



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Application of San Diego Gas & Electric Company  
(U 902 M) for Approval of Low-Income Assistance  
Programs for Program Years 2009-2011.

Application 08-05-024  
(Filed May 15, 2006)

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 Pacific Gas and Electric Company for  
Approval of the 2009-2011 Low Income Energy  
Efficiency and California Alternative Rates for Energy  
and Programs and Budget (U 39 M).

Application 08-05-022  
(Filed May 15, 2008)

Application of Southern California Edison Company  
(U 388-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)

**DIVISION OF RATEPAYER ADVOCATES'  
APPLICATION FOR REHEARING OF DECISION 08-11-031**

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## **I. INTRODUCTION**

Pursuant to Rule 16.1 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure ("Rules"), the Division of Ratepayer Advocates ("DRA") files this Application for Rehearing of Decision (D.) 08-11-031, the Commission's opinion adopting California's Large Investor-Owned ("IOU") Utilities' 2009-2011 Low-Income Energy Efficiency ("LIEE") and California Alternate Rates for Energy ("CARE") programs.

DRA timely files this rehearing application on the grounds that D.08-11-031 failed to consider all evidence on record, which consequently led to an erroneous finding of fact regarding the number of homes that have been treated by the Low Income Home Energy Assistance Program ("LIHEAP"), which in turn directly affects the number of homes to be treated by the LIEE program. The failure to consider substantial evidence presented by DRA has resulted in a violation of DRA's procedural due process rights and is therefore a legal error.

DRA will demonstrate this legal error and respectfully requests that the Commission grant rehearing and reassess the record evidence appropriately.

## **II. BACKGROUND**

D.08-11-031 approved approximately \$3.6 billion for the large IOU LIEE and CARE programs and is the first decision to establish the LIEE program's major policy direction articulated in D.07-12-051. (D.08-11-031, pp. 2-6). The decision is the first of a series of decisions to reach the State's LIEE Programmatic Initiative:

"By 2020, 100% of eligible and willing customers will have received all cost effective Low Income Energy Efficiency measures." (D.08-11-031, p. 7; *California Long-Term Energy Efficiency Strategic Plan*, August 2008, p. 25)."

D.08-11-031 set the LIEE and CARE program budgets and goals for the years 2009 through 2011, and is the first part of the Commission's efforts to reach the 2020 goal. Indeed, D.08-11-031 is significant because it establishes the framework for the

Commission to reach its goal and cover a three-year cycle. The next Commission decision to set program budgets and goals will not be issued to take effect until 2012. Therefore, it is vital that D.08-11-031 not contain any significant policy or factual errors.

The Commission categorized the underlying proceeding for D.08-11-031 as ratesetting. The IOUs filed their applications on May 15, 2008. DRA filed its protest to the Applications on June 19, 2008. The Commission held a Prehearing Conference (“PHC”) on June 24, 2008 at which time DRA filed its PHC statement. At the PHC, the Commission set the schedule for the proceeding establishing a series of workshops and briefing and commenting opportunities.

### **III. STATEMENT OF FACTS**

D.08-11-031 makes an error of material fact in determining the number of homes treated by the federal LIHEAP. D.08-11-031 failed to consider substantial evidence that clearly demonstrates that the number used by the IOUs in their original applications is erroneous. As explained below, DCSD provided overlapping LIHEAP data between multiple utility service territories which in turn resulted in many treated homes being counted as much as three times. The Commission adopted these numbers even though the record towards the end of the proceeding revealed the overestimation. The Commission should grant rehearing to amend the erroneous number contained in the decision.

LIHEAP is a federally funded program to help eligible low-income households meet their home heating and/or cooling needs. (California Government Code § 12087 (2008); D.05-04-052, 2008 *Cal PUC LEXIS* 572 (Cal. PUC 2005)). In California, the state Department of Community Services and Development (DCSD) administers LIHEAP. (*Id.*). There is no dispute in this proceeding that DCSD should provide the number of homes treated by LIHEAP. The number of homes treated by LIHEAP is important in determining how many homes the IOUs must treat for LIEE.<sup>1</sup>

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<sup>1</sup> Please see section IV (C) below for a discussion of the materiality of LIHEAP.

In their Applications filed May 15, 2008, the IOUs provided that the number of homes treated by LIHEAP was 295,452 from 2002-2008.<sup>2</sup> The IOUs subtracted the number of homes anticipated to be treated by LIHEAP in 2008 and the resulting number for the 2002-2007 period was 224,387. The IOUs failed to provide any evidence supporting that LIHEAP had indeed treated these number of homes. In its protest, DRA challenged the validity of this number plainly asserting that “the applications contain no reference to how the IOUs arrived at this figure.” (DRA Protest, p. 14, filed June 19, 2008).

Due to the IOUs’ lack of support for their LIHEAP number, DRA contacted DCSD and received a letter from them stating that the LIHEAP numbers that the IOUs presented in their applications did not properly reflect the correct data for 2002-2007. (See Attachment A). In extensive correspondence with DRA, DCSD refutes the numbers stated in the IOU applications, and explains how the numbers are overstated. (*Id.*). DCSD explained that the *consolidated* number of approximately 224,000 customers is overestimated because some data provided to a utility was also provided to other utilities because service territories were shared by more than one utility. (Attachment A, p. 4, first bullet). And consequentially, “there were service territories or counties that were included as many as three times”! (*Id.*). Due to the double or triple counting of homes treated, when the utilities consolidated their data the total number was a significant overestimation.

In its Brief, DRA submitted that, “the data so far provided does not support the [number of] households [that] have been treated by LIHEAP. **DRA believes the number of households actually treated by LIHEAP [] to be lower.**” (DRA Brief, p. 5). The information provided by DCSD that DRA submitted for the record on August 1, 2008, was dated July 11, 2008, and superseded the data provided in the IOU applications which were dated February of 2008.

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<sup>2</sup> See Attachment A-11 of SoCalGas and SDG&E’s Applications and Sections IIIA of PG&E and SCE’s Applications.

Despite the fact that DRA raised the issue in its protest and brief, the IOUs did not provide any evidence in their opening and reply briefs to challenge DRA or demonstrate that the LIHEAP numbers contained in their Application were correct. In its opening brief, SDG&E merely repeated its May 15, 2008 Application where they assert that they received the figures from DCSD on February 2, 2008 (SDG&E Opening Brief, p. 4 and Attachment 1, August 1, 2008). SoCalGas followed and provided a table that it compiled from data received from DCSD on February 2, 2008 showing that LIHEAP and DOE treated 66,080 homes in SoCalGas' service territory. (SCG Opening Brief, p. 4 and Attachment 1, August 1, 2008).

Likewise, in its opening brief, PG&E stated that it had received the number of customers treated by LIHEAP from DCSD. (PG&E Opening Brief, p. 5). However, PG&E failed to provide any evidence in its brief. SCE also did not provide any new data in its Opening Brief regarding DCSD.

Clearly, a reasonable assessment of the evidence presented by DRA and the lack thereof by the IOUs would result in the finding that the IOU Applications do not contain the correct LIHEAP number. However, the Proposed Decision ("PD") adopted the erroneous number which was not only unsupported by any record evidence, but contradicted by evidence. Therefore, DRA filed its Opening Comments stating:

DRA has again consulted with California's Department of Community Services (CSD) to provide clarification. CSD confirms that the number of homes treated is actually closer to 135,000. This mistake has the effect of excluding approximately 89,000 eligible households from the projected number of households remaining to be treated. (DRA Opening Comments, p. 14).

DRA not only again refuted the claim, but provided even more evidence directly from DCSD that refutes the IOU applications. Specifically, DRA admitted letters from DCSD employee, Leslie Campanella, dated October 2, 2008 stating that "I suggest using the data [from July 30, 2008] as it is the most current and accurate in terms of total number." (Attachment A, p. 4). And again, DRA's opening comments were

unchallenged by the IOUs who should have responded to defend their position. On October 10, 2008, PG&E filed reply comments to “respond to the Opening Comments of DRA.” (PG&E Reply Comments, p. 1, October 10, 2008). PG&E did not address nor refute DRA’s discussion regarding the PD’s error in the LIHEAP figures. Similarly, SCE, SDGE, and SoCalGas filed reply comments to DRA’s opening comments on the PD and did not address or refute DRA’s discussion regarding the PD’s error in the LIHEAP figures. (SCE Reply Comments and SDG&E/SoCalGas Joint Reply Comments, both filed October 10, 2008).

Clearly, the substantial evidence in the record only leads to the conclusion that the LIHEAP number is materially less than 224,387 and the IOUs did not challenge this evidence.

Unfortunately, D.08-11-031 ignored all evidence, including that directly from DCSD that recommends the number of homes treated by LIHEAP. Instead, to determine the “number of homes treated by LIHEAP from 2002-07,” D.08-11-031 relies on the unsubstantiated and subsequently refuted data from the IOU Applications filed on May 15, 2008. Specifically, on page 102, the Decision states:

“According to SoCalGas and SDG&E, the DCSD provided the IOUs with the actual number of households treated by LIHEAP from 2002-07 and the estimated number of households to be served by LIHEAP in 2008. The utilities argue these numbers are valid and should be subtracted from the eligible and willing population.”

The Decision responded to DRA’s Opening Comments to the PD by stating:

“We do not change the LIEE eligible population despite DRA’s assertion that the number in the decision is incorrect. The number in the proposed decision was provided to us by many sources including LIHEAP, and DCSD has not confirmed an alternate number.”

(emphasis added) (D.08-11-031, p. 194). The Decision errs in not adopting the number provided by DRA because it is the only number substantiated by the DCSD. The

Decision further errs in its rationale that the number it adopted was provided by LIHEAP and DCSD because the only record evidence from LIHEAP or DCSD was submitted by DRA and subsequently ignored by the Commission.

DRA files the instant application because D.08-11-031 commits legal error in overlooking the overwhelming evidence provided by DRA and adopting the LIHEAP number based on the unsupported evidence of the IOUs.

#### **IV. DISCUSSION**

The purpose of an application for rehearing is to bring the Commission's attention to a legal or factual error (California Public Utilities Code § 1732; D.08-05-037; 2008 Cal. PUC LEXIS 176, \* 9.). P.U. Code § 1732 requires parties filing an application for rehearing to specifically the ground or grounds on which rehearing is sought. In the instant proceeding, D.08-11-031 failed to consider record evidence and therefore adopted an incorrect number of homes treated by LIHEAP.

##### **A. Commission decisions must afford due process rights by ensuring that facts are supported by evidence**

Both the Supreme Court of California and the Supreme Court of the United States have held that a decision must be based on substantial evidence. *Superintendent v. Hill*, (1985) 472 U.S. 445; *In re Rosenkrantz* (2002) 29 Cal.4th 616. The U.S. Supreme Court has also concluded that “the Commission must act upon the evidence and not arbitrarily.” (D.08-04-044, 2008 Cal. PUC LEXIS 155 citing: *RailRoad Commission of California V. Pacific Gas and Electric Company* (1937) 302 U.S. 388, 393-394).

Commission proceedings are not bound by the strict or technical rules of evidence so that the Commission has the favor of including evidence that would otherwise be inadmissible. (*Mohilef v. Janovici*, 51 Cal. App. 4<sup>th</sup> 267 (2d Dist. 1996)). However, the Commission cannot arbitrarily refuse to consider evidence proffered by a party. (*Bank of America v. City of Long Beach*, 50 Cal. App. 3d 882 (2d Dist. 1975)). Even though the Commission is not bound by the rules of evidence applicable in a court, there must be a residuum of legal evidence to support any finding of fact. *Swars v. Council of City of Vallejo*, 33 Cal. 2d 867 (1949).

The Commission must consider all relevant evidence and reach its decision in accordance with the facts proved by such evidence. *English v. City of Long Beach*, 35 Cal. 2d 155 (1950). Indeed, although courts will accord weight to the Commission's findings of fact, it is only when there is substantial evidence in the record to support the Commission's findings. *City of Helena v. Public Utilities Com.* (2004) 119 Cal. App. 4<sup>th</sup> 793, 801; *Nolan v. Public Utilities Com.* (1953) 41 Cal. 2d 392, 397; *Western Canal Co. v. Railroad Commission* (1932) 216 639, 645-646.

**B. Finding of Fact #63 is arbitrary, unsupported by evidence, and therefore violates DRA's due process rights**

Finding of Fact ("FOF") #63 states that the number of homes treated by LIHEAP from 2002-2007 is approximately 224,387. DRA has provided substantial evidence in the record that the 224,387 is an extreme overestimation for the number of homes treated by LIHEAP because many homes were double or triple counted. (Attachment A). The evidence in the record shows that DCSD had in fact confirmed that the 224,387 number is incorrect. Direct Evidence is defined as evidence that "directly proves a fact, without an inference or presumption, and which in itself . . . conclusively establishes that fact." (California Code of Evidence § 140). The letters from DCSD are direct evidence that clearly negate the numbers from the IOU applications. (Attachment A).

The Commission simply ignored direct evidence from DCSD as submitted by DRA. Despite recognizing that the record provides that leveraging, which should include data sharing, between the IOUs and LIHEAP requires improvement. (*Id.* at 126).

Furthermore, D.08-11-031 states:

"We do not change the LIEE eligible population despite DRA's assertion that the number in the decision is incorrect. The number in the proposed decision was provided to us by many sources including LIHEAP, and DCSD has not confirmed an alternate number."

(D.08-11-031, page 194). The Decision justifies the adopted number on the basis that LIHEAP had provided the Commission that number. But, as mentioned above, the only source evidence on record from LIHEAP/DCSD was submitted by DRA which

refutes the number that the Decision adopts. The Commission clearly intended to use information from DCSD but erred in doing so. Therefore, D.08-11-031 should be amended to change the number that DCSD has confirmed is erroneous. However, the Commission errs in such statement because the only record evidence from LIHEAP/DCSD was submitted by DRA.

All in all, DRA provided an abundance of evidence that contradicts FOF # 63. Courts have annulled Commission orders to the extent that they are unsubstantiated by record evidence. (*Los Angeles v. Public Utilities Comm.* 7 Cal. 3d 331,349 (Cal. 1972)). In fact, Courts have even found that the Commission commits abuse of discretion when a Commission finding “is not supported by substantial evidence in light of the whole record.” (*County of Fresno v. Fair Employment & Housing Com.* (1991) 226 Cal. App. 3d 1541, 1548). The Commission should therefore make a finding regarding the LIHEAP numbers based on the evidence.

### **C. The Factual Error contained in the Decision is Material**

The factual error in D.08-11-031 is material and results in legal error justifying rehearing because thousands of low-income ratepayers, who would otherwise be accounted for, currently are not allocated the funds to provide for LIEE treatment. The total number of households treated by LIHEAP from 2002-2008 is one of the four components, or steps, in the “methodology used to calculate the base point for the programmatic initiative” for LIEE<sup>3</sup>. (D.08-11-031, p. 97). The number of homes treated by LIHEAP is clearly material because it determines the eligible population for the IOUs to treat in order for the state of California to reach the LIEE program’s programmatic initiative by 2020.

## **V. CONCLUSION**

There is no evidence to support the finding in D.08-11-031 that 224,387 households were treated by LIHEAP. To the contrary, DRA provided evidence directly

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<sup>3</sup> While DRA disputed the methodology and the underlying data for other components during the proceeding, this Application for rehearing does not dispute the methodology and only seeks to address the underlying number supporting “the number of homes treated by LIHEAP.”

from the administrators of LIHEAP, DCSD, confirming that the number was much lower. D.08-11-031 did not consider the evidence and arbitrarily concluded on an incorrect number, constituting clear legal error. Therefore, the Commission must grant this rehearing request and base FOF # 63 on the evidence.

Respectfully submitted,

/s/ RASHID A. RASHID

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December 10, 2008

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of each document **“DIVISION OF RATEPAYER ADVOCATES’ APPLICATION FOR REHEARING OF DECISION 08-11-031”** in **A.08-05-024 et al.**, by using the following service:

**E-Mail Service:** sending the entire document as an attachment to an e-mail message to all known parties of record to this proceeding who provided electronic mail addresses.

**U.S. Mail Service:** mailing by first-class mail with postage prepaid to all known parties of record who did not provide electronic mail addresses.

Executed on December 10, 2008 at San Francisco, California.

/s/ NELLY SARMIENTO  
\_\_\_\_\_  
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**N O T I C E**

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