope and Air Sealing	Enclosure	SF	E	10	0.05	0.04	0.04	X	
Envelope and Air Sealing	Enclosure	SF	E	13	0.16	0.16	0.14	X	
Envelope and Air Sealing	Enclosure	SF	E	14	0.04	0.04	0.03	X	
Envelope and Air Sealing	Enclosure	SF	E	15	0.41	0.40	0.33	X	
Envelope and Air Sealing	Enclosure	SF	E	16	0.00	0.00	0.00	X	
Envelope and Air Sealing	Enclosure	MF	E	6	0.02	0.02	0.01	X	
Envelope and Air Sealing	Enclosure	MF	E	8	0.02	0.02	0.02	X	
Envelope and Air Sealing	Enclosure	MF	E	9	0.05	0.05	0.04	X	
Envelope and Air Sealing	Enclosure	MF	E	10	0.04	0.04	0.04	X	
Envelope and Air Sealing	Enclosure	MF	E	13	0.15	0.15	0.14	X	
Envelope and Air Sealing	Enclosure	MF	E	14	0.05	0.05	0.05	X	
Envelope and Air Sealing	Enclosure	MF	E	15	0.05	0.05	0.04	X	
Envelope and Air Sealing	Enclosure	MF	E	16	-	-	-	X	
Envelope and Air Sealing	Enclosure	MH	E	6	0.02	0.02	0.02	X	
Envelope and Air Sealing	Enclosure	MH	E	8	0.25	0.25	0.22		
Envelope and Air Sealing	Enclosure	MH	E	9	0.18	0.18	0.16	X	
Envelope and Air Sealing	Enclosure	MH	E	10	0.18	0.18	0.16	X	
Envelope and Air Sealing	Enclosure	MH	E	13	0.33	0.32	0.27		
Envelope and Air Sealing	Enclosure	MH	E	14	0.16	0.16	0.15	X	
Envelope and Air Sealing	Enclosure	MH	E	15	0.18	0.18	0.16	X	
Envelope and Air Sealing	Enclosure	MH	E	16	0.11	0.11	0.10	X	
Room Air Conditioner	HVAC	SF	E	10	0.11	0.08	0.10	X	
Room Air Conditioner	HVAC	SF	E	13	0.09	0.07	0.09	X	
Room Air Conditioner	HVAC	SF	E	14	0.12	0.08	0.11	X	
Room Air Conditioner	HVAC	SF	E	15	0.24	0.18	0.21	X	
Room Air Conditioner	HVAC	MF	E	10	0.05	0.03	0.04	X	
Room Air Conditioner	HVAC	MF	E	13	0.06	0.04	0.06	X	
Room Air Conditioner	HVAC	MF	E	14	0.08	0.06	0.08	X	
Room Air Conditioner	HVAC	MF	E	15	0.17	0.12	0.15	X	
Room Air Conditioner	HVAC	MH	E	10	0.13	0.09	0.11	X	
Room Air Conditioner	HVAC	MH	E	13	0.18	0.13	0.16	X	
Room Air Conditioner	HVAC	MH	E	14	0.24	0.17	0.21	X	
Room Air Conditioner	HVAC	MH	E	15	0.49	0.36	0.39	X	
Central Air Conditioner	HVAC	SF	E	14	0.03	0.02	0.03	X	
Central Air Conditioner	HVAC	SF	E	15	0.06	0.05	0.06	X	
Central Air Conditioner	HVAC	MF	E	14	0.19	0.13	0.16	X	
Central Air Conditioner	HVAC	MF	E	15	0.35	0.25	0.28		
Central Air Conditioner	HVAC	MH	E	14	0.28	0.20	0.24		
Central Air Conditioner	HVAC	MH	E	15	0.37	0.27	0.30		
Heat Pump	HVAC	SF	E	14	0.26	0.24	0.21		
Heat Pump	HVAC	SF	E	15	0.21	0.18	0.17	X	
Heat Pump	HVAC	MF	E	14	0.27	0.26	0.22		
Heat Pump	HVAC	MF	E	15	0.23	0.21	0.19	X	
Heat Pump	HVAC	MH	E	14	0.39	0.34	0.31		
Heat Pump	HVAC	MH	E	15	0.38	0.33	0.30		
Evaporative Cooler	HVAC	SF	E	10	0.83	0.64	0.58		
Evaporative Cooler	HVAC	SF	E	13	0.86	0.66	0.60		
Evaporative Cooler	HVAC	SF	E	14	0.86	0.69	0.59		
Evaporative Cooler	HVAC	SF	E	15	2.63	1.46	1.19		
Evaporative Cooler	HVAC	SF	E	16	0.44	0.33	0.35		
Evaporative Cooler	HVAC	MH	E	10	0.82	0.60	0.58		
Evaporative Cooler	HVAC	MH	E	13	0.81	0.60	0.57		
Evaporative Cooler	HVAC	MH	E	14	0.82	0.66	0.57		
Evaporative Cooler	HVAC	MH	E	15	2.79	1.34	1.23		
Evaporative Cooler	HVAC	MH	E	16	0.61	0.42	0.46		
Central AC Service Maintenance Measure									X
Evaporative Coolers Maintenance									X

AddBack *A: Add-back measures requested by SCE and included in SCE's original budget application.

Add Back *B: Add-back measures ordered through D.12-08-044 that were not included in SCE's original budget application.

Energy Savings Assistance Program Cost-Effectiveness - Non Weather Sensitive Measures
Southern California Edison

Measure	Measure Group	Type of Home	Electric or Gas	Ratio of Benefits Over Costs			Add Back *A	Add Back *B
		(SF,MH,MF)	(E,G)	Utility Cost Test	Modified Participant Test	Total Resource Cost Test		
Refrigerators	Appliances	SF	E	1.07	1.16	0.67		
Refrigerators	Appliances	MF	E	0.84	0.91	0.56		
Refrigerators	Appliances	MH	E	1.06	1.16	0.66		
Domestic Hot Water Conservation	Domestic Hot Water	All	E	0.94	1.04	0.75		
Compact Fluorescent Lamps	Lighting	SF	E	0.44	0.42	0.97		
Compact Fluorescent Lamps	Lighting	MF	E	0.46	0.43	0.98		
Compact Fluorescent Lamps	Lighting	MH	E	0.47	0.44	0.99		
Hard Wired CFL Fixtures	Lighting	SF	E	0.72	0.13	0.65		
Hard Wired CFL Fixtures	Lighting	MF	E	0.84	0.87	0.65		
Hard Wired CFL Fixtures	Lighting	MH	E	0.84	0.87	0.65		
Torchieres	Lighting	SF	E	3.51	3.65	1.48		
Torchieres	Lighting	MF	E	3.51	3.65	1.48		
Torchieres	Lighting	MH	E	3.51	3.65	1.48		
Pool Pumps - Variable Speed	Miscellaneous	SF	E	1.32	1.19	0.78		
Smart Power Strips	Miscellaneous	All	E	0.41	0.45	0.49		

AddBack *A: Add-back measures requested by SCE and included in SCE's original budget application.
Add Back *B: Add-back measures ordered through D.12-08-044 that were not included in SCE's original budget application.

(End of Attachment I)

Attachment J

Approved Measures - SDG&E

Energy Savings Assistance Program Cost-Effectiveness - Weather Sensitive Measures
San Diego Gas & Electric Company

Measure	Measure Group	Type of Home	Electric or Gas	Climate Zone	Ratio of Benefits Over Costs				
					Utility Cost Test	Modified Participant Test	Total Resource Cost Test	Add Back *A	Add Back *B
		(SF, MH, MF)	(E,G)	(Number)					
AC Tuneup	Maintenance	MF	E	6	0.80	1.42	0.75		
AC Tuneup	Maintenance	MF	E	7	0.77	1.30	0.72		
AC Tuneup	Maintenance	MF	E	8	0.94	1.85	0.88		
AC Tuneup	Maintenance	MF	E	10	1.03	2.17	0.96		
AC Tuneup	Maintenance	MF	E	14	1.00	2.07	0.93		
AC Tuneup	Maintenance	MF	E	15	1.00	2.07	0.93		
AC Tuneup	Maintenance	MH	E	6	0.80	1.42	0.75		
AC Tuneup	Maintenance	MH	E	7	0.77	1.30	0.72		
AC Tuneup	Maintenance	MH	E	8	0.94	1.85	0.88		
AC Tuneup	Maintenance	MH	E	10	1.03	2.17	0.96		
AC Tuneup	Maintenance	MH	E	14	1.00	2.07	0.93		
AC Tuneup	Maintenance	MH	E	15	1.00	2.07	0.93		
AC Tuneup	Maintenance	SF	E	6	0.77	1.33	0.72		
AC Tuneup	Maintenance	SF	E	7	0.74	1.24	0.69		
AC Tuneup	Maintenance	SF	E	8	0.99	2.05	0.93		
AC Tuneup	Maintenance	SF	E	10	1.07	2.35	1.00		
AC Tuneup	Maintenance	SF	E	14	1.04	2.22	0.97		
AC Tuneup	Maintenance	SF	E	15	1.04	2.22	0.97		
Air sealing	Enclosure	MF	E	6	0.06	0.48	0.06		
Air sealing	Enclosure	MF	E	7	0.09	0.70	0.08		
Air sealing	Enclosure	MF	E	8	0.09	0.70	0.08		
Air sealing	Enclosure	MF	E	10	0.11	0.81	0.10		
Air sealing	Enclosure	MF	E	14	0.12	0.93	0.11		
Air sealing	Enclosure	MF	E	15	0.10	0.76	0.09		
Air sealing	Enclosure	MH	E	6	0.06	0.48	0.06		
Air sealing	Enclosure	MH	E	7	0.08	0.64	0.08		
Air sealing	Enclosure	MH	E	8	0.09	0.70	0.08		
Air sealing	Enclosure	MH	E	10	0.11	0.82	0.10		
Air sealing	Enclosure	MH	E	14	0.10	0.76	0.09		
Air sealing	Enclosure	MH	E	15	0.07	0.51	0.06		
Air sealing	Enclosure	SF	E	6	0.11	0.82	0.10		
Air sealing	Enclosure	SF	E	7	0.09	0.66	0.08		
Air sealing	Enclosure	SF	E	8	0.09	0.70	0.08		
Air sealing	Enclosure	SF	E	10	0.10	0.79	0.09		
Air sealing	Enclosure	SF	E	14	0.10	0.78	0.09		
Air sealing	Enclosure	SF	E	15	0.09	0.65	0.08		
Air sealing	Enclosure	MH	G	7	0.13	1.12	0.11		
Air sealing	Enclosure	MH	G	10	0.14	1.21	0.12		
Air sealing	Enclosure	MH	G	14	0.13	1.18	0.12		
Air sealing	Enclosure	MH	G	15	0.15	1.31	0.13		
Air sealing	Enclosure	SF	G	7	0.10	0.87	0.09		
Air sealing	Enclosure	SF	G	10	0.11	0.99	0.10		
Air sealing	Enclosure	SF	G	14	0.37	1.41	0.35		
Air sealing	Enclosure	SF	G	15	0.34	1.30	0.33		
Attic insulation	Enclosure	MF	E	6	0.12	0.33	0.11		
Attic insulation	Enclosure	MF	E	7	0.12	0.32	0.11		
Attic insulation	Enclosure	MF	E	8	0.12	0.33	0.11		
Attic insulation	Enclosure	MF	E	10	0.12	0.33	0.11		
Attic insulation	Enclosure	MF	E	14	0.12	0.33	0.11		
Attic insulation	Enclosure	MF	E	15	0.12	0.33	0.11		
Attic insulation	Enclosure	SF	E	6	0.14	0.37	0.12		
Attic insulation	Enclosure	SF	E	7	0.12	0.32	0.10		
Attic insulation	Enclosure	SF	E	8	0.12	0.33	0.11		
Attic insulation	Enclosure	SF	E	10	0.13	0.35	0.11		
Attic insulation	Enclosure	SF	E	14	0.12	0.33	0.11		
Attic insulation	Enclosure	SF	E	15	0.12	0.33	0.11		
Attic insulation	Enclosure	SF	G	7	0.13	0.37	0.11		
Attic insulation	Enclosure	SF	G	10	0.14	0.42	0.13		
Attic insulation	Enclosure	SF	G	14	0.08	0.39	0.06		
Attic insulation	Enclosure	SF	G	15	0.08	0.39	0.06		
Attic insulation	Enclosure	MF	G	7					X
Attic insulation	Enclosure	MF	G	10					X
Attic insulation	Enclosure	MF	G	14					X
Attic insulation	Enclosure	MF	G	15					X
Furnace Clean and Tune	Maintenance	MF	G	7	0.58	2.30	0.40		
Furnace Clean and Tune	Maintenance	MF	G	10	0.58	2.30	0.40		
Furnace Clean and Tune	Maintenance	MF	G	14	1.08	4.76	0.75		
Furnace Clean and Tune	Maintenance	MF	G	15	1.08	4.76	0.75		
Furnace Clean and Tune	Maintenance	MH	G	7	0.58	2.30	0.40		
Furnace Clean and Tune	Maintenance	MH	G	10	0.73	2.98	0.51		
Furnace Clean and Tune	Maintenance	MH	G	14	1.08	4.76	0.75		
Furnace Clean and Tune	Maintenance	MH	G	15	0.58	2.30	0.40		
Furnace Clean and Tune	Maintenance	SF	G	7	0.58	2.30	0.40		
Furnace Clean and Tune	Maintenance	SF	G	10	0.46	1.81	0.32		
Furnace Clean and Tune	Maintenance	SF	G	14	0.58	2.30	0.40		
Furnace Clean and Tune	Maintenance	SF	G	15	0.27	1.02	0.19		
Furnace Repair/Replacement	HVAC	MF	G	7	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MF	G	10	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MF	G	14	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MF	G	15	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MH	G	7	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MH	G	10	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MH	G	14	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MH	G	15	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	SF	G	7	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	SF	G	10	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	SF	G	14	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	SF	G	15	0.00	0.00	0.00	X	
Room AC	HVAC	MF	E	10	0.00	0.00	0.00	X	
Room AC	HVAC	MH	E	10	0.00	0.00	0.00	X	
Room AC	HVAC	SF	E	10	0.14	0.17	0.13	X	
Duct Test and Seal	HVAC	SF	G	7					X

Energy Savings Assistance Program Cost-Effectiveness - Weather Sensitive Measures
San Diego Gas & Electric Company

Measure	Measure Group	Type of Home	Electric or Gas	Climate Zone	Ratio of Benefits Over Costs				
					Utility Cost Test	Modified Participant Test	Total Resource Cost Test	Add Back *A	Add Back *B
Duct Test and Seal	HVAC	SF	G	10					X
Duct Test and Seal	HVAC	SF	G	14					X
Duct Test and Seal	HVAC	SF	G	15					X
Duct Test and Seal	HVAC	MH	G	7					X
Duct Test and Seal	HVAC	MH	G	10					X
Duct Test and Seal	HVAC	MH	G	14					X
Duct Test and Seal	HVAC	MH	G	15					X
Duct Test and Seal	HVAC	SF	E	7					X
Duct Test and Seal	HVAC	SF	E	8					X
Duct Test and Seal	HVAC	SF	E	10					X
Duct Test and Seal	HVAC	SF	E	14					X
Duct Test and Seal	HVAC	SF	E	15					X
Duct Test and Seal	HVAC	MH	E	7					X
Duct Test and Seal	HVAC	MH	E	8					X
Duct Test and Seal	HVAC	MH	E	10					X
Duct Test and Seal	HVAC	MH	E	14					X
Duct Test and Seal	HVAC	MH	E	15					X

*** Furnace R&R added back in owner occupied homes, consistent with D0811031
Add Back *A: Add-back measures requested by SDG&E and included in SDG&E's original budget application.
Add Back *B: Add-back measures ordered through D.12-08-044 that were not included in SDG&E's original budget application.

Energy Savings Assistance Program Cost-Effectiveness - Non Weather Sensitive Measures
San Diego Gas & Electric Company

Measure	Measure Group	Type of Home	Electric or Gas	Ratio of Benefits Over Costs			Add Back *A	Add Back *B
		(SF,MH,MF)	(E,G)	Utility Cost Test	Modified Participant Test	Total Resource Cost Test		
CFL Lighting	Lighting	All	E	0.94	1.20	0.79		
Faucet Aerators	Domestic Hot Water	MH	E	0.73	3.66	0.62		
Faucet Aerators	Domestic Hot Water	SF	E	0.76	3.78	0.64		
Faucet Aerators	Domestic Hot Water	MF	G	0.11	0.46	0.10		
Faucet Aerators	Domestic Hot Water	MH	G	0.60	2.61	0.52		
Faucet Aerators	Domestic Hot Water	SF	G	0.84	2.75	0.79		
HE Clothes Washers	Appliance	All	E	0.65	3.27	0.54		
HE Clothes Washers	Appliance	All	G	0.40	1.75	0.35		
Interior Hardwire CFL Fixtures	Lighting	MF	E	0.57	0.77	0.46		
Interior Hardwire CFL Fixtures	Lighting	MH	E	0.46	0.63	0.38		
Interior Hardwire CFL Fixtures	Lighting	SF	E	0.52	0.71	0.43		
LED Night Light	Lighting	All	E	1.05	1.28	0.92		
Low Flow Showerhead	Domestic Hot Water	MH	E	0.63	2.91	0.54		
Low Flow Showerhead	Domestic Hot Water	SF	E	0.68	3.00	0.60		
Low Flow Showerhead	Domestic Hot Water	MF	G	0.11	0.32	0.10		
Low Flow Showerhead	Domestic Hot Water	MH	G	0.56	1.97	0.50		
Low Flow Showerhead	Domestic Hot Water	SF	G	0.46	2.06	0.40		
Microwave	Appliance	All	E	1.33	1.68	1.10		
Exterior Hardwire CFL Fixtures	Lighting	SF	E	0.61	0.92	0.46		
Refrigerator	Appliance	MF	E	0.45	0.66	0.36		
Refrigerator	Appliance	MH	E	0.53	0.77	0.42		
Refrigerator	Appliance	SF	E	0.53	0.77	0.42		
Smart Strip	Miscellaneous	All	E	0.95	1.25	0.77		
FAU Standing Pilot Light Conversion	HVAC	All	G	0.78	0.89	0.67		
Thermostatic Shower Valve	Domestic Hot Water	All	E	1.24	1.57	1.09		
Thermostatic Shower Valve	Domestic Hot Water	All	G	0.87	0.91	0.78		
Torchiere Lamp	Lighting	All	E	0.91	1.06	0.81		
Water Heater Repair/Replacement	Domestic Hot Water	All	G	0.00	0.00	0.00	X	
Water Heater Blanket	Domestic Hot Water	MH	E	0.57	0.54	0.52		
Water Heater Blanket	Domestic Hot Water	SF	E	0.41	0.36	0.37		
Water Heater Blanket	Domestic Hot Water	MH	G	0.47	0.34	0.43		
Water Heater Blanket	Domestic Hot Water	SF	G	0.33	0.22	0.30		
Water Heater Pipe Insulation	Domestic Hot Water	MH	E	1.08	1.41	0.86		
Water Heater Pipe Insulation	Domestic Hot Water	SF	E	1.27	1.61	1.01		
Water Heater Pipe Insulation	Domestic Hot Water	MF	G	0.55	0.69	0.45		
Water Heater Pipe Insulation	Domestic Hot Water	MH	G	0.88	1.11	0.73		
Water Heater Pipe Insulation	Domestic Hot Water	SF	G	1.20	1.49	0.98		

Add Back *A: Add-back measures requested by SDG&E and included in SDG&E's original budget application.
Add Back *B: Add-back measures ordered through D.12-08-044 that were not included in SDG&E's original budget application.

(End of Attachment J)

Attachment K

Approved Measures - SoCalGas

Attachment K.1

Energy Savings Assistance Program Cost-Effectiveness - Weather Sensitive Measures
Southern California Gas Company

Measure*	Measure Group	Type of Home	Electric or Gas	Climate Zone**	Ratio of Benefits Over Costs***			Add Back *A	Add Back *B
					Utility Cost Test	Modified Participant Test	Total Resource Cost Test		
		(SF, MH, MF)	(E,G)	(Number)					
Envelope and Air Sealing	Enclosure	MF	G	4	0.03	0.23	0.02	X	
Envelope and Air Sealing	Enclosure	MF	G	5	0.03	0.22	0.02	X	
Envelope and Air Sealing	Enclosure	MF	G	6	0.02	0.13	0.01	X	
Envelope and Air Sealing	Enclosure	MF	G	7	0.02	0.16	0.02	X	
Envelope and Air Sealing	Enclosure	MF	G	8	0.02	0.13	0.01	X	
Envelope and Air Sealing	Enclosure	MF	G	9	0.02	0.13	0.01	X	
Envelope and Air Sealing	Enclosure	MF	G	10	0.02	0.14	0.01	X	
Envelope and Air Sealing	Enclosure	MF	G	13	0.03	0.23	0.02	X	
Envelope and Air Sealing	Enclosure	MF	G	14	0.03	0.23	0.02	X	
Envelope and Air Sealing	Enclosure	MF	G	15	0.02	0.13	0.01	X	
Envelope and Air Sealing	Enclosure	MF	G	16	0.02	0.16	0.02	X	
Envelope and Air Sealing	Enclosure	MH	G	4	0.32	2.28	0.23		
Envelope and Air Sealing	Enclosure	MH	G	5	0.32	2.28	0.23		
Envelope and Air Sealing	Enclosure	MH	G	6	0.26	1.82	0.19		
Envelope and Air Sealing	Enclosure	MH	G	7	0.28	1.98	0.20		
Envelope and Air Sealing	Enclosure	MH	G	8	0.22	1.56	0.16		
Envelope and Air Sealing	Enclosure	MH	G	9	0.22	1.58	0.16		
Envelope and Air Sealing	Enclosure	MH	G	10	0.26	1.82	0.19		
Envelope and Air Sealing	Enclosure	MH	G	13	0.31	2.18	0.22		
Envelope and Air Sealing	Enclosure	MH	G	14	0.35	2.52	0.26		
Envelope and Air Sealing	Enclosure	MH	G	15	0.23	1.61	0.17		
Envelope and Air Sealing	Enclosure	MH	G	16	0.36	2.54	0.26		
Envelope and Air Sealing	Enclosure	SF	G	4	0.16	1.15	0.12		
Envelope and Air Sealing	Enclosure	SF	G	5	0.19	1.31	0.14		
Envelope and Air Sealing	Enclosure	SF	G	6	0.12	0.86	0.09		
Envelope and Air Sealing	Enclosure	SF	G	7	0.12	0.81	0.08		
Envelope and Air Sealing	Enclosure	SF	G	8	0.12	0.83	0.09		
Envelope and Air Sealing	Enclosure	SF	G	9	0.12	0.83	0.09		
Envelope and Air Sealing	Enclosure	SF	G	10	0.13	0.94	0.10		
Envelope and Air Sealing	Enclosure	SF	G	13	0.18	1.30	0.13		
Envelope and Air Sealing	Enclosure	SF	G	14	0.21	1.48	0.15		
Envelope and Air Sealing	Enclosure	SF	G	15	0.12	0.86	0.09		
Envelope and Air Sealing	Enclosure	SF	G	16	0.15	1.08	0.11		
Attic insulation	Enclosure	SF	G	5	0.18	0.33	0.13		
Attic insulation	Enclosure	SF	G	13	0.19	0.35	0.13		
Attic insulation	Enclosure	SF	G	14	0.20	0.36	0.14		
Attic insulation	Enclosure	MF	G	10					X
Attic insulation	Enclosure	MF	G	15					X
Attic insulation	Enclosure	MF	G	16					X
Attic insulation	Enclosure	MF	G	4					X
Attic insulation	Enclosure	MF	G	6					X
Attic insulation	Enclosure	MF	G	7					X
Attic insulation	Enclosure	MF	G	8					X
Attic insulation	Enclosure	MF	G	9					X
Attic insulation	Enclosure	SF	G	10					X
Attic insulation	Enclosure	SF	G	15					X
Attic insulation	Enclosure	SF	G	16					X
Attic insulation	Enclosure	SF	G	4					X
Attic insulation	Enclosure	SF	G	6					X
Attic insulation	Enclosure	SF	G	7					X
Attic insulation	Enclosure	SF	G	8					X
Attic insulation	Enclosure	SF	G	9					X
Duct Test and Seal	HVAC	MH	G	4					X
Duct Test and Seal	HVAC	MH	G	5					X
Duct Test and Seal	HVAC	MH	G	6					X
Duct Test and Seal	HVAC	MH	G	7					X
Duct Test and Seal	HVAC	MH	G	8					X
Duct Test and Seal	HVAC	MH	G	9					X
Duct Test and Seal	HVAC	MH	G	10					X
Duct Test and Seal	HVAC	MH	G	13					X
Duct Test and Seal	HVAC	MH	G	14					X
Duct Test and Seal	HVAC	MH	G	15					X
Duct Test and Seal	HVAC	MH	G	16					X
Duct Test and Seal	HVAC	SF	G	4					X
Duct Test and Seal	HVAC	SF	G	5					X
Duct Test and Seal	HVAC	SF	G	6					X
Duct Test and Seal	HVAC	SF	G	7					X
Duct Test and Seal	HVAC	SF	G	8					X
Duct Test and Seal	HVAC	SF	G	9					X
Duct Test and Seal	HVAC	SF	G	10					X
Duct Test and Seal	HVAC	SF	G	13					X
Duct Test and Seal	HVAC	SF	G	14					X
Duct Test and Seal	HVAC	SF	G	15					X
Duct Test and Seal	HVAC	SF	G	16					X
Furnace clean and tune	Maintenance	MF	G	4	0.44	1.58	0.30		
Furnace clean and tune	Maintenance	MF	G	5	0.44	1.58	0.30		
Furnace clean and tune	Maintenance	MF	G	6	0.44	1.58	0.30		
Furnace clean and tune	Maintenance	MF	G	7	0.44	1.58	0.30		
Furnace clean and tune	Maintenance	MF	G	8	0.44	1.58	0.30		
Furnace clean and tune	Maintenance	MF	G	9	0.44	1.58	0.30		
Furnace clean and tune	Maintenance	MF	G	10	0.44	1.58	0.30		
Furnace clean and tune	Maintenance	MF	G	13	0.44	1.58	0.30		
Furnace clean and tune	Maintenance	MF	G	14	0.44	1.58	0.30		
Furnace clean and tune	Maintenance	MF	G	15	0.44	1.58	0.30		
Furnace clean and tune	Maintenance	MF	G	16	0.44	1.58	0.30		
Furnace clean and tune	Maintenance	MH	G	4	0.43	1.54	0.30		
Furnace clean and tune	Maintenance	MH	G	5	0.43	1.54	0.30		
Furnace clean and tune	Maintenance	MH	G	6	0.43	1.54	0.30		
Furnace clean and tune	Maintenance	MH	G	7	0.43	1.54	0.30		
Furnace clean and tune	Maintenance	MH	G	8	0.43	1.54	0.30		
Furnace clean and tune	Maintenance	MH	G	9	0.43	1.54	0.30		
Furnace clean and tune	Maintenance	MH	G	10	0.51	1.83	0.35		
Furnace clean and tune	Maintenance	MH	G	13	0.43	1.54	0.30		
Furnace clean and tune	Maintenance	MH	G	14	0.43	1.54	0.30		
Furnace clean and tune	Maintenance	MH	G	15	0.43	1.54	0.30		

Attachment K.1

Energy Savings Assistance Program Cost-Effectiveness - Weather Sensitive Measures
Southern California Gas Company

Measure*	Measure Group	Type of Home	Electric or Gas	Climate Zone**	Ratio of Benefits Over Costs***			Add Back *A	Add Back *B
					Utility Cost Test	Modified Participant Test	Total Resource Cost Test		
		(SF, MH, MF)	(E,G)	(Number)					
Furnace clean and tune	Maintenance	MH	G	16	0.43	1.54	0.30		
Furnace clean and tune	Maintenance	SF	G	4	0.43	1.51	0.29		
Furnace clean and tune	Maintenance	SF	G	5	0.43	1.51	0.29		
Furnace clean and tune	Maintenance	SF	G	6	0.43	1.51	0.29		
Furnace clean and tune	Maintenance	SF	G	7	0.43	1.51	0.29		
Furnace clean and tune	Maintenance	SF	G	8	0.31	1.07	0.21		
Furnace clean and tune	Maintenance	SF	G	9	0.28	0.96	0.19		
Furnace clean and tune	Maintenance	SF	G	10	0.36	1.27	0.25		
Furnace clean and tune	Maintenance	SF	G	13	0.43	1.51	0.29		
Furnace clean and tune	Maintenance	SF	G	14	0.43	1.51	0.29		
Furnace clean and tune	Maintenance	SF	G	15	0.23	0.80	0.16		
Furnace clean and tune	Maintenance	SF	G	16	0.43	1.51	0.29		
Furnace Repair/Replacement	HVAC	MF	G	4	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MF	G	5	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MF	G	6	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MF	G	7	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MF	G	8	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MF	G	9	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MF	G	10	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MF	G	13	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MF	G	14	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MF	G	15	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MF	G	16	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MH	G	4	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MH	G	5	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MH	G	6	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MH	G	7	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MH	G	8	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MH	G	9	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MH	G	10	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MH	G	13	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MH	G	14	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MH	G	15	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	MH	G	16	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	SF	G	4	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	SF	G	5	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	SF	G	6	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	SF	G	7	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	SF	G	8	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	SF	G	9	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	SF	G	10	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	SF	G	13	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	SF	G	14	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	SF	G	15	0.00	0.00	0.00	X	
Furnace Repair/Replacement	HVAC	SF	G	16	0.00	0.00	0.00	X	

*** Furnace R&R added back in owner occupied homes, consistent with D0811031

Add Back *A: Add-back measures requested by SCG and included in SCG's original budget application.
Add Back *B: Add-back measures ordered through D.12-08-044 that were not included in SCG's original budget application.

Energy Savings Assistance Program Cost-Effectiveness - Non Weather Sensitive Measures
Southern California Gas Company

Measure*	Measure Group	Type of Home	Electric or Gas	Ratio of Benefits Over Costs***			Add Back *A	Add Back *B
		(SF,MH,MF)	(E,G)	Utility Cost Test	Modified Participant Test	Total Resource Cost Test		
FAU standing pilot light conversion	HVAC	All	G	0.63	0.71	0.43		
Faucet Aerator	Domestic Hot Water	MH	G	0.36	0.62	0.24		
Faucet Aerator	Domestic Hot Water	SF	G	0.42	0.73	0.28		
Faucet Aerator	Domestic Hot Water	MF	G					X
HE Clothes washer	Appliance	All	G	0.38	0.65	0.26		
Low Flow Shower Head	Domestic Hot Water	MF	G	0.20	0.38	0.14		
Low Flow Shower Head	Domestic Hot Water	MH	G	0.47	0.86	0.33		
Low Flow Shower Head	Domestic Hot Water	SF	G	0.56	1.02	0.40		
Thermostatic Shower Valve	Domestic Hot Water	All	G	0.67	0.81	0.47		
Water Heater Blanket	Domestic Hot Water	MH	G	0.28	0.34	0.20		
Water Heater Blanket	Domestic Hot Water	SF	G	0.33	0.41	0.24		
Water Heater Blanket	Domestic Hot Water	MF	G					X
Water Heater Pipe Insulation	Domestic Hot Water	MH	G	0.22	0.27	0.15		
Water Heater Pipe Insulation	Domestic Hot Water	SF	G	0.48	0.59	0.34		
Water Heater Pipe insulation	Domestic Hot Water	MF	G					X
Water heater repair and replace	Domestic Hot Water	MF	G	0.00	0.00	0.00	X	
Water heater repair and replace	Domestic Hot Water	MH	G	0.00	0.00	0.00	X	
Water heater repair and replace	Domestic Hot Water	SF	G	0.00	0.00	0.00	X	

*** Water heater R&R added back in owner occupied homes, consistent with D0811031

Add Back *A: Add-back measures requested by SCG and included in SCG's budget application.
Add Back *B: Add-back measures ordered through D.12-08-044 that were not included in SCG's budget application.

(End of Attachment K)

Attachment L

Pilot & Studies Budgets

Attachment L

Utilities	Study/Pilot Name	Budget Requested				Budget Authorized				Difference
		2012	2013	2014	Total Requested	2012	2013	2014	Total Authorized	
Joint Utility	**Energy Education Assessment Study**				**$300,000**				**$300,000**	**$0**
	PG&E Share	$30,000	$30,000	$30,000	$90,000	$30,000	$30,000	$30,000	$90,000	$0
	SCE Share	$30,000	$30,000	$30,000	$90,000	$30,000	$30,000	$30,000	$90,000	$0
	SoCalGas Share	$25,000	$25,000	$25,000	$75,000	$25,000	$25,000	$25,000	$75,000	$0
	SDG&E Share	$15,000	$15,000	$15,000	$45,000	$15,000	$15,000	$15,000	$45,000	$0
	Impact Evaluation of the 2012 ESA Program (Programmatic M&E)				**$600,000**				**$600,000**	**$0**
	PG&E Share	$60,000	$60,000	$60,000	$180,000	$60,000	$60,000	$60,000	$180,000	$0
	SCE Share	$60,000	$60,000	$60,000	$180,000	$60,000	$60,000	$60,000	$180,000	$0
	SoCalGas Share	$50,000	$50,000	$50,000	$150,000	$50,000	$50,000	$50,000	$150,000	$0
	SDG&E Share	$30,000	$30,000	$30,000	$90,000	$30,000	$30,000	$30,000	$90,000	$0
	Needs Assessment				**$0**				**$700,000**	**$700,000**
	PG&E Share	$0	$0	$0	$0	$70,000	$70,000	$70,000	$210,000	$210,000
	SCE Share	$0	$0	$0	$0	$70,000	$70,000	$70,000	$210,000	$210,000
	SoCalGas	$0	$0	$0	$0	$58,333	$58,333	$58,333	$175,000	$175,000
	SDG&E Share	$0	$0	$0	$0	$35,000	$35,000	$35,000	$105,000	$105,000
	CHANGES Pilot*				**$0**				**$2,160,000**	**$2,160,000**
	PG&E Share	$0	$0	$0	$0	$216,000	$216,000	$216,000	$648,000	$648,000
	SCE Share	$0	$0	$0	$0	$216,000	$216,000	$216,000	$648,000	$648,000
	SoCalGas	$0	$0	$0	$0	$180,000	$180,000	$180,000	$540,000	$540,000
	SDG&E Share	$0	$0	$0	$0	$108,000	$108,000	$108,000	$324,000	$324,000
	CHANGES Pilot Evaluation				**$0**				**$80,000**	**$80,000**
	PG&E Share	$0	$0	$0	$0	$24,000	$0	$0	$24,000	$24,000
	SCE Share	$0	$0	$0	$0	$24,000	$0	$0	$24,000	$24,000
	SoCalGas	$0	$0	$0	$0	$20,000	$0	$0	$20,000	$20,000
	SDG&E Share	$0	$0	$0	$0	$12,000	$0	$0	$12,000	$12,000
	Multifamily Study				**$0**				**$400,000**	**$400,000**
	PG&E Share	$0	$0	$0	$0	$40,000	$40,000	$40,000	$120,000	$120,000
	SCE Share	$0	$0	$0	$0	$40,000	$40,000	$40,000	$120,000	$120,000
	SoCalGas	$0	$0	$0	$0	$33,333	$33,333	$33,333	$100,000	$100,000
	SDG&E Share	$0	$0	$0	$0	$20,000	$20,000	$20,000	$60,000	$60,000

*CHANGES Pilot funding updated per D.12-12-011

(End of Attachment L)

Attachment M

CARE Program Authorized Budgets

PROPOSED & AUTHORIZED CARE BUDGETS PY 2012 - 2014

Attachment M

Pacific Gas and Electric (Proposed)

CARE Budget Categories	2011 Authorized	2012 Proposed	2013 Proposed	2014 Proposed	Total Cycle
Outreach	$ 5,900,000	$ 6,651,000	$ 5,818,000	$ 6,001,000	$ 18,470,000
Processing, Certification, Recertification	$ 2,000,000	$ 1,607,000	$ 1,667,000	$ 1,729,000	$ 5,003,000
Post Enrollment Verification (1)	$ -	$ 375,000	$ 388,000	$ 402,000	$ 1,165,000
IT Programming	$ 300,000	$ 751,000	$ 646,000	$ 651,000	$ 2,048,000
Cool Centers (2)	$ 450,000	$ 229,000	$ 236,000	$ 243,000	$ 708,000
Pilots	$ -	$ -	$ -	$ -	$ -
Measurement and Evaluation (3)	$ -	$ 45,000	$ 46,000	$ 48,000	$ 139,000
Regulatory Compliance	$ 115,000	$ 311,000	$ 316,000	$ 342,000	$ 969,000
General Administration	$ 550,000	$ 1,984,000	$ 2,042,000	$ 2,106,000	$ 6,132,000
CPUC Energy Division Staff (4)	$ 206,000	$ 128,000	$ 128,000	$ 128,000	$ 384,000
SUBTOTAL MANAGEMENT COSTS (5)	$ 9,521,000	$ 12,081,000	$ 11,287,000	$ 11,650,000	$ 35,018,000
Subsidies and Benefits (6)	$ 479,707,435	$ 660,220,000	$ 633,029,000	$ 605,950,000	$ 1,899,199,000
TOTAL PROGRAM COSTS & CUSTOMER DISCOUNTS	$ 489,228,435	$ 672,301,000	$ 644,316,000	$ 617,600,000	$ 1,934,217,000

Pacific Gas and Electric (Authorized Phase II

CARE Budget Categories	2012 Authorized	2013 Authorized	2014 Authorized	Total Cycle
Outreach	$ 6,317,667	$ 5,484,667	$ 5,667,667	$ 17,470,000
Processing, Certification, Recertification	$ 3,607,000	$ 3,667,000	$ 3,729,000	$ 11,003,000
Post Enrollment Verification (1)	$ 1,920,000	$ 1,920,000	$ 1,920,000	$ 5,760,000
IT Programming	$ 751,000	$ 646,000	$ 651,000	$ 2,048,000
Cool Centers (2)	$ 450,000	$ 127,846	$ 134,846	$ 712,691
Pilots	$ 216,000	$ 216,000	$ 216,000	$ 648,000
Measurement and Evaluation (3)	$ 69,000	$ 46,000	$ 48,000	$ 163,000
Regulatory Compliance	$ 311,000	$ 316,000	$ 342,000	$ 969,000
General Administration	$ 1,984,000	$ 2,042,000	$ 2,106,000	$ 6,132,000
CPUC Energy Division Staff (4)	$ 128,000	$ 128,000	$ 128,000	$ 384,000
SUBTOTAL MANAGEMENT COSTS (5)	$ 15,753,667	$ 14,593,512	$ 14,942,512	$ 45,289,691
Subsidies and Benefits(6)	$ 660,220,000	$ 633,029,000	$ 605,950,000	$ 1,899,199,000
TOTAL PROGRAM COSTS & CUSTOMER DISCOUNTS	$ 675,973,667	$ 647,622,512	$ 620,892,512	$ 1,944,488,691

Southern California Edison (Proposed)

CARE Budget Categories	2011 Authorized	2012 Proposed	2013 Proposed	2014 Proposed	Total Cycle
Outreach	$ 2,230,000	$ 2,050,000	$ 2,100,000	$ 2,155,000	$ 6,305,000
Processing, Certification, Recertification	$ 900,000	$ 530,000	$ 559,000	$ 588,000	$ 1,677,000
Post Enrollment Verification		$ 700,000	$ 700,000	$ 700,000	$ 2,100,000
IT Programming	$ 1,000,000	$ 950,000	$ 950,000	$ 1,000,000	$ 2,900,000
Cool Centers	N/A	N/A	N/A	N/A	$ -
Pilots	$ -	$ -	$ -	$ -	$ -
Measurement and Evaluation	$ 56,000	$ 50,000	$ 50,000	$ 50,000	$ 150,000
Regulatory Compliance	$ 145,000	$ 251,000	$ 265,000	$ 264,000	$ 780,000
General Administration	$ 948,000	$ 680,000	$ 702,000	$ 725,000	$ 2,107,000
CPUC Energy Division Staff	$ 206,000	$ 140,000	$ 140,000	$ 140,000	$ 420,000
SUBTOTAL MANAGEMENT COSTS	$ 5,485,000	$ 5,351,000	$ 5,465,000	$ 5,622,000	$ 16,438,000
Subsidies and Benefits	$ 211,400,000	$ 330,200,000	$ 376,900,000	$ 416,800,000	$ 1,123,900,000
TOTAL PROGRAM COSTS & CUSTOMER DISCOUNTS	$ 216,885,000	$ 335,551,000	$ 382,365,000	$ 422,422,000	$ 1,140,338,000
Cool Centers* Funded Separately	$ 792,000	$ 766,667	$ 766,667	$ 766,667	$ 2,300,000

Southern California Edison (Authorized Phase II)

CARE Budget Categories	2012 Authorized	2013 Authorized	2014 Authorized	Total Cycle
Outreach	$ 2,050,000	$ 2,558,000	$ 2,613,000	$ 7,221,000
Processing, Certification, Recertification	$ 530,000	$ 559,000	$ 588,000	$ 1,677,000
Post Enrollment Verification	$ 700,000	$ 989,460	$ 1,423,650	$ 3,113,110
IT Programming	$ 450,000	$ 1,950,000	$ 1,000,000	$ 3,400,000
Cool Centers	N/A	N/A	N/A	$ -
Pilots	$ 216,000	$ 216,000	$ 216,000	$ 648,000
Measurement and Evaluation	$ 74,000	$ 50,000	$ 50,000	$ 174,000
Regulatory Compliance	$ 251,000	$ 265,000	$ 264,000	$ 780,000
General Administration	$ 680,000	$ 702,000	$ 725,000	$ 2,107,000
CPUC Energy Division Staff	$ 140,000	$ 140,000	$ 140,000	$ 420,000
SUBTOTAL MANAGEMENT COSTS	$ 5,091,000	$ 7,429,460	$ 7,019,650	$ 19,540,110
Subsidies and Benefits	$ 330,200,000	$ 376,900,000	$ 416,800,000	$ 1,123,900,000
TOTAL PROGRAM COSTS & CUSTOMER DISCOUNTS	$ 335,291,000	$ 384,329,460	$ 423,819,650	$ 1,143,440,110
Cool Centers* Funded Separately	$ 792,000	$ 105,084	$ 105,084	$ 1,002,167

San Diego Gas & Electric (Proposed)

CARE Budget Categories	2011 Authorized	2012 Proposed	2013 Proposed	2014 Proposed	Total Cycle
Outreach	$ 1,734,261	$ 2,069,410	$ 2,283,171	$ 2,300,352	$ 6,652,933
Processing, Certification, Recertification	$ 230,015	$ 209,305	$ 216,278	$ 223,296	$ 648,879
Post Enrollment Verification	$ -	$ 116,183	$ 118,626	$ 81,074	$ 315,883
IT Programming	$ 452,687	$ 560,195	$ 538,841	$ 544,887	$ 1,643,924
Cool Centers	$ 56,000	$ 57,456	$ 59,122	$ 60,778	$ 177,356
Pilots	$ -	$ -	$ -	$ -	$ -
Measurement and Evaluation	$ 4,326	$ 22,500	$ 22,500	$ 22,500	$ 67,500
Regulatory Compliance	$ 196,401	$ 154,917	$ 160,136	$ 165,362	$ 480,415
General Administration	$ 423,927	$ 492,559	$ 505,430	$ 518,406	$ 1,516,395
CPUC Energy Division Staff	$ 102,900	$ 49,535	$ 53,002	$ 56,712	$ 159,249
SUBTOTAL MANAGEMENT COSTS	$ 3,200,517	$ 3,732,059	$ 3,957,106	$ 3,973,368	$ 11,662,534
Subsidies and Benefits	$ 48,231,658	$ 73,857,625	$ 82,630,988	$ 83,614,933	$ 240,103,546
TOTAL PROGRAM COSTS & CUSTOMER DISCOUNTS	$ 51,432,175	$ 77,589,684	$ 86,588,094	$ 87,588,301	$ 251,766,080

San Diego Gas & Electric (Authorized Phase II)

CARE Budget Categories	2012 Authorized	2013 Authorized	2014 Authorized	Total Cycle
Outreach	$ 2,069,410	$ 2,283,171	$ 2,300,352	$ 6,652,933
Processing, Certification, Recertification	$ 629,215	$ 636,188	$ 643,206	$ 1,908,609
Post Enrollment Verification	$ 403,200	$ 403,200	$ 403,200	$ 1,209,600
IT Programming	$ 1,245,390	$ 1,224,036	$ 1,230,082	$ 3,699,509
Cool Centers	$ 56,000	$ 34,329	$ 35,985	$ 126,314
Pilots	$ 108,000	$ 108,000	$ 108,000	$ 324,000
Measurement and Evaluation	$ 34,500	$ 22,500	$ 22,500	$ 79,500
Regulatory Compliance	$ 154,917	$ 160,136	$ 165,362	$ 480,415
General Administration	$ 492,559	$ 505,430	$ 518,406	$ 1,516,395
CPUC Energy Division Staff	$ 49,535	$ 53,002	$ 56,712	$ 159,249
SUBTOTAL MANAGEMENT COSTS	$ 5,242,725	$ 5,429,992	$ 5,483,806	$ 16,156,523
Subsidies and Benefits	$ 73,857,625	$ 82,630,988	$ 83,614,933	$ 240,103,546
TOTAL PROGRAM COSTS & CUSTOMER DISCOUNTS	$ 79,100,350	$ 88,060,980	$ 89,098,739	$ 256,260,069

Southern California Gas (Proposed)

CARE Budget Categories	2011 Authorized	2012 Proposed	2013 Proposed	2014 Proposed	Total Cycle
Outreach	$ 3,785,932	$ 3,909,220	$ 3,845,745	$ 3,750,223	$ 11,505,188
Processing, Certification, Recertification	$ 1,248,928	$ 1,027,881	$ 1,004,923	$ 1,036,958	$ 3,069,762
Post Enrollment Verification	$ -	$ 322,188	$ 333,083	$ 343,978	$ 999,249
IT Programming	$ 522,554	$ 1,539,760	$ 1,334,767	$ 1,468,725	$ 4,343,252
Cool Centers	$ -	$ -	$ -	$ -	$ -
Pilots	$ -	$ -	$ -	$ -	$ -
Measurement and Evaluation	$ 17,192	$ 17,639	$ 18,150	$ 18,659	$ 54,448
Regulatory Compliance	$ 236,919	$ 227,412	$ 234,962	$ 242,507	$ 704,881
General Administration	$ 604,963	$ 887,541	$ 915,488	$ 943,426	$ 2,746,455
CPUC Energy Division Staff	$ 171,500	$ 60,000	$ 60,000	$ 60,000	$ 180,000
SUBTOTAL MANAGEMENT COSTS	$ 6,587,988	$ 7,991,640	$ 7,747,118	$ 7,864,477	$ 23,603,235
Subsidies and Benefits	$ 135,901,649	$ 128,773,189	$ 129,892,840	$ 131,142,177	$ 389,808,206
TOTAL PROGRAM COSTS & CUSTOMER DISCOUNTS	$ 142,489,637	$ 136,764,829	$ 137,639,959	$ 139,006,654	$ 413,411,441

Southern California Gas (Authorized Phase II)

CARE Budget Categories	2012 Authorized	2013 Authorized	2014 Authorized	Total Cycle
Outreach	$ 3,909,220	$ 3,845,745	$ 3,750,223	$ 11,505,188
Processing, Certification, Recertification	$ 4,479,171	$ 4,456,213	$ 4,488,248	$ 13,423,632
Post Enrollment Verification	$ 3,744,000	$ 3,744,000	$ 3,744,000	$ 11,232,000
IT Programming	$ 3,204,520	$ 2,669,534	$ 2,937,450	$ 8,811,504
Cool Centers	$ -	$ -	$ -	$ -
Pilots	$ 180,000	$ 180,000	$ 180,000	$ 540,000
Measurement and Evaluation	$ 37,639	$ 18,150	$ 18,659	$ 74,448
Regulatory Compliance	$ 227,412	$ 234,962	$ 242,507	$ 704,881
General Administration	$ 887,541	$ 915,488	$ 943,426	$ 2,746,455
CPUC Energy Division Staff	$ 60,000	$ 60,000	$ 60,000	$ 180,000
SUBTOTAL MANAGEMENT COSTS	$ 16,729,502	$ 16,124,092	$ 16,364,513	$ 49,218,108
Subsidies and Benefits	$ 128,773,189	$ 129,892,840	$ 131,142,177	$ 389,808,206
TOTAL PROGRAM COSTS & CUSTOMER DISCOUNTS	$ 145,502,691	$ 146,016,933	$ 147,506,690	$ 439,026,314

(End of Attachment M)

Attachment N

CARE Program Budget Impacts Calculation

	PGE				SCE				SDGE				SoCalGas				Total
Issue	2012	2013	2014	Cycle	2012	2013	2014	Cycle	2012	2013	2014	Cycle	2012	2013	2014	Cycle	
Proposed Management Costs	**$ 12,081,000.00**	**$ 11,287,000.00**	**$ 11,650,000.00**	**$ 35,018,000.00**	**$ 5,351,000.00**	**$ 5,465,000.00**	**$ 5,622,000.00**	**$ 16,438,000.00**	**$ 3,732,059.06**	**$ 3,957,106.34**	**$ 3,973,368.11**	**$ 11,662,533.52**	**$ 7,991,639.96**	**$ 7,747,118.48**	**$ 7,864,476.52**	**$ 23,603,234.96**	**$ 86,721,768.48**
D1208044 Adjustments																	
CARE Tier Rate Change Notification (PGE)	($333,333)	($333,333)	($333,333)	**($1,000,000)**	$0	$0	$0	**$ -**	$0	$0	$0	**$ -**	$0	$0	$0	**$0**	**$ (1,000,000.00)**
2% Monthly PEV Budget Requirement Increases	$1,545,000	$1,532,000	$1,518,000	**$4,595,000**	$2,756,000	$2,756,000	$2,756,000	**$8,268,000**	$287,017	$284,574	$322,126	**$893,717**	$3,421,812	$3,410,917	$3,400,022	**$10,232,751**	**$23,989,468**
Eligibility Proof at time of Recertification	$2,000,000	$2,000,000	$2,000,000	**$6,000,000**	$3,994,000	$3,994,000	$3,994,000	**$11,982,000**	$419,910	$419,910	$419,910	**$1,259,730**	$3,451,290	$3,451,290	$3,451,290	**$10,353,870**	**$29,595,600**
IT Program Costs***				**$0**	($500,000)	$1,000,000	$500,000	**$1,000,000**	$685,195	$685,195	$685,195	**$2,055,585**	$1,664,760	$1,334,767	$1,468,725	**$4,468,252**	**$7,523,837**
Cooling Centers	$ 221,000	($108,154)	($108,154)	**$4,691**					($1,456)	($24,793)	($24,793)	**($51,042)**	$0	$0	$0	**$0**	**($46,351)**
CHANGES Pilot*	$216,000	$216,000	$216,000	**$648,000**	$216,000	$216,000	$216,000	**$648,000**	$108,000	$108,000	$108,000	**$324,000**	$180,000	$180,000	$180,000	**$540,000**	**$2,160,000**
CHANGES Pilot Evaluation**	$24,000	$0	$0	**$24,000**	$24,000	$0	$0	**$24,000**	$12,000	$0	$0	**$12,000**	$20,000	$0	$0	**$20,000**	**$80,000**
Phase II Adjustments																	
SCE- Adjustment to Outreach	$0	$0	$0	**$0**	$0	$458,000	$458,000	**$916,000**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	**$916,000**
SCE- Adjustment to Processing, Certification, Recertification	$0	$0	$0	**$0**	($3,994,000)	($3,994,000)	($3,994,000)	**($11,982,000)**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	**($11,982,000)**
SCE- Adjustment to PEV	$0	$0	$0	**$0**	($2,756,000)	($2,466,540)	($2,032,350)	**($7,254,890)**	$0	$0	$0	**$0**	$0	$0	$0	**$0**	**($7,254,890)**
Net Balance	**$3,672,667**	**$3,306,512**	**$3,292,512**	**$10,271,691**	**($260,000)**	**$1,963,460**	**$1,897,650**	**$3,601,110**	**$1,510,666**	**$1,472,886**	**$1,510,438**	**$4,493,990**	**$8,737,862**	**$8,376,974**	**$8,500,037**	**$25,614,873**	**$ 43,981,663.89**
Approved Management Costs	$ 15,753,666.67	$ 14,593,512.33	$ 14,942,512.33	$ 45,289,691.33	$ 5,091,000.00	$ 7,428,460.00	$ 7,519,650.00	$ 20,039,110.00	$ 5,242,725.17	$ 5,429,992.22	$ 5,483,806.00	$ 16,156,523.39	$ 16,729,502.10	$ 16,124,092.37	$ 16,364,513.18	$ 49,218,107.65	$ 130,703,432.37
Proposed Subsidy BUDGET	$ 660,220,000.00	$ 633,029,000.00	$ 605,950,000.00	$ 1,899,199,000.00	$ 330,200,000.00	$ 376,900,000.00	$ 416,800,000.00	$ 1,123,900,000.00	$ 73,857,625.00	$ 82,630,988.00	$ 83,614,933.00	$ 240,103,546.00	$ 128,773,188.80	$ 129,892,840.29	$ 131,142,177.09	$ 389,808,206.17	$ 3,653,010,752.17
Total Approved CARE Budget	**$ 675,973,666.67**	**$ 647,622,512.33**	**$ 620,892,512.33**	**$ 1,944,488,691.33**	**$ 335,291,000.00**	**$ 384,328,460.00**	**$ 424,319,650.00**	**$ 1,143,939,110.00**	**$ 79,100,350.17**	**$ 88,060,980.22**	**$ 89,098,739.00**	**$ 256,260,069.39**	**$ 145,502,690.90**	**$ 146,016,932.66**	**$ 147,506,690.27**	**$ 439,026,313.82**	**$ 3,783,714,184.55**
SCE Cooling Center-*Funded Separately*					$25,333	($661,583)	($661,583)	**($1,297,833)**									**($1,297,833)**

(End of Attachment N)

Attachment O

Sempra's Additional Budget Requests

	SDGE			
Additional Budget Request	**2012**	**2013**	**2014**	**Cycle**
SDGE- Upward Trend in HVAC- Furnace R&R costs	$2,228,074	$2,228,074	$2,228,074	$6,684,221
SDGE- Upward Trend in Domestic Hot Water - Water Heater R&R costs	$378,234	$378,234	$378,234	$1,134,703
SDGE- Upward Trend in Appliances - Clothes Washers costs	$418,926	$418,926	$418,926	$1,256,778
SDGE- Upward Trend in Enclosures costs	$1,210,915	$1,210,915	$1,210,915	$3,632,745
Total	**$4,238,161**	**$4,238,162**	**$4,238,163**	**$12,708,447**

	SoCalGas			
Additional Budget Request	**2012**	**2013**	**2014**	**Cycle**
SoCalGas- Upward trend in Appliances (Clothes Washer)	$1,999,876	$1,999,876	$1,999,876	$5,999,628
SoCalGas- Upward trend in Domestic Hot Water (Increased install rates and measure costs)	$6,220,780	$6,297,065	$6,373,186	$18,891,031
SoCalGas- Upward trend in Enclosures (Increased install rates and measure costs)	$188,252	$193,603	$198,932	$580,787
SoCalGas- Upward trend in HVAC (Increased install rates and measure costs)	$4,477,007	$4,547,747	$4,649,091	$13,673,845
SoCalGas- Upward trend in Maintenance (Increased install rates and measure costs)	$81,335	$83,824	$86,312	$251,471
SoCalGas- 2012-14 Borrowed Amount to fund 2011 activities				$3,411,020
Total	**$12,967,250**	**$13,122,115**	**$13,307,397**	**$42,807,782**

O- Sempra Add'l Budget Requests

(End of Attachment O)

Attachment P-1

Southern California Gas Company: Management Audit of the Energy Savings Assistance Program dated December 21, 2012

Southern California Gas Company

Management Audit of the Energy Savings Assistance Program

December 21, 2012

MACIAS CONSULTING GROUP

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Executive Summary

Why the Examination was Conducted

On February 16, 2012, the Joint Assigned Commissioner and Administrative Law Judge before the California Public Utilities Commission (CPUC) ordered that Southern California Gas Company (SoCal Gas) retain an independent third party management auditing firm to examine the records of its Energy Savings Assistance Program (ESAP). ESAP provides no-cost weatherization services to low-income households that meet certain income guidelines. ESAP contracts with area vendors to provide these services. The CPUC order required SoCal Gas' management audit to determine what causes, precursors, or contributory factors affected and otherwise triggered a "sudden spike" in contractors' invoicing in November of 2011 which in turn led to SoCal Gas' decision to temporarily suspend ESAP activities during the month of December 2011[1].

What the Review Found

Our review found that the "sudden spike" in contractors' invoices projected by ESAP management did not actually materialize as predicted. The "sudden spike" projections were largely based on inaccurate contractor estimates and not actual data. While the program ultimately did go over budget by $23.9 million[2] for program year 2011, the number of actual November and December 2011 invoices paid by ESAP was significantly lower than projected. Although the program did experience sustained above-average invoice amounts in the last five months of program year 2011, actual expenditures that occurred in the months of November and December were not significantly higher than in other months in program year 2011.

We examined ESAP management practices during program year 2011 and determined there were various reasons why the "sudden spike" in contractor invoices did not materialize and why ESAP eventually exceeded its program budget. We found that ESAP management could have done more to monitor and control expenditures throughout the program year including aligning the aggregate maximum spending limits in its vendor agreements to the ESAP budget in program year 2011, ensuring its contract provisions did not limit management's ability to manage expenditures, and enforcing existing contract provisions that would result in timelier invoice data.

What We Recommend

This report contains five recommendations for ESAP management to strengthen its contractual control over program expenditures, more accurately project future program expenditures and ensure it has complete and timely information from its contractors.

[1] Joint Assigned Commissioner and Administrative Law Judge's Post Order to Show Cause Hearing Ruling: http://www.liob.org/docs/Joint%20ACR%20and%20ALJ%20Post%20Order%20to%20show%20cause%20hearing%20ruling%202-16-12.pdf

[2] Carryover funds from prior under-budget program years were used to cover $20.9 million of the $23.9 million in over-budget expenditures.

Background

The Energy Savings Assistance Program (ESAP) began as a direct assistance program provided by some investor-owned utilities (IOUs) in the 1980s. In 1990, the program was formally adopted by the Legislature within Public Utilities Code Section 2790. Formerly known as the Low Income Energy Efficiency Program or LIEE, ESAP provides no-cost weatherization services to low-income households that meet certain income guidelines. The program is managed by the California Public Utilities Commission (CPUC) and administered by four of the IOUs it regulates – Southern California Gas Company, Pacific Gas & Electric, San Diego Gas & Electric and Southern California Edison – and funded by the Public Purpose Program charge included in customers' bills. Services provided include attic insulation, energy efficient refrigerators, energy efficient furnaces, weather stripping, caulking, low-flow showerheads, water heater blankets, and door and building envelope repairs which reduce air infiltration. The program may also include installation of energy efficient appliances. According to the CPUC, ESAP reached over 300,000 low-income California homes in 2011.

At the Southern California Gas Company (SoCal Gas), ESAP is managed by the Customer Programs division within the Customer Programs and Assistance Department. The division uses an Internet-facing web application called Home Energy Assistance Tracking (HEAT), to manage ESAP activities. The HEAT information management system is used by both SoCal Gas employees and its external ESAP contractors to facilitate program outreach and installation. Contractor invoice data, once processed and approved by division management, is exported from HEAT to the SoCal Gas accounting system, SAP, for payment.

In Decision 08-11-031, the CPUC authorized SoCal Gas $204.7 million for the 2009-2011 energy efficiency program cycle. In the fall of 2011, SoCal Gas' Energy Savings Assistance Program (ESAP) management anticipated that the program may exceed its program budget for the 2011 program year and ultimately, for the 2009-2011 cycle. Management's initial projections in September 2011 estimated ESAP expenditures for the entire program year to be $101 million. This amount would exceed the program's combined authorized budget of $78.2 million and exhaust its carryover amount from prior under-budget program years of $20.9 million.

In November 2011, SoCalGas ESAP management officials attempted to gather additional information from their largest contractors and debated various ways to slow expenditures prior to the program year-end, including requesting estimates from all 44 of its authorized contractors for work to be completed but not yet entered into the HEAT system and for estimates of all other work to be completed before program year-end. These new projections, including contractors' estimates of work completed and projected work, were much higher than expected.

Ultimately, on November 28, 2011 SoCal Gas notified its contractors of its decision to suspend ESAP activity effective December 1, 2011 until 2012 when funds would become available. A day later, the East Los Angeles Community Union, the Association of California Community and Energy Services, and the Maravilla Foundation filed a Joint Emergency Motion to continue SoCal Gas' ESAP. The subsequent Order to Show Cause (OSC) hearing held on December 6, 2011 led to an order from the Administrative Law Judge that SoCal Gas retain an independent third party to examine its program year 2011 ESAP records, specifically those related to November 2011.

Scope

This review examined SoCal Gas' management policies and actions of the Energy Savings Assistance Program during program year 2011, particularly in the fall of 2011. We also verified a random selection of 10 percent of contractors' actual November 2011 invoices.

Objectives

The Administrative Law Judge's order for an independent management audit required that the audit identify and examine all of SoCal Gas' management actions relating to the ESAP activities with a focus on the period from July 1, 2011 to December 31, 2011, to determine what causes, precursors, or contributory factors affected and otherwise triggered the "sudden spike" in contractors' invoicing in November 2011.

Methodology

To address the objectives, we:

- Conducted interviews with key ESAP management staff.
- Reviewed all communication between SoCal Gas and the CPUC relevant to the audit time period.
- Reviewed SoCal Gas' ESAP vendor agreement in place in November 2011 and documented any changes to the vendor agreement that management enacted in 2012.
- Reviewed the most recent internal audit of SoCal Gas' ESAP.
- Documented enhancements to ESAP management practices, protocols and contract management tools that SoCal Gas has either implemented or plans to implement.
- Analyzed overall ESAP 2011 expenditures and homes treated data from SoCalGas' invoicing system and financial reporting system
- Reviewed a random sample of contractors' actual November 2011 invoices to determine if work was documented in compliance with SoCal Gas' vendor contracts and ESAP policies and procedures.
- Developed recommendations for how management practices and tools should be enhanced to prevent recurrence of any potential stoppage of future ESAP activities.

In accordance with the Administrative Law Judge's Order we will also complete on-site verification of a randomly selected sample of ten percent of the contractors' actual November 2011 invoices to ascertain whether ESAP measures were actually installed and whether such work was completed in compliance with ESAP rules and standards. The results of our on-site verification will be presented in a separate report.

We conducted this management audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This work was conducted between July and November 2012.

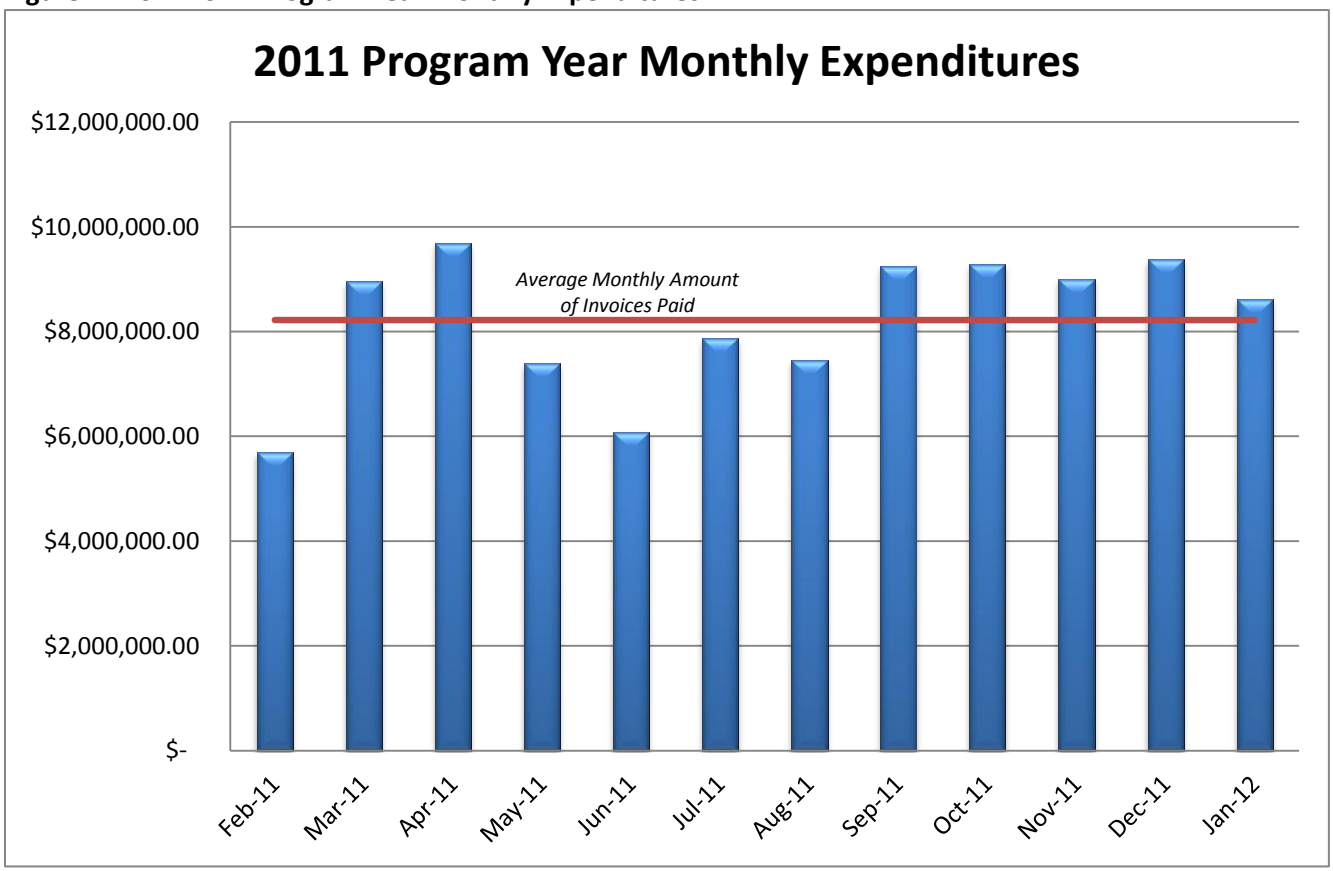
We have discussed the results with SoCalGas ESAP management and they had been provided a copy of the draft report. SoCal Gas ESAP management agrees with the recommendations in the report and had no further comments.

Principal Results

The Projected Sudden Spike in Contractor Invoices did not Materialize

Although ESAP management projected a spike to occur in November and December 2011, our review of actual ESAP expenditures found that a "sudden spike" did not actually occur. Figure 1 below illustrates SoCal Gas' actual monthly ESAP expenditures by the month invoices were processed for payment as well as the average monthly amount of invoices paid for program year 2011. We performed this analysis using data from SoCal Gas' accounting system. To gain assurance that the invoice data was reasonable, we verified supporting invoice documentation on a sample basis. The results of this verification are documented within the Appendix. As shown below, while the last five months of program year 2011 expenditures were all above the monthly average of $8.2 million, November and December 2011 were not the highest months of expenditures in program year 2011 and were on par with expenditures that occurred in the prior two months and earlier in the year.

Figure 1: 2011 ESAP Program Year Monthly Expenditures



Source: ESAP Program Year 2011 expenditure data from SoCal Gas' SAP system by date of export from the HEAT system for payment from February 2011 through January 2012 for work performed between January 2011 and December 2011. This chart is on a cash disbursement basis and therefore, does not include quarterly accrual amounts.

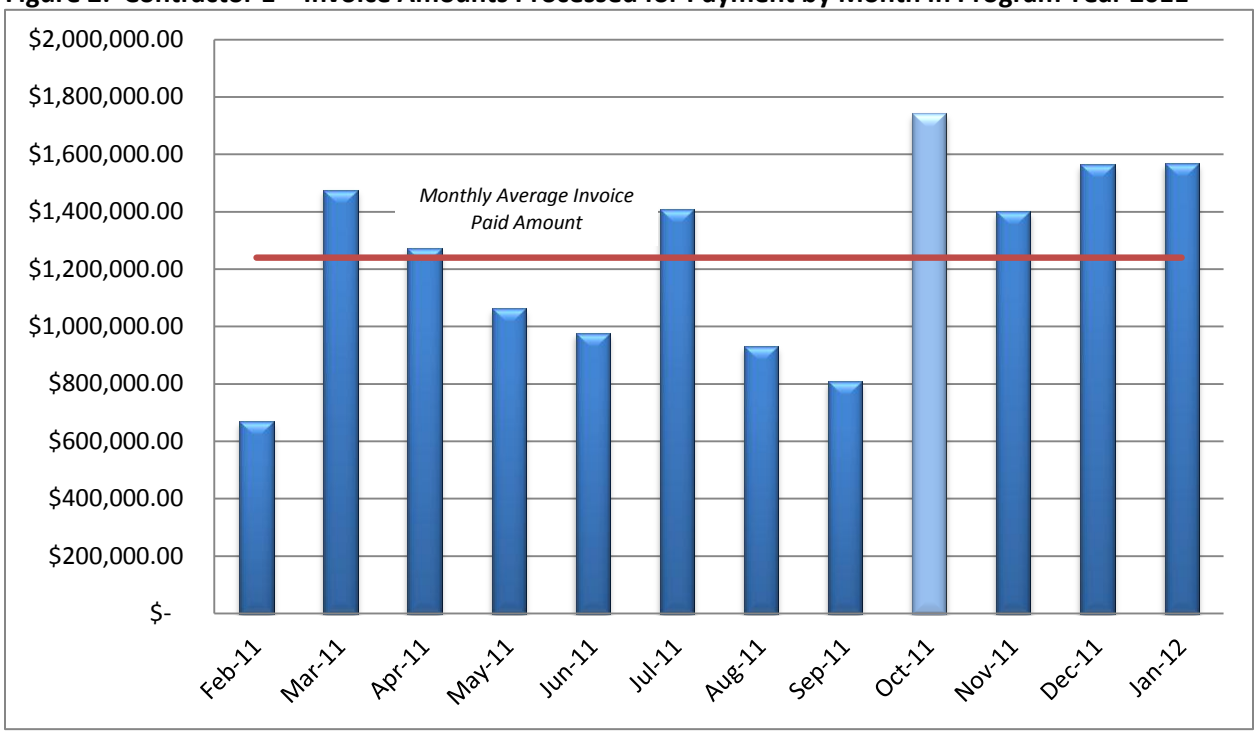
The Three Largest ESAP Contractors Also did not Experience a "Sudden Spike" in November and December 2011.

Three ESAP contractors accounted for over $40 million, or 41 percent, of the total ESAP expenditures in program year 2011. According to monthly expenditure data for program year 2011, these three contractors also did not experience a "sudden spike" at year-end. To maintain confidentiality of ESAP data, we have labeled these three contractors: Contractor 1, Contractor 2 and Contractor 3.

Contractor 1

Figure 2 below shows the amount of invoices processed for payment by month in program year 2011 for Contractor 1. While invoices paid at year-end were above average for this contractor, the highest month of expenditures actually occurred in October 2011.

Figure 2: Contractor 1 – Invoice Amounts Processed for Payment by Month in Program Year 2011

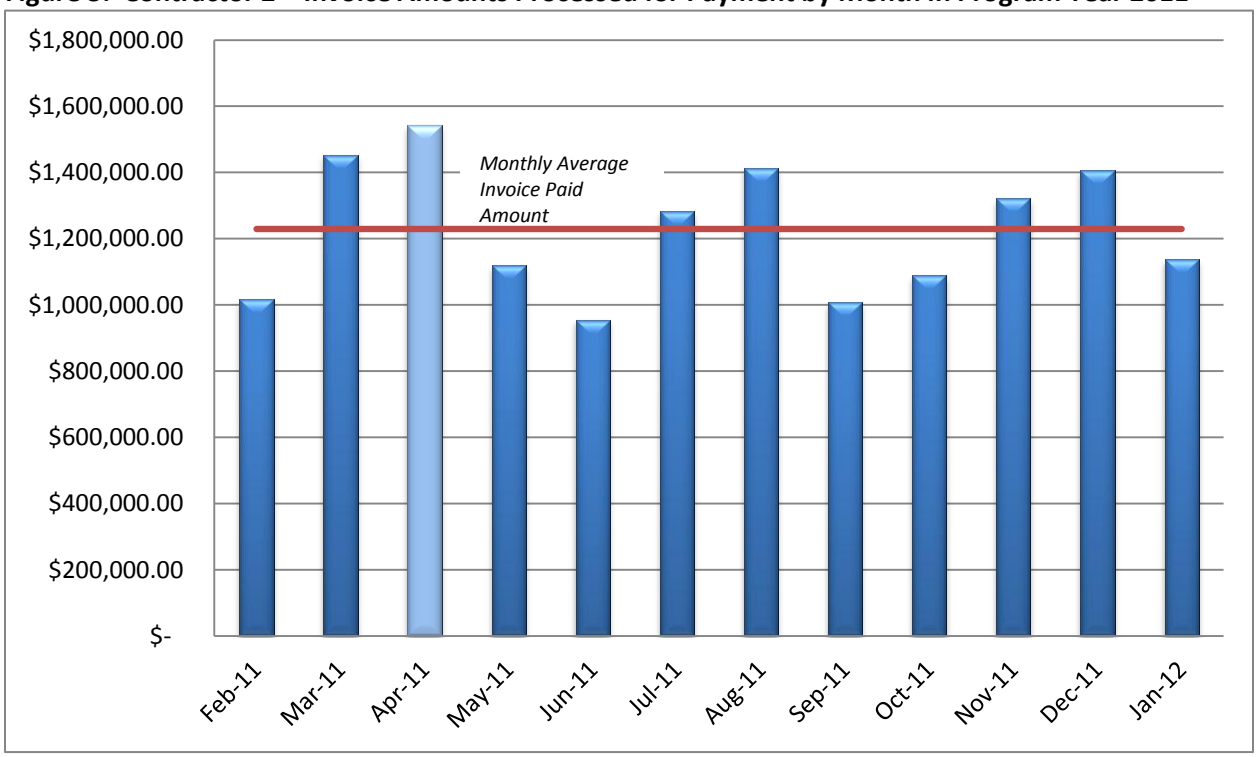


Source: ESAP Program Year 2011 expenditure data from SoCal Gas' SAP system by date of export from the HEAT system for payment from February 2011 through January 2012 for work performed between January 2011 and December 2011. This chart is on a cash disbursement basis and therefore, does not include quarterly accrual amounts.

Contractor 2

Figure 3 shows the amount of invoices processed for payment by month in program year 2011 for Contractor 2, who also did not experience a year-end spike in the amount of invoices processed for payment. The highest month of invoices processed for payment occurred in April 2011. In contrast, the amount of invoices processed for payment in the final month of the program year was below the annual average.

Figure 3: Contractor 2 – Invoice Amounts Processed for Payment by Month in Program Year 2011

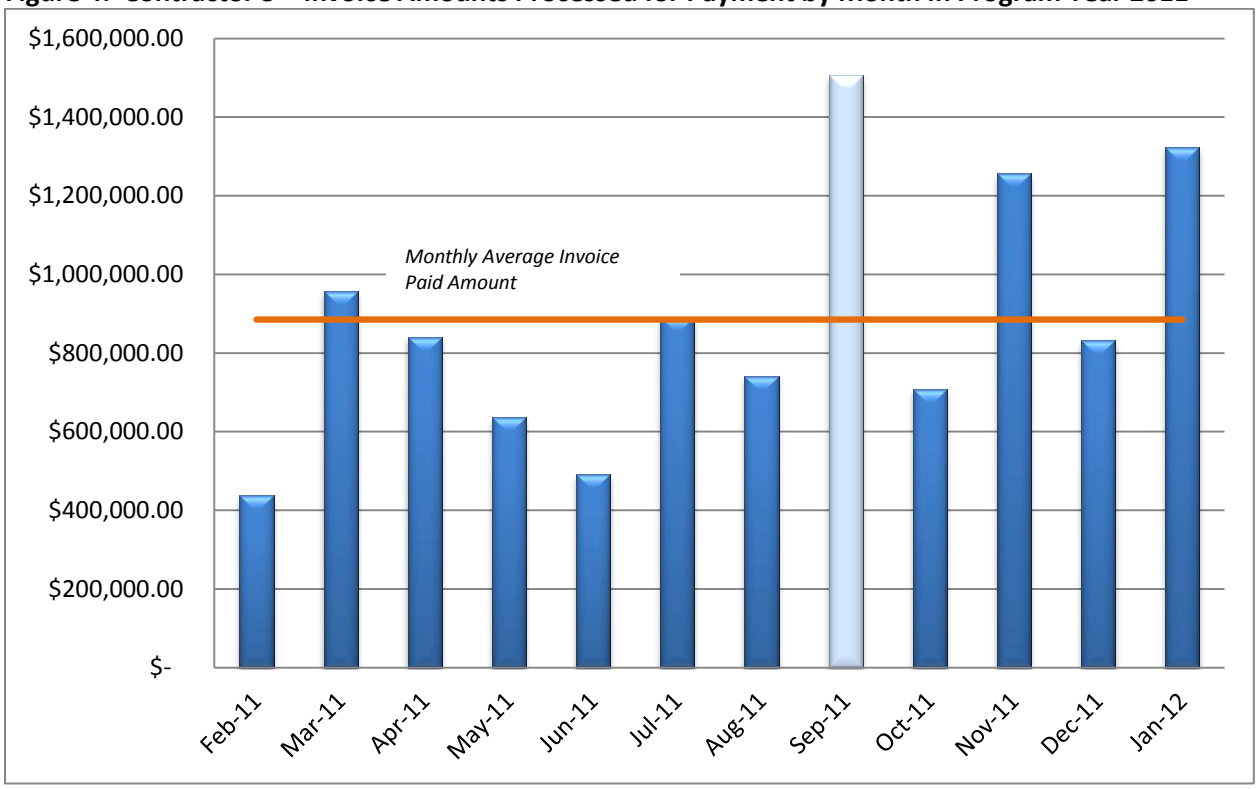


Source: ESAP Program Year 2011 expenditure data from SoCal Gas' SAP system by date of export from the HEAT system for payment from February 2011 through January 2012 for work performed between January 2011 and December 2011. This chart is on a cash disbursement basis and therefore, does not include quarterly accrual amounts.

Contractor 3

Figure 4 shows the amount of invoices processed for payment by month in program year 2011 for Contractor 3. While some months at year-end did have higher than average amounts of invoices processed for payment, Contractor 3 did not experience a sustained spike in the last quarter of program year 2011. The highest amount of invoices processed for payment for Contractor 3 actually occurred in September 2011.

Figure 4: Contractor 3 – Invoice Amounts Processed for Payment by Month in Program Year 2011



Source: ESAP Program Year 2011 expenditure data from SoCal Gas' SAP system by date of export from the HEAT system for payment from February 2011 through January 2012 for work performed between January 2011 and December 2011. This chart is on a cash disbursement basis and therefore, does not include quarterly accrual amounts.

While our review of monthly expenditure data for these three contractors did not find that any of them experienced a spike in invoices processed for payment at year-end, it did show that there was no cohesive pattern among the contractors in invoice amounts by month in program year 2011. The significant differences in invoice amounts from month-to-month could be due to the contractors' activity variations or lags in their entering of invoice data into the HEAT system for processing by SoCal Gas. During our verification of 10 percent of enrollments, discussed in the Appendix, we note that SoCal Gas did not enforce its contract provision requiring its contractors to submit invoices within 14 calendar days of work completion[3]. Enforcing this provision may aid ESAP management in receiving invoices timely and possibly smooth the pattern of invoice receipt during the program year rendering projections more reliable.

[3] This date corresponds to the date the Work Order work flow step is closed in the HEAT system.

ESAP Management Projections and Budgeting Predicted a Spike for Various Reasons

Effective program management depends, in part, on accurate and timely data that enables decision-makers to monitor program budgets and expenditures. However, ESAP relied on inaccurate data to formulate project projections for the 2011 program year..

In late November 2011, ESAP management tried to estimate its total commitment through program year-end. This estimate included:

- Invoices already submitted for payment,
- Contractor work already completed, but yet to be invoiced, and
- Contractor estimates of work yet to be completed and scheduled to be completed by year end.

This estimate totaled $32.6 million. In SoCal Gas' December 2011 response to the Joint Emergency Motion, this amount was detailed as:

- $22.4 million in total November 2011 program expenses, and
- $10.2 million in contractor projections for December 2011 planned work.

While the $22.4 million appeared to be a "sudden spike" in monthly expenditures, it did not represent just a one month estimate of invoices to be paid, but the total amount of invoices that were submitted for payment in November 2011, all of the expected invoices that were recorded as work in progress, and the contractors' estimates of work to be completed by calendar year-end. The additional $10.2 million that was included in the ESAP estimate was based on contractor estimates of their remaining planned program year 2011 work and was used by ESAP to estimate December 2011 projections.

Figure 5 compares the committed and projected amounts according to ESAP management on November 21, 2011 to the actual amount of invoices paid for the same period.

Figure 5: ESAP Projections versus Actual Expenditure Amounts

	ESAP Estimated Amounts as of November 21, 2011*	Actual Invoice Amount Paid	Difference
Invoices Submitted for Payment** November 1 - November 21, 2011	$6,780,080	$6,839,234	($59,154)
Invoices submitted and pending utility approval	11,402,262		
Contractors' estimate of work completed but not yet submitted to SoCal Gas	4,244,968		
Invoices Projected for November 22 - December 31, 2011	15,647,230	11,548,668	4,098,562
Total Invoices Submitted for Payment and Estimates of Invoices Awaiting Submission.	**$22,427,310**	**$18,387,902**	**$4,039,408**
November 1 - December 31, 2011			
Contractors estimates of additional anticipated work for program year 2011.	10,234,170	8,612,057	1,622,113
TOTAL Program Expenditures (processed and projections)	**$32,661,480**	**$26,999,959**	**$5,661,521**

*Program Committed/Projected amounts.
**Invoices submitted to SoCal Gas' financial management system (SAP) for payment

Source: Response of Southern California Gas Company to the Joint Emergency Motion to Continue the Low Income Energy Savings Assistance Program for Southern California Gas Company's Low Income Household filed on December 1, 2011, interviews with SoCal Gas ESAP management, SAP data and auditor analysis.

As described in Figure 5 above, $14.5 million, or 44 percent, ($4.24 Million and $10.23 million) of the total $32.6 million committed or projected amount as of November 21, 2011 was based on contractor-provided estimates, not historical expenditure data for the same time period within prior program years. By relying so heavily on contractor estimates, rather than historical or actual data, SoCal Gas' projections were found to be significantly higher than actual invoices amounts paid. Reviewing contractor performance from year-to-year and month-to-month may have alerted management to be more cautious in using the figures provided by contractors.

Limited Management Oversight Led to Budget Overruns

In program year 2011, SoCal Gas' ESAP actual versus budgeted expenditures, units treated and cost per unit treated were significantly different. SoCal Gas management stated in its response to the Joint Emergency Motion before the California Public Utilities Commission that shortage of program funding is fundamentally a result of the success of the program but that this success has also revealed new challenges that need to be addressed. Based on the program's ability to meet its goals, it has become increasingly successful in recent program years. At the same time, our review found that the gap

between budget and actual expenditures and units treated goals have been narrowing significantly from program year 2009-2011, shifting from underperformance to overspending. This trend has been due to multiple factors including the program treating more units than projected, increasing costs, and greater installation of certain measures.

SoCal Gas' ESAP Treated a Greater Number of Homes each Program Year

As shown in Figures 6 and 7, SoCal Gas' ESAP program treated a significantly greater number of homes in program year 2011 than in prior program years. Figure 6 below lists the percentage of each program year's units treated goals that SoCal Gas achieved. Between each program year, SoCal Gas made significant progress in meeting, and finally exceeding, its goal for units treated.

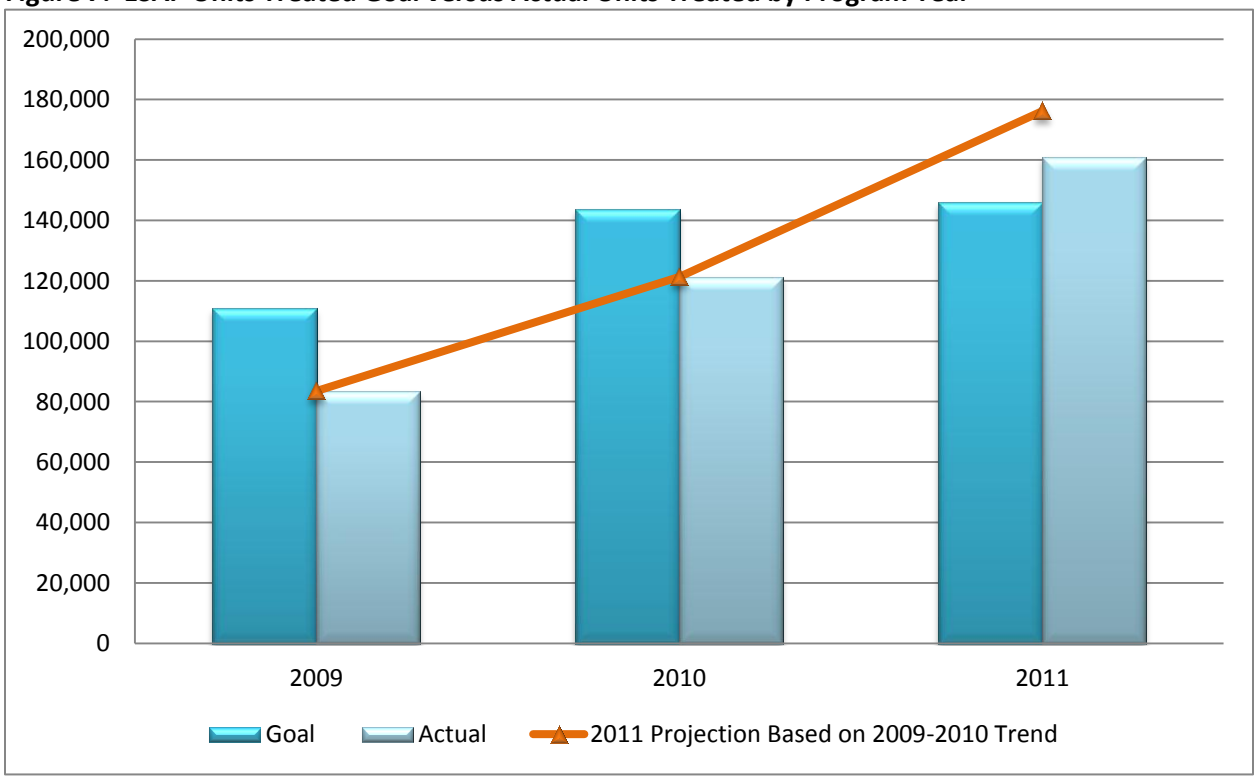
Figure 6: Percentage of Units Treated Goal Met by Program Year

Program Year	Percentage of Units Treated Goal Met
2009	75 percent of goal units treated
2010	85 percent of goal units treated
2011	110 percent of goal units treated

Source: Auditor Analysis of actual units treated and unit treated goals by program year as provided by SoCal Gas ESAP Management.

Figure 7 below compares the goal and actual units treated by program year. The orange line represents the number of units treated in program years 2009 and 2010 and the 2011 projections if the percentage of growth from program years 2009 to 2010 continued unchanged into program year 2011. This calculation could have alerted management earlier in program year 2011 that it would likely surpass its unit treated goals. Our review of reports used by management did not include any high-level unit, expenditure or cost per unit trend reports comparing program years.

Figure 7: ESAP Units Treated Goal versus Actual Units Treated by Program Year

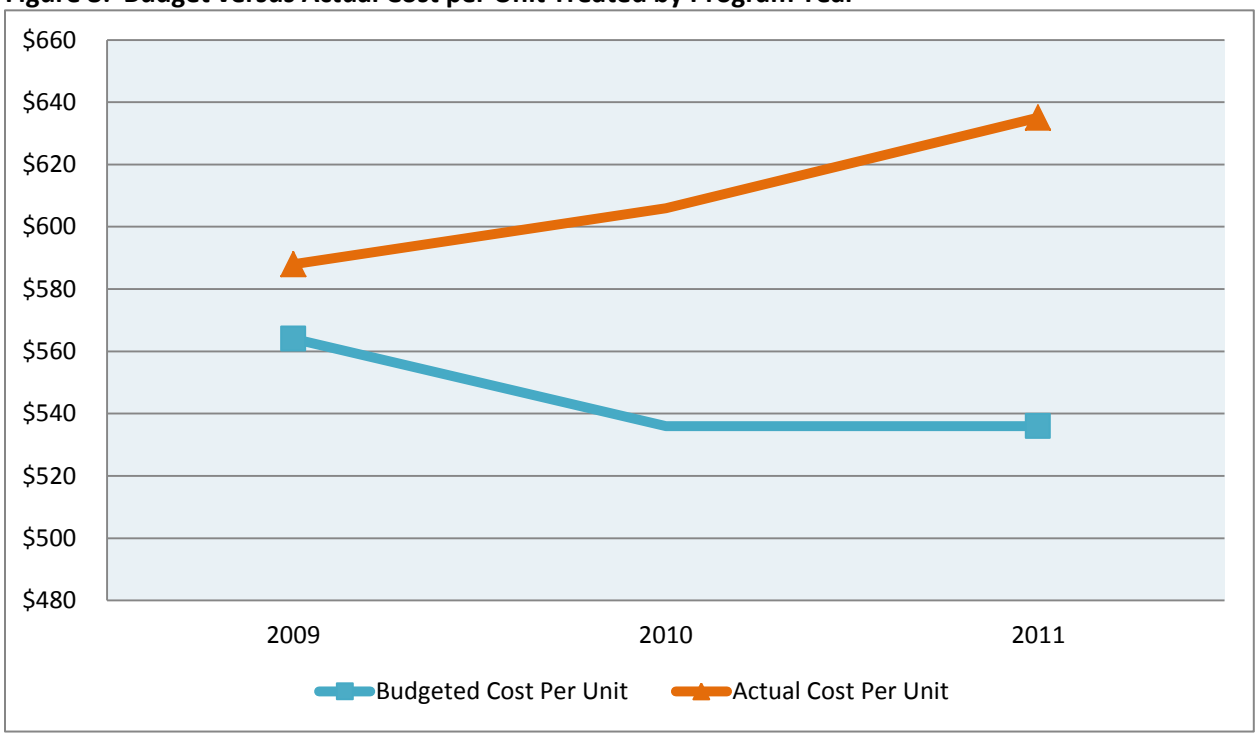


Source: Auditor Analysis of SoCal Gas' Annual Reports to the CPUC available publically on www.LIOB.org.

The Actual Cost per Unit Treated Has Consistently Increased

As shown in Figure 8 below, the actual cost per unit treated increased in two years from $588 to $635, but the amount budgeted, on a per unit basis, by ESAP declined to $536.

Figure 8: Budget versus Actual Cost per Unit Treated by Program Year



Source: Auditor Analysis of SoCal Gas' Annual Reports to the CPUC available publically on www.LIOB.org.

This increase in the cost per unit treated, combined with the increase in the number of units treated, contributed to the increased expenditures and the budget overrun in program year 2011. The table below, Figure 9, lists planned and actual installations by measure categories. Four categories of measures experienced a sharp increase in expenditures in program year 2011: envelope and air sealing measures, attic insulation, water heater conservation and water heater replacement measures. According to its response to the CPUC's Joint Emergency Motion, SoCal Gas did not anticipate the installation of weatherization measures such as weather stripping and outlet gaskets. For this reason, funding for the installation of these measures was not included in the program years 2009-2011 budget. Also shown in Figure 9 is that over twice the amount budgeted was expended on the installation of envelope and air sealing measures.

SoCal Gas' ESAP management also stated that many contractors expanded their capacity to install certain measures during program years 2009-2011 contributing to an increase in the installation of certain measures, such as attic insulation. During the same period the cost of attic insulation materials increased. Also shown in Figure 9, not only was the number of homes that received attic insulation higher than planned but the average cost per unit increased significantly. The results of this increase in homes treated and cost per unit is that SoCal Gas expended nearly twice as much as planned on attic insulation. Conversely, while the per unit cost of water heater replacement was lower, the total number

of units replaced was more than four times the number estimated resulting in expenditures for this measure being 466.4 percent more than budgeted.

Figure 9: Planned versus Completed & Expensed Installations in Program Year 2011

Measures with large increases in quantity installed and/or average unit cost.

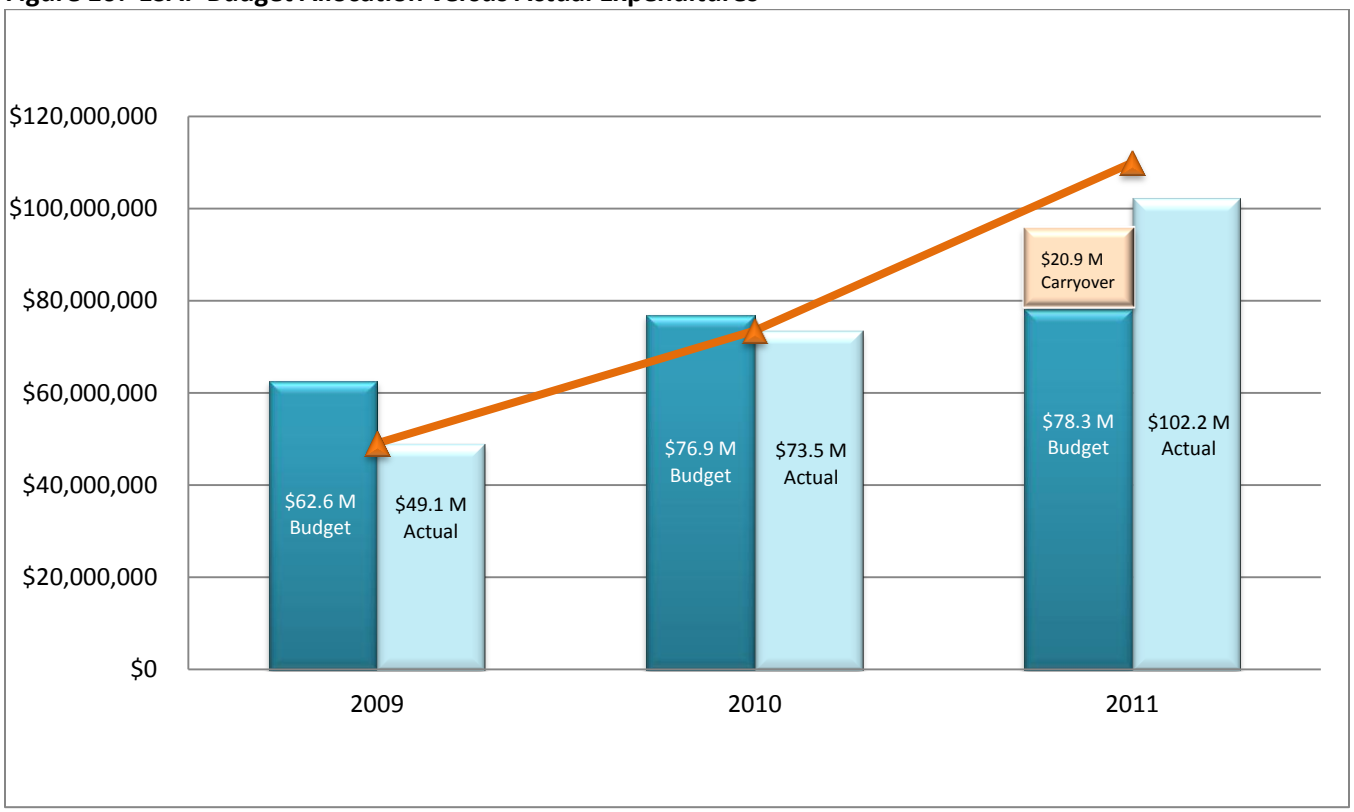
Measures	Program Year 2011 Planned Installations (Budgeted)				Program Year 2011 Completed & Expensed Installations (Actual)				% of 2011 Budget Spent
	Units	Quantity Installed	Expenses	Average Unit Cost	Units	Quantity Installed	Expenses	Average Unit Cost	
Heating Systems									
Furnaces	Each	12,281	$10,145,459	$826	Each	13,090	$14,100,070	$1,077	138.98%
Infiltration & Space Conditioning									
Envelope and Air Sealing Measures	Home	N/A	$13,902,073	N/A	Home	117,617	$32,778,417	$279	235.78%
Duct Sealing	Home	N/A	$3,010,642	N/A	Home	2,478	$3,149,034	$1,271	104.60%
Attic Insulation	Home	6,504	$4,823,236	$742	Home	7,836	$8,319,788	$1,062	172.49%
Water Heating Measures									
Water Heater Conservation Measures	Home	N/A	$3,899,530	N/A	Home	123,805	$6,185,768	$50	158.63%
Water Heater Replacement – Gas	Each	334	$356,118	$1,066	Each	1,635	$1,660,939	$1,016	466.40%
Tankless Water Heater – Gas	Each	17	$42,442	$2,540		0	$0	$0	0.00%
New Measures									
Forced Air Unit Standing Pilot Change Out	Each	15,808	$4,189,019	$265	Each	127	$39,418	$310	0.94%
Furnace Clean and Tune	Each	N/A	$5,800,598	N/A	Each	21,265	$1,301,979	$61	22.45%
High Efficiency Clothes Washer	Each	7,928	$3,963,911	$500	Each	2,119	$1,594,731	$753	40.23%
Total			**$50,133,027**				**$69,130,143**		**137.89%**
Homes Treated and Weatherized	**Planned Homes Weatherized**	**141,498**	**Planned Homes Treated**	**145,874**	**Actual Homes Weatherized**	**129,514**	**Actual Homes Treated**	**161,020**	**110.38%**

Source: Energy Programs Supervisor, SoCal Gas and SoCal Gas' Program Year 2011 Annual Report to the CPUC.

SoCal Gas' Energy Savings Assistance Program Expenditures Increased from 2009 to 2011

Actual expenditures between program years 2009 and 2010 increased by $24.4 million or 49.75 percent. According to SoCal Gas, the expenditures increased from program year 2009 through 2011 because the ESAP budget did not include certain weatherization measures that were installed, contractors increased their installation capabilities and the program itself was more successful due in part to new outreach efforts. We reviewed the total expenses, units treated and cost per unit treated trends in program years 2009 – 2011. Figure 10 shows the budged and actual ESAP expenditures by program year.

Figure 10: ESAP Budget Allocation versus Actual Expenditures



Source: Auditor Analysis of SoCal Gas' Annual Reports to the CPUC available publically on www.LIOB.org.

Prior to 2011, SoCal Gas' ESAP management relied on its contractors' previously consistent under-budget performance and did not effectively monitor the program's increasing expenditures. The increase in expenditures between 2009 and 2010 was not viewed by management as an indication that program year 2011 would most likely go over budget. For example, as shown by the orange line in Figure 10, if the rate of increase between program years 2009 and 2010 had remained unchanged, program year 2011 expenditures could have been projected by management to be $110 million and over the authorized budget amount of $78.2 million. While actual program year 2011 expenditures were ultimately $102.2 million, they remained significantly higher than the authorized budget amount and also exceeded the total budget amount. Foreseeing the possibility of exceeding its budget earlier in program year 2011 may have allowed SoCal Gas' ESAP management greater maneuverability to address these increased expenditures.

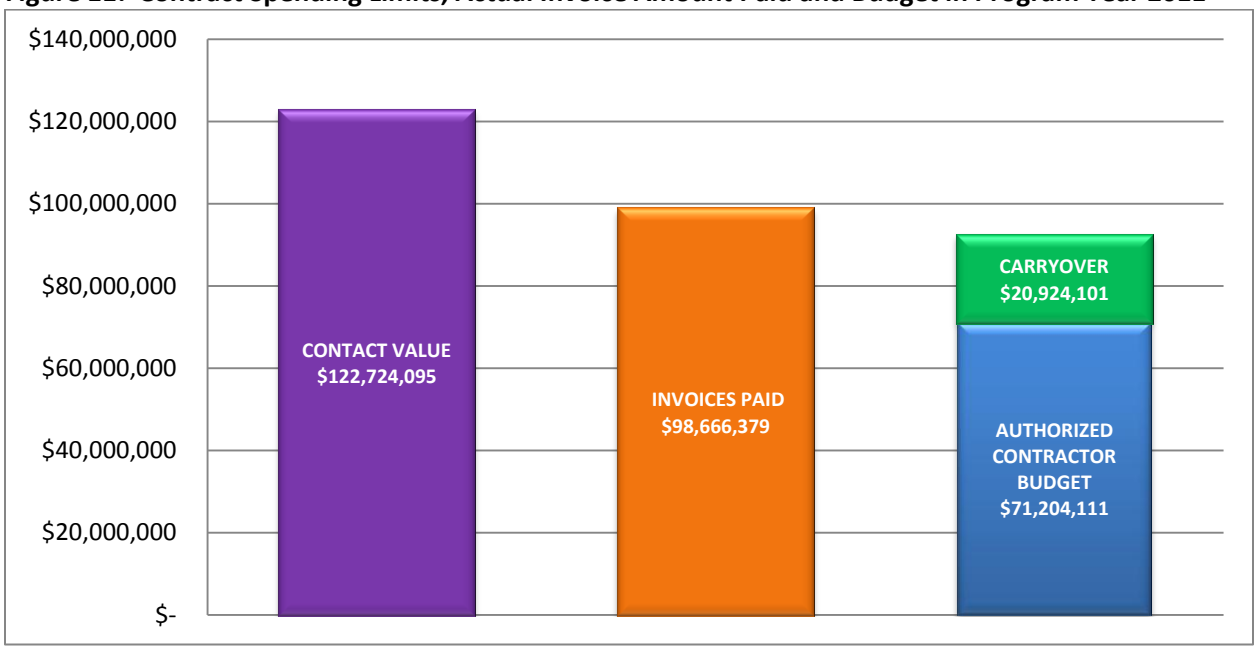
ESAP Contracting Weaknesses Contributed to Budget Overruns

SoCal Gas' ability to manage its contractors was limited by its vendor contracts. The vendor contracts effective in November 2011 had two major control weaknesses:

- Aggregate maximum spending limits within the vendor contracts were greater than the authorized Program Year 2011 budget; and
- SoCal Gas could not change the maximum spending limit or homes treated goals of a vendor's contract without vendor agreement.

As seen in Figure 11 below, the program year 2011 aggregate maximum spending limits within the vendor contracts were higher than the authorized budget and were also higher than the total budget which included carryover funds[4]. While the amount of actual invoices paid did not reach the contracts' maximum spending limit, it far exceeded the program's authorized budgeted amount and was also greater than the total budget amount. According to SoCal Gas' ESAP management, the original intention behind having higher maximum spending limits was to encourage its contractors to meet performance goals.

Figure 11: Contract Spending Limits, Actual Invoice Amount Paid and Budget in Program Year 2011



Source: ESAP Management, SAP data for Program Year 2011 and the program year 2011 ESAP Budget.

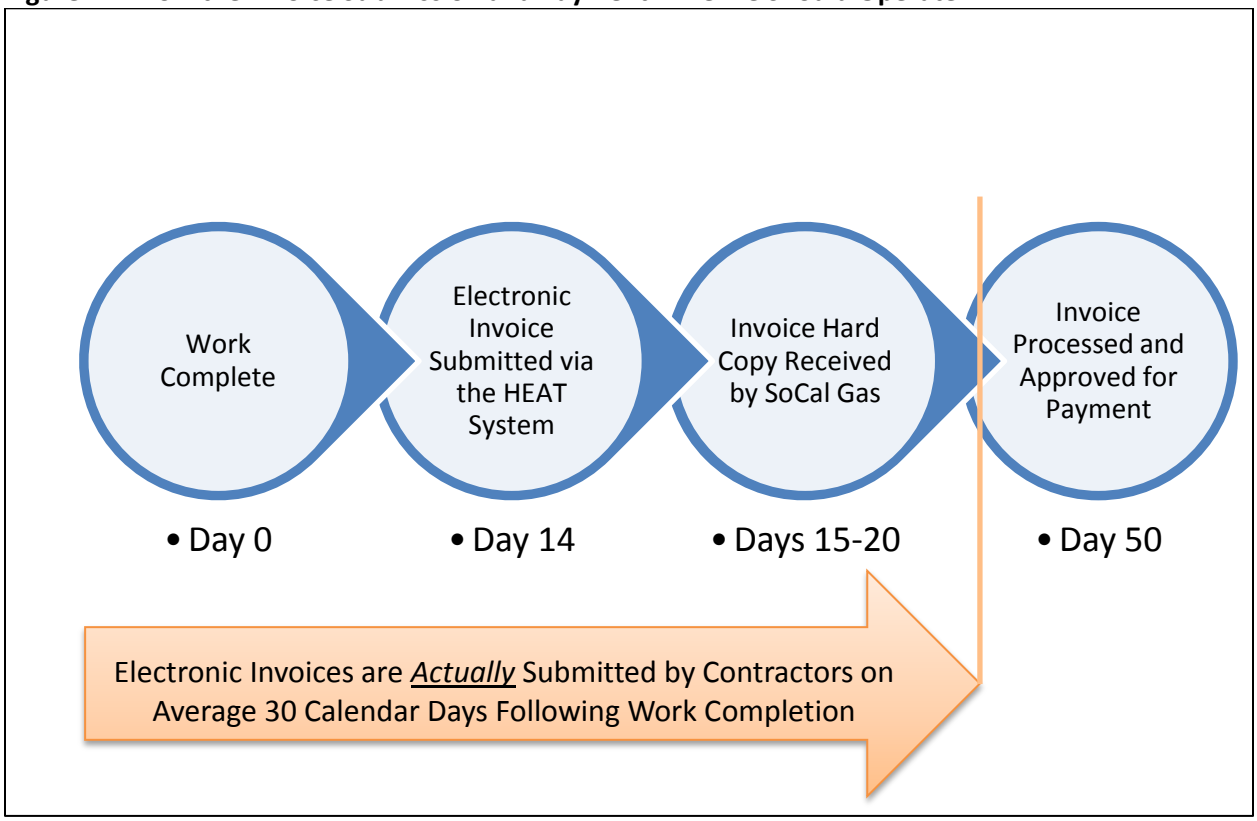
SoCal Gas' HEAT system uses the maximum spending limit amount for each vendor as a ceiling and will not allow a contractor to proceed with the submission of an invoice once the ceiling has been reached. This system control ensures that no contractor is paid for invoices beyond their agreed upon limit. Had the program year 2011 maximum spending limits aligned with the total budget, the HEAT system would have rejected invoices submitted above the total budgeted amount. By not having the maximum spending limits of its contractors align with the total budget SoCal Gas was negating one of its cost

[4] Carryover funds may be used to pay for expenses within the ESAP budget other than contractor invoices, such as training.

controls. Beginning in January 2012, SoCal Gas' ESAP management ensured its aggregate contractual maximum spending limits were in line with the authorized program budget.

Moreover, we found that SoCal Gas ESAP management has not enforced a provision of its contract requiring that vendors submit invoices within 14 calendar days of work completion[5]. Within our testing of a sample of invoices, as described in the Appendix, we found that contractors submit electronic invoices, on average, 30 calendar days following work completion and submit the hard copy invoices on average 5 calendar days following the electronic invoice submission, for a total of 35 days on average. Figure 12 below depicts the process timeline as it should operate based on contract provisions and SoCal Gas' ESAP policies. The time lag between work completion and invoice submission poses challenges for SoCal Gas because the utility is not fully aware when work will be invoiced by the contractor. According to SoCal Gas' Customer Programs Manager, not receiving invoices within this time frame does affect the company's ability to make accurate projections. Without timely submission of invoice data, SoCal Gas' projections are less data-driven and may therefore be less reliable.

Figure 12: How the Invoice Submission and Payment Timeline Should Operate



Source: Auditor analysis of SoCal Gas' November 2011 vendor contract provisions and invoice processing policies.

[5] This date corresponds to the date the Work Order work flow step is closed in the HEAT system.

Recommendations

1. ESAP management should ensure that the aggregate contractual maximum spending limits are within budget.

    a. SoCal Gas corrected this issue by aligning the ESAP contractors' maximum spending limits with the program year budget as of January 1, 2012.

2. ESAP management should change the contract language with vendors to allow SoCal Gas to unilaterally change unit treated goals and maximum spending limit during the program year.

    a. SoCal Gas changed the language in its vendor contracts and is now able to change maximum spending limits and unit treated goals, without vendor agreement, effective January 1, 2012.

3. ESAP management should enforce the contract provision requiring that vendors submit invoices within 14 calendar days of work completion to ensure the HEAT system's data is timely and accurate.

4. ESAP management should develop a projection methodology that is data-driven, produced on a frequent basis (quarterly), consistently evaluated for its accuracy and easily visible by ESAP management. This methodology should produce a high-level report that quickly shows managers overall program status, i.e. budget versus actual, commitments, and remainder of program year projections for the entire ESAP program. In addition to a high-level report, the projection methodology should produce detailed reports that alert management to changes in its quantities installed, average cost per unit and expenses by unit and by contractor.

    a. While SoCal Gas has much of this information available now, ESAP management has stated it is difficult and time consuming to analyze and compile it into useful reports. For this reason, staff is contracting with the original developer of the HEAT system to enhance its management tools.

5. ESAP management should provide Outreach Workers with clear training on how to complete the Income Worksheet and what supporting documentation is appropriate and necessary.

    a. SoCal Gas' ESAP Management recently reviewed the proper way to complete an Income Worksheet and income documentation requirements with its Outreach Workers through training.

Appendix

ESAP is Not Collecting all Required Customer Information

Of the 325 transactions we randomly selected for verification, we tested 301[6]. We compared hard copy invoice and enrollment documentation to data within the HEAT system and SAP accounting system, ESAP policies and procedures, and vendor contract language to ensure all documentation was complete, accurate and consistent with ESAP rules and standards. We also examined the group of transactions for any trends in ESAP activities to better understand the "sudden spike". The frequency of transactions by type is listed in Figure A1 below. The majority of our randomly selected transactions, 46.8 percent, were for work orders – the actual installation of an energy savings measure followed by enrollments and assessment transactions at 41.2 percent. Enrollment and assessment transactions include documentation from the Outreach Worker of the Customer Agreement, Assessment and Income Worksheet and associated documentation. A small percentage of the sample transactions were made up of inspections, combined enrollment, assessment and work order samples, and leads.

Figure A1: Breakdown of Enrollment Sample Items

Sample Type	Count	Percentage of Total
Work Orders (WO)	152	46.8%
Enrollments & Assessments (E&A)	134	41.2%
Removed NGAT Only[3]	24	7.4%
Inspections	10	3.1%
Both WO and E&A	4	1.2%
Lead	1	0.3%
Total	**325**	**100.00%**

During our testing of the 301 transactions, we initially found 19 exceptions. SoCal Gas staff was able to locate the appropriate documentation to support eight of those 19 initial exceptions, leaving 11 remaining exceptions. Figure A2 summarizes the 11 remaining exceptions by category.

[6] 24 enrollments were not tested because they were for Natural Gas Appliance Testing (NGAT). NGAT does not impact SoCal Gas' ESAP budget and therefore, is excluded from our testing.

Figure A2: Summary of Exceptions

Category	Preliminary Exceptions	Percentage of Category	Percentage of Enrollments Tested
E&A	9	6.7%	3.0%
WO	1	.7%	.3%
Both	1	4.2%	.3%
Inspection	0	n/a	n/a
Lead	0	n/a	n/a
Total	**11**		**3.6%**

The majority of the exceptions, nine in total, occurred within enrollment and assessment transactions. While this only represents a small amount of the overall 301 transactions at 3.0 percent, it does constitute a significant portion, greater than 5 percent, of the 134 enrollment and assessment transactions at 6.7 percent. These exceptions were primarily due to incomplete income documentation for customer enrollments.

SoCal Gas' ESAP vendor contracts require the completion of an Income Worksheet for all household members of working age and in some cases, supporting documentation of income or enrollment in another means-tested program, such as Medi-Cal. Without proper income documentation, outreach workers could enroll some households into ESAP that may not actually be eligible. SoCal Gas management became aware of this issue following a recently issued internal audit. In response to the audit in early 2012, SoCal Gas's ESAP management stated it would reinforce the importance of accuracy and completeness of the ESAP enrollment process with contractors reminding them that they will be held accountable for ensuring accuracy via the imposition of a processing fee.

(End of Attachment P-1)

Attachment P-2

Southern California Gas Company: Management Audit of the Energy Savings Assistance Program dated February 25, 2013

Southern California Gas Company

Management Audit of the Energy Savings Assistance Program

On-Site Verification Appointment Results

MACIAS CONSULTING GROUP

February 25, 2013

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Executive Summary

Why the Examination was Conducted

On February 16, 2012, the Joint Assigned Commissioner and Administrative Law Judge before the California Public Utilities Commission (CPUC) ordered that Southern California Gas Company (SoCal Gas) retain an independent third party management auditing firm to examine the records of its Energy Savings Assistance Program (ESAP)[1]. ESAP provides no-cost weatherization services to low-income households that meet certain income guidelines. ESAP contracts with area vendors to provide these services. The CPUC order required SoCal Gas' management audit to include random verification of ten percent of the contractors' actual November 2011 invoices.

What the Review Found

We found no exceptions in any of the on-site verifications we performed. Each measure inspected was installed in accordance with California Weatherization Installation Standards, installed in the quantity indicated on the invoice and appeared to have been installed on the installation date indicated on the invoice.

The results of this review, combined with the work from our first report, dated December 21, 2012, detailing the causes, precursors, or contributory factors for the perceived "sudden spike" in ESAP contractor invoices in November 2011, leads us to conclude that the invoices submitted by ESAP contractors to SoCal Gas for payment accurately reflected the work they performed.

What We Recommend

As there were no exceptions, this report contains no recommendations.

[1] Joint Assigned Commissioner and Administrative Law Judge's Post Order to Show Cause Hearing Ruling: http://www.liob.org/docs/Joint%20ACR%20and%20ALJ%20Post%20Order%20to%20show%20cause%20hearing%20ruling%202-16-12.pdf

Background

The Energy Savings Assistance Program (ESAP) began as a direct assistance program provided by some investor-owned utilities (IOUs) in the 1980s. In 1990, the program was formally adopted by the Legislature within Public Utilities Code Section 2790. Formerly known as the Low Income Energy Efficiency Program or LIEE, ESAP provides no-cost weatherization services to low-income households that meet certain income guidelines. The program is managed by the California Public Utilities Commission (CPUC) and administered by four of the IOUs it regulates – Southern California Gas Company, Pacific Gas & Electric, San Diego Gas & Electric and Southern California Edison – and funded by the Public Purpose Program charge included in customers' bills. Services provided include attic insulation, energy efficient refrigerators, energy efficient furnaces, weather stripping, caulking, low-flow showerheads, water heater blankets, and door and building envelope repairs which reduce air infiltration. The program may also include installation of energy efficient appliances. According to the CPUC, ESAP reached over 300,000 low-income California homes in 2011.

At the Southern California Gas Company (SoCal Gas), ESAP is managed by the Customer Programs division within the Customer Programs and Assistance Department. The division uses an Internet-facing web application called Home Energy Assistance Tracking (HEAT), to manage ESAP activities. The HEAT information management system is used by both SoCal Gas employees and its external ESAP contractors to facilitate program outreach and installation. Contractor invoice data, once processed and approved by division management, is exported from HEAT to the SoCal Gas accounting system, SAP, for payment.

In Decision 08-11-031, the CPUC authorized SoCal Gas $204.7 million for the 2009-2011 energy efficiency program cycle. In the fall of 2011, SoCal Gas' Energy Savings Assistance Program (ESAP) management anticipated that the program may exceed its program budget for the 2011 program year and ultimately, for the 2009-2011 cycle. Management's initial projections in September 2011 estimated ESAP expenditures for the entire program year to be $101 million. This amount would exceed the program's combined authorized budget of $78.2 million and exhaust its carryover amount from prior under-budget program years of $20.9 million.

In November 2011, SoCalGas ESAP management officials attempted to gather additional information from their largest contractors and debated various ways to slow expenditures prior to the program year-end, including requesting estimates from all 44 of its authorized contractors for work to be completed but not yet entered into the HEAT system and for estimates of all other work to be completed before program year-end. These new projections, including contractors' estimates of work completed and projected work, were much higher than expected.

Ultimately, on November 28, 2011 SoCal Gas notified its contractors of its decision to suspend ESAP activity effective December 1, 2011 until 2012 when funds would become available. A day later, the East Los Angeles Community Union, the Association of California Community and Energy Services, and the Maravilla Foundation filed a Joint Emergency Motion to continue SoCal Gas' ESAP. The subsequent Order to Show Cause (OSC) hearing held on December 6, 2011 led to an order from the Administrative Law Judge that SoCal Gas retain an independent third party to examine its program year 2011 ESAP records, specifically those related to November 2011.

Scope

This review examined a random sample of ten percent of ESAP contractors' invoices processed for payment by SoCal Gas in November 2011.

Objectives

The Administrative Law Judge's Order for an independent management audit required that the audit include the random verification of ten percent of the ESAP contractors' actual November 2011 invoices to ascertain whether such work was completed in compliance with the ESAP rules and standards and to see a random profile of ESAP activities during that anomalous period to better understand the "sudden spike."

Methodology

To address the objectives, we:

- Conducted interviews with key ESAP management staff.
- Selected a random ten percent sample of the 612 work order-related invoices processed for payment in November 2011 resulting in 62 sample invoices.
- Randomly selected three work order enrollments[2] within each invoice to increase our probability of scheduling one on-site verification appointment per randomly selected invoice[3]. These three work order enrollments are referred to as the primary, secondary and tertiary enrollments within a sample invoice.
- In cooperation with SoCal Gas staff, developed a customer contact strategy, phone script, scheduling process and logistical plans to achieve the maximum number of on-site verification appointments.
- Scheduled 46 on-site verification appointments.
- Conducted 45 on-site verification appointments.
- Documented and photographed each measure inspected during each on-site verification appointment to determine if:
    - The measure was installed and if so, if it was installed in accordance with applicable California Weatherization Installation Standards;
    - The quantity listed on the invoice of the measure installed was accurate; and
    - The measure appeared to have been installed on the installation date indicated on the invoice.
- Analyzed the results of on-site verification appointments conducted.

In accordance with the Administrative Law Judge's Order, we previously completed the first phase of this management audit which determined what causes, precursors, or contributory factors affected and otherwise triggered a "sudden spike" in contractors' invoicing in November of 2011 which in turn led to

[2] Contractor invoices may include one or more work orders for weatherization measure installations at individual residences, or enrollments. Some invoices contained fewer than three work order enrollments and therefore, only one or two work order enrollments were selected within those invoices.

[3] Home residents were not provided any incentive, nor were they obligated to participate in the inspections.

SoCal Gas' decision to temporarily suspend ESAP activities during the month of December 2011. We provided our initial report to SoCal Gas on December 21, 2012.

We conducted both phases of this management audit in accordance with the Institute of Internal Auditors' International Standards for the Professional Practice of Internal Auditing. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This work was conducted between December 2012 and February 2013. See Appendix A for the detailed implementation methodology.

We have discussed the results with SoCalGas ESAP management and they were provided a copy of the draft report. SoCal Gas ESAP management had no comments on this report.

Principal Results

Each Measure Inspected was Properly Installed and Agreed with Invoice Data

There were no exceptions among any of the 45 on-site physical verifications we performed. All measures inspected were installed in accordance with the California Weatherization Installation Standards and in the quantity specified on the invoice. Each inspected measure also appeared to have been installed on the date indicated on the invoice.

November 2011 Invoices Accurately Reflect Work Completed by ESAP Contractors

In our previous report, dated December 21, 2012, we determined that the projected sudden spike in contractor invoices did not materialize. While this remains true, our on-site verifications, combined with invoice data reliability work completed in the prior report, validates that the ESAP invoices paid by SoCal Gas in November 2011 accurately reflect work completed. In our prior report, we tested 301 enrollments included in contractors' November 2011 invoices to determine if the work billed was documented in compliance with SoCal Gas' vendor contracts and ESAP policies and procedures. While there were some exceptions mainly due to incomplete enrollment and assessment documentation, work order billing information was overall, accurate. Our physical inspections of work performed found no exceptions and no evidence that the invoices SoCal Gas paid in November 2011 did not accurately represent completed ESAP work.

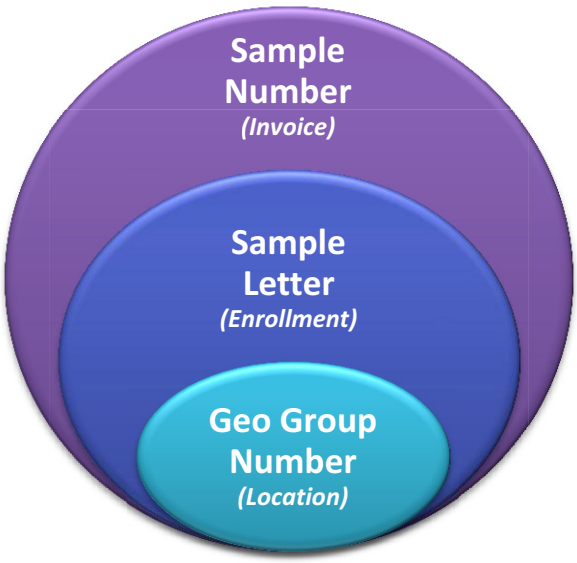
Appendix A: Detailed Methodology: Sampling, Scheduling and Performing On-site Verifications

Sampling Methodology

Each ESAP contractor's invoice can contain multiple enrollments. Each enrollment represents one property and may include charges for initial assessment and enrollment into ESAP, measure installation (work order) or an inspection. For this reason, some of the 779 November 2011 invoices contain only enrollments with charges for the assessment of a residence or the inspection of a previously installed measure and were not suitable for our on-site verification sample. Of the 779 November 2011 invoices, we identified 612 as most likely to contain work orders and therefore, would contain a measure installation that we could inspect.

From those 612 invoices, we randomly selected a ten percent sample of 62 invoices. Of the 33 contractors doing business under the ESA program in November 2011, 22 were represented within our 62 sample invoices. To increase our odds of achieving one on-site verification appointment per invoice, we then randomly selected a primary, secondary and tertiary work order-related enrollment from each sample invoice. As shown in Figure 1 below, we labeled each of our sample invoices with a number, one through 62, and each of the three enrollments within each invoice with the letter A, B or C. Each enrollment was then further coded based on its geographical location within SoCal Gas' territory.

Figure 1: Sample Codes

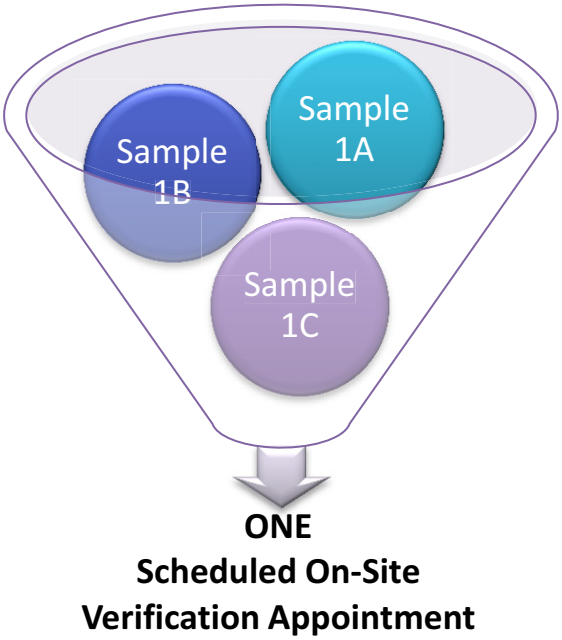


Source: Auditor Analysis of Sample Methodology.

As shown in Figure 2 below, to better our chances of performing at least one on-site verification of an enrollment within each of our 62 sample invoices, we randomly selected three enrollments within each invoice[4] as candidates for verification because customers:

- May not respond to our phone calls; or
- Could decline to schedule an on-site verification appointment; or
- May have sold the property within which the measure was originally installed.

Figure 2: Goal of Using Three Randomly-Selected Enrollments per Sample Invoice



Source: Auditor Analysis of Sampling Methodology.

Scheduling Methodology

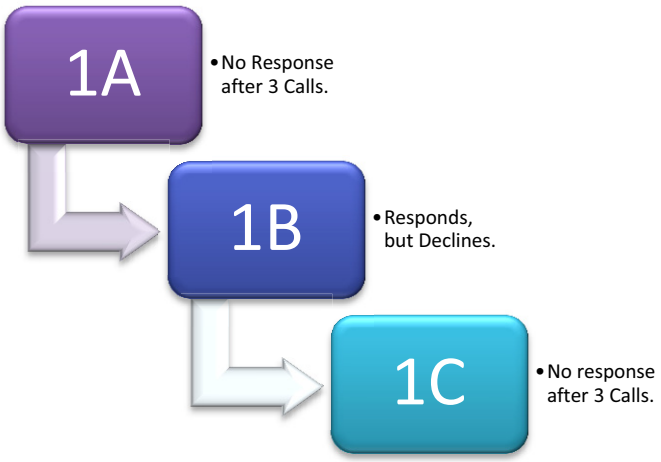
As shown in Figure 2 above, for Sample Invoice 1 there are three randomly-selected enrollments: the primary enrollment (A), the secondary enrollment (B) and the tertiary enrollment (C). For each sample invoice, we contacted the primary enrollment first, followed by the secondary enrollment and finally the tertiary enrollment, if necessary. All contact was made by phone by SoCal Gas Customer Service Representatives.

We contacted each enrollment up to three times with one phone call per day over the course of three days. If there was no response on the fourth day, we marked that enrollment as non-responsive and began the process again with the next enrollment within the sample invoice. Each customer that did

[4] Some invoices contained fewer than three work order enrollments and therefore, only one or two work order enrollments were selected within those invoices.

respond could also do so by declining to schedule an on-site verification appointment. In these instances, we also moved on to the next enrollment within a sample invoice. If all three enrollments within a sample invoice did not respond or declined to schedule an appointment, due to time constraints we moved on to the next invoice sample. Figure 3 provides an example wherein all three enrollments within a sample invoice are either non-responsive or decline to schedule an on-site verification appointment.

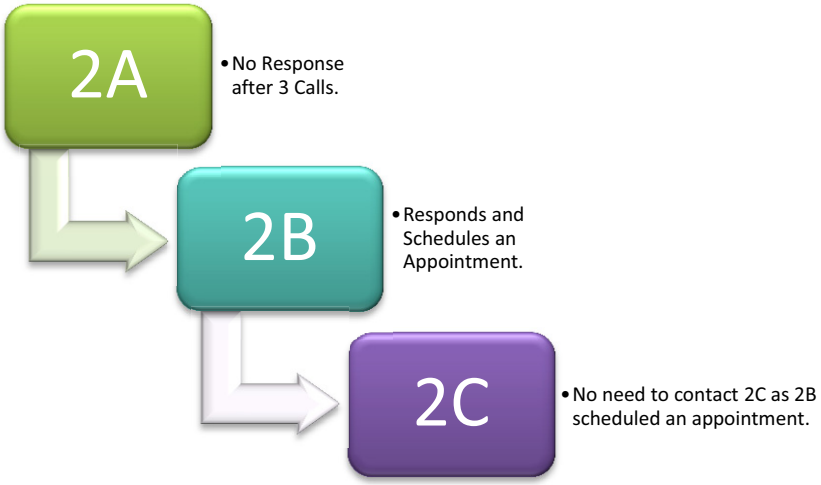
Figure 3: Example Scheduling Scenario 1 – Non-Responsive and Decline to Schedule an Appointment



Source: Auditor Analysis of Scheduling Process.

In most instances, we were able to successfully schedule an on-site verification appointment. If at any time an enrollment within a sample invoice agreed to schedule an on-site verification appointment, the remaining enrollments within that sample invoice no longer needed to be contacted. For example, in Figure 4 below, within Sample Invoice 2, while Enrollment A does not respond after three phone calls, Enrollment B does respond and schedules an on-site verification appointment. At this point in the process, we achieved our goal of scheduling one on-site verification appointment per sample invoice and therefore, Enrollment C no longer needs to be contacted.

Figure 4: Example Scheduling Scenario 2 – A Customer Agrees to Schedule an Appointment



Source: Auditor Analysis of Scheduling Process.

In total, SoCal Gas Customer Service Representatives made over 110 phone calls to schedule our 46 on-site verification appointments. Additionally, Customer Service Representatives contacted each customer that scheduled an on-site verification appointment 48 hours ahead of time to confirm the appointment. Although we designed our sampling and scheduling methodology to achieve the highest number of on-site verification appointments, some customers either did not respond to our request for an appointment or declined to schedule an appointment. Ultimately, we were able to schedule 46 on-site verification appointments. Due to one customer not showing up for a scheduled appointment, we completed 45 on-site verifications.

As required by the ALJ Order, our 62 sample invoices and the work order enrollments within them were randomly selected and therefore, each of the 178 residences in our sample could be located anywhere within SoCal Gas' territory. According to its website, SoCal Gas serves 20.9 million consumers in more than 500 communities. As shown in Figure 5 below, SoCal Gas' territory encompasses approximately 20,000 square miles in diverse terrain throughout Central and Southern California, from Visalia to the Mexican border.

Figure 5: SoCal Gas Territory Map

Source: SoCal Gas' website - http://www.socalgas.com/about-us/company-info.shtml.

To schedule our confirmed on-site verifications more efficiently, we assigned each enrollment with a Geo Code Group. Using Geographical Information System (GIS) software, we were able to divide SoCal Gas' territory into 19 Geo Code Groups. If a customer agreed to schedule an on-site verification appointment, the appointment was scheduled on a day assigned for that customer's corresponding Geo Code Group. In this way, on-site verification appointments could be grouped by location to allow for us to complete more appointments in a shorter period of time.

Performing the On-Site Verifications

With the assistance of SoCal Gas employees, we performed the on-site verification appointments by traveling to each of the 46 residences and personally examining a previously installed ESAP measure. At each on-site verification, we photographed the inspected measure and documented our confirmation that the measure existed, was installed in accordance with California Weatherization Installation Standards, was installed in the quantity indicated on the invoice and appeared to have been installed on the installation date indicated on the invoice. Figures 6 and 7 below are examples of these forms and photographs.

Figure 6: Example of On-Site Verification Form

Performed by: _____ Enrollment: Sample:

Appointment Date	Appointment Time

Appointment Information	
Customer Name	
Customer Address	
Phone Number for Day of Appointment	
Special Notes	

Sample	Measure	Quantity	Date Installed	Exists?	Quantity Accurate?	Appear to have been installed on date indicated?	Appear to have been installed properly?

Please Record Any Additional Notes on the back of this form.

Source: Auditor-developed On-Site Verification Form.

Figure 7: Photographs of Some of the Installed Measures Inspected During On-Site Verifications

Low Flow Handheld Showerhead | Door Striker Plate | Door Weather Stripping | Door Lockset

Furnace Line Valve and Flex Connector

Water Heater Pipe Insulation

Source: Auditor photographs from some of the on-site verifications completed.

(End of Attachment P-2)

Attachment Q

Guidance Documents and Templates for 2015-2017 Applications for the ESA and CARE Programs and Budgets

Attachment Q

GUIDANCE DOCUMENT FOR THE ENERGY SAVINGS ASSISTANCE (ESA) AND CALIFORNIA ALTERNATE RATES FOR ENERGY (CARE) PROGRAMS AND BUDGETS APPLICATION FOR THE 2015-2017 PROGRAM YEARS (PYs)

I. SUMMARY AND OVERVIEW OF THE ESA AND CARE PROGRAMS AND BUDGETS APPLICATION FOR THE 2015-2017 PYs

In the Summary and Overview sections of the applications, the investor-owned utilities (IOUs) must provide a brief descriptive introduction of the ESA and CARE Programs and a summary of the utility's requests, including proposals and budgets associated with the 2015-2017 cycle applications and an overview of the service area. The IOUs may also include any further information that is relevant for consideration in their respective budget applications. The framework and guidelines outlined below must be followed as closely as possible to allow for ease of application review and analysis.

II. ESA PROGRAM AND BUDGETS APPLICATION FOR THE 2015-2017 PYs

A. ESA PROGRAM BACKGROUND

In the ESA Program Background section of the application, the IOUs must:

1. **History:** Provide a brief history of the ESA Program and how it helps low-income customers, how it is funded and how the program has changed over the years, including any prior guidance given by the Commission.

2. **Summary:** Provide a description of the ESA Program, including descriptions of (i) the legal framework of the ESA Program, (ii) the ESA Program Eligibility Guidelines, and (iii) the eligible population.

3. **Current Proposal:**

   a) Explain how your current proposal has changed from that in prior years, including any proposed new ESA Program measures or other activities.

   b) Based on your review of all of the previous budget cycle study findings and working group recommendations, are there any new measures, strategies or best practices that could be considered for inclusion in this program that could benefit California's low-income customers?

   c) In early 2014, Governor Brown declared a state of emergency due to the drought and directed state officials to take all necessary actions to prepare for these drought conditions. We note that several of California's Native American tribes have declared a drought emergency including the Hoopa Valley Tribe, the Yurok Tribe, and the Yocha Dehe Wintun Nation. Each utility's proposal shall consider the water-energy nexus and propose measures and ways to prioritize the cost-effective ESA measures that also save water and contribute to alleviating the drought emergency.

   d) Explain how you coordinated and consulted with water utilities, water districts, water agencies, government offices, Native American tribes, community-based organizations and non-profits, and water experts including the Commission and the Commission's water-energy nexus proceeding(s) to identify potential water-energy nexus measures and analyze their cost effectiveness. Take into account the potential to

forestall use of high energy water sources such as desalinization in analyzing cost effectiveness.

B. ESA PROGRAM GOALS AND BUDGETS FOR THE 2015, 2016 AND 2017 PYs

In the ESA Program Goals section of the application, the IOUs must:

1. **Strategic Plan:** Identify the Strategic Plan Vision, Goals and Strategies for the ESA Program.
2. **Participation Goals:** Propose specific ESA Program participation goals for 2015-2017 (number of homes treated and weatherized). Provide the estimated number of eligible and willing households.
3. **Willingness to Participate (WTP):** Specify all WTP factors being used by your utility, in addition to other factors taken into consideration (e.g., CSD treated homes, the modified 3 Measure Minimum (Modified 3MM) Rule limitations and non-feasibility based on historical tracking data, etc.) in proposing the homes treated goals for the next ESA program cycle. The 2013 Low Income Needs Assessment (LINA) reports varying WTP estimates (anywhere from 52%-72%) based on the pool of respondents and various sources. This estimate is also dependent on unidentified barriers to participation in the ESA Program.
4. **Response to Barriers to Participation:** Identify how your utility has addressed barriers to participation, including WTP related issues, and attempted to serve those customers that have been unwilling to participate. Indicate why those efforts have been successful or not successful.
5. **2002-2013 Homes Treated Data:** Provide actual or estimated participation data and the number of homes treated or weatherized compared against the benchmarks, if any, established by the Commission for the period 2002 to 2013.

6. **Unique Factors:** Discuss unique issues in your utility's service area that would make 100 percent penetration challenging and also discuss homes projected but not reached in the 2012-2013 PYs.
7. **Estimated Energy Savings:** Provide a chart of estimated energy savings in kilowatt hour (kWh) or Therms from years 2015 to 2017.

In the ESA Program Budgets section of the application, the IOUs must:

1. **Strategies:** Present a detailed discussion that clearly identifies specific strategies and programs for the budget years 2015-2017, including proposed budget strategies, aimed at accomplishing the ESA Program programmatic initiative. In light of Governor Brown's declaration of a state of emergency due to the drought, and other drought emergency declarations, also present any strategies incorporating the Governor's directive and other drought directives, and ways to prioritize the cost-effective ESA measures that also save water and could contribute to alleviating the drought emergency.
2. **Actual 2012 and 2013 Expenditures:** Provide your utility's actual expenditures, along with approved budgets, from 2012 and 2013 by line item, consistent with the Accounting and Reporting Requirements previously distributed by the Energy Division. Costs must be shown on an annual basis; and the 2014 approved budget must also be included.
3. **Carry-over Funds:** Discuss carry-over funds from the 2012-2014 budget cycle. Explain why the carry-over funds exist.

C. PROGRAM DELIVERY

1. Program Design

In the ESA Program Design section of the application, the IOUs must:

a) Proposal(s): Describe any specific proposed requests to enhance the ESA Program during the 2015-2017 program years, including budget and proposed program design modifications based on Phase II Studies and/or Working Groups' Reports findings and recommendations, and also describe any requests, including budgets and proposed program designs, aimed at furthering your strategies concerning the Governor's drought emergency directive, and other drought declarations and directives, and ways to prioritize the cost-effective ESA measures that also save water and could contribute to alleviating the drought emergency.

b) Approach and Design: Describe how the utility intends to approach and design its ESA Program during the 2015-2017 program years. Discuss past program accomplishments and obstacles with regard to program implementation.

c) Complaint History: Describe your utility's history of any customer complaints or concerns.

d) Program Delivery: Describe your utility's use of CBOs, private contractors, third parties, etc.;

e) Portfolio composition: Describe your utility's m ix of measures and proposed new measures. Include potential alternatives to mitigate challenges faced by single fuel utilities, such as customer reliance on natural gas or propane or similar barriers to ESA Program participation; and

f) Leveraging: Describe your utility's coordination activities with other utility programs and other entities to increase efficiency and ensure eligible homes are afforded an opportunity to participate in the ESA Program.

2. Marketing, Education and Outreach

In the ESA Program Marketing, Education and Outreach section of the application, the IOUs must include discussions of each of the following subject areas:

a) Renters: Discuss program marketing and outreach improvements that will assist with easier enrollment for renters, particularly those living in Single Family homes that have identified barriers with enrollment such as landlord approvals and completed Property Owner Waivers.

b) Rural Population: Identify specific underserved rural areas (by ZIP code or county, tribal area, or other appropriate area considering climate and population) in your utility's service area. Discuss what new strategies your utility will employ to better target and enroll those households in the ESA Program. Also, identify the strategies to be carried out in each county, zip code, tribal area, or identified area, if they vary. Consider coordination with California and Federal LifeLine providers offering service in those areas, tribal Governments, local governments, CBOs, and others when developing your marketing and outreach strategies.

c) High Poverty Areas (income less than 100% of federal poverty guidelines): Identify the very high poverty areas within your service territory that have low rates of participation in the ESA Program (by ZIP code or county, tribal area, or other identified area), and discuss what new

strategies your utility will employ to increase ESA Program participation. Consider coordination with California and Federal LifeLine providers offering service in those areas, with CBOs, consultation with tribal Governments, and with local government agencies in those areas, when developing your marketing and outreach strategies.

d) Transiency in the Low -Income Population: As outlined in the Multifamily Segment Study and echoed in other studies, a large component of California's low-income population is transient, particularly those low-income Californians residing in multifamily housing. Discuss what systems your utility can use to flag and follow past ESA Program participants as they relocate, if they remain income eligible.

e) Non-Transient CARE Population and ESA Program Participation: While a high transiency rate is observed for part of the low-income population, Commission staff has analyzed CARE program data that indicates that a large proportion of enrolled CARE customers have lived at their current address (and same energy meter/account) for over four years and have never participated in the ESA Program. What is your utility's plan to ensure that this specific CARE customer segment participates in the ESA Program to both reduce their energy burden, energy consumption, and their subsequent CARE subsidy impact?

f) Brand Identity: The 2013 Low Income Needs Assessment study reported that few customers knew of the ESA Program by its name or acronym, whereas there is much more widespread awareness of the CARE Program. This lack of ESA Program name recognition was true even of those customers who had participated previously or had recently had contact with the program. The study makes the recommendations to link ESA marketing consistently with existing outreach efforts for CARE whenever that is not already done and establish a clearer identity and brand for the ESA Program. Describe your utility's response to these two recommendations and propose how these two recommendations could best be implemented amongst the four IOUs, at a minimum employing the examples provided in the study.

In the ESA Program Marketing, Education and Outreach section of the application, the IOUs must also:

a) Plans for Improving Enrollment: Describe all current and suggested Marketing, Education and Outreach methods, including all efforts to coordinate with California and federal LifeLine providers in the utility's service territory and any water utilities and water districts in the utility's service territory, CBO, tribal Government, and local government and business partnerships to improve ESA enrollment, and include the estimated costs.

b) Coordination Between the ESA and Lifeline Programs: D.14-01-036 allows low-income customers to receive subsidized wireless service through the California Lifeline Program. In what ways can this new opportunity be leveraged to market the ESA Program, improve outreach to

enroll eligible households, and enhance existing PEV and re-certification processes during the upcoming 2015-2017 program cycle and beyond? Be specific in your response to the above and include opportunities for data sharing to support inter-program coordination. In particular, address how smart phones can be used to facilitate customer education/outreach, and income verification.

c) Plans for Meeting Participation Goals: Discuss how Marketing, Education and Outreach efforts will result in meeting program participation goals including any specific population sectors or segments.

d) 2012-2014 Actual Expenditures and Per Household Cost: For each of the program years from 2012 to 2014, provide a comparison of the budgeted, recorded or estimated average Marketing, Education and Outreach cost per household treated.

e) Effectiveness: Discuss the effectiveness of your utility's local Marketing, Education and Outreach methods within your service territory and what has been your past experience regarding the success of these methods.

f) Statewide Marketing Education and Outreach: Discuss alternatives to minimize redundancy and better leverage local and statewide Marketing, Education and Outreach efforts including approved initiatives and/or funding in the general energy efficiency docket, Rulemaking (R.) 09-11-014?

3. ESA Program Implementation

In the ESA Program Implementation section of the application, the IOUs must include discussions of each of the following subject areas:

a) Reduce the number of visits to a home for measure implementation: One of the barriers identified by the 2013 Low Income Needs Assessment (LINA) study was that the number of visits to a home deterred households from enrolling. Discuss how your utility will continue to refine its implementation strategies to reduce the number of visits so that households that refuse to enroll due to difficulties being home for subsequent visits may participate in greater numbers.

b) Priorities for treatment: One of the recommendations provided by the 2013 LINA study was to explore the tradeoffs associated with screening customers based on energy usage, energy burden, and health, comfort and safety criteria to determine priorities for treatment and/or tailor ESA Program services to the home. Based on the demographics and characteristics of those customers exhibiting the highest energy burden and insecurity, discuss how your utility will prioritize this segment of the low-income population to ensure that they are targeted and enrolled into the program, and how their homes will be treated, if differently from other low-income homes. In light of the drought emergency declared in 2014 and uncertainties about future water supplies in California, and in light of the energy intense nature of certain water supplies (e.g. desalination which may be used in some areas if other supplies are not available in sufficient quantities), discuss how your utility will prioritize delivery of the ESA measures to save water or enable water savings.

c) Overlapping Service territories: Discuss how your utility will ensure that in the IOUs' overlapping service areas (especially SCE and SoCalGas), customers are screened for both IOUs' measures efficiently to increase the number of customers that pass the Modified 3MM rule and to provide comprehensive treatment.

d) In Home Energy Education: Phase 1 Report of the Energy Education Study revealed opportunities for standardization and improvement to the existing ESA Program energy education materials. What specific

enhancements and improvements are planned to encourage customer behavior changes toward gaining greater energy efficiency and conservation in low-income households and to improve their awareness of energy efficiency and conservation practices?

e) Modified Materials: Describe all modified materials to improve customer engagement, recollection and subsequent use (e.g., guidebooks, energy wheel, calendars, website or internet-based materials, phone apps, etc.), including materials that are customized with applicable and tailored content to certain household demographics including households with multiple members, small children, teenagers, seniors, persons with disabilities, non-English dominant speakers, etc.

f) Post ESA-treatment Follow-up: Describe all post ESA treatment follow-up activities including all mail-back or web-based survey, texts, apps, calls or other forms of periodic communications that are being considered for the upcoming program cycle.

g) Training and Materials: Describe plans for standardization of training and materials across all four of the IOUs' service areas.

h) Compliance Surveys: Describe plans for augmentation of your utility's existing compliance surveys and In-Home Inspections to ascertain the quality of the Energy Education information provided.

i) Comparative Home Energy Usage Reports/Residential Behavior-Based Energy Efficiency for Low -Income Customers: Home Energy Usage Reports provide customers with a comparison of their energy usage to that of their neighbors in similar-sized households. Customers who use more than their neighbors receive reports that reveal their relative higher usage patterns for the month and recommendations to lower their energy usage. Customers who use less energy than their neighbors receive reports that include positive messages to encourage continued "good behavior." The 2013 *Evaluation of Pacific Gas and Electric Company's Home Energy Report Initiative for*

the 2010–2012 Program verified energy savings claims from PG&E's piloting of Comparative Usage Reports. Describe plans, if any, for implementing either the same or similar Residential Behavior-Based Energy Efficiency efforts to ESA Program eligible customers, separately or as part of the subsequent phase of the Energy Education Study (Phase 2).

j) Multifamily Sector: Describe all updated program designs and marketing approaches for Multifamily Households, including an extended discussion of (1) how your utility proposes to implement the recommendations of Multifamily Segment Study adopted in the Phase II decision in this proceeding and (20 how your utility proposes to coordinate or integrate with non-low-income energy efficiency programs. Indicate how these updated design(s) and marketing approaches address the ESA program goals and strategies. Indicate how these updated design(s) and marketing approaches for Multifamily Households address the dual objectives of serving all ESA Program eligible and willing households and delivering energy efficiency measures cost-effectively. Address all of the topics listed below:

(1) D.12-08-044 directed the IOUs to implement Multifamily Segment Strategy 3 - an updated marketing approach to treating this sector. Discuss how your utility implemented this strategy in the last program cycle.

(2) A primary finding of the Multifamily Segment Study suggests that the ESA Program employ a marketing strategy component that targets the owners and operators of multifamily properties with low-income residents and to align this new messaging to communicate the benefits of building upgrades from an investment perspective. Discuss what specific changes your utility will be making to the ESA Program's existing marketing and outreach efforts in light of these recommendations.

(3) The Multifamily Segment Study recommends that the IOUs develop a system to receive notices about low-income

multifamily buildings planning a recapitalization event through the Low Income Housing Tax Credit (LIHTC) administered by the State Treasurer's office and conduct targeted, in-person outreach to these identified properties and owners. Discuss how your utility plans to target low-income multifamily properties and their owners with outreach and marketing at identified" trigger-points" (i.e. scheduled or ongoing building recapitalization, renovation, or refinancing events) and what this targeted outreach will entail.

(4) Discuss how your utility plans to leverage relationships with lenders and other banking institutions, Local, state, and federal government institutions, tribes, non-profits and others including trade associations to identify, and target outreach to market-rate low-income multifamily property owners initiating or undergoing a recapitalization, renovation, or refinancing event, and whose buildings may house low-income households.

(5) Discuss all new approaches your utility plans to utilize to improve the quality of data collected (i.e., building vintage data via county assessor and recorder information, historical/future permitting data via county building inspection data, US Department of Agricultural Rural Development housing data, tribal or Bureau of Indian Affairs Data, local, state, and federal, and CBO data, etc.). Discuss how your utility plans to utilize these data to target potential ESA Program eligible multifamily properties and their owners. Discuss how your utility plans to leverage existing relationships and data sharing agreements with mainstream energy efficiency funded, local government partnerships to acquire the data and insight to help target low-income multifamily properties and residents for ESA Program participation. Indicate what third party data are available, and how your utility will use these data to augment your current customer database(s) to help identify low-income multifamily properties and residents eligible for ESA Program participation.

(6) Discuss how your utility's ESA Program multifamily offerings will utilize benchmarking for marketing, education, outreach and other program delivery efforts. Discuss whether EPA's Portfolio Manager benchmarking tool could fulfil the benchmarking needs for the ESA Program's participating multifamily properties. Provide an analysis of the costs and benefits of requiring mandatory whole-building benchmarking for multifamily property participation in the ESA Program.

(7) The Multifamily Segment Study recommends revisiting ESA Program policy on expanding the variances under which a low-income building qualifies for relaxed income verification requirements for the program. The study also provides a method by which to determine the viability and potential costs and benefits of implementing this recommendation. Indicate which, if any, ESA Program policy and procedure changes your utility requests in regards to allowing documentation that certifies a building for identified income-based subsidy programs (e.g., Section 8, deed-restricted, HUD, TCAC, HCD or USDA) and serve as qualification to enroll tenants in the ESA Program. Using the study consultant's outlined methods, discuss the viability and potential costs and benefits of implementing this recommendation.

(8) 80:20 Rule: Discuss how your utility proposes to implement a change to the ESA Program policy and procedures that would lower the level of verification from 80% of a multifamily building's tenants being income qualified to treat unoccupied units and the building shell and other energy systems, to some lower level of verification. Based on historical participant data and measure installation costs, describe what your utility projects as the resulting impact(s) of instituting this rule change in your utility's service territory.

(9) Single Point of Contact: D.12-08-044 directed the IOUs to implement a single point of contact to coordinate

the varying IOUs' programs for the multifamily segment. For program year 2013, discuss what level of ESA Program funding, staff time, or other resources supported IOUs' compliance with this directive. Discuss your utility's lessons learned from implementing a single point of contact and how they are reflected or otherwise incorporated in any updated program delivery design.

(10) For the 2015-2017 cycle, specify the level of funding, staff time, or other resources the ESA Program will dedicate to continuing the single point of contact effort.

(11) The Multifamily Segment Study findings indicate that for low-income multifamily properties, there is less opportunity for owners to increase rents to cover the costs of energy efficient upgrades, making energy efficient retrofits more costly and less likely. Describe how your utility plans to coordinate the ESA Program funding with the Energy Upgrade California Multifamily (EUC-MF) or Multi-Family Energy Efficiency Rebate (MFEER) programs for low-income buildings or with energy efficiency upgrades associated with other utility energy efficiency, energy procurement or demand response strategies. Discuss all funding options your utility is considering (including coordinated funding and no funding) or whether your utility is considering leveraging other program funding or private funding, energy procurement or demand response strategies, or carbon compliance offset/credit strategies. An example may be, but is not limited to, a per-unit adder, based on the number of verified low-income tenant units, from the ESA Program, to the EUC-MF or MFEER programs.

(12) Multifamily Measure Offerings: Discuss if your utility will be proposing to offer common area lighting measures and/or other "new" measures to eligible and willing multifamily properties via the ESA Program? If so, discuss whether there is precedent or justification for a mechanism to pool or comingle ESA Program funds with MFEER and/or EUC-MF offerings or other energy

efficiency, energy procurement or demand response programs to provide increased incentives for those programs for eligible low-income properties?

k) Energy Upgrade California Multifamily Program (EUC-MF)/Middle Income Direct Install Program (MIDI)/Multi-Family Energy Efficiency Rebate (MFEER) Coordination for Multifamily Sector: Describe all updated plans and proposals to coordinate among ESA and EUC-MF/MIDI/MFEER or other energy efficiency, energy procurement or demand response programs. Specifically, address the items below:

(1) Per D.12-08-044's Multifamily Segment Strategy 4, describe all steps your utility took since 2012 to synchronize the ESA Program's policies and procedures with those of EUC-MF and MFEER.

(2) Describe whether these efforts been successful. If not, identify how your utility plans to overcome these barriers in the next cycle.

(3) Describe how your utility plans to implement a single intake form for any and all programs that have multifamily offerings. Explain whether your utility plans to allow or request that the more rigorous audit and assessment findings from other IOU programs (i.e., EUC-MF) will fulfill the assessment requirements for the ESA Program.

(4) Describe how your utility proposes to implement comprehensive customer data sharing efforts between the ESA Program and other IOU Multifamily programs (i.e., EUC-MF and MFEER) to ease integration between programs.

l) Leveraging and Coordination: Describe all updated plans and proposals for leveraging and coordination with other IOU programs, Government and Local Agencies, and tribes, including the below:

(1) Department of Community Services Development: Discuss the existing leveraging efforts with this agency for the pilots listed below and any other

similar efforts and how lessons learned from those efforts will be applied in 2015-2017:

(i) Data Sharing Pilot Results

(ii) Geographic Coordination Pilot Results

(iii) Solar Water Heater Pilot Results

(iv) Bulk Purchasing Pilot Results

(2) CBOs: Discuss how you will coordinate *differently* in this next cycle with CBOs to conduct outreach to overcome potential ESA Program customers' lack of trust in contractors, a significant barrier identified in the LINA study.

(3) Other utilities: Discuss coordination plans with other water, telephone, energy utilities, or water districts to increase and improve outreach to the CARE and ESA population and improve program delivery.

(4) Other coordination: Discuss coordination between ESA and other energy efficiency, energy procurement, or demand response programs and coordination between ESA and local, state, federal, and regional government entities, and California Tribes including associations and service providers for tribes.

m) Program Rule(s) Modification(s): Describe all updated plans and proposals, if any, for modifications to the existing program rules and attendant justifications, including but not limited to:

(1) Income self-certification (CARE and ESA)

(2) Modified 3MM Rule

(3) 10 Year go back rule

(4) Second Refrigerator replacements & Proposed incentives (per LINA recommendation)

(5) High Efficiency Furnaces (95 AFUE) (Model & Efficiency levels)

(6) Exceptions specific to Multifamily

(7) Exceptions specific to those with high energy burden, energy insecurity, or medical issues

(8) Others

n) Workforce Education and Training (WE&T): Describe the current status of WE&T data collection and your utility's plan to complete the collection of ESA Program workforce data that is necessary for meaningful analysis and addresses concerns of uniformity, consistency, accuracy, and granularity by filling any current data gap. Describe your utility's proposed plan, schedule and budget to develop and implement your WE&T plan.

o) Best Practices: Incorporating Best Practices and Lessons Learned from 2012-2014 Implementation: Discuss the challenges and obstacles your utility experienced in meeting the 2012-2014 budget cycle goals. Include any changes your utility would propose in the program delivery cycle to further your success in meeting the strategic planning goals. Consider opportunities for partnerships and coordination such as coordination with other energy, water or telephone utilities, local, state, federal, regional, and tribal governments, CBOs, non-profits or trade associations to meet strategic planning goals. Consider use of technologies such as apps, text, internet services, calls, instant messages, community, tribal, and CBO-based outreach, media including non-English language media and social media, and other methods and avenues to achieve program goals.

p) Customer Service Strategies: Describe all new and proposed Customer Service Improvements and Strategies.

q) Legislative Changes: Describe your utility's plan and proposals to comply with legislative changes including but not limited to AB 327 and related budget impact projections.

r) AB 270: Describe your utility's plan and projected costs of complying with the data publication requirements of PU Code 589 as legislated by AB 270.

s) Single Family Affordable Homes (SASH) Solar Program and Multifamily Affordable Solar Housing (MASH) Program: Describe your utility's plan to prioritize SASH and MASH applicants in compliance with AB 217, and include a discussion of the following:

(1) Costs, benefits, and barriers to implementing a synchronized data exchange/lead generation protocol for the SASH, MASH and ESA Programs to ensure that the programs work cooperatively and in an integrated manner.

(2) Costs and benefits of referring your utility's CARE customers with electric usage above 400% baseline to the SASH and MASH programs: Discuss whether such a referral should be triggered after the first time a customer reaches 400% of average use, or rather the second time that threshold is reached in a 12-month period. What are the costs and benefits of making such referrals to tenants of single family households or multifamily households. Also discuss the costs and benefits of outreach to landlords and landlord representatives or associations where tenants use 400% of baseline energy; and

(3) Any program delivery design benefits from authorizing and training SASH and MASH contractors and outreach workers to do ESA Program assessments and enrollments, keeping in mind that energy efficiency and demand response are first in the loading order.

D. COST EFFECTIVENESS AND ENERGY SAVINGS

In the Cost Effectiveness and Energy Savings section of the application, the IOUs must include discussions of each of the following subject areas:

1. Summary and Overview:

Provide a summary and overview of the ESA Program cost effectiveness and energy savings. Include a discussion of plans to prioritize cost-effective measures that also save water and contribute to alleviating the drought emergency. Analysis may also include consideration of all climate-zone specific cost-effective measures that save energy and water and consideration of water saving education to raise awareness of the water energy nexus issues. Include a discussion and analysis with supporting data, if any, of whether any passive efforts such as water education, passive cooling through climate appropriate trees, drought tolerant landscape education or replacement incentives could be considered cost-effective measures in the ESA Program.

2. 2012-2014:

Specifically discuss the results of the ESA Program efforts, cost effectiveness and energy savings, accomplished during the 2012-2014 program cycle.

3. Plans and Proposals:

Explain how your utility plans to incorporate the results and recommendations into the 2015-2017 program cycle while incorporating the Cost Effectiveness Working Group Final Recommendations we adopt in the Phase II decision in this proceeding and coordinating with the directions in the Commission's Rulemaking proceeding, R.09-11-014. Discuss your utility's plans to address the water-energy nexus.

E. MEASURE PORTFOLIO COMPOSITION

In the IOUs' Measure Portfolio section, IOUs must include the following:

1. Overall Portfolio Composition:

Discuss the mix of measures proposed for the 2015-2017 portfolio, including discussion of the topics below:

a) Cost Effectiveness and Other Criteria for Program Measures:

- Describe the criteria used to compose the portfolio.
- Describe how the portfolio composition results in improved cost-effectiveness.
- Describe how each measure included in the portfolio achieves the dual objectives of maximizing long-term and enduring energy savings and enhancing the participants' quality of life.
- Discuss the benefit/cost ratio and cost- effectiveness ratio of proposed measures using the proposed CE tests. Explain assumed values and variables and other model components.
- Provide justification for measures included in the portfolio (if any) that do not meet the current criteria of cost effectiveness but serve other important policy objectives. This may include, but is not limited to, consideration of water- energy nexus measures that address the drought or forestall the need to use highly energy intensive water resources such as desalination.
- If your utility is proposing to go back to homes that have received ESA Program treatment since 2002 to provide additional new measures, discuss the tradeoffs of doing so and include the cost implications.

b) New Measures:

- Identify new measures that are being proposed for the 2015-2017 program cycle, with the relevant cost effectiveness ratios or justification for deviations as described above.
- Provide justification for why such measures should be included in your ESA program portfolio.

c) Retired Measures:

- Identify measures from the 2012-2014 portfolio that are being retired or proposed to be retired from the 2015-2017 program cycle.
- Provide a justification for why such measures should no longer be included in your portfolio.

F. OTHER ESA PROGRAM ELEMENTS AND POLICIES:

1. Existing Policies:

Generally, discuss the existing policies that should be reiterated and will be continued into the 2015-2017 program cycle, any existing policies that are being proposed to be retired, and any existing policies that are being proposed to be expanded or modified in the next cycle.

2. Southern California Edison (SCE) and Audit Findings:

SCE must provide as a separate attachment to its 2015-2017 budget application filing, its utility's response to the Utility Audit Finance and Compliance Branch (UAFCB's) 2009-2010 Audit Report along with a summary of all corrective measures that were implemented to ensure compliance. SCE must specify where each corrective measure is also properly reflected and/or documented (e.g., monthly and/or annual reports, formal filings, etc.).

3. **ESA Program Report Posting to the California Energy Efficiency Statistics (EEStats) Site:**

   In addition to sending the monthly and annual ESA Program compliance reports to the service lists, the IOUs should begin planning to post ESA Program Monthly and Annual Reports to the California Energy Efficiency Statistics (EEStats) Site. EEStats is an easy to navigate public website that among other functions, acts as a repository for the IOUs' Energy Efficiency reports. The IOUs should begin planning and coordinating with Energy Division to integrate ESA Program data, starting in the 2015-2017 program cycle, into EEStats' EE Data Portal functionality. The EE Data Portal is the official public reporting site for California energy efficiency program tracking data. This site presents standardized quarterly program tracking data submitted by the state's IOUs.

   The IOUs, in their respective applications, should describe what coordination and planning have been completed to ensure that they are ready to submit the monthly and annual ESA Program compliance reports to the service lists, as well as posting ESA Program Monthly and Annual Reports to the California Energy Efficiency Statistics (EEStats) Sites, starting January 2015.

4. **San Onofre Nuclear Generating Station (SONGS):**

   a) San Diego Gas & Electric Company (SDG&E) and SCE must describe how your utilities are utilizing the ESA Program to reduce load and energy usage in transmission constrained areas resulting from the decommissioning of the SONGS. Describe efforts to coordinate your ESA program efforts with other energy efficiency, energy procurement, or demand response efforts, and D.14-03-044 which authorized procurement for SCE and SDG&E to meet local capacity needs stemming from the retired SONGS.

b) SDG&E, SCE and Pacific Gas & Electric Company (PG&E) must describe how residents in other transmission constrained areas in their respective service territories are being prioritized for participation in the ESA Program.

5. **Advanced Metering Initiative:**

With over $5 Billion dollars in ratepayer funds expended on the Advanced Metering Initiative, describe how the smart meter data, including Green Button Data, or Smart Meter functionality, are being utilized by the ESA Program in planning, implementation, and program design. Third party data analytics may be available to do remote, appliance level load disaggregation for potential ESA Program participants. Describe how this data interpretation, or similar analytics, is being planned for use in outreach, assessment, or educating potential ESA Program participants. Describe how Smart Meter functionality including local area networks (LANS) is being used to implement ESA Program. Describe how Smart Meter LANS and other resources could be used to coordinate with water utilities to promote water consumption awareness and leak detection to address the water-energy nexus.

7. **Workforce Education and Training:** D.12-08-044 established the ESA Program Workforce, Education and Training Working Group (WE&T Working Group). The WE&T Working Group attempted, but was unable, to collect and report data in several WE&T areas. The ESA WE&T Working Group proposed that the WE&T expert consultants selected in the mainstream energy efficiency proceeding address the ESA Program workforce data collection needs as well as research questions provided in the Working Group's final recommendation filing. However, the expert consultants may not be able to provide the data the WE&T Working Group has recommended. One of the WE&T expert consultants will be developing an action plan that will include

recommendations on how the IOUs can begin this data collection effort.

a) Describe how and when your utility would be able to implement the plan to collect this ESA Program workforce data to ensure that the data is useful for analysis and addresses concerns of uniformity, consistency, accuracy, and granularity?

b) As part of the consultant's action plan, the consultant may suggest the IOUs acquire off-the-shelf software tools to track workforce data. Describe how your utility would implement such tools to develop and report on the workforce data requirements outlined in D.12-08-044. Assume for purposes of this response that the IOUs would be authorized to pool their funding to procure one reporting system that can be utilized across multiple programs.

c) The WE&T expert consultant may recommend instituting a wage-floor or prevailing wage for the contractors participating in the ESA Program. Include your utility's estimated budget to facilitate a prevailing wage and the cost-effectiveness implications of instituting such a change. Consider employer savings on turnover costs, increases in productivity, the effect on work quality, and accepting a lower profit margin when determining cost effectiveness. When could a prevailing wage be established in the ESA Program for your utility?

d) Worker Training Ladder: How will your utility develop a "career pipeline" for workers currently employed in the IOUs' ESA Program that articulates career pathways and educational opportunities or certificates for workers to access higher wage and higher skill jobs? Possible career pipeline development strategies can include the release of Requests For Proposals to qualified workforce development entities for the creation of a pre-apprenticeship training and certificate program that will provide the ESA Program workers the skills, training and skills needed to

provide access to entry-level residential, non-residential EE, and utility employment.

e) "First Source" Hiring Requirements: A "First Source" requirement requires that contractors provide advanced notice of upcoming job or internship opportunities to the utilities. Moreover, the language requires that the IOUs have existing relationships with experienced workforce training providers, who can match skilled EE workers to the job openings. SDG&E and SoCalGas have begun inserting "Source" and "Job Creation" reporting requirements in their contracts with energy efficiency contractors. Their language can be easily used by other IOUs.[1] How can your utility implement similar "Source"language in the next round of ESA contracting? Strong and specific "First Source" language in all ESA Program contracts between the IOUs and a given contractor can increase access for low-income, disadvantaged workers to enter the ESA jobs pipeline. Furthermore, by establishing relationships with experienced and skilled workforce development organizations, the IOUs can create a pipeline of disadvantaged workers with the necessary skills to work in the ESA program.

8. **Database for Energy Efficient Resources (DEER):** How will your utility's ESA Program support (via allocated employee resources, etc.) the planned updates to the DEER database to include ESA Program specific measures, as well as low-income usage profiles for current measure entries? What is your utility's plan to augment or bolster these

[1] The referenced language is as follows: "In the event that new job opportunities arise as a result of this SOW, Contractor shall provide advanced notice of job or internship opportunities and the skills required for those positions to COMPANY or COMPANY's designee. Advanced notice should be provided at least two weeks before the job or internship opportunity is listed publicly. These opportunities may be shared with organizations that provide EE workforce training."

ongoing DEER updates and will these updates be incorporated into ESA Program planning? If so, how will this incorporation occur?

9. Evaluation, Measurement & Valuation (EM&V):

The 2012-2014 budget cycle saw several corresponding ESA and CARE Program studies that, in conjunction with other planned mainstream energy efficiency EM&V efforts, inundated IOUs' EM&V staff and systems with high volume,
complex, data demands. As a result, there were delays in processing consultant data requests and transmitting data to study consultants. What is your utility's plan to support these internal EM&V departments, staff and systems to prevent future resource constraints and data delays?

10. AB 327:

In light of potential future rate design changes directed under AB 327 and under consideration in R.12-06-013, how will your electric utility address affordability issues through ESA? Discuss whether your utility would be seeking to roll out technological solutions, new outreach plans or partnerships, or other initiatives under ESA to address AB 327, and if so, explain how your utility plans to implement the solution, in detail.

G. ESA PROGRAM PILOTS:

Clearly describe a summary of any new pilots being proposed that are consistent with the programmatic initiatives findings and recommendations of the study reports and working group reports. Describe any new proposals for water-energy nexus pilots. Describe any new proposals for pilots to use the ESA Program to ameliorate carbon emissions, encourage or support carbon offset projects, and address factors that contribute to climate change. Discuss specifically how each pilot contributes to meeting the programmatic initiative, consistent with the findings and recommendations of the study reports and

working group reports. All proposals must include proposed budgets and detailed justifications for the proposed pilot and budget.

H. STUDIES AND EVALUTATIONS:

Clearly describe a summary of any new studies and/or evaluations being proposed. Discuss how each study/evaluation contributes to meeting the programmatic initiative. All proposals must include proposed budgets and detailed justifications for the proposed study/evaluation and budget, as proposed.

I. IMPACT EVALUATION STUDY

1. 2012-2014 Impact Evaluation:

Discuss the results of the 2012-2014 Impact Evaluation carried out during the 2012-2014 program cycle. Explain how those results and recommendations will be incorporated into the 2015-2017 program cycle.

2. 2015-2017 Impact Evaluation:

In addition to other elements that may be added, the 2015-2017 Impact Evaluation will estimate first-year gas and electric energy savings and coincident peak demand reduction attributable to the ESA Program energy savings impact estimates, in aggregate, by IOU service territory, by average participant, by household, by measure and/or measure group, and, where possible and appropriate, by climate zone and housing type.

J. LOW INCOME NEEDS ASSESSMENT

1. 2012-2014 Low Income Needs Assessment Study:

Discuss the results of the recently completed Low Income Needs Assessment Study that was carried out during the 2012-2014 program cycle. Explain how those results and recommendations will be incorporated into the 2015-2017 program cycle.

2. AB 327:

Pursuant to the AB 327 requirement for a triennial needs assessment study, the IOUs must propose specific study areas or subjects for further study in the next LINA. Present a specific areas or subjects and detailed discussion of why these areas warrant further study and how the additional information works towards accomplishing the ESA Program's programmatic initiatives. At minimum, include the following topics:

a) Estimates of Remaining Energy Savings Potential.
b) Updated Assessment of Energy Insecurity and Energy Burden.
c) Level of burden in providing income documentation for CARE Program participation.
d) Most beneficial program measures.

3. Energy Education Study - Phase 2 Report:

On November 1, 2013, a joint petition to modify D.12-08-044 (Joint Petition) was filed by the IOUs seeking modification of that decision that would authorize an extension of time for the IOUs to complete the Energy Education Study ordered in that decision, including completing the field study requirements in assessing the benefits of the current energy education offerings until the ESA and CARE 2015-2017 program cycle. Provide a joint proposal for the subsequent phase of the Energy Education Study (Phase 2) for the 2015-2017 program cycle pursuant to the requested and granted modifications to D.12-08-044.

K. ESA PROGRAM BUDGET

Present a detailed budget discussion that clearly identifies specific strategies and programs for budget years 2015-2017 and works towards accomplishing the ESA Program's programmatic initiatives.

1. The proposed budget must clearly outline each program category cost and break it into specific components.
2. Include a table on the 2012-2014 actual budget, comparing the costs with the proposed 2015-2017 budget, and indicate the reasons for an increase or decrease in proposed allocations for program categories.
3. Tracking Program Costs - Propose methods for reporting costs and demonstrate consistency across the utilities.
4. Include a discussion on required budget flexibility and potential Fund Shifting.

L. Revenue Requirement and Impacts

In the ESA Program Revenue Requirement and Impact section of the application, the IOUs must:

1. Discuss the revenue requirements necessary to achieve the program plans and objectives proposed for the three year application period as well as the projected rate impacts that would arise due to the increased revenue requirements.
2. Include a detailed accounting of funds unused from prior budget cycles and how these funds will reduce the revenue requirement.
3. Include a brief discussion of the costs and the benefits of these programs and how they impact the rates and the general well-being of ratepayers of your service area and priorities such as energy reliability, safety, and the water-energy nexus.
4. Include a brief description of the balancing accounts for the ESA Program and CARE Programs. Explain any changes to the balancing accounts.

M. PROGRAM FUNDING AND FUND SHIFTING REQUESTS

In the ESA Program Funding and Fund Shifting Requests section of the application, the IOUs must request Commission authorization to continue funding for the 2015-2017 program cycle and for any flexibility in managing the funds each program year if the Commission decision is delayed.

III. CARE PROGRAM PLAN AND BUDGETS APPLICATION FOR THE 2015-2017 PYs

A. CARE PROGRAM BACKGROUND

In the CARE Program Background section of the application, the IOUs must:

1. **History:** Provide a brief history of the CARE Program and how it helps low-income customers, how it is funded and how the program has changed over the years, including any prior guidance given by the Commission.
2. **Summary:** Provide a summary of the CARE Program, including descriptions of (i) the legal framework of CARE Program, and (ii) the eligible population.
3. **Program Eligibility Guidelines**

   Provide a summary of the program eligibility guidelines, including income, categorical eligibility qualifications, self-certifications, and the process for getting enrolled. Identify any proposed changes from the 2012-2014 framework and implications associated with the recent adoption of AB 327 (Perea 2013).
4. **Current Proposal:**
   a) Explain your proposal and plans for the CARE Program during the upcoming 2015-2017 budget cycle.
   b) Discuss how the elements and strategies in the proposed 2015-2017 CARE Program are specifically designed to reach the penetration goal of 90%.
   c) Provide an estimate of the number of households projected to be enrolled in the 2015-2017 program

years, along with the overall budget requested to meet this goal.

d) Explain how your current proposal has changed from that in prior years, if any.

e) Based on your review of all of the study findings and working groups' recommendations and in light of new technologies and opportunities for partnership and collaboration, are there any new strategies or best practices that could be considered for inclusion in this program that could benefit California customers? For example, to promote eligible households to enroll or re-enroll in the CARE Program, consider the use of apps, text, media including social media and non-English language media, partnerships with California and federal LifeLine providers, partnerships with water, telephone or energy utilities, CBOs, non-profits, businesses or trade associations, consultation with tribal governments, and other avenues or means of effectively communicating with eligible customers.

D. CARE PROGRAM GOALS AND BUDGETS FOR THE 2015, 2016 AND 2017 PYs

In the CARE Program Goals section of the application, the IOUs must provide a description of the 2015-2017 program requests, including:

1. A detailed description of all proposed program activities and program participation goals for each year. Include the number of eligible households.
2. A summary of actual participant data from 2012 and 2013, including CARE participant counts and percentage rates for program enrollment. Also provide estimated participation data for 2014 and provide a comparison to the benchmarks established by the Commission.
3. A discussion of any significant variations in enrollment from year to year and unique issues, if any, of your service area that presents challenges toward reaching the penetration goals of enrollment established by the Commission.
4. A discussion of how the utility's CARE Program goals for the 2015-2017 CARE Program align with Commission directives of reaching the penetration goal of 90%.
5. A description of your utility's existing program elements and strategies to be continued.
6. A description of any new program elements and strategies to be implemented, including estimates of budgets for these new approaches.
7. A detailed description of any proposed pilots and/or studies to be conducted, including detailed proposed budgets.
8. Your utility's total requested budget of the portfolios for each year, and for the entire budget cycle.

9. Estimates of the total number of households to be enrolled for each year, and for the entire budget cycle.

10. Requests for any exceptions, as necessary.

E. PROGRAM DELIVERY

1. Existing Strategies:

Discuss the mechanics of the program and provide a brief description of the strategies employed during 2012-2014 that will be continued through 2015-2017, including a description of all activities performed by third-parties and other stakeholders.

2. Post Enrollment Verification (PEV) Long Term Probability Model:

a) Discuss the results of both the interim and long term CARE probability models implemented during the 2012-2014 program cycle.

b) Identify the factors used, any identifiable best practices, and explain how the results will be incorporated into the 2015-2017 program cycle.

c) The IOUs' long-term probability advice letters and supplemental advice letters (SDG&E 2515-E-A/2224-G-A, SoCalGas 4537-G-A, PG&E 3410-G-A/4279-E-A, SCE 2936-E-A), noted that CARE customers who fail to respond to the requests for income verification during the PEV process may not be ineligible for the CARE Program. However, much is not known as to why these CARE customers fail to respond, nor is much known as to the characteristics of this customer segment - precisely because they fail to respond to the utility's requests for further information. Discuss the efforts and strategies your IOU will be implementing in the 2015-2017 budget cycle to learn more about this customer segment and to decrease the number of CARE customers who fail to respond to income verification requests during the PEV process.

d) These long-term probability advice letters and supplemental advice letters include extensive detail in

outlining what specific customer factors may indicate eligibility and ineligibility for the CARE Program. Describe how these factors relate to the findings in the Low Income Needs Assessment. Discuss whether these factors need
to be updated to correspond with the Needs Assessment findings. Discuss the process your utility will employ to conduct this update.

e) The IOUs' long-term probability model advice letters illustrated some variation in the application of these tools, and some best practices are identified as well. Discuss how quickly, and at what cost, your utility would be able to implement the following PEV procedures:

   (i) Prior to probability model screening, require random selection of 1% of all CARE customers, annually, for post-enrollment verification?

   (ii) Subject all remaining CARE customers (not including those on CARE Program for 20 days or less, or passing verification in the last 24 months, or users with electric usage above
   400% baseline who must undergo PEV separately per D.12-08-044) to your utility's individual probability models?

   (iii) Using all past program data, project/estimate the total number of CARE customers that would be selected (by month, and by percentage of total CARE population) that would be required to undergo the PEV process using the above procedures as well as the projected administrative costs to facilitate implementation.

3. **Targeting the Rural Population:**

   Identify specific underserved rural areas (by ZIP code or county, tribal area, or appropriate area), as discussed in the latest Needs Assessment or as additional analysis to assess rural population needs, and discuss what new strategies your utility will employ to better target and enroll those households. Include a discussion on your utility's strategies will be carried out in each area, if different.

4. **Targeting the High Poverty Areas (income less than 100% of federal poverty guidelines):**

   Identify the very high poverty areas within your service territory that are underserved (by ZIP code or county), and discuss what new strategies your utility will employ to increase CARE penetration in these areas.

5. **Other New and Proposed Strategies**:

   Discuss the mechanics of the program and provide a brief description of new strategies that will be employed, including a description of activities performed by third-parties and other stakeholders.

6. **New and Proposed Strategies to Reach the "Hard to Reach"**:

   Discuss how your utility will address the needs of hard to reach low-income customers.

7. **Leveraging with California Department of Community Services and Development (CSD):**

   Third-party, off-the-shelf software solutions are available to help streamline the data exchange between Low-Income Home Energy Assistance Program (LIHEAP) utility assistance providers and the IOUs' customer service representatives who oversee customer billing and accounting. How will your utility seek to improve the application of LIHEAP crisis grants for those CARE customer accounts at risk of disconnection? What customer credit or customer billing system upgrades or enhancements has your utility considered to reduce the

delay in applying LIHEAP crisis grants/pledges for CARE customers?

F. PROGRAM ADMINISTRATION

Describe the administration of the program, including outreach, and any change or improvement being implemented by category. Include cost by category (should match the budget table).

G. OTHER CARE PROGRAM ELEMENTS PROGRAM DELIVERY

Discuss the existing policies that should be reiterated and should be continued into the 2015-2017 cycle, any existing policies that are being proposed to be retired, and any existing policies that are being proposed to be expanded or modified in the next cycle.

H. COORDINATION BETWEEN CARE AND LIFELINE PROGRAM

D.14-01-036 allows low-income customers to receive subsidized wireless service through the California Lifeline Program. In what ways can this new opportunity be leveraged to market the CARE Program and improve outreach to enroll eligible households, and enhance existing PEV and re-certification processes during the upcoming 2015-2017 program cycle and beyond? Be specific in your response to the above and include opportunities for data sharing to support inter-program coordination. In particular, address how smart phones can be used to facilitate customer education/outreach, and income verification.

I. COOLING CENTERS

D.12-08-044 reinstated cooling center restrictions previously ordered in D.05-04-052 and authorized lower cooling center budgets for SCE, SDG&E and PG&E. The annual cooling center reports submitted on behalf of these utilities summarize recent cooling center activities and reflect overall budget surpluses

for all three participating IOUs. SCE, SDG&E and PG&E are directed to discuss reasonable alternatives and/or enhancements to existing cooling center program models including specific justification for relief from each restriction currently in place. Describe existing and planned leveraging efforts with local government agencies to ensure compliance with General Order 166 (re: Standards for Operation, Reliability and Safety during Emergencies and Disasters) and propose cooling center budgets for the 2015-2017 program cycle accordingly.

J. OUTREACH REPORT

1. Describe the current and suggested Outreach methods to improve enrollment, and include the estimated costs;
2. Discuss how Outreach efforts will result in meeting program participation goals, including any specific population sectors or segments; and
3. As appropriate, for each of the years from 2012 to 2013 provide a comparison of the budgeted, recorded or estimated average Outreach cost per household.

K. PILOTS

1. Include a detailed description of any new pilots being proposed, if any.
2. Discuss how each pilot contributes specifically to meeting the programmatic initiative.
3. Provide a detailed budget for any proposed pilot.

L. STUDIES

1. Include a summary of any studies being proposed.
2. Discuss how each study contributes to meeting the programmatic initiative; and
3. Provide a detail budget for any proposed study.

M. CARE PROGRAM BUDGET

1. Strategies:

Present a detailed budget discussion that clearly identifies specific strategies and programs for the 2015-2017 budget years.

2. 2012-2014 Actual Expenditures:

Provide a detailed summary of your utility's actual expenditures, along with approved budgets, from 2012 and 2013 by line item, consistent with Accounting and Reporting Requirements previously distributed. Costs should be shown on an annual basis. The 2014 approved budget should also be included.

3. 2012-2013 Actual Average Cost Per Household:

Provide an actual or estimated average cost per enrolled household (from 2012-2013) for all major categories of expenses such as processing, certification, verification, outreach, and general administration.

4. Tracking Program Costs:

Propose all methods for reporting costs and demonstrate how the proposed methods are consistent across the utilities.

N. REVENUE REQUIREMENTS AND RATE IMPACTS

Discuss the revenue requirements necessary to achieve the program plans and objectives proposed for the three year application period as well as the projected rate impacts that would arise due to the increased revenue requirements.

O. AB 327 MARKETING, EDUCATION AND OUTREACH:

What is your utility's plan for communicating/ messaging to the customers of the potential CARE rate changes per AB 327? What are the projected costs of this expanded marketing and outreach effort? Will this marketing be a statewide effort, regional, and/or local effort? And if so, how

will it integrate with the California Center for Sustainable Energy (CCSE) Statewide Marketing effort?

P. GENERAL REPORT

1. Discuss all program accomplishments and challenges; and
2. Describe any customer complaints or concerns.

IV. CONCLUSION

Summarize your utility's requests seeking the Commission's approval as part of the CARE and ESA Programs and budgets for the 2015, 2016, and 2017 PYs.

Provide your utility's potential bridge funding estimates for your utility's ESA and CARE Programs, in the event that a decision on the applications for the 2015-2017 ESA and CARE Programs is not adopted before January 1, 2015. Provide your utility's bridge funding estimates for a delay of 3 months, 6 months, 9 months and 12 months for both the CARE and ESA Programs to continue without disruption.

V. EXCEL ATTACHMENTS

The IOUs must use the attached excel templates to be filed with their 2015-2017 application and testimony.

A. ESA Program

1. ESA Program BUDGET PROPOSAL TEMPLATE
2. ESA Program BUDGET PROPOSAL TEMPLATE- ELECTRIC
3. ESA Program BUDGET PROPOSAL TEMPLATE- GAS
4. ESA Program PLANNING
5. ESA Program COMPREHENSIVE MEASURES LIST
6. ESA Program PENETRATION
7. ESA Program -- DETAIL BY HOUSING TYPE
8. ESA Program -- COST EFFECTIVENESS
9. ESA Program -- COST EFFECTIVENESS- WEATHER SENSITIVE
10. ESA Program -- COST EFFECTIVENESS- NON WEATHER SENSITIVE
11. ESA Program STUDIES AND PILOTS PROPOSAL
12. SUMMARY: ALL Proposed Changes to the ESA Program

B. CARE

1. CARE BUDGET PROPOSAL TEMPLATE
2. CARE RATE IMPACTS
3. CARE RATE IMPACTS- GAS
4. CARE RATE IMPACTS- ELECTRIC
5. CARE PENETRATION
6. CARE PROGRAM DETAIL- USAGE AND SAVINGS
7. CARE STUDIES AND PILOTS PROPOSAL
8. SUMMARY: ALL Proposed Changes to the CARE Program

C. STUDIES AND PILOTS PROPOSAL TEMPLATE D.

D. UTILITY TESTIMONY

PY 2015-2017 Energy Savings Assistance Program Proposed Electric & Gas Budget
[Utility Name]

	PY2014 Authorized	PY 2015 Year-End Projected	PY 2016 Year-End Projected	PY 2017 Year-End Projected
Energy Savings Assistance Program				
Energy Efficiency				
Appliances				
Domestic Hot Water				
Enclosure				
HVAC				
Maintenance				
Lighting				
Miscellaneous				
Customer Enrollment				
In Home Education				
Pilot				
Energy Efficiency Total				
Training Center				
Inspections				
Marketing and Outreach				
Statewide Marketing Education and Outreach				
Measurement and Evaluation Studies				
Regulatory Compliance				
General Administration				
CPUC Energy Division				
TOTAL PROGRAM COSTS				
Funded Outside of ESAP Program Budget				
Indirect Costs				
NGAT Costs				

PY 2015-2017 Energy Savings Assistance Program Proposed Electric Budget
[Utility Name]

	PY2014 Authorized	PY 2015 Year-End Projected	PY 2016 Year-End Projected	PY 2017 Year-End Projected
Energy Savings Assistance Program				
Energy Efficiency				
Appliances				
Domestic Hot Water				
Enclosure				
HVAC				
Maintenance				
Lighting				
Miscellaneous				
Customer Enrollment				
In Home Education				
Pilot				
Energy Efficiency Total				
Training Center				
Inspections				
Marketing and Outreach				
Statewide Marketing Education and Outreach				
Measurement and Evaluation Studies				
Regulatory Compliance				
General Administration				
CPUC Energy Division				
TOTAL PROGRAM COSTS				
Funded Outside of ESAP Program Budget				
Indirect Costs				
NGAT Costs				

PY 2015-2017 Energy Savings Assistance Program Proposed Gas Budget
[Utility Name]

	PY2014 Authorized	PY 2015 Year-End Projected	PY 2016 Year-End Projected	PY 2017 Year-End Projected
Energy Savings Assistance Program				
Energy Efficiency				
Appliances				
Domestic Hot Water				
Enclosure				
HVAC				
Maintenance				
Lighting				
Miscellaneous				
Customer Enrollment				
In Home Education				
Pilot				
Energy Efficiency Total				
Training Center				
Inspections				
Marketing and Outreach				
Statewide Marketing Education and Outreach				
Measurement and Evaluation Studies				
Regulatory Compliance				
General Administration				
CPUC Energy Division				
TOTAL PROGRAM COSTS				
Funded Outside of ESAP Program Budget				
Indirect Costs				
NGAT Costs				

Attachment 2

PY 2015-2017 Energy Savings Assistance Program Planning Assumptions
[Utility Name]

Measures*	Units	PY 2014 Authorized					PY 2015 Planned					PY 2016 Planned					PY 2017 Planned				
		Quantity Installed	kWh (Annual)	kW (Annual)	Therms (Annual)	Projected Expenses	Quantity Installed	kWh (Annual)	kW (Annual)	Therms (Annual)	Proposed Expenses	Quantity Installed	kWh (Annual)	kW (Annual)	Therms (Annual)	Proposed Expenses	Quantity Installed	kWh (Annual)	kW (Annual)	Therms (Annual)	Proposed Expenses
Appliances																					
High Efficiency Clothes Washer	Each																				
Refrigerators	Each																				
Microwaves	Each																				
Domestic Hot Water																					
Water Heater Blanket	Home																				
Low Flow Shower Head	Home																				
Water Heater Pipe Insulation	Home																				
Faucet Aerator	Home																				
Water Heater Repair/Replacement	Each																				
Thermostatic Shower Valve	Each																				
Enclosure																					
Caulking	Home																				
Weatherstripping	Home																				
Utility Gaskets	Home																				
Attic Access Weatherstripping	Home																				
Evaporative Cooler Cover	Home																				
AC Vent Cover	Each																				
Attic Insulation	Home																				
HVAC																					
FAU Standing Pilot Light Conversion	Each																				
Furnace Repair/Replacement	Each																				
Room A/C Replacement	Each																				
Central A/C Replacement	Each																				
Heat Pump Replacement	Each																				
Evaporative Coolers (Replacement)	Each																				
Evaporative Coolers (Installation)	Each																				
Duct Testing and Sealing	Home																				
Maintenance																					
Furnace Clean and Tune	Home																				
Central A/C Tune-up	Home																				
Evaporative Cooler Maintenance	Home																				
Lighting																					
Compact Fluorescent Lights (CFLs)	Each																				
Interior Hard wired CFL fixtures	Each																				
Exterior Hard wired CFL fixtures	Each																				
Torchiere	Each																				
Occupancy Sensor	Each																				
LED Night Lights	Each																				
Miscellaneous																					
Pool Pumps	Each																				
Pilots																					
	Each																				
	Each																				
Customer Enrollment																					
In-Home Education	Home																				
Total																					

* Include all proposed new measures, where appropriate.

Energy Savings Assistance Program Penetration
[Utility Name]

	Number of Customers in Utility Service Area	Number of Eligible Low Income Customers*	Number of Customers Served by ESAP in Past 10 Years	Number of Customers Enrolled in CARE	Number of Eligible and Willing ESAP Customers**	Customers to be Treated by ESAP Program	Percent of ESAP Programmatic Initiative Achieved
PY 2007							
PY 2008							
PY 2009							
PY 2010							
PY 2011							
PY 2012							
PY 2013							
PY 2014							
PY 2015							
PY 2016							
PY 2017							

* Number of eligible low income customers to be based on customers at or below 200 percent of the Federal Poverty Line.
** Number of eligible and willing ESAP customers based on utility's proposed "standard means of deriving the number of LIEE customers on which to reaching 1/2 of the Commission's programmtic initiative," as discussed in Section III.

Energy Savings Assistance Program Detail by Housing Type
[Utility Name]

	PY 2013		PY 2014 (Projected)		PY 2015 (Projected)		PY 2016 (Projected)		PY 2017 (Projected)	
	Customers Eligible	Customers Treated	Customers Eligible	Customers Treated	Customers Eligible	Customers Treated	Customers Eligible	Customers Treated	Customers Eligible	Customers Treated
Gas and Electric Customers										
Owners - Total										
Single Family										
Multifamily										
Mobile Homes										
Renters - Total										
Single Family										
Multifamily										
Mobile Homes										
Electric Customers (only)										
Owners - Total										
Single Family										
Multifamily										
Mobile Homes										
Renters - Total										
Single Family										
Multifamily										
Mobile Homes										
Gas Customers (only)										
Owners - Total										
Single Family										
Multifamily										
Mobile Homes										
Renters - Total										
Single Family										
Multifamily										
Mobile Homes										

Summary of Energy Savings Assistance Program Cost Effectiveness
[Utility Name]

	Ratio of Program Benefits over Program Costs		
	Utility Cost Test	Modified Participant Test	Total Resource Cost Test
PY 2008			
PY 2009			
PY 2010			
PY 2011			
PY 2012			
PY 2013			
PY 2014			
PY 2015			
PY 2016			
PY 2017			

Energy Savings Assistance Program Cost-Effectiveness - Weather Sensitive Measures
[Utility Name]

Measure*	Measure Group	Type of Home (SF, MH, MF)	Electric or Gas (E,G)	Climate Zone** (Number)	Ratio of Benefits Over Costs***		
					Utility Cost Test	Modified Participant Test	Total Resource Cost Test
	Appliances						
	Domestic Hot Water						
	Enclosure						
	HVAC						
	Maintenance						
	Lighting						
	Miscellaneous						

* Include chart pertaining to each proposed measure, with information included on type of home (ie. Single Family, Multi Family, Mobile Home) and electric or gas (if applicable).
** Charts to include information on each climate zone in utility service area.
***

Energy Savings Assistance Program Cost-Effectiveness - Non Weather Sensitive Measures
[Utility Name]

Measure*	Measure Group	Type of Home (SF,MH,MF)	Electric or Gas (E,G)	Ratio of Benefits Over Costs***		
				Utility Cost Test	Modified Participant Test	Total Resource Cost Test
	Appliances					
	Domestic Hot Water					
	Enclosure					
	HVAC					
	Maintenance					
	Lighting					
	Miscellaneous					

***

PY 2015 - 2017 Energy Savings Assistance Program Pilots and Studies
[Utility Name]

Line No.	Statewide Study	Total Cost	Percent paid by Utility	Total Cost paid by Utility
Total				

PY 2015 - 2017 Energy Savings Assistance Program Summary of Proposed Changes
[Utility Name]

Proposed Program Change	Notes

PY 2015 - 2017 CARE Proposed Program Budget
[Utility Name]

CARE Budget Categories	2014 Authorized	2015 Planned	2016 Planned	2017 Planned
Outreach				
Processing, Certification, Recertification				
Post Enrollment Verification				
IT Programming				
Cool Centers				
Pilots				
Measurement and Evaluation				
Regulatory Compliance				
General Administration				
CPUC Energy Division Staff				
SUBTOTAL MANAGEMENT COSTS				
Subsidies and Benefits				
TOTAL PROGRAM COSTS & CUSTOMER DISCOUNTS				

PY 2015 - 2017 CARE and ESAP Rate Impacts - Gas
[Utility Name]

PY 2015 Customer Type	Average Rate Excluding CARE/ESA Surcharge	CARE Subsidy Portion of Rate	CARE Administration Portion of Rate	ESA Program Portion of Rate	ESA Program Administration Portion of Rate	Total CARE/ESA Surcharge	Average Rate Including CARE/ESA Surcharge
Residential							
Commercial							
Industrial							
Agricultural							
Lighting							
System							

PY 2016 Customer Type	Average Rate Excluding CARE/ESA Surcharge	CARE Subsidy Portion of Rate	CARE Administration Portion of Rate	ESA Program Portion of Rate	ESA Program Administration Portion of Rate	Total CARE/ESA Surcharge	Average Rate Including CARE/ESA Surcharge
Residential							
Commercial							
Industrial							
Agricultural							
Lighting							
System							

PY 2017 Customer Type	Average Rate Excluding CARE/ESA Surcharge	CARE Subsidy Portion of Rate	CARE Administration Portion of Rate	ESA Program Portion of Rate	ESA Program Administration Portion of Rate	Total CARE/ESA Surcharge	Average Rate Including CARE/ESA Surcharge
Residential							
Commercial							
Industrial							
Agricultural							
Lighting							
System							

PY 2015 - 2017 CARE and ESAP Rate Impacts - Electric
[Utility Name]

PY 2015 Customer Type	Average Rate (cents/kWh)	Portion for CARE surchage and administration (cents/kWh)	Portion for CARE rate exemptions (cents/kWh)	Portion for ESA (cents/kWh)	Average Rate (cents/kWh) including surcharge
Residential					
Commercial					
Industrial					
Agricultural					
Lighting					
System					

PY 2016 Customer Type	Average Rate (cents/kWh)	Portion for CARE surchage and administration (cents/kWh)	Portion for CARE rate exemptions (cents/kWh)	Portion for ESA (cents/kWh)	Average Rate (cents/kWh) including surcharge
Residential					
Commercial					
Industrial					
Agricultural					
Lighting					
System					

PY 2017 Customer Type	Average Rate (cents/kWh)	Portion for CARE surchage and administration (cents/kWh)	Portion for CARE rate exemptions (cents/kWh)	Portion for ESA (cents/kWh)	Average Rate (cents/kWh) including surcharge
Residential					
Commercial					
Industrial					
Agricultural					
Lighting					
System					

PY 2013-2014 CARE Outreach and Penetration Information
[Utility Name]

CARE PY 2013				
Outreach Method	Total Cost	Estimated # of Customers	Estimated # of Customers	Percent of Net Enrollment

CARE PY 2014				
Outreach Method	Total Cost	Estimated # of Customers	Estimated # of Customers	Percent of Net Enrollment

PY 2015 - 2017 CARE Estimated Participation
[Utility Name]

	Total Enrolled 12-31-13	Total Enrolled Through June 2014	PY 2014 Estimated Eligible	Estimated Net PY 2014 Enrollments	Estimated Year End PY 2014 Participation	Estimated PY 2014 Goal Rate	Estimated PY 2015 Net Enrollments	Estimated Year End PY 2015 Participation	Estimated PY 2015 Goal Rate (a)	Estimated PY 2016 Net Enrollments	Estimated Year End PY 2016 Participation	Estimated PY 2016 Goal Rate (a)	Estimated PY 2017 Net Enrollments	Estimated Year End PY 2017 Participation	Estimated PY 2017 Goal Rate (a)
(Source)	(1)		(2)	(3)	(Col. B+E)	(Col. F/D)	(2)	(Col. F+H)	(Col. I/D)	(2)	(Col. I+K)	(Col. L/D)	(2)	(Col. L+N)	(Col. O/D)
	0	0	0	0	0	0%	0	0	0%	0	0	0%	0	0	0%

(a) Estimated PY2015, PY2016 and PY2017 Goal Rate will fluctuate based on updated CARE Eligibility information to be filed December 2015, December 2016 and December 2017.

(1) CARE Annual Reports, dated 5/1/14

(2) Each utility's estimate based on eligibility rates filed.

(3) Most recent estimates of net enrollments.

Low Income Customer Usage Levels
[Utility Name]

		PY 2013		PY 2014 (Projected)		PY 2015 (Projected)		PY 2016 (Projected)		PY 2017 (Projected)	
		Number of CARE Customers	Number of Customers Treated by ESAP	Number of CARE Customers	Number of Customers Treated by ESAP	Number of CARE Customers	Number of Customers Treated by ESAP	Number of CARE Customers	Number of Customers Treated by ESAP	Number of CARE Customers	Number of Customers Treated by ESAP
Electric	Total										
	Tier 1*										
	Tier 2*										
	Tier 3*										
	Tier 4*										
	Tier 5*										
Gas	Total										
	Below Baseline*										
	Above Baseline*										

* Utility may include a more detailed breakdown of gas customers' usage level and an explanation of measurement breakdown employed.
The usage tier should be reported as the tier the customer was on, the maximum number of months, in the reported year.

PY 2015 - 2017 CARE Pilots and Studies
[Utility Name]

Line No.	Statewide Study	Total Cost	Percent paid by Utility	Total Cost paid by Utility
Total				

PY 2015 - 2017 CARE Program Summary of Proposed Changes
[Utility Name]

Proposed Program Change	Notes

(End of Attachment Q)

Attachment R

Statewide Energy Savings Assistance Program Policy and Procedures Manual

Statewide Energy Savings Assistance Program
Policy and Procedures
Manual

Applicable to:
Pacific Gas & Electric Company
Southern California Edison Company
Southern California Gas Company
San Diego Gas & Electric Company
Southwest Gas Corporation
Liberty Utilities
Golden State Water Company
PacifiCorp
Alpine Natural Gas Operating Company

California Statewide Energy Savings Assistance Program
Policy and Procedures Manual

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1 Introduction

1.1 Overview

This *Statewide Energy Savings Assistance Program Policy and Procedures Manual*[1] *(P&P Manual)* describes the policies and procedures followed in the Energy Savings Assistance (ESA) Programs administered by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas), and San Diego Gas & Electric Company (SDG&E) (collectively referred to as the utilities or investor-owned utilities (IOUs)). This P&P Manual also applies to Southwest Gas Corporation, Liberty Utilities, Golden State Water Company/Bear Valley Electric (Bear Valley), PacifiCorp, and Alpine Natural Gas Operating Company (collectively referred to as the Small Multijurisdictional Utilities (SMJUs)) that also administer ESA Program services. The Statewide ESA Program (Program) policy and procedures are adopted by the California Public Utilities Commission (Commission or CPUC). This Manual provides policies and procedures for implementation of the ESA Program and is being updated pursuant to the changes in the Program in Commission Decisions (D.) 12-08-044 and (D.) 14-05-004. This *P&P Manual* is accompanied by the ESA Program California Installation Standards Manual[2] which specifically outlines technical procedures and standards associated with installation of program measures. All contractors employed in the ESA Program must comply with both manuals.

An electronic copy of this Statewide P&P Manual may be obtained at the CPUC website at www.cpuc.ca.gov/PUC/energy/Low+Income. In situations where there are questions regarding the interpretation of a certain policy or procedure, the Utilities shall use Commission D.12-08-044 and D. 14-05-004 as the overriding authorities.

The policies and procedures in this *P&P Manual* are supplemented by the general and specific terms and conditions incorporated into contracts between the IOUs and their contract service providers as part of the ESA Program.

Updates in ESA Program policies and procedures may be issued by the utilities during the course of the Program Year subject to approval by the CPUC. ESA Program Managers have the flexibility to deviate from established procedures to respond to cases of customer hardship and

[1] Formerly known as the Statewide Low Income Energy Efficiency Policy and Procedures Manual.
[2] The California Installation Standards Manual was also updated and revised to comply with D.12-08-044.

unusual circumstances. The approving Program Managers shall document any exceptions along with adequate justification and his or her name in the customer file.

1.2 Structure of this Manual

The remainder of this *P&P Manual* is organized as follows:

- Section 2 specifies general statewide policies and procedures relating to customer and home eligibility for the ESA Program.
- Section 3 discusses polices relating to customer outreach and customer relations.
- Section 4 describes the services that are provided under the ESA Program in the initial home visit.
- Section 5 lists the energy efficiency measures that are available to participants in the ESA Program.
- Section 6 discusses policies relating to home repairs.
- Section 7 describes policies and procedures relating to the installation of energy efficiency measures.
- Section 8 summarizes general statewide inspection policies and procedures.
- Section 9 discusses contractor eligibility.
- Section 10 describes policies and procedures relating to natural gas appliance testing and furnace repairs and replacements.
- Appendix A provides a list of the cities comprising the California Energy Commission (CEC) climate zones used in the determination of attic insulation levels and program eligibility of other measures.

2 Customer and Structural Eligibility

2.1 Overview

This section discusses the eligibility of individual households for ESA Program services. Eligibility of a household for measures offered through the ESA Program depends on several factors, including:

- Household income;
  - Actual income documentation
  - Categorical eligibility
  - Self certification
- The utility services provided by the utility to the dwelling;
- The specific type of structure in which the household resides;
- The ability to obtain the approval of the property owner or authorized agent in the event the household resides in rental property;
- Previous ESA Program services provided for the property in question; and
- The dwelling's need for energy efficiency measures offered through the Program.

These eligibility requirements are explained below.

2.2 Customer Eligibility Requirements

2.2.1. Income Guidelines

All the utilities use the ESA Program income guidelines established by the CPUC to qualify participants in the ESA Program.

These guidelines are provided to the utilities by the CPUC on an annual basis. As set forth in D.05-10-044, the income eligibility level is based on 200% of the Federal Poverty Guidelines. The CPUC updates the ESA Program income guidelines every year for inflation. The current ESA Program income guidelines can be obtained at the CPUC website at www.cpuc.ca.gov/PUC/energy/Low+Income.

2.2.2. Types of Income Included in Household Income

For the purposes of determining ESA Program eligibility, all income is considered, from all household members, from all sources listed in Table 2-1, 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 2-1 indicates the specific items included as income, but is not limited for the purpose of determining eligibility for the ESA Program.

The following types of receipts **are *not*** considered household income for the purposes of determining eligibility:

- Loan proceeds; including reverse mortgages
- Assets (money in bank accounts, a house, a car or other property of possessions);
- Funds transferred from one applicant account to another; or
- Liquidation of assets (other than the portion representing capital or other gains).

Table 2-1: Items Included in Income

Wages, salaries and commissions	401K payments or withdrawals[1]
Alimony payments	Rental income and royalties[2]
Child support payments	School grants, scholarships or other aid[1]
Disability benefits	Self-employment earnings[2]
Foster care payments	Social security payments
Realized capital gains on assets	Housing subsidies
Interest and dividends on assets	Supplemental Security Income (SSI) payments and State Supplemental Payments (SSPs)
Food stamps	Temporary Assistance to Needy Families (TANF) payments
Gambling/lottery winnings	Unemployment Benefits payments
General relief	Veterans Administration Benefit payments
Monetary gifts (both one-time and recurring)	Workers Compensation payments
Insurance settlements or legal settlements[1]	Union strike fund benefits
Pension payments or withdrawals[1]	

[1] Other than loans.
[2] For rental income and self-employment income, only positive values of income are included. Negative net rents and negative self-employment income are ignored.

2.2.3. Verification of Income

2.2.3.1 Actual Income Documentation Required

When income documentation is required, income documentation must be reviewed, recorded, copied and securely stored by service providers prior to the installation of measures for all prospective participants.

CARE **self-certification** does not automatically qualify a household for ESA Program, except in the case of group homes or targeted self certification areas, where it is specifically allowed unless otherwise noted by Commission Decision.

In the case where the utility has **verified** that the customer is CARE-eligible within the past year, such income verification may be used for ESA Program participation.

The utility will periodically audit enrollment information and /or income documentation retained by the contractor. In the event that information and/or documentation is not complete and correct for a participant, payment to the contractor for the provision of Program services to that unit may be disallowed.

The kinds of income documentation required by the Program include but are not limited to those presented in Table 2-2. In applying these documentation requirements, the following stipulations must be observed:

- Current award letters must include the value of the award and the period of time in question. They must also be dated within one year of the customer's signature date and must list the customer's name.
- Affidavits relating to gifts must indicate the amount and frequency of the gift(s). They must also contain the name, phone number, address and signature of the giver.
- In determining rental income, a renter-landlord relationship exists between household members when a room or rooms in the house is being rented and the renter is not a dependent of anyone in the household. Therefore, the renter is not counted as a household member and the rent paid is counted as part of the total household income. If the renter is a dependent, the renter is counted as a household member (even if he or she is paying rent) and his or her income is considered part of the total household income. A dependent is anyone claimed on the applicant's income tax return.
- Federal income tax documentation must include copies of all 1099s and W-2 forms.

- Affidavits from an employer who plays the applicant cash wages must include the company name, address and phone number. It must also include the name of the applicant, total amount paid to the applicant, and the frequency of payments, and must contain a signature from the employer's authorized representative.

- If the applicant receives cash wages for jobs like mowing lawns, babysitting, handyman services, casual day labor, etc., a self-employment affidavit from the applicant is acceptable if it meets all Program criteria.

- In cases where a household claims no income for the past 12 months, the applicant must demonstrate his or her means of financial support other than income. In the event that the applicant cannot provide documentation of either income or other means of support, Program services will not be performed until such information is provided.

2.2.3.2. Categorical Eligibility

Categorical eligibility is another enrollment procedure designed to ease enrollment processes in both ESA and CARE programs. Customers may be eligible to participate under categorical eligibility[3] and enroll in the ESA Program based on their current participation in another local, state, or federal means-tested program if those income guidelines are at or below current CARE/ESA program income guidelines as set forth by the Commission. The categorical programs that have been adopted can be found at www.cpuc.ca.gov/PUC/energy/Low+Income .

Applicants utilizing the categorical eligibility option to enroll in ESA Program must present documentation reflecting current participation in one of the Commission approved programs in order to satisfy the "income documentation" component. Such documentation must be reviewed, recorded, copied and securely stored by service providers prior to the installation of measures for all prospective applicants.

[3]Categorical eligibility approved in Decision 06-12-038 for SCE, PG&E, SoCalGas, and SDG&E. Utilities, Energy Division staff and DRA to determine acceptable categorical eligibility programs.

2.2.3.3. Targeted Self-Certification

Targeted Self Certification is a third enrollment procedure designed to ease enrollment processes in ESA Program. Eligibility for self certification is determined by each utility based on their identification of geographic areas of their service territory where 80% of the customers are at or below 200% of the federal poverty line. Applicants residing within these targeted self certification areas must sign a "self certification statement" certifying that they do indeed meet the current income guidelines established for participation in the ESA Program. This self certification statement is to be retained in lieu of other income documentation or proof of participation in a categorical eligibility program. A current CARE self certification statement is allowed.

Table 2-2: Types of Income Documentation

Type of Income	Documentation
Wages, salaries and Commissions	Copy of customer's payroll check stub(s) OR Federal income tax filing showing gross income OR affidavit from employer (for cash wages only, and only where just one employer)
Alimony or Child Support Payments	Copy of check, bank statement, OR most recent court document stating amount
Disability benefits, Foster Care payments, Unemployment Benefits, VA Benefits, Workers Compensation	Copy of checks stubs OR copy of most recent award letter
Capital or Other gains	Federal Income Tax filing showing capital or other gains
Food stamps	Copy of most recent award letter OR food stamp/cash issuance letter (indicate TANF or General Relief)
Gambling/lottery winnings	determined on case-by-case basis
General relief	Copy of most recent award letter (Notice of Action) OR copy of un-cashed check(s) OR copy of direct deposit statement(s)
Monetary gifts	Copy of customer's bank statement OR affidavit from gift giver
Proceeds from insurance settlements or legal settlements	Copy of settlement document
Interest and dividend income	Copy of customer's bank statement(s) OR copy of customer's investment statement(s) OR Federal Income Tax filing showing gross income
Pension or 401K payments or Withdrawals	Copy of customer's check stubs OR copy of most recent award letter OR Form 1099R from prior year OR copy of most recent bank statement
Rental income [4]	Tax return (Form 1040, Schedule E, Total Rental Real Estate and Royalty Income or Loss) showing rental income OR copy of rental receipts OR copy of rental agreement specifying rent amount and affidavit from tenant
School grants, scholarships or other aid	Copy of award letter OR copies of cancelled checks
Self-employment earnings [3]	Income statement showing most recent quarterly adjusted earnings plus prior year's tax return (1040 Schedule C, Net Profit or Loss) OR written affidavit from an accountant or applicant
Housing subsidies	award letter
SSI payments, TANF payments, or Social Security payments	Copy of most recent award letter (Notice of Action) OR copy of un-cashed check(s) OR copy of customer's direct deposit statement
Union strike fund benefits	Copy of benefits payment stub

[4] For rental income and self-employment income, only positive values of income are included. Negative net rents and negative self-employment income are ignored.

2.2.4. Household Income Calculation Procedures

Household income guidelines are based on gross *(pre-tax)* annual income. For self-employed individuals, gross (pre-tax) income is defined to be net profit or loss from self-employment. In the event that a full 12 months of income information is not available, or if there has been a change in the employment status of the household over the past 12 months, it may be necessary to annualize income from a shorter period of time. If, for instance, a household member has been employed for six months, the income earned over this period would be annualized by multiplying it by 2.

It is the intention of the ESA Program for all outreach personnel to compute annual income as accurately as possible. The calculations used will depend on the type of records available from each household member. Since all household members may not have the same type of income records, it may be necessary, and appropriate, to use more than one method when documenting income for different members of the same household.

2.2.5. Determining Household Size

Household size is the current number of people living in the home as permanent residents. Friends or family on a temporary visit (less than 6 months) are not considered household members nor are their earnings part of household income.

Children and/or other dependents residing in the household *only* on weekends, holidays, or vacations may be counted as part of the household only if the family claims them as dependents on their federal income tax filing. Children by previous marriages who do not reside in the home cannot be considered household members, even if they are receiving child support, unless they are claimed as dependents on the applicant's federal income tax filing.

2.2.6. Qualifying Multifamily Complexes

The ESA Program makes use of fractional income qualification for certain measures for multifamily complexes. The terms of income qualification are as follows:

- For the purposes of determining income eligibility, multifamily complexes are defined as those with five (5) or more dwelling units. Duplexes, triplexes, and fourplexes will be qualified as single family homes for the purposes of determining income eligibility.
- For multi-family buildings, refer to Table 5-1 herein for the measures available to multi-family buildings.

- To qualify an entire multifamily building for other measures offered by the Program (defined as 80-20 measures), at least 80% of all (occupied and unoccupied) dwelling units must be occupied by income-qualified households. However, if at least 80% of all units adjacent to a common attic space satisfy the 80% rule, that attic space may be treated even if the 80% rule is not satisfied for the entire building. In the event that fewer than 80% of the dwelling units are occupied by income-qualified households, individual dwelling units occupied by qualifying households may still receive all feasible 80-20 measures.
- Service providers must review, record, copy and securely store income documentation for all households used to qualify an apartment building. The provider must also make its best effort to review and record income documentation for all other households in the multifamily building (i.e., those not used to meet the 80% qualification standard).
- Unoccupied and other non-qualified multifamily dwellings may be weatherized, as long as the multifamily building satisfies the 80% rule for income qualification.

2.3 Service Eligibility

2.3.1. General Service Eligibility Conditions

To be eligible for the ESA Program, a customer must be served by an active utility account/meter (includes master meter). In an area served by different investor-owned or municipal gas and electric utilities (e.g., the SoCalGas-SCE overlap area) the fuel source for the dwelling's space heat shall determine which utility will be the provider of air sealing/envelope and attic insulation measures to the dwelling as long as that fuel source is either natural gas or electricity. In the event that a non-IOU heating fuel is used *and* the home has air conditioning, the electric IOU will be the provider of weatherization measures other than infiltration-reduction measures.

Measure-specific eligibility requirements will be followed in the ESA Program. Not all measures are offered in all utility services territories or climate zones. Table 5-1 shows the measures offered by each utility.

2.3.2. Referrals

In order to provide the maximum opportunity for eligible customers to receive all feasible measures, the four IOUs—PG&E, SCE, SoCalGas, and SDG&E—will set up a referral system with each other. In addition, the utilities will work with community agencies and local governments including their local Department of Community Services and Development (DCSD) agencies to expand leveraging opportunities. This will increase the number of measures available to eligible customers by sharing the cost of measures offered by both programs.

In areas where a customer receives natural gas and electric services from two different IOUs, the utilities will work together to ensure the customer receives all feasible measures. The utility installing infiltration measures will conduct natural gas appliance testing as long as the utility serves natural gas somewhere in its service area (and thus has trained gas service representatives). In the event that the customer has electric space heat served by an electric-only utility, the electric utility will not install infiltration measures if natural gas appliances are present.

In order to mitigate the duplication of costs that could otherwise be associated with customers participating in two utility programs, two steps shall be taken:

- First, customers that have provided proof of income qualification or deemed categorically eligible by one IOU, shall be considered eligible by all other IOU's serving this customer; and
- Second, gas and electric utilities will offer common energy education in overlap areas so that customers will need to receive education from only one utility.

Additionally, the minimum measure requirement for eligibility (see Section 2.8) will not apply to homes referred by one IOU to another, if the first IOU establishes that a home meets this minimum for the combination of gas and electricity.

2.4 Structural Eligibility

Public Housing. Public housing is eligible for participation in the ESA Program, but must meet the program eligibility requirements in order to participate. (Note that this does not include on-base military housing, insofar as these dwelling units are not served by the investor-owned or municipal utilities.)

Housing Type

Single family homes, multifamily dwelling units, and mobile homes are eligible to participate in the program.

- Duplexes, triplexes, and fourplexes will be qualified as single family homes.
- Multifamily complexes are defined as those with five (5) or more dwelling units.
- Mobile homes are defined by California Department of Housing and Community Development as having "over 320 square feet of gross floor area, more than eight feet in width, and more than 40 feet in length." A mobile home is a manufactured home regulated by the U.S. Department of Housing and Urban Development code (Sec. 3280) and built on a trailer chassis and designed for highway delivery to a permanent location, and it can be a single-, double-, or triple-wide home.

The utilities may promote or limit the treatment of housing types in individual program years as long as these actions are consistent with the achievement of the programmatic initiative.

Housing on Non-Residential Rates. In general, only residential customers on residential rates are eligible to participate in the ESA Program. However, group homes on non-residential rates are eligible for ESA Program services as long as they are currently eligible for CARE under current CARE guidelines applicable to group living facilities,[5] and the structure in question is a single family, multifamily or mobile home suitable for weatherization under ESA Program standards.[6]

CARE-eligible facilities include but are not limited to the following.

- Migrant farm worker housing centers, as defined in Section 50710 of the Health and Safety Code, provided that 70% of all energy usage in master-metered facilities and 100% of all energy usage in individually-metered facilities is residential.
- Privately owned employee housing, as defined in Section 17009 of the Health and Safety Code, that is licensed and inspected by the state and local agencies pursuant to Part I of Division 13, and in which 100% of all energy use is residential.
- Housing for agricultural employees operated by non-profit entities, as defined in Subdivision (b) of Section 1140.4 of the Labor Code, and that has an exception from local property taxes pursuant to subdivision (g) of the Revenue and Taxation Code, provided that 70% of all energy usage in master-metered facilities and 100% of all energy usage in individually-metered facilities is residential.
- Non-profit group living facilities, defined as transitional housing (such as a drug rehabilitation or halfway house), short- or long-term care facilities (such as a hospice, nursing home, children's home or seniors' home), group homes for physically or mentally challenged persons, or other nonprofit group living facilities.
- Homeless shelters, hospices and women's shelters with the primary function of providing lodging and which are open for operation with at least six beds for a minimum of 180 days and/or nights (including satellite facilities in the name of the licensed corporation, where 70% of the energy supplied is for residential purposes).

[5] See D. 92-04-024, April 8, 1992; D. 92-06-060, June 17, 1992; D. 95-10-047, October 18, 1995. Also see *Commission Advisory and Compliance Division, Workshop Report on California Alternate Rates for Energy (CARE): The Development of Guidelines to Implement CARE for Migrant Farmworker Housing, Agricultural Employee Housing, and Employee Housing,* May 1995

[6] It should be noted that CARE income eligibility requires that 100% of the residents of the facility (other than live-in staff) meet the CARE income guideline. This income eligibility criterion will be applied to group homes for the purposes of determining ESA Program income eligibility.

As mandated by AB 868 and reiterated by an October 1, 2004 Administrative Law Judge's Ruling,[7] migrant housing centers are presumed to meet CARE income eligibility guidelines without verification. This presumption will also be used in determining ESA Program income eligibility of such facilities. For the purpose of determining eligibility of other types of housing on non-residential rates, income qualification shall be considered satisfied if the facility is on CARE. These facilities represent a unique situation and this income verification procedure shall not be considered a precedent for other circumstances.

2.5 Home Ownership Documentation

2.5.1. Overview

Home ownership must be verified in order to ensure that the legal owner or authorized agent signs the Property Owner Waiver. It is the responsibility of the contractor to review the documents and ensure proof of home ownership. If a home is in the name of a deceased spouse, the surviving spouse should be considered as the owner. For example, if the home is in the husband's name and never transferred to the widow, the widow is considered the current homeowner.

Any of the following may be used for home ownership documentation.

- Current loan or mortgage documents;
- Property tax records or bills;
- Home owner property insurance (fire insurance);
- Mortgage payment invoices or book;
- Data Quick or similar title search service;
- Deeds; and
- Current Mobile Home Registration from Department of Housing and Community Development.

[7] Administrative Law Judge's Ruling Seeking Input Regarding Assembly Bill 868 (Care Eligibility for Migrant Housing Centers), October 1, 2004.

2.5.2. Multiple Ownership

If the home is owned by more than one person, the homeowner will be considered any one of the persons whose name appears on the document.

2.5.3. Life Estate/Living Trust

A homeowner may have established a "Life Estate" or “Living Trust.” With either, the property is deeded to another individual or trust but the original owner maintains control of the property. The original owner may sign as the property owner only if he or she has a copy of Life Estate or Living Trust documents. Contractor must review and verify that the individual signing the Property Owner Waiver is authorized to do so within the “Life Estate” or “Living Trust”. Contractor and individual signing POW shall sign a statement to document that they are authorized to sign agreement to participate in ESA Program and a copy of the signed statement must be maintained in the customer’s file.

2.5.4. Power of Attorney (POA)

In cases where the property owner is not available to sign on the Agreement, any person having a Power of Attorney (POA) for that owner may sign the Agreement. Contractor and individual signing POA shall sign a statement to document that they are authorized to sign agreement to participate in ESA Program and a copy of the signed statement must be maintained in the customer’s file.

2.5.5. Property Management Companies

Authorized representatives of property management companies may sign for property owners for both single family and multifamily agreements under the following conditions: the property management company has a standard Power of Attorney agreement with the property owner; or the property management company has a signed Management Agreement with the owner authorizing the property management company to act as the agent for the specific property; or any other documentation that the utility may require to establish that an agreement exists between the property owner and the management company. A copy of any support documentation must be kept in the customer’s files.

2.6 Treatment of Rental Units

2.6.1. Property Owner Approval

In general, rental units may not receive Program Services and Measures until a Property Owner's Waiver has been received. This approval must cover the participation of the unit in the Program as well as the installation of specific measures. Such approval is valid for a period of 12 months from the date it is signed by the Property Owner or authorized agent. If approval of the Property Owner is not received before the installation of such services, the Contractor will be required to reimburse the utility for all payments received from the utility for the measures in question. However with prior written authorization from the utilities' Program Manager, a contractor may proceed with the installation of services and measures that do not directly affect the condition and/or structure without the signed Property Owner Waiver.

2.6.2. Eligibility of Rental Units for Certain Measures

Assuming that the Property Owner's permission is required and has been obtained and that other eligibility conditions are met, rental units may be treated under the Program. However, the following policies relating to specific measures shall be applied. Not all measures listed are offered in all utility service territories or climate zones. See Table 5-1.

- Rental units are not eligible for furnace replacements or major furnace repairs associated with the mitigation of NGAT failures. However, service and adjustments may be made to furnaces and water heaters if these actions would improve the performance of the system at a minimal cost.
- Refrigerator and air conditioner replacements may be provided at no charge to either the tenant or the property owner, except in the instance where the property owner owns the refrigerator or air conditioning unit that is replaced and also pays the utility bill. In these instances, the utilities may make payments to installation contractors that cover only part of the cost of replacement.
- The utilities may opt to provide, at a nominal charge to the property owner, evaporative coolers, refrigerator replacement, and replacement air conditioners and heat pumps.

2.7 Previous Program Participation

In order to provide services to the widest range of low-income households possible, D.08-11-031 places the following restrictions on the participation of homes that have previously been treated under the ESA Program.

- The IOUs are allowed to go back and treat any dwelling served prior to 2002, but they will first seek out new dwellings that have yet to be treated.

2.8 Need for ESA Program Services

A home must receive all feasible measures offered under the ESA Program. In D.08-11-031, the Commission modified the "3 Measure Minimum Rule" to allow utilities to install one or two measures, as long as the installed measures meet the specified minimum energy savings threshold. Decision 09-06-026 issued June 18, 2009 further modified the "3 Measure Minimum Rule" to clarify the allowable measures under the "3 Measure Minimum Rule". For homes that need fewer than 3 measures, the energy savings achieved must meet certain minimums as established by the Commission. Energy savings of at least 125 kWh annually or 25 therms annually must be achieved in homes where only one or two measures are to be installed. Each IOU will provide its contractors with the individual measures that qualify for installation if a home requires less than three measures. The total energy savings achieved by either one or two measures combined should yield savings of at least either 125 kWh annually or 25 therms annually. The IOUs are to use the most current energy savings estimates as determined in the Final Report of the Load Impact Evaluation for the applicable program cycle, unless directed otherwise by the Commission. For measures not reflected in the Load Impact Evaluation, those energy savings can be derived from DEER, engineering calculations, etc. as appropriate.

Homes that require three or more individual measures qualify for ESA Program participation regardless of energy savings. For homes that require more than three individual measures, refer to Table 5-1.

In an area served by multiple gas and electric utilities (investor-owned or municipal), the minimum number of measures will be defined as if the home were served by a combined gas and electric utility, and the utilities will use a referral system to ensure the installation of all feasible measures.

For all homes meeting the minimum for necessary measures, all feasible measures must be installed.[8] As stipulated in the standard non-feasibility criteria, if a measure is already in place and operating properly, even if it does not meet the current Installation Standards for new installations, it should not be removed and replaced.

[8] If a customer refuses a measure, that measure is considered non-feasible. See Section 7.

3 Customer Outreach and Customer Relations

3.1 Introduction

This section presents statewide ESA Program policies and procedures in the areas of customer outreach and customer relations. Subsection 3.2 discusses policies relating to the recruitment of participants for the Program, while Subsection 3.3 focuses on the maintenance of proper relationships with customers. It should be understood that the policies in this section are supplemented by additional provisions in both specific and general terms and conditions included in formal agreements between utilities and contractors.

3.2 Customer Outreach

Contractors recruiting customers for participation in the ESA Program are required to follow strict policies relating to customer outreach. Customer outreach policies cover promotional guidelines, limitations on representations made by contractors and their employees, outreach interactions, and tracking.

3.2.1. Promotional Guidelines

Only promotional materials approved by the Utility Program Manager may be used to promote participation in the ESA Program.

3.2.2. Representations by Contractor and Contractor's Employees

Neither the contractor nor his/her employees may imply that they are employees of the Utility or affiliated with the Utility in any way other than through the ESA Program.

3.2.3. Outreach Interaction

Outreach personnel must effectively contact and interact with a diverse set of customers. These personnel shall have available any necessary multilingual staff and/or translators and shall make every effort to resolve barriers to communication attributable to disabilities.

3.2.4. Targeted Outreach

Outreach efforts should target those customers with the highest energy usage, energy burden and/or energy insecurity but not at the expense of all other customers. Contractors shall also serve those customers who are disabled. Such customers may be identified based on their enrollment in the Medical Baseline Program, their enrollment in the Deaf and Disabled Telecommunications Program (DDPT), their enrollment in ESA Program through a disability-based community-based organization (CBO), their request for accessible formats of written materials or use of Tele-Typewriter/Telecommunications Device for the Deaf (TTY/TDD), the visibility of an observed disability and/or their self-identification as having a disability. Contractors shall not ask the customer if he/she is disabled.

3.3 Customer Relations

3.3.1. Introduction

It is imperative that both contractors and utility employees maintain proper customer relationships. The ESA Program is a customer service program, and should be delivered accordingly. Specific polices with respect to customer relations are specified below.

3.3.2. Expedient Service

Service must be provided to participants in a reasonable time frame, as determined by the utility. Crews must inform customers of the approximate amount of time required for installations, inspections and gas appliance testing (if required), and shall provide services as expeditiously as possible. The number of visits to a home shall be kept to a minimum.

3.3.3. Other Work

Only work directly associated with providing ESA Program authorized services to participating customers may be billed to the ESA Program. The contractor is prohibited from selling other services to the customer or charging the customer for any other service.[9]

[9] Note that this provision does not preclude the possibility of requiring a co-payment for the installation of one or more measures, if approved by the utility.

3.3.4. Staff Identification

All contractor or subcontractor employees who engage in customer contact must wear identification badges provided or approved by the utility at all times. Each badge must include a color photo of the employee. If the contractor produces badges, templates for identification badges will be provided by the utility. The contractor shall immediately return the ID badges of all personnel no longer working for the contractor or its subcontractors on the ESA Program. In the event the contractor is unable to return a badge, the contractor shall immediately notify the Program Administrator.

3.3.5. Crew Appearance

ESA Program contractors are responsible for the courtesy and appearance of their employees. Discourteous personnel and unprofessional appearance will not be tolerated in this program and may constitute grounds for contract termination.

3.3.6. Customers 18 Years or Older

In general, contractors shall enter customer's residences only when adults, eighteen (18) years of age or older are present. The only exception to this rule is that contractors may enter the home of a customer under eighteen (18) years of age if the customer is married or has been declared an emancipated minor by the courts.

3.3.7. Customer Complaint Procedures

The contractor must make every effort to resolve barriers to communication attributable to factors including language preference and disabilities. The contractor must make every effort to resolve and document customer complaints. The Contractor must notify the utility or its designee of the status of each complaint within 24 hours of the contractor's receipt of the complaint. If the complaint deals with customer safety, the contractor must resolve it within 24 hours. If the complaint does not relate to customer safety, the contractor must resolve the complaint to the satisfaction of the customer as required by the IOU. The acceptability of the contractor's resolution of complaints will be determined at the sole discretion of the utility. If the contractor has not resolved the complaint within the mandated period, the contractor shall notify the utility or its designee of this failure.

3.3.8. Substance Abuse and Smoking Policy

In addition to local and state laws, contractor personnel shall not be under the influence of drugs or alcohol nor be using drugs or alcohol anytime when performing ESA Program work. Smoking is prohibited within the residence being served at all times and on the customer's property.

3.3.9. Incident Report

Contractors must immediately contact the utility or its designee if during a home visit there is damage to a customer's home and/or property or if the contractor's employee has been accused of an illegal act. Within 24 hours, the contractor will inform the utility or its designee of the resolutions of all such incidents.

4 Procedures for Pre-Installation Contacts

4.1 Introduction

This section describes the procedures to be followed by outreach workers and contractors during pre-installation visit or visits to a participating home. These procedures cover the provision of general program information, the collection of data on the household and the home, the administration of home energy education, the completion of the home energy assessment, and the installation of measures as approved by each IOU.

4.2 Description of Program Services

In the course of the customer enrollment, the outreach worker shall provide a thorough description of the program services available to the income qualified household. At a minimum, this description must cover the following services:

- The ESA Program, including program goals, eligibility requirements, eligible measures, and procedures. The procedures to be covered by this description must encompass energy education, available energy efficiency services and home repairs, general installation procedures, inspection procedures, and natural gas appliance testing procedures (if applicable).
- Other programs designed to repair/replace furnaces or install other energy efficiency measures (if these are offered as separate programs).
- The California Alternate Rates for Energy (CARE) Program. Outreach workers will also provide assistance in enrolling the customer in CARE if the customer chooses to participate in it.
- Other utility programs designed to provide services to low-income customers, including level-payment programs, medical baseline programs, and other energy efficiency programs for which the customer may be qualified.
- Similar programs offered by DCSD and other known energy related programs.

The outreach worker may also describe other utility and non-utility low income assistance and energy efficiency programs. At no time shall Program personnel promote or provide fee-based services to customers in lieu of free services offered under the ESA Program.

4.3 Data Collection

During the initial interview, the outreach worker will also collect data needed to document eligibility and to meet tracking and reporting requirements. In general, information including, but not limited to the following must be collected:

- Name, address and phone number of applicant,
- Senior/disability status of applicant or other permanent household member, as observed by the assessor or voluntarily provided by the applicant,
- Residence type and owner/renter status,
- Gas and/or electric account information,
- Appliance/HVAC system information,
- Customer unwillingness/inability to participate, and
- Home square footage.

Demographic data may also be collected if offered by the customer.

4.4 In-Home Energy Education

In-home energy education will be provided to all income-eligible applicants whose dwellings require the minimum number of measures, using forms and checklists provided by the utilities. Energy education will cover the following general areas: heating and cooling usage, water heating system usage, major electric and gas appliance usage, small appliance usage, benefits of energy efficiency programs in reducing greenhouse gas emissions, water conservation, and lighting usage. At a minimum, topics to be covered in the course of energy education must include:

- The general levels of usage associated with specific end uses and appliances,
- The impacts on usage of individual energy efficiency measures offered through the ESA Program or other Programs offered to low-income customers by the utility,
- Practices that diminish the savings from individual energy efficiency measures, as well as the potential cost of such practices,
- Ways of decreasing usage through changes in practices,
- Information on CARE, the Medical Baseline Program, and other available programs,

- Appliance safety information,
- The way to read a utility bill,
- Greenhouse gas emissions,
- Water conservation,
- CFL disposal and recycling, and
- The procedures used to conduct natural gas appliance testing (if applicable).

4.5 In-Home Energy Assessment

An assessment of the structure will be completed on homes with income-qualifying applicants using utility approved forms and/or tools. The assessment will identify measures which may be installed through the Program.

5 Program Measures

5.1 Introduction

This section identifies the energy efficiency measures available through the ESA Program and discusses the means by which changes in eligible measures are made over time. Subsection 5.2 focuses on measures offered under the program, while Subsection 5.3 outlines the process that will be used to evaluate measures for inclusion in the Program in future years.

5.2 Program Measures

Table 5-1 indicates the specific Program measures that may be provided to participants for the ESA Program in accordance with Commission Decision D.12-08-044 and the California Installation Standards Manual[10].

5.3 Consideration of Changes to Measure List

Utilities will jointly evaluate existing Program measures in the course of developing recommendations for programs in subsequent years. The utilities evaluate these measures using all available information on both costs and benefits (including energy benefits as well as non-energy benefits), and develop a set of recommendations for CPUC approval. If warranted by the evidence, these recommendations may vary across climate zones. The utilities will also implement a process for considering new measures to be added to the Program. This process will entail the issuance of a solicitation for recommendations for new measures and the assessment of the cost-effectiveness of these measures.

[10] The SMJU are also authorized to install ESA program measures as specified in table 5-1 by housing types and climate zone pursuant to D.14-05-004.

Table 5-1 Eligible Measures

Measure [1]	PG&E			Avail. to Renters	SDG&E			Avail. to Renters	SCE			Avail. to Renters	SCG			Avail. to Renters
	S/F	M/F	M/H		S/F	M/F	M/H		S/F	M/F	M/H		S/F	M/F	M/H	
Heating, Ventilation & Air Conditioning																
Gas Furnace [4] Repair/Replace CZ 1,2,3,4,5,6,11, 12, 13,14, 16	√	√	√													
Gas Furnace [4] Repair/Replace - CZ -7, 10, 14,15					√	√	√									
Gas Furnace [4] Repair/Replace - CZ –4, 5, 6, 7, 8, 9,10,13,14,15,16													√	√	√	
Forced Air Unit Standing Pilot Light Conversion - All – CZ					√	√	√	√					√	√	√	√
Room A/C Replacement																
-CZ 10					√	√	√	√								
- CZ 10,13,14, 15	√								√	√	√	√				
Central A/C Replacement																
- CZ 14	√															
- CZ 14 & 15									√	√	√	√				
Heat Pump - CZ 14 & 15									√	√	√	√				
AC Time Delay - CZ 1, 2, 3, 4, 5, 6, 11, 12, 13, 14, 16, (Except SF & MF CZ 1,5,6 and MF CZ 3)	√	√	√	√												
Duct Sealing CZ 1, 2, 3, 4, 5, 11, 12, 13, 16	√		√	√												
- CZ 7, 8, 10, 14,15 (Except CZ 8 Gas)					√		√	√								
- CZ 4, 5, 6, 7, 8, 9,10,13,14,15,16													√		√	√
Evaporative Coolers																
-CZ 10,13,14,15,16									√		√	√				
- CZ 1, 2, 3, 4, 11, 12,13, 14, 16 (Except MH CZ 1)	√		√	√												

Table 5-1 Eligible Measures (Continued)

Measure [1]	PG&E				SDG&E				SCE				SCG			
	S/F	M/F	M/H	Avail. to Renters	S/F	M/F	M/H	Avail. to Renters	S/F	M/F	M/H	Avail. to Renters	S/F	M/F	M/H	Avail. to Renters
Maintenance																
Furnace Clean & Tune CZ 4,5, 6,7, 8, 9,10,13,14,15,16													√	√	√	√
- CZ 7,10,14,15					√	√	√	√								
Central A/C Tune-up/Services																
- CZ 2, 4, 6, 11, 12, 13, 14, 16	√	√	√	√												
- CZ 6,7, 8, 14, 15					√	√	√	√								
All CZ									√	√	√	√				
Enclosure																
Envelop/Air Sealing Measures[2]																
- CZ 1, 2, 3, 4, 5, 6,11,12,13,14,16	√	√	√	√												
- CZ 4,5,6,7,8,9,10, 13,14, 15,16													√	√	√	√
- CZ 6,8, 9, 10, 13, 14, 15, 16 Electric Heated Home									√	√	√	√				
- CZ 6, 7, 8,10,14, 15 Electric Heated Home					√	√	√	√								
- CZ 7, 10,14, 15 Gas Heated Home					√		√	√								
Attic Insulation																
CZ 1, 2, 3, 4, 5, 6. 11, 12, 13, 14, 16	√	√		√												
- CZ 4,5,6,7,8,9,10 13, 14, 15, 16													√	√		√
- CZ 6,7,8,10,14,15 Electric					√	√		√								
- CZ 7,10,14,15 Gas					√	√		√								
Home[3] Repairs - All - CZ	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√

Table 5-1 Eligible Measures (Continued)

Measure [1]	PG&E			Avail. to	SDG&E			Avail. to	SCE			Avail. to	SCG			Avail. to
	S/F	M/F	M/H	Renters	S/F	M/F	M/H	Renters	S/F	M/F	M/H	Renters	S/F	M/F	M/H	Renters
Domestic Hot Water																
Faucet Aerators All – CZ	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√
Low Flow Showerhead All – CZ	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√
Water Heater [4] Repair/ Replacement - Gas - All CZ	√	√	√		√	√	√						√	√	√	
Water Heater Blanket All – CZ	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√
Water Heater Pipe Insulation All – CZ	√	√	√	√	√	√	√	√	√	√	√	√	√	√[5]	√	√
Thermostatic Shower Valve - All – CZ	√	√	√	√	√	√	√	√					√	√	√	√
Lighting Measures																
CFL Lighting - All – CZ	√	√	√	√	√	√	√	√	√	√	√	√				
Interior Hard wired CFL fixtures - All - CZ	√	√	√	√	√	√	√	√								
Exterior Hard wired CFL fixtures - All - CZ	√	√	√	√	√			√	√			√				
Torchiere All - CZ	√	√	√	√	√	√	√	√	√	√	√	√				
Occupancy Sensors - All C	√	√	√	√												
LED Night Light - All CZ					√	√	√	√								
Appliances																
Refrigerators - All - CZ	√	√	√	√	√	√	√	√	√	√	√	√				
High Efficiency Clothes Washer - All – CZ					√	√	√	√					√	√	√	√
LIHEAP Appliances All CZ	√	√	√	√												
Microwave Ovens - All - CZ	√	√	√	√	√	√	√	√								
Miscellaneous																
Pool Pumps - All CZ									√			√				
Smart Power Strip All - CZ					√	√	√	√	√	√	√	√				

Table 5-1 Footnotes:

[1] Table 5-1 indicates the specific Program measures that may be provided to participants for the ESA Program in accordance with the California Installation Standards Manual

[2] Includes Caulking, Outlet Cover Plate Gaskets, Evaporative Cooler Cover, Air Conditioner Cooler Cover, Attic Access Weather-Stripping Doors and Home Repairs (which include repairs such as ceiling repair, cover plates, door jams, door patch/plate, door replacement, exhaust fan vents, exterior wall repair, foam wall patch, interior wall repair, glass replacements, glazing compounds, lock sets (exterior door) windowsill repair, thresholds, vent repair and alignment, and window repair). For the purposes of qualifying a home for the Program, these measures count as a single measure. If contractors are installing less than three measures in a home, they should refer to Section 2.8.

[3.] There are multiple sub-measures included under home repairs. Home repairs are constituted by services that either reduce infiltration (e.g., window repairs), mitigate a hazardous condition, or accommodate the installation of Program measures (e.g., attic venting). For the purposes of qualifying a home for the Program, all home repairs (combined) count as a single measure.

[4.] For owner occupied, furnace repairs and replacements are provided only when necessary to mitigate NGAT fails and pursuant to the installation of infiltration-reduction measures. Water heater repairs and replacements are also provided only to mitigate NGAT fails or to replace leaking water heater tanks.

Note:

In situations where there are questions regarding the interpretation of a certain measure, the Utilities shall use D.12-08-044 and D.14-05-004 as the overriding authorities.

6 Home Repairs

6.1 Introduction

This section describes the ESA Program policies and procedures relating to home repairs. Section 6.2 discusses the home repairs that may be provided through the ESA Program. Section 6.3 describes Program limits on expenditures on general types of home repairs. Finally, Section 6.4 describes the prioritization criteria that will be used by Program Managers to prioritize repairs for a specific home when not all needed home repairs can be made within the constraints of the budget limits for that home.

6.2 Home Repairs

Home repairs are repairs required to enable installation of weatherization measures, to reduce infiltration, or to mitigate a hazardous condition. These repairs shall be done in a manner that maintains accessibility for customers with observed disabilities.

In *owner-occupied* homes receiving infiltration-reduction measures, home repairs, including furnace and/or water heater repair and replacement and other home repairs may be necessary to mitigate natural gas appliance testing (NGAT) fails that cannot be corrected with service by utility gas service personnel (or their designated representative). Such NGAT fails may include, but are not limited to, CO above the action level, inadequate draft, unsafe flue/vent pipe/system, unacceptable flame or flame change when air handler comes on, a non-operable appliance, or the absence of a furnace in cases where another gas appliance is used for space heating.

In *all* homes receiving infiltration-reduction measures, home repairs also include other corrections needed to pass the NGAT protocol, including but not limited to, adding combustion and ventilation air (CVA) venting, and other corrections. It is the general policy of the ESA Program that these repairs must be made if they are needed and feasible, subject to budgetary limits.

6.3 Limits on Home Repairs

There are two types of limits on costs incurred for home repairs.

- ***Average Cost Limits.*** These are limits on the average cost of categories of service across all homes receiving the service in question. They are designed to provide overall cost control for the provision of these services.
- ***Individual Home Limits.*** These are defined as limits on the cost that can be incurred for an individual home without the specific approval of the utility Program Manager. Individual home limits are meant to provide for equity in the distribution of program funds across individual households but yet provide Program Managers enough flexibility to respond to individual customer needs and hardship situations.

These limits are presented in Table 6-1. It should be noted that the expenditure limits apply to all home repairs, including any actions taken to respond to gas leak/carbon monoxide emission problems identified during the utility's gas appliance testing procedures.

Table 6-1 Caps on Home Repairs

Service	Average Cost per Home Receiving Service	Maximum Cost for Individual Home
Furnace Replacements Central Furnaces Wall/Floor/Direct Vent Furnaces		$2,000[11] $1,500
Water Heater Repairs and Replacements (Total Combined Cost for home receiving one or the other)	$900	$1,250
Other Home Repairs	$300	$750
Furnace Repairs (restriction on repair expenditures relative to cost of replacement) Central Furnaces Wall/Floor/Direct Vent Furnaces		50%[10] 40%

[11] Does not include the costs of Title 24 compliance.

Total of All Home Repairs		$2500
1 Does not include the costs of Title 24 compliance.		

6.4 Prioritization of Home Repairs

In the event that a contractor requests permission from the utility Program Manager to exceed the limit on home repairs, the Program Manager will base a decision on the status of the Contractor's home repair budget, the overall program budget, and the need for the repairs in question. The approving Program Managers shall ensure that any exceptions and adequate justification are documented along with his or her name in the customer file. If the Program Manager deems it necessary to limit expenditures on the home, measures will be prioritized using the following general priority list:

- Repairs needed to mitigate immediate hazards (e.g., repairs made to mitigate natural gas appliance testing (NGAT) fails, or door repairs where doors will not close or lock),
- Repairs needed to mitigate major infiltration sources (e.g., broken windows, holes in doors, etc.),
- Repairs required to permit the installation of a measure, and
- Other repairs.

7 Measure Installation Policies and Procedures

7.1 Introduction

This section presents ESA Program policies for Program measures that are covered in the ESA Program Installation Standards Manual. Subsection 7.2 specifies general policies that apply to all measures, including contractor installation, installation standards, safety, site clean up, and other policies.

7.2 General Installation Policies

7.2.1. Introduction

Several general policies relating to the installation of Program measures must be followed by installation personnel. These policies are presented below.

7.2.2. Installation by Contractor

All measures, including CFLs must be installed by the contractor in compliance with Program rules. Dropping off materials for later installation by the customer is not permitted under this Program.

7.2.3. Installation Standards

All measures must be installed in conformance with the ESA Program Installation Standards Manual. These standards are intended to meet or exceed existing codes and regulations, and to conform to accepted building practices. When a conflict exists between these installation standards and local codes, the more stringent requirement shall take precedence. Copies of these Installation Standards Manual may be obtained by using the contact information provided in Section 1.1.

7.2.4. Safety

Contractors must plan and conduct all work in a manner that is consistent with the safety of persons and property. All work shall be conducted in compliance with reasonable and safe working practices and with applicable federal, state, and local laws. For instance, the Contractor is responsible for complete compliance with California Occupational Safety and

Health Standards.

It is the responsibility of each program contractor to establish and maintain a safety program for all work undertaken for the ESA Program. It is also the responsibility of each contractor to ensure that all employees observe safety rules by complying with all required safety precautions and regulations. Contractors must ensure that their staff members receive appropriate training in the safe and proper use of the tools associated with the installation of each ESA Program measure.

7.2.5. Installation of Feasible Measures

It is the policy of the CPUC that ESA Program Contractors must install all feasible measures unless after communicating the benefits of installing the new measure(s), the customer specifically refuses the measure(s). If the installer determines that a measure cannot be installed, the reason shall be recorded and made available to the utility or its designee.

7.2.6. Lead-Safe Practices

Contractors shall conduct lead-safe practices when working with pre-1978 painted materials in accordance with federal, state, and local regulations and codes. Lead-safe practices for specific measures are listed in the California Installation Standards Manual.

7.2.7. Site Clean-Up Policies

The Contractor must maintain all work sites and related structures, equipment and facilities in a clean, orderly condition during all work conducted under the ESA Program. Any unused or leftover materials, garbage and debris must be promptly removed from the customer's premises by the Contractor and disposed of at the Contractor's expense. The customer's premises must be left in a clean and orderly condition at the end of each day and at the completion of work.

7.2.8. Recycling and Disposal Policy

The contractor shall properly dispose and recycle replaced measures in an environmentally safe manner and in accordance with federal, state, and local regulations and codes. Specific disposal and recycling policies and procedures of measures are listed in the California Installation Standards Manual.

7.2.9. Weatherization of Mobile Homes

Mobile homes with open combustion furnaces or water heaters drawing air from inside the conditioned space may not have infiltration reduction measures installed under the ESA Program. In addition, attic insulation (and therefore attic duct reconnection) is not a measure for mobile homes.

8 Inspection Policies

8.1 Introduction

This section summarizes the inspection policies used in the ESA Program to ensure safety and quality control in the installation of measures and home repairs. Subsection 8.2 discusses the designation of the responsibilities for inspections. Subsection 8.3 describes policies relating to pre-installation inspections. Subsection 8.4 presents policies on post-installation inspections.

8.2 Inspection Personnel

Utilities will use in-house personnel, contract employees, or contractors to conduct inspections. However, each utility will undertake in-house either the prime contractor (administration) function or the inspection function, but not both, with the very limited exceptions discussed in D. 00-07-020.

8.3 Pre-Installation Inspection

The IOUs may implement a pre-installation inspection process for their respective ESA Program. As part of this process, each IOU can select the percentage of homes to be evaluated for program eligibility prior to the installation of measures.

8.4 Post-Installation Inspection

8.4.1. General Polices on Post-Installation Inspection

Post-installation inspections are used to assure that Contractors install measures in accordance with the California Installation Standards of the ESA Program. In this subsection, specific polices relating to post-installation inspections are presented. These policies encompass the types of pass rates used in program administration, the frequency of post-installation inspections, the treatment of failed inspections, resolution of disputes relating to inspections, inspection waivers, and minor job corrections.

8.4.2. Types of Pass Rates

Utilities or their designees will collect information on both per-home and per-measure pass rates. Per-home pass rates will be used for the purposes of determining minimum sample sizes for tracking performance. Per-measure pass rates will be used to tailor training and technical assistance for contractors, as well as to manage programs in a prudent manner.

8.4.3. Post-Installation Inspection Frequency

Utilities or their inspection contractors will select[12] for inspection all attic insulation and furnace replacement jobs. For all other jobs not involving attic insulation or furnace replacement, random inspections will be conducted for a sample of dwelling units.

Suggested minimum sample sizes are shown in Table 8-1. These sample sizes are designed to provide 90% confidence that the true pass rate is within 5% of the estimated value.

Table 8-1: Minimum Sample Sizes for Inspections (90%/□5% precision)

Pass Rate	Number of Homes Completed By Contractor					
	200	500	1000	2000	5000	10000
0.70	140	241	317	377	425	444
0.75	129	210	265	306	337	348
0.80	115	176	213	239	257	264
0.85	98	139	161	175	184	188
0.90	76	97	108	114	118	119
0.95	45	51	54	56	57	57

[12] It is understood that selecting 100% of jobs for inspection does not necessarily mean that 100% of inspections will be completed, since the utilities and their inspection contractors cannot compel program participants to be present for inspection appointments.

Utilities or their inspection contractors may exceed these minimum sample sizes if, in the judgment of the administrator, larger sample sizes are necessary to preserve program quality control. Circumstances that may justify larger sample sizes include, but are not limited to, the following.

1. If the utility's program or the amount of additional post-inspections undertaken is small enough to conduct additional post inspections without substantially increasing total program expenditures.
2. If a particular contractor exhibits a pattern of inspection failures that justifies inspection of a higher percentage of jobs.
3. If a contractor is on a quality improvement plan which requires improvement of its inspection pass rates.
4. If contractor crews are newly trained or new to the program, and require closer field supervision and on-the-job training.
5. If a contractor's installation crews are not sure of program **installation** standards, as shown by failed inspection results.
6. If a contractor's allocation of homes covers multiple counties.
7. If post-inspections are done in conjunction with post-installation natural gas appliance tests, since there are economies associated with conducting post-installation inspections and post-installation natural gas appliance testing **at the same time.**[13]
8. If larger sample sizes are necessary to resolve disputes with contractors over estimated billing fail rates.
9. If a new measure has been added to the Program.

Utilities will keep records of actual inspection frequencies by contractor.

8.4.4. Failed Inspections

If a feasible measure is installed incorrectly or is not installed at all, Contractor may be issued a correction fail which must be resolved as required by the IOU. Hazardous fails must be addressed within 24 hours of notification by the utility and/or its designee.

[13] The rational here is that there are economies associated with conducting post-installation inspections and post-installation natural gas appliance testing.

8.4.5. Failed Inspection Dispute Resolution

In those instances where a dispute arises between inspectors and contractors, the utility and service provider may agree to utilize in-house personnel to hear and determine appropriate action on any unresolved dispute between service providers and inspectors. In the event that an agreement cannot be reached between the utility and service provider, a neutral third party may be utilized. The costs of such service shall be paid by the party that "loses" the arbitration.

8.4.6. Inspection Waivers

Policies on inspection waivers vary between mandatory and non-mandatory inspections, as follows:

- ***Mandatory inspections*** are required for projects which include attic insulation or furnace replacement. For mandatory inspections, three attempts will be made to arrange for a post-installation inspection within 30 calendar days of the notification of job completion. After three such attempts, the inspection provider will send a certified letter to the participant asking for permission to inspect the home. If the participant does not respond to this certified letter within two weeks, the inspection provider need not conduct the inspection but must notify the utility that the inspection could not be completed. In these instances, the portion of program funding associated mandatory inspections should be either not billed by the or refunded to the program. ***Non-mandatory inspections*** relate to projects not involving attic insulation or furnace replacement. They are non-mandatory in the sense that only a sample of projects must be inspected. For non-mandatory inspections, three attempts will be made to arrange for a post-installation inspection within 30 calendar days of the notification of job completion. A non-mandatory inspection of a sampled project may be waived by the utility after three attempts to contact the participant, provided that attempts are made in an effort to overcome barriers attributable to language preference or disability. The inspection provider shall replace a waived inspection with another inspection and shall complete a sufficient number of inspections as provided in the policy on post inspection frequency (see above).

9 Contractor Eligibility

9.1 Introduction

This section outlines contractor eligibility conditions under the ESA Program. Subsection 9.2 deals with insurance requirements. Subsection 9.3 relates to licensing requirements. Subsection 9.4 relates to workforce, education, and training. The purpose of this section is to provide general information on these requirements. It may not include all of the requirements specified in the contracts between contractors and Program Administrators. Contractors interested in participating in the ESA Program can obtain information at each utilities respective website.

9.2 Insurance Requirements

Contractors shall maintain insurance in full force and effect during the life of the contract with the utility, with responsible insurance carriers authorized to do business in California and having a Best Insurance Guide (or equivalent) rating that meets the guidelines of each utility.

9.3 Licensing Requirements

Any organization or company contracting under the ESA Program must comply with all applicable federal, state and local laws and regulations, as well as with utility guidelines. Contractors and subcontractors must also comply with any applicable CSLB licensing requirements, including current requirements for electrical, plumbing and HVAC, and must remain in good standing with the CSLB.

9.4 Workforce Education and Training (WE&T)

Contractors should make every effort to hire and train from the local low income communities. Additionally the contractors are required to work with the utilities to better track the training and hiring of a low income energy efficiency workforce.

10 Natural Gas Appliance Testing

10.1 Introduction

This section summarizes the statewide policy on ESA Program natural gas appliance testing (NGAT). Subsection 10.2 discusses the circumstances when such testing must be conducted. Subsection 10.3 presents the general protocols that are followed in the course of natural gas appliance testing. Subsection 10.4 addresses the timing of testing. Subsection 10.5 considers actions to be taken when one or more test is failed by appliances in a participating home. Finally, Subsection 10.6 discusses the types of personnel used for the assessments.

Note that specific standards for these natural gas appliance testing (NGAT) protocols are described in the *ESA Program California Installation Standards Manual.*

10.2 Applicability of Natural Gas Appliance Testing

10.2.1. General Applicability

In general, natural gas appliance testing will be conducted for all homes that receive infiltration reduction measures and that have at least one natural gas appliance affecting the living space.[14] In addition, the repair and replacement of a natural gas furnace or water heater involves appliance testing. See the Natural Gas Appliance Testing section in the California Installation Standards Manual, as applicable.

10.2.2. Applicability to Combustion Fuels other than IOU Natural Gas

Homes with non-IOU (e.g., propane) space heating fuels are not eligible for infiltration reduction measures. As a consequence, they are not eligible for natural gas appliance testing. Homes with IOU space heating but which use a non-IOU combustion fuel for another appliance (i.e., water heating) are also ineligible for NGAT due to the inability of the IOUs to service combustion appliances using non-IOU fuels. The IOUs will refer these latter homes to local LIHEAP agencies.

[14] The NGAT section of the ESA Program Installation Standards Manual describes the conditions under which an appliance is determined to affect the living space.

10.3 Natural Gas Appliance Testing Protocols

10.3.1. General Protocols

General natural gas appliance testing (NGAT) protocols are presented below. Note again that detailed procedures are described in the NGAT section of the California *Installation Standards Manual.* The types of checks conducted as part of NGAT are described in this section.

10.3.2. Pre-Weatherization Evaluations of Gas Appliances

In order to avoid cases in which post-weatherization NGAT would discover nonconforming conditions that (a) preclude installation of infiltration reduction measures, and (b) cannot be corrected within the scope of the program, some pre-weatherization evaluations of gas appliances are performed as part of the home assessment.

Required corrections will be performed before weatherization commences. The customer will be informed of conditions that preclude installation of infiltration reduction measures and cannot be remedied by the ESA Program (e.g., exhausting clothes dryers outdoors, and repair or replacement of appliances and gas vents for which repair or replacement is not available).

10.3.3. Post-Weatherization Natural Gas Appliance Testing (NGAT)

After completion of weatherization that includes infiltration reduction measures, NGAT is performed for all natural gas appliances affecting the living space.

10.3.4. Disposition of Appliance Fails/Problems

If a problem is identified through the application of the overall natural gas appliance testing protocol (i.e., elevated CO, inadequate draft, or defect causing an unsafe condition), the case will be referred for resolution to qualified utility-trained personnel or a contractor licensed to repair appliances. Such resolution may involve the use of flue CO testing as well as other procedures.

10.4 Timing of Combustion Appliance Testing

10.4.1. Homes with Natural Gas Appliances

For homes with natural gas appliances, post-weatherization NGAT protocols are conducted after weatherization. Post-weatherization NGAT shall be conducted within five (5) working days from the date that infiltration reduction measures are installed.

10.5 Actions to be Taken When Appliances Fail NGAT

The following actions will be taken when appliances fail NGAT:

- In owner-occupied homes, natural gas space heaters failing one or more of the tests covered by the NGAT protocol will be provided with Service/Adjustment and, if necessary, will be repaired or replaced subject to Program policies and procedures.[15]
- In owner-occupied homes, natural gas water heaters failing one or more of the tests covered by the NGAT protocol will be provided with Service/Adjustment and, if necessary, will be repaired or replaced subject to Program policies and procedures.[16]
- In owner-occupied homes, non-program appliances[17] failing one or more of the tests covered by the NGAT protocols will be provided with Service/Adjustment.[18] If Service/Adjustment does not correct the problem in question, the appliance will be tagged, shut off, and/or capped and reported to the customer.
- In renter-occupied homes, appliances failing one or more of the tests covered by the NGAT protocol will be provided with Service/Adjustment. [19] If Service/Adjustment does not correct the problem in question, the appliance will be tagged, shut off, and/or capped and reported to the customer.

10.6 Personnel Performing Natural Gas Appliance Assessments and Testing

The utilities have the option of conducting natural gas appliance assessments and testing using in-house staff or contracting with third parties to provide these services.

[15] Note that the absence of a furnace in cases where another gas appliance is used for space heating will constitute an NGAT fail.
[16] Water heater repairs and replacements are provided only to mitigate NGAT fails or to replace leaking water heaters.
[17] Appliances for which ESA Program repair or replacement is not available.
[18] In this context, Service/Adjustment of an appliance entails providing services that are within the scope of the gas service department for customers in general.
[19] In this context, Service/Adjustment of an appliance entails providing services that are within the scope of the gas service department for customers in general.

(End of Attachment R)