

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Applications of Pacific Gas and Electric Company for Approval of the 2009-2011 Low Income Energy Efficiency and California Alternate Rates for Energy Programs and Budget (U39M)	Application 08-05-022 (Filed May 15, 2008)
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Application of Southern California Gas Company (U 904 G) for Approval of Low Income Assistance Programs and Budgets for Program Years 2009 – 2011.	Application 08-05-025 (Filed May 15, 2008)
Application of Southern California Edison Company (U 338-E) for Approval of Low Income Assistance Programs and Budgets for Program Years 2009, 2010 and 2011.	Application 08-05-026 (Filed May 15, 2008)

**PETITION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902E) AND
THE SOUTHERN CALIFORNIA GAS COMPANY (U 904G) TO MODIFY
DECISION 08-11-031**

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May 14, 2010

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OF THE STATE OF CALIFORNIA**

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I. BACKGROUND AND INTRODUCTION

On November 6, 2008, the California Public Utilities Commission issued (“D.”) 08-12-031, which approved the large investor-owned utilities’ (“IOUs”) 2009-11 Low Income Energy Efficiency (“LIEE”) and California Alternate Rate for Energy (“CARE”) Applications.

Pursuant to Rule 16.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”) San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”) (collectively, the “Joint Utilities”), respectfully submit this petition for modification (“PFM”) of D.08-11-031. In this PFM, the Joint Utilities request

modifications or clarifications to D.08-11-031 that will enable the utilities to: 1) establish memorandum accounts to track natural gas appliance testing (“NGAT”) costs;¹ 2) increase their enrollment of disabled households in the LIEE programs; 3) correct the list of eligible measures offered under the LIEE program; 4) and modify certain LIEE program components.

II. DISCUSSION

A. D.08-11-031 Should Be Modified to Permit the Joint Utilities to Establish Memorandum Accounts to Track Unanticipated and Unforeseeable NGAT Costs Incurred Above Authorized GRC Levels.

The Joint Utilities respectfully request that D.08-11-031 be modified to permit the tracking through memorandum account of the unanticipated and unforeseeable NGAT costs which will be incurred as a result of the Joint Utilities’ compliance with the directive that the IOUs provide LIEE measures for 25% of eligible and willing customers in the 2009-2011 program cycle.² The Decision substantially increased the number of homes that the IOUs must treat, as well as the number of natural gas appliance tests that must be conducted pursuant to the LIEE program. In each of their General Rate Case (“GRC”) applications, filed in 2006, the Joint Utilities based their proposed levels of NGAT funding on 2005 recorded expenses and activity levels and only moderately adjusted upward for Test Year 2008, as the Joint Utilities, the settling parties, and the Commission itself could not have reasonably foreseen that the Commission, three months *after* its approval of the Joint Utilities’ Test Year 2008 GRC funding, would require the IOUs to drastically increase their NGAT requirements in the following years.³ The Commission approved the parties’ settlement containing the Joint Utilities Test Year 2008 GRC

¹ NGAT tests for gas leaks and carbon monoxide (“CO”) emissions from natural gas appliances. NGAT is also known as “combustion appliance testing” and refers generically to CO testing of household appliances that use combustion fuels, such as natural gas or propane.

² The Decision requires the IOUs to treat a total of 1,055,096 households in the 2009-2011 program cycle. SDG&E was ordered to treat, on an annual basis, an average of 20,384 homes. SoCalGas was ordered to treat, on an annual basis, an average of 133,426 homes. *See* D.08-11-031, Ordering Paragraph (“OP”) 48.

³ *See* Attachment 1, SDG&E Operating and Maintenance Assumptions for Test Year 2008 requests. *See* Attachment 2, SoCalGas Operating and Maintenance Assumptions for Test Year 2008 requests.

funding for NGAT in D.08-07-046 on July 31, 2008. On November 6, 2008, the Commission approved D.08-11-031, ordering an increase in the number of homes to be NGAT-treated above the approved Test Year 2008 GRC funding in D.08-07-046.

As such, while SDG&E in its GRC application projected that 8,400 homes would require NGATs annually, at a cost of approximately \$300,000,⁴ D.08-11-031 requires SDG&E to conduct approximately 15,288 NGATs annually,⁵ at a cost of \$535,000. This represents an increase of 82% over the assumed GRC level. Although SoCalGas in its GRC application projected that 45,500 homes would require NGATs annually, at a cost of approximately \$1,592,500,⁶ D.08-11-031 requires SoCalGas to conduct some 120,083 NGATs annually,⁷ at a cost of \$4.2 million. This represents an increase of 163.9% over the GRC's assumed level of 45,500 homes that would require NGATs annually. The Joint Utilities, the settling parties, and the Commission could not and did not anticipate the higher NGAT requirements of D.08-11-031.

The Joint Utilities did not pursue additional NGAT funding in their 2009-2011 LIEE and CARE Program Applications, filed in May 2008, because the Commission made clear in D.06-12-038, OP 19, that NGAT costs should be funded through base rates and not through public purpose program ("PPP") funds. In fact, the Commission reaffirmed its position regarding NGAT source funding in D.08-11-031 when it denied PG&E's request to fund NGAT activities with PPP funds, stating: "Natural Gas Appliance Testing (NGAT) funding shall be from general

⁴ SDG&E requested an additional \$75,000 above the base 2005 expenses in Test Year 2008 to cover the costs of an increased number of NGATs to be conducted and for increases in contractor costs associated with conducting those tests. See Prepared Direct Testimony of Joseph Velasquez on Behalf of San Diego Gas & Electric Company, December 2006, page JSV-14.

⁵ This figure is based on the projections that 75% of the 20,384 homes SDG&E treats annually will require NGAT.

⁶ SoCalGas, in its GRC application, requested authorization of an additional \$474,000 above the 2005 base year expenses in Test Year 2008 to cover the costs of an increased number of tests and to provide for increases in contractor costs associated with performing the tests. See Revised Prepared Direct Testimony of Phillip E. Baker on Behalf of Southern California Gas Company, April 2007, page PEB-25.

⁷ This figure is based on the projections that 90% of the 133,426 homes SoCalGas treats annually will require NGAT.

rates and not the LIEE program. No IOU shall request otherwise in future LIEE request, as we have resolved the issue in the same manner for many LIEE program cycles.”⁸

As part of their GRC proceedings, the Joint Utilities reached Test Year 2012 revenue requirement settlements with DRA (SDG&E) and with DRA and TURN (SoCalGas). Included with the Motions to adopt the settlement agreements (filed on December 21, 2007) were detailed comparison exhibits that described the positions of the parties and the settlement amounts on a detailed basis. SDG&E requested \$300,000 and SoCalGas requested \$1.592 million for NGAT funding in FERC account 908.0, respectively. DRA instead proposed a two-year average for most of the components of FERC 908.0, including NGAT funding. The settling parties agreed upon an overall funding level for each of the 908.0 accounts that did not specifically address each component of the 908.0 accounts. The overall SDG&E 908.0 funding level was equivalent to 83.3% of the SDG&E GRC request, and the overall SoCalGas 908.0 funding level was equivalent to 85.2% of the SoCalGas GRC request. Thus, while a specific authorized NGAT GRC funding level is not identified for SDG&E or SoCalGas, it is reasonable to assume that in no case would the settlement funding level for NGAT have been increased over the Joint Utilities GRC request, given the facts known at the time that the test year cost projections were prepared or at the time that settlement was reached.

Further, it is also reasonable to conclude that based on the intent of the settling parties, the implied authorized level of NGAT funding for SDG&E was \$250,000 ($\$300,000 \times 83.3\%$), and the implied authorized level of NGAT funding for SCG was \$1.357 million ($\$1.592 \text{ million} \times 85.2\%$). Clearly the implied authorized funding for NGAT in the Joint Parties TY 2008 GRCs is inconsistent with the level of program activity for NGAT as ordered by the Commission in D.08-11-031. Some may proffer the argument that the Joint Utilities’ GRC NGAT funding in

⁸ D.08-11-031 at OP 65.

FERC account 908 comingles funds with ethnic media and other items, and, therefore, there is no way for the Commission to know that current NGAT funding is indeed inadequate. This argument uses the settlement terms against the Joint Utilities. It puts the Joint Utilities at risk for mandated expenses not foreseen in the GRC by the Joint Utilities or the settling parties and, thus, generally conflicts with the Commission policy of encouraging settlements.

To rectify this discrepancy, the Joint Utilities propose that the Commission find that the Joint Parties' TY 2008 GRC funding is reasonably insufficient to meet the unanticipated and unforeseeable NGAT costs of D.08-11-031 and, therefore, that the Commission permit the Joint Utilities to establish memorandum accounts⁹ to track the unanticipated and unforeseeable NGAT costs incurred that are in excess of the levels requested in the GRC by SDG&E and SoCalGas. The use of the Joint Utilities' implied authorized level of NGAT funding to establish the requested memorandum accounts represents a conservative interpretation of the potential shortfall in funding because it takes into account the fact that the Settlements for FERC 908 were below the amount in total requested by the utilities.

The Commission has previously permitted the IOUs to establish memorandum accounts in similar situations to track unanticipated costs incurred because of IOU compliance with Commission directives. For example, in response to D.05-04-052 in which call center costs were disallowed, SDG&E filed Advice Letter 1721-E-A and received Commission approval, in Resolution E-3958, to establish a memorandum account to track the previously disallowed call center costs, which were not projected in its GRC. More recently, the Commission, in the Order Instituting Rulemaking ("OIR"), regarding customer disconnections, authorized the IOUs to establish memorandum accounts to track additional and unforeseen costs associated with complying with the Order's directives. Specifically, OP 3 (c) of Rulemaking 10-02-005 states:

Each utility is authorized to file a Tier 1 advice letter to establish a memorandum account to track any significant costs associated with complying with the new practices initiated with this proceeding, including any operations and maintenance charges associated with implementation of the practices as well as any

⁹ A memorandum account is simply a mechanism to record costs into an account for future Commission determination regarding recovery; it does not guarantee recovery of costs.

uncollectibles that are in excess of those projected in the utility's last general rate case.

Thus, precedent exists to support establishment of a memorandum account in this instance.

As discussed above, the requested NGAT levels and associated costs projected in the Joint Utilities' GRC applications, and subsumed within the settlement amounts for FERC 908 as approved in D.08-07-046, are significantly lower than NGAT levels and costs as adjusted by D.08-11-031. Per D.08-11-031, the Joint Utilities should be allowed the opportunity to seek recovery in base rates of additional costs that can be reasonably quantified and will inure as a consequence of the Commission's updated policy direction for the LIEE programs. For these reasons, the Joint Utilities request that the Commission modify D.08-11-031 (1) to find that per D.08-11-031, the Joint Utilities will realize additional, unanticipated and unforeseeable costs associated with NGAT testing that are not reflected in their base rates and (2) to permit the Joint Utilities to file advice letters to establish memorandum accounts to track these costs, which will be determined in the utilities' next GRC proceedings.

SoCalGas and SDG&E respectfully request that the Commission modify OP 65 of D.08.11.031 to read:

65. Natural Gas Appliance Testing (NGAT) funding shall be from general rates and not the LIEE program. No IOU shall request otherwise in future LIEE requests, as we have resolved the issue in the same manner for many LIEE program cycles. We find, however, that the costs of expanding NGAT testing, as required by this Decision, could not have been anticipated or foreseen by the Commission, the parties, and the IOUs in the Commission's prior decisions approving settlements among the parties that include GRC funding for prior levels of NGAT. Accordingly, we will allow the IOUs to establish memorandum accounts to track the unanticipated and unforeseeable NGAT incurred costs, as a result of compliance with this Decision, that are in excess of the implied authorized level of NGAT funding from those settlements as approved by the Commission in prior utility GRC decisions.

B. D.08-11-031 Should Be Modified to Permit Utilities to Allow Customers to Self-Identify as Disabled.

In order to better identify and communicate with their disabled customers, the Joint Utilities respectfully request that the Commission modify D.08-11-031 to allow the utilities to include optional language on their written applications and other customer materials that will allow customers to self-identify as disabled. In D.08-11-031, the Commission ordered that the IOUs increase their disabled household enrollments for the 2009-2011 program years, so that customers with disabilities comprise approximately 15% of new LIEE enrollments annually.¹⁰ However, the Decision also states that utilities “should not ask customers if they are disabled, but instead allow customers with disabilities to voluntarily self-identify.”¹¹ The Decision’s mandate was “based on comments on the proposed decision by [Disability Rights Advocates (“DisabRA”)].”¹² The Joint Utilities have interpreted this statement to mean that they are not permitted to ask customers, using any form of communication, if they are disabled. This requirement has stymied the utilities’ ability to outreach to disabled households because, as the Commission is aware, “customers with disabilities may not always self-identify or be obvious.”¹³

For this reason, the Joint Utilities have engaged in discussions with representatives from DisabRA to discuss alternative means to identify and outreach to disabled customers. DisabRa has stated, however, that, with respect to their comments regarding utility communications with disabled customers, they simply intended that the Commission restrict the utilities, or their representatives, from asking customers if they are disabled, during a direct communication

¹⁰ D.08-11-031 at OP 29.

¹¹ *Id.* at OP 31.

¹² D.08-11-031 at p. 75.

¹³ *Id.* at p. 69.

exchange¹⁴ or any situation whereby a customer may feel forced or pressured to make an oft times uncomfortable or potentially embarrassing revelation. DisabRA fully supports the Joint Utilities' proposal to place an optional and voluntary question on written customer communications such as forms, enrollment applications, websites, that will allow disabled customers to self-identify. Below is an example of an optional and voluntary declaration on written communications. Variations of this may be needed but such language will remain optional.

Optional: [check box] I or a member of my household has a permanent disability.

For these reasons, the Joint Utilities request that the Decision be changed to reflect that utilities are allowed to ask if customers are disabled on all forms of written communications.

Below are suggested red-lined changes to OP 31.

31. We will allow IOUs to count customers they enroll in LIEE as a result of leveraging with CBOs that serve the disabled community, or with the DDTP, toward the 15% annual disabled enrollment goal. IOUs may also count customers who voluntarily self-identify as disabled or whom the IOUs enroll from the Medical Baseline program, but should not ask customers whether they are disabled during a direct communication exchange (defined as face-to-face, in a telephone call or through direct electronic communications such as text messaging) or any situation within in a face-to-face situation. IOUs are allowed to ask customers on all other methods of communication and to pose such a question as optional and voluntary for customers to choose whether to identify if they or a member of their household have a permanent disability. In addition, the IOUs may count as disabled persons who voluntarily describe themselves as having a disability during a face-to-face encounter, persons who have an observed disability such as mobility, vision or hearing disability, and persons who use TTY/TDD or request accessible formats of written materials (*i.e.*, large print and/or Braille).

¹⁴ Direct communication exchange entails face-to-face communications, telephone calls, or direct electronic communications such as text messaging.

C. D.08-11-031 Should Be Modified to Include Inadvertently Omitted Measures.

The Joint Utilities respectfully request that the Commission modify D.08-11-031 to include additional LIEE measures offered in certain climate zones within the Joint Utilities' respective service territories. This request is being made because the Joint Utilities inadvertently omitted measures available for certain climate zones in their LIEE and CARE Program Applications. Installation of these measures should be allowed because they are consistent with the Commission's programmatic initiative to "provide all eligible LIEE customers the opportunity to participate in LIEE programs and to offer those who wish to participate all cost-effective energy efficiency measures in their residences by 2020."¹⁵

Consistent with the cost effective methodologies adopted in D.08-11-031, the Joint Utilities have conducted cost effectiveness tests for those measures that were inadvertently omitted in certain climate zones and the results have been illustrated in Attachment 3 (SDG&E) and Attachment 4 (SoCalGas). The cost effectiveness results show that a significant number of the measures that were inadvertently omitted in certain climate zones in the Joint Utilities' respective Applications passed the cost effectiveness test threshold of 0.25 benefit/cost ratio for measure installation.

During 2009, the Joint Utilities installed all feasible measures in eligible customer homes as reflected in Attachment F2 and F3 of D.08-11-031, including those measures in certain climate zones that were inadvertently omitted. Once the Joint Utilities realized that there were measures that had not been included in their Applications, the Joint Utilities conducted cost effectiveness tests for these measures.¹⁶ SDG&E discontinued installation of measures that failed the Commission-adopted benefit/cost ratio threshold test in 2009. However, if the

¹⁵ D.07-12-051 at p.2.

¹⁶ OP 17.a. and 17.b. of D.08-11-031.

measures in the affected climate zones failed the 0.25 benefit/cost ratio threshold test, but were considered authorized measures pursuant to D.08-11-031, then for purposes of customer health, comfort, and safety, SDG&E continued to install those measures.¹⁷ However, SoCalGas discontinued installation of the omitted measures, whether they met the cost effectiveness thresholds or not, in early 2010.

The Joint Utilities request authorization to continue installation of the measures in the affected climate zones that met the benefit/cost ratio threshold and to continue installation of those measures in the affected climate zones that meet the customer health, comfort, and safety provisions in D.08-11-031. In addition, the Joint Utilities request authorization to count the measure installations and energy savings toward program accomplishments as well as expenditures associated with the measures because eligible customers received the benefits of the LIEE program and the energy savings contributed to the Commission's energy savings goal adopted by D.04-09-060.

D. The Joint Utilities' Furnace Clean and Tune Measure Should Also Be Included as an Add Back Measure.

The Joint Utilities respectfully request that the Commission modify D.08-11-031 to provide Furnace Clean and Tune with the same cost effectiveness provision prescribed for customer quality of life measures that fail the cost effectiveness test, and consider it an add-back measure. The Furnace Clean and Tune measure should also be included in the provision set forth in OP 17.c. of D.08-11-031 when the measure fails the cost-effectiveness test because the measure may improve the customers' quality of life. Heating systems in Southern California are not used often, and consequently many customers neglect to service their heating systems as

¹⁷ OP 17.c. of D.08-11-031 states "existing and new measures with both PCm and UCT test results less than 0.25 for that utility may be included in the LIEE program for all climate zones if they consist of furnace repair and replacement or water heater repair and replacement. Air conditioning and evaporative cooling measures may be included in the LIEE program in hot climates.....require them to pay for such amenities."

frequently as needed, which can lead to disrepair. For safety and operational efficiency, it is important that heating systems are inspected and maintained by qualified personnel, because regular furnace maintenance aids in efficient furnace operation and minimizes the risk of health dangers due to incomplete combustion. For these reasons, the Joint Utilities request that the Commission modify OP 17.c of D.08-11-031 to read:

c. Existing and new measures with both PCm and UCT test results less than 0.25 for that utility may be included in the LIEE program for all climate zones if they consist of furnace repair and replacement, furnace clean and tune, or water heater repair and replacement. Air conditioning and evaporative cooling measures may be included in the LIEE program in hot climates (in accordance with the measure guidelines of the 2007-08 LIEE program, which disallowed cooling measures in temperate climate zones), subject to new reporting requirements. Heating and water heating measures in landlord-owned property may not be installed with LIEE funds, as landlords' legal habitability obligations require them to pay for such amenities.

F. D.08-11-031 Should Be Modified to Permit the Joint Utilities to Eliminate the Audit & Rewards Portion of Their LIEE Programs.

In their Applications for the 2009-2011 program cycle, SoCalGas and SDG&E proposed a revised program design that approached the LIEE program in a completely different manner than in prior budget applications. Together, SoCalGas and SDG&E proposed program designs that were focused on meeting the Commission's directives of providing more services to more customers and achieving energy savings. The Joint Utilities proposed similar program designs which were comprised of six elements, including a customized rewards program that was tied to the results of a customized energy audit. The intended purpose of the proposed customized energy audit was to determine which measures should or should not be installed in a customer's

home, based on each individual customer's historical and claimed energy usage.¹⁸ The Joint Utilities' ultimate goal in including the customized energy audit was to improve the cost effectiveness of the program, achieve real, long-term and enduring energy savings, and ensure that customers received only those measures that had the highest probability of increasing energy savings and lowering energy bills while increasing comfort and safety. The audit was also designed to identify goals that customers could work toward to obtain a customer reward.

In OP 16 of D.08-11-031, the Commission directed the IOUs to pursue a "whole house approach" to meet LIEE customers' needs and stated that each eligible home would receive an individualized energy audit to obtain all feasible measures necessary for maximal energy efficiency. The Commission also stated in OP 16 that to the extent that an energy audit focuses on energy use in a home, "*such usage shall not be used to lower the number of feasible measures to be installed in the home.*"

As a result, the Joint Utilities' customized audit-based, tiered measures approach is inconsistent with the "whole house approach". The customized audit and rewards program is no longer workable because the customized audit, in conjunction with the basic program design from past years, adds little to no value to the program or to their customers when all feasible measures are to be installed in a home. The Joint Utilities submit that the customized audit and rewards program is therefore not a wise use of program funds. In order to comply with the decision's directive, an *assessment* of the customer's home is being conducted to identify all feasible measures to be installed and services to be provided, as compared to a customized audit that would identify those measures potentially yielding the greatest energy savings and lowering of energy bills based on customer specific historical and claimed usage.

¹⁸ SDG&E proposed to group the customers into tiers by household energy usage (high, medium, and low). SoCalGas proposed to identify customers by high usage (above baseline) and low usage (below baseline) and prioritize homes to be served and measures to be installed, according to SoCalGas' proposed "tiered approach".

The original intent and primary benefit of the proposed audit was to increase the average energy savings realized per measure installed while increasing the cost effectiveness LIEE program. These benefits are significantly diminished under the “all feasible” measures approach adopted in D.08-11-031. Since the customized energy audit is not necessary under the “all feasible” approach, the customer usage data collection process from the customer audit for the purpose of estimating customer baseline energy usage, performance, and rewards is also unnecessary.

As proposed, the customized energy audit would have prioritized which LIEE measures provided the most energy savings in each LIEE home, and measure installations would have been based on measures that provided the highest savings potential. Since D.08-11-031 adopted an “all feasible measures” approach to providing LIEE measures, the basis for implementing a customer rewards program, as originally proposed, is no longer applicable. The Joint Utilities instead propose that the funds originally slated for implementation of the customized audit and rewards program be used to cover the expense of providing additional measures (weather stripping, caulking, etc) to additional customers under the “all feasible measures” approach.

For these reasons, SoCalGas and SDG&E respectfully request that the Commission modify Section 19.2 of D.08.11.031 at page 164 as follows:

The Commission ~~does not grants~~ the request of SDG&E and SoCalGas ~~on a pilot Basis~~ to implement a customer rewards program. ~~SoCalGas and SDG&E shall monitor the effectiveness of the rewards program and provide in their annual reports due each May details of whether the program has (1) contributed to new customer enrollments or (2) enhanced program energy savings. Their report shall also contain a narrative section candidly explaining the results of the pilot. Once the results of the program are reviewed, the Commission will determine if the program results in the desired behavioral changes and sustained energy savings and will determine at that point whether such a program should be implemented beyond the pilot stage.~~

Additionally, SoCalGas and SDG&E respectfully request that the Commission modify D.08.11.031 to revise Conclusion of Law 37 and OP 84 as follows:

The Commission should not approve SDG&E and SoCalGas' LIEE customer rewards program. ~~on a pilot basis.~~

IV. CONCLUSION

For the reasons set forth above, the Joint Utilities respectfully request that D.08-11-031 be modified to: 1) establish memorandum accounts to track unanticipated and unforeseeable NGAT costs; 2) increase enrollment of disabled households in the LIEE programs; 3) correct the list of eligible measures offered under the LIEE program; 4) and modify certain LIEE program components.

Respectfully submitted,

/s/ Kim F. Hassan

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May 14, 2010

ATTACHMENT 1

**San Diego Gas & Electric
Test Year 2008 General Rate Case
SDG&E Customer Services Team**

* * * **O&M Working Template** * * *

PUC Acct:
 Acct Name: Assistance
 Prepared by: Connie Schramm
 Department: Customer Assistance
 Date: 03/02/06

SUMMARY					
2005 \$ - Thousands of Direct Dollars					
	Labor (\$000)	N/Labor (\$000)	Other (\$000)	Total (\$000)	FTE
2005 Base	\$ 169	\$ 342		\$ 511	2.8
Net Adj to Base	\$ 91	\$ 44		\$ 135	1.9
2005 Adj Base	\$ 260	\$ 386	\$ -	\$ 646	4.7
2006 Total	\$ 310	\$ 569	\$ -	\$ 879	5.7
2007 Total	\$ 310	\$ 639	\$ -	\$ 949	5.7
2008 GRC Total	\$ 450	\$ 781	\$ -	\$ 1,231	7.7
Incr/(Decr) from 2005 to 2008	\$ 190	\$ 395	\$ -	\$ 585	3.0
% Change	73.1%	102.2%	0.0%	90.5%	63.8%

NOTE: Input amounts in thousands of dollars, e.g., if the amount is \$1,523,254, divide by \$1000 and the result would be reflected as \$1,523.

Explanation of Changes from 2005 to 2008:

				2005 \$ - Millions of Direct Dollars				
Key Driver	Type of Cost	Assumption/Calculation	Labor	N/Labor	Other	Total	FTE	
2005 Adjusted Base			\$ 260	\$ 386	\$ -	\$ 646	4.7	
Changes from 2005 - 2006								
Co-Testing	Non-Labor	8000 homes x \$35.00 per home = \$280k Contracted services for CO-Testing of homes under the Direct Assistance Program.		\$ 50		\$ 50		
Reg Rqmts Compliance								
Payment Assistance	Labor & Non-labor	Support and development of Third Party Notification Program. Customer research on payment issues and development of services. 1 FTE - Assoc. Prom Mgr	\$ 50	\$ 40		\$ 90	1.0	
Increased Quality of Cust Svcs								
Outreach	Non-Labor	Research, community outreach and collateral for special needs customer programs, including summer and winter preparedness.		\$ 60				
Increased Quality								
Medical Baseline	Non-Labor	Design and printing of Medical Baseline collateral materials for disabled customers. Expanded Medical Baseline outreach for special needs customers.		\$ 33		\$ 33		
Reg Rqmts Compliance								
Sub-Total: 2005 - 2006 Change			\$ 50	\$ 183	\$ -	\$ 233	1.0	
			% Change >>	19.2%	47.4%	0.0%	36.1%	21.3%
2006 GRC			\$ 310.0	\$ 569.0	\$ -	\$ 879	5.7	

**San Diego Gas & Electric
Test Year 2008 General Rate Case
SDG&E Customer Services Team**

* * * **O&M Working Template** * * *

PUC Acct:
Acct Name: Assistance
Prepared by: Connie Schramm
Department: Customer Assistance
Date: 03/02/06

SUMMARY					
2005 \$ - Thousands of Direct Dollars					
	Labor (\$000)	N/Labor (\$000)	Other (\$000)	Total (\$000)	FTE
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Net Adj to Base	\$ 91	\$ 44		\$ 135	1.9
2005 Adj Base	\$ 260	\$ 386	\$ -	\$ 646	4.7
2006 Total	\$ 310	\$ 569	\$ -	\$ 879	5.7
2007 Total	\$ 310	\$ 639	\$ -	\$ 949	5.7
2008 GRC Total	\$ 450	\$ 781	\$ -	\$ 1,231	7.7
Incr/(Decr) from 2005 to 2008	\$ 190	\$ 395	\$ -	\$ 585	3.0
% Change	73.1%	102.2%	0.0%	90.5%	63.8%

NOTE: Input amounts in thousands of dollars, e.g., if the amount is \$1,523,254, divide by \$1000 and the result would be reflected as \$1,523.

Explanation of Changes from 2005 to 2008:

			2005 \$ - Millions of Direct Dollars				FTE
Key Driver	Type of Cost	Assumption/Calculation	Labor	N/Labor	Other	Total	FTE
16 Changes from 2006 - 2007							
17							
18	Co-Testing Reg Rqmts Compliance	Non-Labor - Contracted Services for CO-Testing of 8400 homes x \$35.00 per home = \$300k (increase number of homes being weatherized under the Direct Assistance Program) (\$25K)	\$ -	\$ 25	\$ -	\$ 25	
19	Payment Assistance Increased Quality of Cust Svcs	Labor & Non-labor Increase support and development of Third Party Notification; increase in development of payment assistance programs and payment options.	\$ -	\$ 30	\$ -	\$ 30	
20	Outreach Increased Quality	Non-Labor Increase support of 2-1-1; research and development of enhanced phone system.	\$ -	\$ 15	\$ -	\$ 15	
21	Medical Baseline Reg Rqmts Compliance	Non-Labor No change.	\$ -	\$ -	\$ -	\$ -	-
22	Sub-Total: 2006 - 2007 Change		\$ -	\$ 70	\$ -	\$ 70	-
23	% Change >>		0.0%	12.3%	0.0%	8.0%	0.0%
24							
25							
26							
27	2007 GRC		\$ 310	\$ 639	\$ -	\$ 949	5.7
28							

**San Diego Gas & Electric
Test Year 2008 General Rate Case
SDG&E Customer Services Team**

* * * **O&M Working Template** * * *

PUC Acct: Assistance
 Acct Name: Assistance
 Prepared by: Connie Schramm
 Department: Customer Assistance
 Date: 03/02/06

SUMMARY					
2005 \$ - Thousands of Direct Dollars					
	Labor (\$000)	N/Labor (\$000)	Other (\$000)	Total (\$000)	FTE
2005 Base	\$ 169	\$ 342		\$ 511	2.8
Net Adj to Base	\$ 91	\$ 44		\$ 135	1.9
2005 Adj Base	\$ 260	\$ 386	\$ -	\$ 646	4.7
2006 Total	\$ 310	\$ 569	\$ -	\$ 879	5.7
2007 Total	\$ 310	\$ 639	\$ -	\$ 949	5.7
2008 GRC Total	\$ 450	\$ 781	\$ -	\$ 1,231	7.7
Incr/(Decr) from 2005 to 2008	\$ 190	\$ 395	\$ -	\$ 585	3.0
% Change	73.1%	102.2%	0.0%	90.5%	63.8%

NOTE: Input amounts in thousands of dollars, e.g., if the amount is \$1,523,254, divide by \$1000 and the result would be reflected as \$1,523.

Explanation of Changes from 2005 to 2008:

				2005 \$ - Millions of Direct Dollars				
Key Driver	Type of Cost	Assumption/Calculation		Labor	N/Labor	Other	Total	FTE
29 Changes from 2007 - 2008								
30								
31	Co-Testing	Non-Labor	8400 homes x \$35.00 per home = \$300k	\$ -	\$ -		\$ -	-
	Reg Rqmts Compliance							
32	Payment Assistance	Labor & Non-labor	Increased support and development of Third Party Notification; implement payment assistance programs; communications on payment assistance and payment options programs. 1 FTE - Program Manager	\$ 70	\$ 75		\$ 145	1.0
	Increased Quality of Cust Svcs							
33	Outreach	Labor & Non-Labor	Increase in 2-1-1 costs, summer and winter preparedness outreach; implementation of "smart" phone system; additional FTE for support of outreach efforts and enhanced phone system. 1 FTE Program Manager	\$ 70	\$ 67	\$ -	\$ 137	1.0
	Increased Quality							
34	Medical Baseline	Non-Labor	No change.	\$ -	\$ -	\$ -	\$ -	-
	Reg Rqmts Compliance							
35	Sub-Total: 2007 - 2008 Change			\$ 140	\$ 142	\$ -	\$ 282	2.0
36								
37	% Change >>			45.2%	22.2%	0.0%	29.7%	35.1%
38								
39	2008 GRC			\$ 450	\$ 781	\$ -	\$ 1,231	7.7

ATTACHMENT 2

**Southern California Gas Company
Test Year 2008 General Rate Case
SCG Customer Services Team**

* * * O&M Working Template * * *

PUC Acct:
Acct Name: Assistance
Prepared by: Connie Schramm
Department: Customer Assistance
Date: 06/01/06

Cost centers: 2200-2032; 2200-0356;
2200-2033; 2200-2034; 2200-2035

NOTE: Input amounts in thousands,
e.g., if the amount is \$1,523,254, divide
and the result would be reflected as \$

SUMMARY					
2005 \$ - Thousands of Direct Dollars					
	Labor (\$000)	N/Labor (\$000)	Other (\$000)	Total (\$000)	FTE
2005 Base	\$ 43	\$ 1,365		\$ 1,408	0.6
Net Adj to Base	\$ 107	\$ 13		\$ 120	1.6
2005 Adj Base	\$ 150	\$ 1,378	\$ -	\$ 1,528	2.2
2006 Total	\$ 333	\$ 1,713	\$ -	\$ 2,046	5.5
2007 Total	\$ 333	\$ 1,863	\$ -	\$ 2,196	5.5
2008 GRC Total	\$ 473	\$ 2,248	\$ -	\$ 2,721	7.5
Incr/(Decr) from 2005 to 2008	\$ 323	\$ 870	\$ -	\$ 1,193	5.2
% Change	215.3%	63.1%	0.0%	78.1%	235.6%

Explanation of Changes from 2005 to 2008:

2005 \$ - Millions of Direct Dollars								
Key Driver	Type of Cost	Assumption/Calculation	Labor	N/Labor	Other	Total	FTE	
2005 Adjusted Base			\$ 150	\$ 1,378	\$ -	\$ 1,528	2.2	
Changes from 2005 - 2006								
Co-Testing	Non-Labor	40000 homes x \$35.00 per home = \$1.4M Contracted services for CO-Testing of homes under the Direct Assistance Program		\$ 274		\$ 274		
Payment Assistance	Labor & Non-labor	Support and development of Third Party Notification Program. Customer research on payment issues and development of services.		\$ 44		\$ 44	-	
Outreach	Non-Labor	Research, community outreach and collateral for special needs customer programs, including summer and winter preparedness. 2.2 FTE's Program Managers. \$60k	\$ 128	\$ (10)		\$ 118	2.2	
Medical Baseline	Non-Labor	Design and printing of Medical Baseline collateral materials for disabled customers. Expanded Medical Baseline outreach for special needs customers. 1.0 FTE Processing Clerk.	\$ 55	\$ 27		\$ 82	1.0	
Sub-Total: 2005 - 2006 Change			\$ 183	\$ 335	\$ -	\$ 518	3.2	
			% Change >>	122.0%	24.3%	0.0%	33.9%	145.5%
2006 GRC			\$ 333	\$ 1,713	\$ -	\$ 2,046	5.5	

**Southern California Gas Company
Test Year 2008 General Rate Case
SCG Customer Services Team**

* * * O&M Working Template * * *

PUC Acct: Assistance
 Acct Name: Assistance
 Prepared by: Connie Schramm
 Department: Customer Assistance
 Date: 06/01/06

Cost centers: 2200-2032; 2200-0356;
 2200-2033; 2200-2034; 2200-2035

NOTE: Input amounts in thousands,
 e.g., if the amount is \$1,523,254, divide
 and the result would be reflected as \$

	2005 \$ - Thousands of Direct Dollars				FTE
	Labor (\$000)	N/Labor (\$000)	Other (\$000)	Total (\$000)	
2005 Base	\$ 43	\$ 1,365		\$ 1,408	0.6
Net Adj to Base	\$ 107	\$ 13		\$ 120	1.6
2005 Adj Base	\$ 150	\$ 1,378	\$ -	\$ 1,528	2.2
2006 Total	\$ 333	\$ 1,713	\$ -	\$ 2,046	5.5
2007 Total	\$ 333	\$ 1,863	\$ -	\$ 2,196	5.5
2008 GRC Total	\$ 473	\$ 2,248	\$ -	\$ 2,721	7.5
Incr/(Decr) from 2005 to 2008	\$ 323	\$ 870	\$ -	\$ 1,193	5.2
% Change	215.3%	63.1%	0.0%	78.1%	235.6%

Explanation of Changes from 2005 to 2008:

Key Driver	Type of Cost	Assumption/Calculation	2005 \$ - Millions of Direct Dollars				FTE
			Labor	N/Labor	Other	Total	
16 Changes from 2006 - 2007							
17	Co-Testing	Non-Labor		\$ 100		\$ 100	
18	Reg Rqmts Compliance	42500 homes x \$35.00 per home = \$1.5M Contracted services for CO-Testing of homes under the Direct Assistance Program					
19	Payment Assistance	Labor & Non-labor		\$ 15		\$ 15	-
	Increased Quality of Cust Svcs	Support and development of Third Party Notification Program. Customer research on payment issues and development of services.					
20	Outreach	Non-Labor	\$ -	\$ 35		\$ 35	-
	Increased Quality	Research, community outreach and collateral for special needs customer programs, including summer and winter preparedness. 2.2 FTE's Program Managers.					
21	Medical Baseline	Non-Labor	\$ -	\$ -		\$ -	-
	Reg Rqmts Compliance	Design and printing of Medical Baseline collateral materials for disabled customers. Expanded Medical Baseline outreach for special needs customers. 1.0 FTE Processing Clerk					
22	Sub-Total: 2006 - 2007 Change		\$ -	\$ 150	\$ -	\$ 150	-
23	% Change >>		0.0%	8.8%	0.0%	7.3%	0.0%
24							
25							
26							
27	2007 GRC		\$ 333	\$ 1,863	\$ -	\$ 2,196	5.5
28							

**Southern California Gas Company
Test Year 2008 General Rate Case
SCG Customer Services Team**

* * * O&M Working Template * * *

PUC Acct:
Acct Name: Assistance
Prepared by: Connie Schramm
Department: Customer Assistance
Date: 06/01/06

Cost centers: 2200-2032; 2200-0356;
2200-2033; 2200-2034; 2200-2035

NOTE: Input amounts in thousands,
e.g., if the amount is \$1,523,254, divide
and the result would be reflected as \$

SUMMARY					
2005 \$ - Thousands of Direct Dollars					
	Labor (\$000)	N/Labor (\$000)	Other (\$000)	Total (\$000)	FTE
2005 Base	\$ 43	\$ 1,365		\$ 1,408	0.6
Net Adj to Base	\$ 107	\$ 13		\$ 120	1.6
2005 Adj Base	\$ 150	\$ 1,378	\$ -	\$ 1,528	2.2
2006 Total	\$ 333	\$ 1,713	\$ -	\$ 2,046	5.5
2007 Total	\$ 333	\$ 1,863	\$ -	\$ 2,196	5.5
2008 GRC Total	\$ 473	\$ 2,248	\$ -	\$ 2,721	7.5
Incr/(Decr) from 2005 to 2008	\$ 323	\$ 870	\$ -	\$ 1,193	5.2
% Change	215.3%	63.1%	0.0%	78.1%	235.6%

Explanation of Changes from 2005 to 2008:

			2005 \$ - Millions of Direct Dollars				FTE
Key Driver	Type of Cost	Assumption/Calculation	Labor	N/Labor	Other	Total	FTE

29 **Changes from 2007 - 2008**

30									
31	Co-Testing	Non-Labor	45500 homes x \$35.00 per home = \$1.6M		\$ 100		\$ 100		
	Reg Rqmts Compliance		Contracted services for CO-Testing of homes under the Direct Assistance Program.						
32	Payment Assistance	Labor & Non-labor	Support and development of Third Party Notification Program. Customer research on payment issues and development of services.	1.5 FTE	\$ 105	\$ 165	\$ 270	1.5	
	Increased Quality of Cust Svcs								
33	Outreach	Non-Labor	Research, community outreach and collateral for special needs customer programs, including summer and winter preparedness. .5 FTE's Program Managers.		\$ 35	\$ 120	\$ 155	0.5	
	Increased Quality								
34	Medical Baseline	Non-Labor	Design and printing of Medical Baseline collateral materials for disabled customers. Expanded Medical Baseline outreach for special needs customers.		\$ -	\$ -	\$ -	-	
	Reg Rqmts Compliance								
35	Sub-Total: 2007 - 2008 Change				\$ 140	\$ 385	\$ -	\$ 525	2.0
36				% Change >>	42.0%	20.7%	0.0%	23.9%	36.7%
37									
38									
39	2008 GRC				\$ 473	\$ 2,248	\$ -	\$ 2,721	7.5

ATTACHMENT 3

ATTACHMENT - 3

LIEE Cost-Effectiveness - Measures

San Diego Gas & Electric Company

Weather Sensitive	Housing Type	Fuel Type	Measure	Utility Cost Test	Modified Part. Test	Total Resource Cost Test	Pass / Fail
W	Mobile Home	E	Air sealing, MH, elec, cz14	0.49	2.10	0.40	Pass
W	Mobile Home	E	Air sealing, MH, elec, cz10	0.43	1.85	0.35	Pass
N	All	E	Showerstart elec	1.12	1.65	0.93	Pass
W	Single Family	E	DHW conservation, SF, elec	1.11	1.63	0.92	Pass
W	Single Family	E	Air sealing, SF, elec, cz14	0.37	1.59	0.30	Pass
W	Mobile Home	E	DHW conservation, MH, elec	1.04	1.53	0.87	Pass
W	Single Family	E	Air sealing, SF, elec, cz10	0.35	1.52	0.28	Pass
W	Mobile Home	G	Air sealing, MH, gas, cz10	0.40	1.41	0.36	Pass
W	Multi-family	E	DHW conservation, MF, elec	0.96	1.41	0.80	Pass
W	Mobile Home	G	Air sealing, MH, gas, cz14	0.40	1.40	0.35	Pass
W	Mobile Home	E	AC Tuneup,MH,elec, cz15	1.23	1.40	1.13	Pass
W	Single Family	E	AC Tuneup,SF,elec, cz15	1.22	1.38	1.12	Pass
W	Multi-family	E	AC Tuneup,MF,elec, cz15	1.21	1.36	1.11	Pass
N	All	E	Microwaves	1.14	1.34	0.94	Pass
W	Single Family	G	DHW conservation, SF, gas	0.89	1.33	0.77	Pass
N	All	G	Showerstart gas	0.86	1.30	0.75	Pass
W	Single Family	E	AC Tuneup,SF,elec, cz14	1.16	1.26	1.07	Pass
W	Mobile Home	E	AC Tuneup,MH,elec, cz14	1.16	1.25	1.06	Pass
W	Mobile Home	G	furnace clean and tune,MH, cz14	0.76	1.22	0.62	Pass
N	All	E	Nightlights	0.97	1.19	0.80	Pass
W	Mobile Home	G	DHW conservation, MH, gas	0.78	1.17	0.68	Pass
N	All	G	Gas furnace pilot conversion	0.65	1.17	0.52	Pass
W	Mobile Home	E	Air sealing, MH, elec, cz15	0.26	1.14	0.21	Pass
W	Single Family	G	Air sealing, SF, gas, cz10	0.33	1.13	0.29	Pass
W	Mobile Home	G	Air sealing, MH, gas, cz7	0.32	1.10	0.28	Pass
W	Single Family	G	Air sealing, SF, gas, cz14	0.31	1.06	0.27	Pass
W	Multi-family	E	AC Tuneup,MF,elec, cz14	1.05	1.05	0.96	Pass
W	Multi-family	G	DHW conservation, MF, gas	0.67	0.99	0.58	Pass
W	Mobile Home	G	furnace clean and tune,MH, cz10	0.63	0.99	0.51	Pass
N	All	E	Torchieres	0.77	0.95	0.64	Pass
W	Single Family	E	AC Tuneup,SF,elec, cz10	0.98	0.93	0.89	Pass
W	Mobile Home	G	Air sealing, MH, gas, cz15	0.27	0.93	0.24	Pass
N	Mobile Home	E	Refrigerators,MH	0.67	0.91	0.55	Pass
W	Single Family	E	Air sealing, SF, elec, cz6	0.21	0.91	0.17	Pass
W	Single Family	E	Air sealing, SF, elec, cz7	0.21	0.91	0.17	Pass
W	Single Family	E	Air sealing, SF, elec, cz8	0.21	0.91	0.17	Pass
N	Single Family	E	Refrigerators, SF	0.66	0.89	0.54	Pass
W	Mobile Home	G	furnace clean and tune,MH, cz7	0.56	0.87	0.45	Pass
W	Single Family	G	Air sealing, SF, gas, cz7	0.25	0.87	0.23	Pass
N	All	E	Clothes washer, elec	0.61	0.87	0.50	Pass
W	Single Family	E	Air sealing, SF, elec, cz15	0.19	0.85	0.16	Pass
W	Single Family	G	Attic insulation, SF, gas, cz14	0.67	0.85	0.58	Pass
W	Mobile Home	E	AC Tuneup,MH,elec, cz10	0.92	0.85	0.84	Pass
W	Single Family	G	furnace clean and tune,SF, cz14	0.54	0.83	0.44	Pass
N	All	E	CFL Lighting	0.68	0.83	0.56	Pass
W	Multi-family	E	AC Tuneup,MF,elec, cz10	0.90	0.82	0.83	Pass
N	All	E	Interior Hardwire CFL Fixtures	0.64	0.78	0.52	Pass
N	Multi-family	E	Refrigerators,MF	0.57	0.78	0.47	Pass
W	Single Family	G	Attic insulation, SF, gas, cz15	0.61	0.77	0.53	Pass
W	Single Family	G	Air sealing, SF, gas, cz15	0.21	0.73	0.19	Pass
W	Single Family	E	AC Tuneup,SF,elec, cz6	0.62	0.72	0.52	Pass
W	Single Family	E	AC Tuneup,SF,elec, cz8	0.62	0.72	0.52	Pass
W	Mobile Home	G	furnace clean and tune,MH, cz15	0.44	0.68	0.36	Pass
W	Mobile Home	G	Duct sealing & testing, gas, MH, cz14	0.59	0.67	0.52	Pass
W	Single Family	G	Duct sealing & testing, gas, SF, cz14	0.59	0.67	0.52	Pass
W	Multi-family	E	Air sealing, MF, elec, cz10	0.15	0.67	0.12	Pass
W	Mobile Home	E	Duct sealing & testing, elec, MH, cz14	0.54	0.64	0.44	Pass
W	Single Family	G	furnace clean and tune,SF, cz15	0.42	0.64	0.34	Pass
W	Single Family	E	Duct sealing & testing, elec, SF, cz14	0.53	0.63	0.44	Pass
W	Mobile Home	G	Duct sealing & testing, gas, MH, cz15	0.60	0.63	0.53	Pass

Weather Sensitive	Housing Type	Fuel Type	Measure	Utility Cost Test	Modified Part. Test	Total Resource Cost Test	Pass / Fail
N	All	G	Clothes washer, gas	0.42	0.63	0.36	Pass
W	Single Family	G	Duct sealing & testing, gas, SF, cz10	0.53	0.62	0.46	Pass
W	Single Family	G	furnace clean and tune,SF, cz10	0.40	0.61	0.33	Pass
W	Mobile Home	E	Duct sealing & testing, elec, MH, cz15	0.58	0.60	0.50	Pass
W	Mobile Home	G	Duct sealing & testing, gas, MH, cz10	0.51	0.60	0.44	Pass
W	Single Family	E	Duct sealing & testing, elec, SF, cz15	0.57	0.60	0.49	Pass
W	Single Family	G	Duct sealing & testing, gas, SF, cz15	0.57	0.58	0.50	Pass
W	Single Family	G	Attic insulation, SF, gas, cz10	0.46	0.58	0.39	Pass
W	Mobile Home	E	Central AC, MH, cz15	0.65	0.56	0.42	Pass
W	Single Family	E	Central AC, SF, cz15	0.64	0.55	0.42	Pass
W	Single Family	G	furnace clean and tune,SF, cz7	0.36	0.55	0.29	Pass
W	Single Family	G	Attic insulation, SF, gas, cz7	0.43	0.54	0.37	Pass
W	Single Family	E	Duct sealing & testing, elec, SF, cz10	0.44	0.54	0.36	Pass
W	Single Family	E	Attic insulation, SF, elec, cz14	0.41	0.53	0.33	Pass
W	Single Family	E	Attic insulation, SF, elec, cz15	0.41	0.53	0.33	Pass
W	Mobile Home	E	Duct sealing & testing, elec, MH, cz10	0.42	0.52	0.34	Pass
W	Multi-family	G	Air sealing, MF, gas, cz10	0.14	0.47	0.12	Pass
W	Mobile Home	E	AC Tuneup,MH,elec, cz6	0.60	0.46	0.55	Pass
W	Mobile Home	E	AC Tuneup,MH,elec, cz8	0.60	0.46	0.55	Pass
W	Mobile Home	E	AC Tuneup,MH,elec, cz7	0.60	0.46	0.55	Pass
W	Multi-family	G	Attic insulation, MF, gas, cz14	0.36	0.46	0.31	Pass
W	Single Family	E	Central AC, SF, cz14	0.53	0.44	0.34	Pass
W	Single Family	E	AC Tuneup,SF,elec, cz7	0.57	0.44	0.52	Pass
W	Multi-family	G	Air sealing, MF, gas, cz14	0.13	0.44	0.12	Pass
W	Multi-family	G	Air sealing, MF, gas, cz15	0.13	0.44	0.12	Pass
W	Mobile Home	E	Central AC, MH, cz14	0.52	0.43	0.34	Pass
W	Mobile Home	G	Duct sealing & testing, gas, MH, cz7	0.32	0.39	0.27	Pass
W	Single Family	E	Duct sealing & testing, elec, SF, cz8	0.31	0.38	0.25	Pass
W	Multi-family	E	Air sealing, MF, elec, cz6	0.08	0.36	0.07	Pass
W	Multi-family	E	Air sealing, MF, elec, cz8	0.08	0.36	0.07	Pass
W	Multi-family	E	Air sealing, MF, elec, cz7	0.08	0.36	0.07	Pass
W	Single Family	G	Duct sealing & testing, gas, SF, cz7	0.29	0.35	0.25	Pass
W	Multi-family	G	Air sealing, MF, gas, cz7	0.10	0.33	0.09	Pass
W	Multi-family	G	Attic insulation, MF, gas, cz15	0.26	0.33	0.23	Pass
W	Multi-family	E	Central AC,MF,elec, cz15	0.44	0.33	0.40	Pass
W	Multi-family	E	AC Tuneup,MF,elec, cz6	0.45	0.33	0.41	Pass
W	Multi-family	E	AC Tuneup,MF,elec, cz8	0.45	0.33	0.41	Pass
W	Multi-family	E	AC Tuneup,MF,elec, cz7	0.45	0.33	0.41	Pass
W	Multi-family	G	Attic insulation, MF, gas, cz10	0.25	0.31	0.22	Pass
W	Mobile Home	E	Duct sealing & testing, elec, MH, cz6	0.24	0.31	0.20	Pass
W	Single Family	E	Duct sealing & testing, elec, SF, cz6	0.24	0.31	0.19	Pass
W	Mobile Home	E	Duct sealing & testing, elec, MH, cz8	0.25	0.30	0.21	Pass
W	Single Family	E	Attic insulation, SF, elec, cz7	0.19	0.27	0.15	Pass
W	Single Family	E	Attic insulation, SF, elec, cz6	0.19	0.27	0.15	Pass
W	Single Family	E	Attic insulation, SF, elec, cz8	0.19	0.27	0.15	Pass
W	Mobile Home	E	Duct sealing & testing, elec, MH, cz7	0.20	0.26	0.16	Pass
W	Single Family	E	Duct sealing & testing, elec, SF, cz7	0.20	0.26	0.16	Pass
N	All	E	Water heater repair/replace, electric	0.22	0.26	0.18	Pass
W	Multi-family	G	Attic insulation, MF, gas, cz7	0.20	0.25	0.17	Fail
W	Single Family	E	Central AC, SF, cz10	0.31	0.24	0.20	Pass
W	Mobile Home	E	Central AC, MH, cz10	0.27	0.21	0.17	Pass
W	Single Family	E	Evap cooler,SF,elec, cz10	0.29	0.20	0.26	Pass
W	Mobile Home	E	Evap cooler,MH,elec, cz10	0.28	0.19	0.26	Pass
W	Multi-family	E	Central AC,MF,elec, cz14	0.27	0.18	0.25	Pass
W	Single Family	E	Central AC, SF, cz8	0.24	0.18	0.16	Fail
N	All	G	Tankless water heater	0.10	0.16	0.09	Fail
W	Mobile Home	E	Central AC, MH, cz8	0.20	0.15	0.13	Fail
W	Single Family	E	Evap cooler,SF,elec, cz14	0.22	0.14	0.20	Fail & Add Back
W	Single Family	E	Evap cooler,SF,elec, cz15	0.22	0.14	0.20	Fail & Add Back
N	All	G	Water heater repair/replace, gas	0.12	0.14	0.10	Fail & Add Back
W	Single Family	E	Room AC, SF, cz10	0.21	0.14	0.19	Fail & Add Back
W	Single Family	E	Room AC, SF, cz14	0.21	0.14	0.19	Fail & Add Back
W	Mobile Home	E	Evap cooler,MH,elec, cz14	0.21	0.14	0.19	Fail & Add Back
W	Mobile Home	E	Evap cooler,MH,elec, cz15	0.21	0.14	0.19	Fail & Add Back

Weather Sensitive	Housing Type	Fuel Type	Measure	Utility Cost Test	Modified Part. Test	Total Resource Cost Test	Pass / Fail
W	Multi-family	E	Central AC,MF,elec, cz10	0.18	0.12	0.17	Fail & Add Back
W	Mobile Home	E	Evap cooler,MH,elec, cz6	0.18	0.12	0.16	Fail
W	Mobile Home	E	Evap cooler,MH,elec, cz8	0.18	0.12	0.16	Fail
W	Single Family	E	Evap cooler,SF,elec, cz6	0.18	0.12	0.16	Fail
W	Single Family	E	Evap cooler,SF,elec, cz8	0.18	0.12	0.16	Fail
W	Mobile Home	E	Room AC, MH, cz14	0.18	0.12	0.16	Fail & Add Back
W	Mobile Home	E	Room AC, MH, cz10	0.18	0.12	0.16	Fail & Add Back
W	Mobile Home	E	Central AC, MH, cz6	0.13	0.10	0.09	Fail
W	Single Family	E	Central AC, SF, cz6	0.12	0.09	0.08	Fail
W	Multi-family	E	Room AC, MF, cz15	0.12	0.08	0.11	Fail & Add Back
W	Mobile Home	E	Room AC, MH, cz15	0.12	0.08	0.11	Fail & Add Back
W	Single Family	E	Room AC, SF, cz15	0.12	0.08	0.11	Fail & Add Back
W	Multi-family	E	Central AC,MF,elec, cz8	0.12	0.07	0.11	Fail
W	Multi-family	E	Attic insulation, MF, elec, cz10	0.10	0.07	0.09	Fail
W	Multi-family	E	Attic insulation, MF, elec, cz14	0.10	0.07	0.09	Fail
W	Multi-family	E	Attic insulation, MF, elec, cz15	0.10	0.07	0.09	Fail
W	Single Family	E	Attic insulation, SF, elec, cz10	0.08	0.06	0.07	Fail
W	Single Family	E	Room AC, SF, cz6	0.09	0.06	0.08	Fail
W	Multi-family	E	Room AC, MF, cz6	0.09	0.06	0.08	Fail
W	Multi-family	E	Room AC, MF, cz8	0.09	0.06	0.08	Fail
W	Mobile Home	E	Room AC, MH, cz6	0.09	0.06	0.08	Fail
W	Mobile Home	E	Room AC, MH, cz8	0.09	0.06	0.08	Fail
W	Multi-family	E	Central AC,MF,elec, cz6	0.07	0.05	0.07	Fail
W	Mobile Home	G	Gas furnace repair/replace,gas,MH, cz14	0.05	0.05	0.03	Fail & Add Back
W	Multi-family	E	Room AC, MF, cz10	0.07	0.04	0.06	Fail & Add Back
W	Multi-family	E	Room AC, MF, cz14	0.07	0.04	0.06	Fail & Add Back
W	Single Family	E	Room AC, SF, cz8	0.05	0.03	0.05	Fail
W	Mobile Home	G	Gas furnace repair/replace,gas,MH, cz10	0.03	0.03	0.02	Fail & Add Back
W	Mobile Home	G	Gas furnace repair/replace,gas,MH, cz7	0.03	0.03	0.02	Fail & Add Back
W	Single Family	G	Gas furnace repair/replace,gas,SF, cz14	0.03	0.03	0.02	Fail & Add Back
W	Mobile Home	G	Gas furnace repair/replace,gas,MH, cz15	0.02	0.02	0.01	Fail & Add Back
W	Single Family	G	Gas furnace repair/replace,gas,SF, cz15	0.02	0.02	0.01	Fail & Add Back
W	Single Family	G	Gas furnace repair/replace,gas,SF, cz10	0.02	0.02	0.01	Fail & Add Back
W	Single Family	G	Gas furnace repair/replace,gas,SF, cz7	0.01	0.01	0.01	Fail & Add Back
W	Multi-family	E	Air sealing, MF, elec, cz14	0.00	0.00	0.00	Fail
W	Multi-family	E	Air sealing, MF, elec, cz15	0.00	0.00	0.00	Fail
W	Mobile Home	E	Air sealing, MH, elec, cz6	0.00	0.00	0.00	Fail
W	Mobile Home	E	Air sealing, MH, elec, cz7	0.00	0.00	0.00	Fail
W	Mobile Home	E	Air sealing, MH, elec, cz8	0.00	0.00	0.00	Fail
W	Multi-family	E	Attic insulation, MF, elec, cz6	0.00	0.00	0.00	Fail
W	Multi-family	E	Attic insulation, MF, elec, cz7	0.00	0.00	0.00	Fail
W	Multi-family	E	Attic insulation, MF, elec, cz8	0.00	0.00	0.00	Fail
W	Multi-family	G	furnace clean and tune,MF, cz10	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	G	furnace clean and tune,MF, cz14	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	G	furnace clean and tune,MF, cz15	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	G	furnace clean and tune,MF, cz7	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	G	Gas furnace repair/replace,gas,MF, cz10	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	G	Gas furnace repair/replace,gas,MF, cz14	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	G	Gas furnace repair/replace,gas,MF, cz15	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	G	Gas furnace repair/replace,gas,MF, cz7	0.00	0.00	0.00	Fail & Add Back

ATTACHMENT 4

ATTACHMENT - 4

LIEE Cost-Effectiveness - Measures
Southern California Gas Company

Weather Sensitive	Category	Measure	Utility Cost Test	Modified Part. Test	Total Resource Cost Test	Pass / Fail
W	Mobile Home	Air sealing / envelope, MH, cz13	0.52	2.33	0.42	Pass
W	Mobile Home	Air sealing / envelope, MH, cz16	0.47	2.08	0.37	Pass
W	Single-family	Air sealing / envelope, SF, cz13	0.45	1.99	0.36	Pass
W	Single-family	Air sealing / envelope, SF, cz16	0.40	1.75	0.32	Pass
W	Mobile Home	Air sealing / envelope, MH, cz4	0.36	1.57	0.29	Pass
N	All Housing Types	DHW Conservation, SF, gas	0.25	1.55	0.61	Pass
W	Mobile Home	Air sealing / envelope, MH, cz10	0.32	1.41	0.26	Pass
N	All Housing Types	DHW conservation, MH, gas	0.22	1.41	0.55	Pass
W	Mobile Home	Air sealing / envelope, MH, cz8	0.30	1.32	0.24	Pass
W	Mobile Home	Air sealing / envelope, MH, cz14	0.30	1.32	0.24	Pass
W	Single-family	Air sealing / envelope, SF, cz4	0.29	1.28	0.24	Pass
W	Mobile Home	Air sealing / envelope, MH, cz5	0.27	1.16	0.21	Pass
N	All Housing Types	Furnace pilot conversion	0.73	1.16	0.55	Pass
N	All Housing Types	DHW Conservation, MF, gas	0.44	1.15	0.45	Pass
W	Single-family	Air sealing / envelope, SF, cz10	0.26	1.13	0.21	Pass
W	Multi-family	Air sealing / envelope, MF, cz13	0.26	1.12	0.21	Pass
W	Mobile Home	Air sealing / envelope, MH, cz7	0.25	1.11	0.20	Pass
W	Single-family	Air sealing / envelope, SF, cz14	0.24	1.07	0.20	Pass
W	Single-family	Air sealing / envelope, SF, cz8	0.24	1.05	0.19	Pass
W	Mobile Home	Furnace clean & tune, MH, cz13	0.66	1.03	0.49	Pass
W	Mobile Home	Furnace clean & tune, MH, cz14	0.64	1.00	0.48	Pass
W	Mobile Home	Furnace clean & tune, MH, cz10	0.61	0.95	0.46	Pass
W	Mobile Home	Air sealing / envelope, MH, cz9	0.22	0.95	0.18	Pass
W	Multi-family	Air sealing / envelope, MF, cz16	0.22	0.94	0.17	Pass
W	Mobile Home	Air sealing / envelope, MH, cz15	0.22	0.94	0.17	Pass
W	Mobile Home	Furnace clean & tune, MH, cz16	0.60	0.94	0.45	Pass
W	Single-family	Air sealing / envelope, SF, cz5	0.21	0.92	0.17	Pass
N	All Housing Types	Clothes washer	0.29	0.89	0.34	Pass
W	Single-family	Air sealing / envelope, SF, cz7	0.20	0.88	0.16	Pass
W	Single-family	Attic insulation, SF, cz15	0.57	0.86	0.44	Pass
W	Single-family	Attic insulation, SF, cz14	0.57	0.86	0.44	Pass
W	Single-family	Attic insulation, SF, cz13	0.56	0.85	0.44	Pass
W	Mobile Home	Furnace clean & tune, MH, cz9	0.53	0.83	0.40	Pass
W	Mobile Home	Furnace clean & tune, MH, cz5	0.53	0.81	0.39	Pass
W	Mobile Home	Furnace clean & tune, MH, cz6	0.53	0.81	0.39	Pass
W	Mobile Home	Furnace clean & tune, MH, cz8	0.52	0.80	0.39	Pass
W	Single-family	Attic insulation, SF, cz16	0.53	0.80	0.41	Pass
W	Mobile Home	Furnace clean & tune, MH, cz7	0.50	0.78	0.38	Pass
W	Single-family	Furnace clean & tune, SF, cz13	0.50	0.77	0.37	Pass
W	Single-family	Furnace clean & tune, SF, cz14	0.49	0.76	0.37	Pass
W	Single-family	Furnace clean & tune, SF, cz5	0.49	0.76	0.37	Pass
W	Single-family	Furnace clean & tune, SF, cz4	0.00	0.76	0.37	Pass
W	Single-family	Air sealing / envelope, SF, cz9	0.17	0.75	0.14	Pass
W	Single-family	Attic insulation, SF, cz4	0.00	0.75	0.38	Pass
W	Single-family	Air sealing / envelope, SF, cz15	0.17	0.74	0.14	Pass
W	Single-family	Attic insulation, SF, cz10	0.48	0.73	0.37	Pass
N	Mobile Home	Duct sealing & testing, MH, gas, cz16	0.48	0.73	0.37	Pass
W	Single-family	Furnace clean & tune, SF, cz10	0.46	0.72	0.35	Pass
W	Single-family	Attic insulation, SF, cz5	0.46	0.70	0.36	Pass
W	Single-family	Duct sealing & testing, SF, gas, cz16	0.46	0.70	0.36	Pass
W	Single-family	Furnace clean & tune, SF, cz16	0.45	0.69	0.34	Pass
W	Single-family	Attic insulation, SF, cz6	0.44	0.67	0.34	Pass
W	Single-family	Attic insulation, SF, cz9	0.44	0.67	0.34	Pass
W	Mobile Home	Duct sealing & testing, MH, gas, cz5	0.44	0.67	0.34	Pass
W	Single-family	Attic insulation, SF, cz8	0.42	0.65	0.33	Pass
W	Single-family	Attic insulation, SF, cz7	0.42	0.64	0.33	Pass
W	Mobile Home	Furnace clean & tune, MH, cz15	0.42	0.64	0.31	Pass

Weather Sensitive	Category	Measure	Utility Cost Test	Modified Part. Test	Total Resource Cost Test	Pass / Fail
W	Multi-family	Air sealing / envelope, MF, cz4	0.15	0.64	0.12	Pass
W	Single-family	Duct sealing & testing,SF, gas, cz5	0.42	0.64	0.32	Pass
W	Single-family	Furnace clean & tune, SF, cz6	0.38	0.57	0.28	Pass
W	Single-family	Furnace clean & tune, SF, cz9	0.38	0.57	0.28	Pass
W	Single-family	Furnace clean & tune, SF, cz7	0.38	0.57	0.28	Pass
W	Single-family	Furnace clean & tune, SF, cz8	0.38	0.57	0.28	Pass
W	Multi-family	Air sealing / envelope, MF, cz10	0.13	0.56	0.10	Pass
W	Mobile Home	Air sealing / envelope, MH, cz6	0.12	0.53	0.10	Pass
W	Multi-family	Attic insulation, MF, cz14	0.34	0.53	0.27	Pass
W	Multi-family	Attic insulation, MF, cz15	0.34	0.53	0.27	Pass
W	Single-family	Duct sealing & testing,SF, gas, cz10	0.34	0.52	0.26	Pass
W	Single-family	Duct sealing & testing,SF, gas, cz13	0.34	0.52	0.26	Pass
N	Mobile Home	Duct sealing & testing,MH, gas, cz14	0.34	0.52	0.26	Pass
W	Multi-family	Air sealing / envelope, MF, cz8	0.12	0.51	0.10	Pass
W	Multi-family	Air sealing / envelope, MF, cz14	0.12	0.51	0.10	Pass
N	Mobile Home	Duct sealing & testing,MH, gas, cz10	0.34	0.51	0.26	Pass
W	Single-family	Duct sealing & testing,SF, gas, cz14	0.33	0.51	0.26	Pass
W	Single-family	Duct sealing & testing,SF, gas, cz4	0.33	0.51	0.26	Pass
W	Multi-family	Attic insulation, MF, cz5	0.32	0.49	0.25	Pass
W	Multi-family	Attic insulation, MF, cz13	0.32	0.49	0.25	Pass
N	Mobile Home	Duct sealing & testing,MH, gas, cz9	0.29	0.45	0.23	Pass
N	Mobile Home	Duct sealing & testing,MH, gas, cz13	0.29	0.45	0.23	Pass
W	Multi-family	Air sealing / envelope, MF, cz5	0.10	0.45	0.08	Pass
W	Single-family	Furnace clean & tune, SF, cz15	0.29	0.43	0.21	Pass
W	Single-family	Duct sealing & testing,SF, gas, cz9	0.28	0.43	0.22	Pass
W	Single-family	Duct sealing & testing,SF, gas, cz6	0.27	0.42	0.21	Pass
W	Mobile Home	Duct sealing & testing,MH, gas, cz8	0.27	0.41	0.21	Pass
W	Multi-family	Air sealing / envelope, MF, cz7	0.09	0.40	0.08	Pass
W	Single-family	Air sealing / envelope, SF, cz6	0.09	0.40	0.08	Pass
W	Multi-family	Attic insulation, MF, cz16	0.26	0.40	0.20	Pass
W	Single-family	Duct sealing & testing,SF, gas, cz8	0.26	0.39	0.20	Pass
W	Mobile Home	Duct sealing & testing,MH, gas, cz4	0.25	0.38	0.19	Pass
W	Multi-family	Attic insulation, MF, cz10	0.25	0.38	0.19	Pass
W	Mobile Home	Duct sealing & testing,MH, gas, cz7	0.25	0.38	0.19	Pass
N	Mobile Home	Duct sealing & testing,MH, gas, cz15	0.23	0.36	0.18	Pass
W	Multi-family	Air sealing / envelope, MF, cz9	0.08	0.36	0.07	Pass
W	Multi-family	Attic insulation, MF, cz4	0.00	0.35	0.17	Pass
W	Single-family	Duct sealing & testing,SF, gas, cz7	0.22	0.34	0.17	Pass
W	Mobile Home	Duct sealing & testing,MH, gas, cz6	0.22	0.34	0.17	Pass
W	Multi-family	Attic insulation, MF, cz6	0.22	0.33	0.17	Pass
W	Multi-family	Air sealing / envelope, MF, cz15	0.08	0.33	0.06	Pass
W	Multi-family	Attic insulation, MF, cz7	0.21	0.32	0.16	Pass
W	Multi-family	Attic insulation, MF, cz8	0.20	0.32	0.16	Pass
W	Single-family	Duct sealing & testing,SF, gas, cz15	0.20	0.31	0.15	Pass
W	Multi-family	Attic insulation, MF, cz9	0.20	0.31	0.15	Pass
N	All Housing Types	Tankless water heater	0.34	0.26	0.10	Pass
W	Multi-family	Air sealing / envelope, MF, cz6	0.04	0.19	0.04	Fail
W	Mobile Home	Heating system repair / replace, MH, cz4	0.09	0.13	0.07	Fail & Add Back
W	Mobile Home	Heating system repair / replace, MH, cz13	0.08	0.13	0.06	Fail & Add Back
N	All Housing Types	DHW repair/replace, SF, gas	0.25	0.12	0.05	Pass
N	All Housing Types	DHW repair/replace, MF, gas	0.27	0.12	0.05	Pass
N	All Housing Types	DHW repair/replace, MH, gas	0.29	0.12	0.05	Pass
W	Mobile Home	Heating system repair / replace, MH, cz14	0.08	0.12	0.06	Fail & Add Back
W	Mobile Home	Heating system repair / replace, MH, cz10	0.07	0.10	0.05	Fail & Add Back
W	Mobile Home	Heating system repair / replace, MH, cz16	0.07	0.10	0.05	Fail & Add Back
W	Mobile Home	Heating system repair / replace, MH, cz9	0.05	0.08	0.04	Fail & Add Back
W	Mobile Home	Heating system repair / replace, MH, cz5	0.05	0.08	0.04	Fail & Add Back
W	Mobile Home	Heating system repair / replace, MH, cz6	0.05	0.08	0.04	Fail & Add Back
W	Mobile Home	Heating system repair / replace, MH, cz8	0.05	0.07	0.04	Fail & Add Back
W	Mobile Home	Heating system repair / replace, MH, cz7	0.05	0.07	0.04	Fail & Add Back

Weather Sensitive	Category	Measure	Utility Cost Test	Modified Part. Test	Total Resource Cost Test	Pass / Fail
W	Single-family	Heating system repair / replace, SF, cz13	0.05	0.07	0.04	Fail & Add Back
W	Single-family	Heating system repair / replace, SF, cz5	0.05	0.07	0.03	Fail & Add Back
W	Single-family	Heating system repair / replace, SF, cz4	0.05	0.07	0.03	Fail & Add Back
W	Single-family	Heating system repair / replace, SF, cz14	0.05	0.07	0.03	Fail & Add Back
W	Single-family	Heating system repair / replace, SF, cz10	0.04	0.06	0.03	Fail & Add Back
W	Single-family	Heating system repair / replace, SF, cz16	0.04	0.06	0.03	Fail & Add Back
W	Mobile Home	Heating system repair / replace, MH, cz15	0.03	0.05	0.03	Fail & Add Back
W	Single-family	Heating system repair / replace, SF, cz8	0.03	0.04	0.02	Fail & Add Back
W	Single-family	Heating system repair / replace, SF, cz6	0.03	0.04	0.02	Fail & Add Back
W	Single-family	Heating system repair / replace, SF, cz9	0.03	0.04	0.02	Fail & Add Back
W	Single-family	Heating system repair / replace, SF, cz7	0.03	0.04	0.02	Fail & Add Back
W	Single-family	Heating system repair / replace, SF, cz15	0.02	0.03	0.01	Fail & Add Back
W	Multi-family	Heating system repair / replace, MF, cz4	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Heating system repair / replace, MF, cz5	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Heating system repair / replace, MF, cz6	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Heating system repair / replace, MF, cz7	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Heating system repair / replace, MF, cz8	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Heating system repair / replace, MF, cz9	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Heating system repair / replace, MF, cz10	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Heating system repair / replace, MF, cz13	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Heating system repair / replace, MF, cz14	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Heating system repair / replace, MF, cz15	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Heating system repair / replace, MF, cz16	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Furnace clean & tune, MF, cz4	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Furnace clean & tune, MF, cz5	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Furnace clean & tune, MF, cz6	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Furnace clean & tune, MF, cz7	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Furnace clean & tune, MF, cz8	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Furnace clean & tune, MF, cz9	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Furnace clean & tune, MF, cz10	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Furnace clean & tune, MF, cz13	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Furnace clean & tune, MF, cz14	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Furnace clean & tune, MF, cz15	0.00	0.00	0.00	Fail & Add Back
W	Multi-family	Furnace clean & tune, MF, cz16	0.00	0.00	0.00	Fail & Add Back
W	Mobile Home	Furnace clean & tune, MH, cz4	0.00	0.00	0.00	Fail & Add Back

CERTIFICATE OF SERVICE

I hereby certify that a copy of **PETITION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) AND THE SOUTHERN CALIFORNIA GAS COMPANY (U 904G) TO MODIFY DECISION 08-11-031** has been electronically mailed to each party of record of the service list in A.08-05-022, A.08-05-024, A.08-05-025, A.08-05-026. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and by depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to the assigned Administrative Law Judges and Commissioner.

Executed this 14th day of May, 2010 at San Diego, California.

_____/s/ Jenny Norin

Jenny Norin



CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: A0805022 - PG&E - FOR APPROVAL
FILER: PACIFIC GAS AND ELECTRIC COMPANY
LIST NAME: LIST
LAST CHANGED: APRIL 28, 2010

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