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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)

Application of Southern California Gas Company (U904G) for Approval of Low-Income Assistance Programs and Budgets for Program Years 2012 - 2014

Application 11-05-018
(Filed May 16, 2011)

Application of Pacific Gas & Electric Company for Approval of the 2012 – 2014 Energy Savings Assistance and California Alternative Rates for Energy Programs and Budget (U39M)

Application 11-05-019
(Filed May 16, 2011)

Application of San Diego Gas & Electric Company (U902M) for Approval of Low-Income Assistance Programs and Budgets for Program Years 2012-2014

Application 11-05-020
(Filed May 16, 2011)

**LA COOPERATIVA DE CAMPESINA REPLY COMMENTS TO DECISION PARTY
PARTICIPANT COMMENTS ON THE PROPOSED DECISION ON LARGE
INVESTOR-OWNED UTILITIES' 2012 – 2014 ENERGY SAVINGS ASSISTANCE
(ESA) (FORMERLY REFERRED TO AS LOW INCOME ENERGY EFFICIENCY OR
LIEE) AND CALIFORNIA ALTERNATIVE RATES FOR ENERGY (CARE)
APPLICATIONS**

Submitted by:

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SUBJECT INDEX OF RECOMMENDATIONS, CONCERNS AND COMMENTS

TABLE OF CONTENTS

- I. INTRODUCTION**
- II. LA COOPERATIVA REPLY COMMENTS -- TURN**
- III. LA COOPERATIVA REPLY COMMENTS -- ENERGY EFFICIENCY
COUNCIL (EEC)**
- IV. LA COOPERATIVA REPLY COMMENTS -- TELACU**
- V. LA COOPERATIVA REPLY COMMENTS -- GREENLINING INSTITUTE**
- VI. CONCLUSION**

- I. **INTRODUCTION:** La Cooperativa concurs with many of the submitted comments from stakeholders that are parties to this process. Having said that, it is important to make the critical distinction that La Cooperativa (through its member agency statewide network of service providers provides WE&T, EE and other social services) services, advocates and represents predominantly *rural* California communities and is heartened to know that there are many other urban service providers and advocates with common issues in need of both advocacy and corrective action.
- II. **LA COOPERATIVA REPLY COMMENTS -- TURN - Language Change:** TURN, in its Summary of Recommendations, Item # 2 requests that the term “coordinate” be removed in favor of the term “integrate when it is applied to the ESA Program with Energy Upgrade California and other CORE EE Programs, not just the multi-family segments. La Cooperativa concurs and also requests that change in language with these program efforts.

Single Family Low-Income Segment Benefits: TURN, in its Summary of Recommendations, Item # 3 requests modification in the PD’s direction that the “single family low-income segment should benefit from the integration of ESAP and Core EE Programs, not just the multifamily segment.” **La Cooperativa agrees, the term: “Single Family Low-income Segment” better defines rural communities** and makes a critical addition that is a fact when it comes to better defining rural low-income housing across California.

La Cooperativa agrees with TURN to relax the .025 Cost-Effectiveness Thresholds: **La Cooperativa strongly agrees with TURN’s Recommendation, Item # 6** in as much as it removes any miscalculations regarding CE eligibility within Climate Zones with temperatures that can be historically severe, yet disparate.

Reject PG&E’s and SDG&E’s Proposals to Retire Room and Central Air AC Cooling Measures: TURN, in its Summary of Recommendations states in Item # 9, “the PD should be modified to reject PG&E’s and SDG&E’s proposals to retire Room and Central Air AC cooling measures.” **La Cooperativa strongly agrees with TURN given**

this request. In the Draft PD, Zone 13 was eliminated from eligibility for both Room and Central AC cooling measures due to a substandard (.025) CE calculation. However, Zone 14 did not meet the CE standard, yet was not eliminated as eligible for these measures. Both zones have extreme temperatures as compared to other regions of the state, but there was no clear reason as to why Zone 14 was reinstated.

SCE's Evaporative Cooler Maintenance Should Continue: TURN states in its reply comments to the PD: "The PD would authorize SCE's proposal to retire its Evaporative Cooler Maintenance measure. The measure, offered in 2009-2011 for customers with evaporative coolers previously installed through ESAP, is intended to ensure that the systems operate at peak efficiency and effectively through their expected life span.

La Cooperativa agrees and supports both the conclusions and the request that evaporative cooler maintenance not be removed, and should continue. La Cooperativa Member, Proteus Inc. out of Visalia, in Tulare County, performs this maintenance for these disadvantaged groups at no cost due to need and hardship. La Cooperativa agrees and requests that SCE's evaporative cooler maintenance be continued an EE measure.

The PD Errs in Ignoring the Need to Commence the Next Low-Income Needs Assessment: TURN comments that: "Several parties, including TURN, CforAT, and DRA, have proposed that the Commission commence the next Low-Income Needs Assessment during this CARE/ESAP program cycle so that updated data can be relied upon in planning the next program cycle. La Cooperativa agrees with TURN that the data needs to be refreshed and the PD modified to provide for a Low-Income Needs Assessment.

- III. **LA COOPERATIVA REPLY COMMENTS -- ENERGY EFFICIENCY COUNCIL (EEC):** Reply comments submitted by the Energy Efficiency Council (EEC), speak to the same reasoning as delineated by **La Cooperativa in its opening comments given this request for reinstatement of room air-conditioners in CZ 13.** EEC recommends retaining this very important measure for health, comfort and safety until such time as the climate zones can be adequately evaluated; **La Cooperativa agrees and requests that Zone 13 be deemed as eligible for both room and central air conditioning measures.**

La Cooperativa further agrees with EEC’s reply comments: “We [EEC] urge the Commission to require the IOUs to ensure there are no delays between the Bridge period and implementing the Commission’s new budgets and directives. The Commission’s recent Bridge Funding Decision underscored the importance of ensuring these very important programs continue uninterrupted and we urge the Commission to continue that precedent. The issuance of the Decision is only the first step in the process to continue these programs uninterrupted; the IOUs still need to turn around contracts to service providers.”

IV. LA COOPERATIVA REPLY COMMENTS -- TELACU: La Cooperativa again agrees with the aforementioned request by TELACU and others that due to unforeseen disruptions in contracting and services delivery there have been **service interruptions and contractor layoffs due to the transition period; this calamity for both ratepayers and workers must be avoided in the future.**

V. LA COOPERATIVA REPLY COMMENTS -- GREENLINING INSTITUTE

Greenlining Supports the PD’s Strategy for Tracking Workforce, Education & Training Outcomes; La Cooperativa agrees that the issue of utilitarian WE&T data, program structure & design concepts as well as program execution and services delivery be addressed by the PD’s working group. La Cooperativa further recommends for the increased inclusion of CBO service providers in the makeup of the working group(s). Also, the repeated call to refresh the CPUC’s and the IOU’s data on low-income communities across their respective service regions is both necessary and timely as a deliverable of this PD; La Cooperative supports the call for a refreshed Low-Income Needs Assessment.

VI. CONCLUSION (AGREEMENT AND SUPPORT OF PARTY COMMENTS)

TURN Comments: Item # 2 requests that the term “coordinate” be removed in favor of the term “integrate when it is applied to the ESA Program with Energy Upgrade California and other CORE EE Programs, not just the multi-family segments. Item # 3

requests modification in the PD's direction that the "single family low-income segment should benefit from the integration of ESAP and Core EE Programs, not just the multifamily segment." Item # 6, request that the PD be modified to "immediately relax the .025 cost-effectiveness threshold..." Reject PG&E's and SDG&E's Proposals to Retire Room and Central Air AC Cooling Measures; SCE's Evaporative Cooler Maintenance should continue and the PD Errs in Ignoring the Need to Commence the Next Low-Income Needs Assessment

EEC Comments: La Cooperativa further agrees with EEC's reply comments that the issuance of the Decision is only the first step in the process to continue these programs uninterrupted; the IOUs still need to turn around contracts to service providers.

TELACU Comments: If the Commission issues a decision in this proceeding after June 7, 2012, Bridge Funding should be extended to avoid program disruption.

GREENLINING INSTITUTE Comments: PD's Strategy for Tracking Workforce, Education & Training Outcomes; Workshops and a Low-Income Needs Assessment Should Be Ordered and a Working Group(s) selection that includes CBO's.

Dated: May 30, 2012

Respectfully submitted,

By: _____/s/_____

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