ATTACHMENT 1

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's Proposed Policies and Programs Governing Post-2003 Low Income Assistance Programs.	***R 04-01-006, A. 04-06-038; A. 04-07-002; A. 04-07-010; A. 04-07-011; A. 04-07-012; A. 04-07-013; A. 04-07-014; A. 0407015; A. 04-07-020; A. 04-07-027; A. 0407050***

LOW INCOME ENERGY EFFICIENCY STANDARDIZATION PROJECT PROPOSED AMENDMENTS TO THE PHASE 5 WORK PLAN, BUDGET AND SCHEDULE

Georgetta J. Baker

Attorney for San Diego Gas & Electric Company
and Southern California Gas Company
101 Ash Street HQ 13
San Diego, CA. 92101
Phone: (619) 699-5064
Fax: (619) 699-5027
E-mail: gbaker@sempra.com

April 25, 2005

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the Commission's Proposed Policies and Programs Governing Post-2003 Low Income Assistance Programs.	***R 04-01-006, A. 04-06-038; A. 04-07-002; A. 04-07-010; A. 04-07-011; A. 04-07-012; A. 04-07-013; A. 04-07-014; A. 0407015; A. 04-07-020; A. 04-07-027; A. 0407050***

LOW INCOME ENERGY EFFICIENCY STANDARDIZATION PROJECT PROPOSED AMENDMENTS TO THE PHASE 5 WORK PLAN, BUDGET AND SCHEDULE CONSISTENT WITH THE MARCH 25, 2005 ASSIGNED COMMISSIONER'S RULING

1. Introduction

In order to comply with the Assigned Commissioner's Ruling (ACR), dated March 25, 2005, San Diego Gas & Electric Company, on behalf of the Standardization Team (Team), here files a revised scope of work for Phase 5. More particularly, in the March 25 ACR, the Public Utilities Commission (Commission) directed the Team to withdraw its January 18, 2005 filing, to solicit public input on the proposed changes, and to resubmit its recommendations pending the public input.[1] In its April 11, 2005, reply to the ACR, the Team withdrew the proposed recommendations stating that it would institute a new process for consideration of recommendations and file a revised scope of work for Phase 5 to meet the ACR's directives. This filing effectuates the Team's undertaking.

By way of background, in Decision (D.) 03-11-020, issued on November 13, 2003, the California Public Utilities Commission (Commission) directed the Low Income Energy Efficiency (LIEE) Standardization Project Team[2] to develop and submit a Phase 5 work

---

1 *Assigned Commissioner's Ruling Directing the Standardization Team to Withdraw and Refile its Proposal Related to Phase 5 of the Low Income Energy Efficiency Standardization Project*, March 25, 2005.

2 The Team consists of Pacific Gas & Electric Company, Southern California Edison, Southern California Gas Company, San Diego Gas & Electric Company, and the joint utilities technical consultants, with

plan, schedule, and budget for inclusion of new measures in the 2006 LIEE program for Commission consideration by October 8, 2004. In an ACR issued October 1, 2004, the Team was directed to review the existing standards and manuals to ensure that the current LIEE program manuals remain up to date, and develop the necessary proposed standards and manual changes in time for program year (PY) 2005. On October 15, 2004[3], the Team filed the Phase 5 work plan, schedule, and budget which was adopted by the Commission in a Ruling issued on October 22, 2004.

The Phase 5 schedule adopted on October 22, 2004 called for the submission of two major deliverables: a set of recommendations for changes in the LIEE Policy & Procedures (P&P) Manual and Weatherization Installation Standards (WIS) Manual on or before December 15, 2004[4]; and recommendations on new measures for the Program on or before April 30, 2005.

As directed in Ordering Paragraph 16, of D.03-11-020, "the Team shall conduct a cost-effectiveness evaluation and develop recommendations, with public input." The "Report on the Assessment of Proposed New 2006 LIEE Measures" (Report) is currently being conducted by the Team. As adopted by the October 22, 2004 Ruling, the Report will be filed with the Commission no later than April 30, 2005.

The Team filed its recommendations for changes to the LIEE P&P and WIS Manuals on January 18, 2005. Comments on these recommendations were filed jointly by the East

---

coordination assistance from the Commission's Energy Division and participation by the Office of Ratepayer Advocates.

3 The October 1st Ruling directed the Team to file the work plan by October 8, 2004. However, the Commission granted an extension to file the work plan by October 15, 2004.

4 On January 7, 2005, the Executive Director of the Commission granted a one-month extension to submit Manual revisions no later than January 18, 2005.

Los Angeles Community Union and the Maravilla Foundation, and the Bay Area Poverty Resource Council on March 14, 2005, prompting the issuance of the March 25 ACR.

The remainder of this document summarizes the impacts of the March 25 ACR on the Phase 5 scope of work, identifies other factors that have necessitated additions to the scope of work and provides a revised work plan, schedule and budget for Phase 5 to allow the Team to accommodate the directives of the March 25 ACR.

2. The March 25 ACR's Directives

The March 25 ACR has a number of impacts for Phase 5 of the Standardization Project. These impacts are discussed below and take into account in the revised scope of work presented in Section 4.

Reconsideration of Changes in the P&P and WIS Manuals

The ACR directed the Team to withdraw its recommendations, to provide for public input, and to refile recommendations after considering this public input. This will now require the scheduling of public workshops, additional meetings of the Standardization Team, and the preparation of new recommendations, extensive analysis of those recommendations and a comment/reply comment period. These changes in the scope of work are discussed further in Section 3.

Open Team Meetings

Second, the ACR reiterated the Commission's position that Team meetings do not fall under the provisions for the Bagley-Keene Open Meetings Act, but stated its expectation that "the attendance at working sessions related to the standardization process will not be unnecessarily restricted."[5] As stated in its April 11, 2005 filing, the Team will open its

[5] March 25, 2005 ACR.

working sessions to the public. We propose the following specific procedures for accommodating the ACR's instruction:

1. Notice of Team meetings will be sent to the service list in Rulemaking 04-01-006, and draft meeting agendas will be provided.
2. Meetings will be open to the public and teleconference capabilities will be made available to individuals who are unable to participate in person.
3. Members of the public attending meetings in person or by teleconference will be given the opportunity to provide input on agenda items, but will not have voting rights on decisions made by the Team.
4. Minutes will be recorded and distributed to the service list, and minutes of the prior meeting will be approved by the Team at the beginning of each meeting.
5. While Team meetings will be open to the public, it should be understood that it may occasionally be necessary for utility representatives and Commission staff to meet to discuss administrative, contractual and other confidential matters relating to the Program. These meetings will not be open to the public.
6. From time to time, the Team may delegate technical issues to small working groups. These ad hoc working groups, which will consist of designated subject matter experts in technical areas like installation standards, will craft language that implements the decisions of the Team and develop technical recommendations for the Team's consideration. All working group recommendations will be fully discussed in Team meetings, which will be open to the public, prior to their acceptance by the Team.

The Team recognizes that this process of open meetings will increase the Phase 5 budget and extend the schedule. The Team has taken these impacts into account in developing timelines and budget estimates presented in Section 4.

Documentation of Recommendations

The ACR appears to adopt the proposal of the East County Los Angeles Community Union and the Maravilla Foundation that certain documentation be provided with future recommendations put forth by the Team. The documentation must include:

1. Summary of the comments and recommendations of interested parties;
2. Final recommendations of the Standardization Team;
3. Discussion of the pros and cons of each policy alternative;

4. For each alternative, the estimated impacts on services to low-income customers, relative to existing policies; and

5. The impact estimates required under (4) above should be specific to low-income households within each of the utilities' service territory. The reports should show the impacts on low-income households within the service territory as a whole and also on low-income households located in rural areas. The data should be presented in a consistent manner across utilities.

The ACR instructs the Standardization Team to "undertake these further steps."[6] The Team has always attempted to document its recommendations for changes in the LIEE Program, and does not consider the first three requirements different from its past practices. However, requirements 4 and 5 appear to go considerably beyond past practice, and will require significant increases in the Phase 5 budget. It is clear from the ACR's endorsement of the wording of requirements 4 and 5 that the Team will be required to present quantitative estimates of impacts of **any change** in the P&P or WIS Manual on low-income customers in specific service areas and in urban and rural areas. Given that any set of recommendations is likely to be extensive and to include a wide range of relatively minor changes in installation standards and procedures as well as substantive changes in policies, developing quantitative estimates of impacts will be an enormous undertaking. In its January 18, 2005 filing, for instance, the Team recommended many changes to the WIS Manual necessitated by code changes, ambiguities in wording of the existing manual, inconsistencies between the P&P and WIS Manuals, and other problems in existing standards. If the Commission's instruction is taken literally, the Team will have to provide quantitative estimates of the numbers of low-income customers affected by these changes, by service area and urban/rural designation.

In the past, the Commission has asked for estimates of impacts only for very major program policy recommendations, like the treatment of homes with propane appliances; it

---

6 March 25 ACR.

has never asked for such estimates of impacts for all recommended changes. We are prepared to implement these new requirements for more extensive documentation, but would hope that the Commission would reconsider its ruling relating to these requirements. In Section 4, we propose costs and schedules under two assumptions with respect to these requirements.

3. Other Factors Requiring Modifications of the Phase 5 Work Scope

The primary reason for submitting this revised Phase 5 work scope is the need to respond to the March 25 ACR. However, other events as described below will require further modifications of the LIEE P&P and WIS Manuals, and we take this opportunity to incorporate the costs of responding to these needs as part of this revision of the Phase 5 scope of work.

Title 24 Duct Testing and Sealing Requirements

Significant changes have been made in the California Energy Commission (CEC) Title 24 Standards and Compliance Manual for 2005. These changes, which include several heating, ventilating, and air conditioning (HVAC) efficiency requirements affecting existing residential buildings, will have a significant impact upon the utilities' LIEE Program.

Effective October 1, 2005, most HVAC repairs and all replacements will be considered "alterations" that are subject to Title 24 regulations. In those CEC climate zones with predominantly cold and hot climates, duct testing and sealing will be mandated when HVAC alterations are performed, and the completed jobs will be subject to third party verification by a Home Energy Rating System (HERS) rater (documentation of which will be required to finalize the building permit).

In order to comply with the October 1, 2005 effective date, the Team will need to **quickly** revise the Statewide Policies and Procedures (P&P) Manual and the Weatherization Installation Standards (WIS) Manual to put in place criteria that address HVAC alterations and required HERS field testing and verifications.

Other Unanticipated Costs Associated with the Standardization Process

In the course of providing technical assistance to the Standardization Team, the consultants have encountered costs that were not anticipated in the original Phase 5 budget. The activities leading to these additional costs are discussed in Section 4.

4. Revisions to the Phase 5 Work Plan

Based on the instructions contained in the March 25 ACR and the other events summarized above in Section 3, the Team proposes a number of revisions to the work plan, budget and schedule for Phase 5 of the Standardization Team. These new revisions will be known as Phase 5.1. The changes in the work plan are presented below, using the original major task designations adopted in the ACR issued on October 22, 2004.

Task 1. Revise P&P Manual for PY2005

Task 1 entails the development of proposals for changes in the P&P Manual. Specific changes in the budgets for individual subtasks are presented below.

Task 1.1. Identify Proposed Revisions

No additional budget is requested for this subtask.

Task 1.2. Develop Recommendations for Revisions

Additional work on the development of recommendations is included below under a new Task 1.8.

Task 1.3. Update P&P Manual

Based on any new changes in LIEE policies and procedures developed during Phase 5.1, it will be necessary to make further changes in the P&P Manual. The additional cost of making these changes is estimated to be $8,900.

Task 1.4. Respond to Low Income Oversight Board (LIOB)

In the course of Phase 5, the Team has met twice with the Low Income Oversight LIOB to discuss its recommendations, and has responded to a number of questions raised by members of the Board. We anticipate that this interaction will continue throughout Phase 5.1. The total cost of meeting with the Board for past meetings (which were not covered by the consultant budget) as well as future meetings, is estimated to be $13,540.

Task 1.5. Conduct Additional Team Meetings

In the course of redeveloping recommendations for both P&P and WIS changes, the Team will hold a series of Team meetings. The Team plans to hold as many as ten (10) meetings, and it is anticipated that most if not all of these meetings will be held in San Francisco due to Commission budget constraints and the need to have Energy Division and ORA participation. The total cost of these meetings, including preparation of materials and the compilation of minutes, will be $55,680.

Task 1.6. Conduct Workshops

In compliance with the March 25 ACR, the Team will conduct public workshops to discuss Team recommendations and to solicit public input on the Manuals. The Team plans to hold two (2) sets of workshops. The first set will be held to discuss possible changes in the P&P and WIS Manuals. One workshop on this topic will be in San Francisco and another in Southern California. The second set of workshops will focus on Installation Standards for new measures added to the LIEE Program for PY2006 as well as new installation standards

associated with compliance with Title 24 duct testing and sealing requirements. The total cost of these two sets of workshops, including preparation and summarization of the proceedings, is estimated to be $27,840.

Task 1.7. Conduct Title 24 Requirements Scoping Study

As explained above, the Team will have to accommodate new Title 24 requirements relating to duct testing and sealing when alterations are made as part of the LIEE Program. The Team requests funds to have its consultants prepare a scoping study detailing the costs of compliance and the impacts on the Program.

The consultants will prepare for and participate in Team meetings, public hearings and workshops regarding this issue. Taking into account the input gained in these meetings, the consultant will prepare and submit a scoping study with recommendations that address the following:

- Cost implications of complying with the requirement
- Training requirements for contractors and utility personnel
- Client impact
- Possible reduction in service
- Time required for program structure and ramp-up
- The protocols required for:
  - Third party inspections (HERS)
  - Utility inspections/verifications
- Exemption policies

The estimated cost of this scoping study is $35,060.

Task 1.8. Prepare New Recommendations for P&P Changes

On the basis of the meetings and workshops held as part of Phase 5.1 of the Standardization Project, the Team will prepare a set of new recommendations for changes in the P&P Manual. These recommendations will be explained and justified, as has been done in the past with Team recommendations. The cost of drafting these recommendations and writing reply comments relating to them is estimated to be $37,777.

Task 1.9 (Optional New Task) Provide New Level of Documentation for P&P Changes

As indicated in Section 3, the Commission seems to be instructing the Team to provide a much higher level of analysis of impacts of all recommendations than has generally been provided in the past. Assessing quantitative impacts of all individual recommendations (and their alternative) will require the retrieval of utility-specific program databases, the transformation of these databases into comparable formats, and extensive analysis of the data. Insofar as we have requested that the Commission reconsider this instruction, we propose this as an optional task. We expect that the cost of providing this higher level of impact assessment for P&P changes will be a minimum of $74,000. It should be understood that the Team's consultants cannot provide a firm estimate of these costs without spending a considerable amount of time examining the individual utility databases, so this estimate is subject to increase in the future.

Task 1.10 Prepare Non-Heat Matrix, Flowcharts and Energy Star

Section 10 "Natural Gas Appliance Testing" of the Low Income Energy Efficiency Program Statewide Policy and Procedures Manual was written to accompany Section 29 of the "California Conventional and Mobile Home Weatherization Installation Standards". These sections were completed and filed with the Commission, however, some of the details related to the day-to-day operation of the LIEE programs were not included. Thus, to ensure further standardization between the four IOUs and to prepare for contractor NGAT training, detailed flow charts were developed that allow crews to determine what type of actions would be appropriate under specific and general conditions. For example, the flow charts include the appropriate action when items such as the following occur:

- No natural gas heating system is present, but water heating or gas cooking exists

- Natural gas heating system is present, but is disconnected
- Natural gas heating system is present, but is not functional

The cost of preparing these materials is $7,440.

Task 2. Revise WIS Manual for PY2005

Task 2.1. Identify Proposed Revisions

No additional budget is requested for this subtask.

Task 2.2. Develop Recommendations for Revisions in the WIS Manual

Additional work on the development of recommendations is included below under a new Task 2.7.

Task 2.3. Update WIS Manual

The Team has already updated the WIS Manual to reflect the recommendations it filed on January 18, 2005. However, we anticipate that further changes in the Manual will be necessary after the Commission acts on any new recommendations arising from Phase 5.1.

Once the proposed changes have ascertained the Commission's approval, each item must be integrated into both the Mobile Home and Conventional Home WIS Manuals. This will require the following tasks to be completed prior to preparing camera-ready master copies for print:

- revise the appropriate pages;
- cross reference each section of the WIS with the corresponding section of the P&P;
- reposition/modify the necessary graphics;
- update table of contents; and
- update nonfeasibility criteria

We have allocated a cost of $8,761 to make these changes. However, it should be noted that the actual cost may be different, depending on the nature of the changes.

Task 2.4. (New Task) Rework NGAT Standards

In order to clarify the new natural gas appliance testing standards, the Team instructed the consultants to rework the standards to include five parts, including:

- General Criteria
- Pre-Weatherization Evaluation
- Weatherization Crew Verification
- Post-Weatherization NGAT
- Post Repair and Replacement Checks

Each of the above components of the NGAT standards was presented to the Team for review and was revised utilizing the Team's input until a census draft was completed. The cost of reworking these standards was not included in the Phase 5 budget. The cost of reworking these standards for Phase 5.1 is estimated to be $24,000.

Task 2.5. (New Task) Prepare WIS Masters with Preface Pages

A camera-ready master copy of both the Conventional Home and Mobile Home WIS Manuals will be prepared for each utility and will bear their individual logos. A "generic" copy of the WIS Manuals will be prepared for the CPUC from which copies will be made for public distribution. These documents will be printed on gloss paper to ensure the highest quality reproduction. The cost of this subtask is estimated to be $5,250.

Task 2.6. (New Task) Modify WIS for Title 24

The next new task will entail making modifications in the WIS Manual to recognize the new Title 24 requirements for duct testing and sealing in homes with major alterations.

Utilizing input gained from Title 24 research, and the public opinion gathered during workshops, the consultants will revise the installation standards for the following measures:

- Natural Gas Central Forced Air Heating System Repair and Replacement
- Natural Gas Floor Furnace Repair and Replacement
- Natural Gas Appliance Testing Standards

Upon approval of the modified sections of the WIS Manual, camera-ready masters will be prepared by the consultants and distributed to each utility representative. The cost of these modifications is estimated to be $17,820

Task 2.7. (New Task) Prepare New WIS Recommendations

On the basis of the meetings and workshops held as part of Phase 5.1 of the Standardization Project, the Team will prepare a set of new recommendations for changes in the WIS Manual. These recommendations will be explained and justified, as has been done in the past with Team recommendations. The cost of drafting these recommendations and writing reply comments relating to them is estimated to be $40,209.

Task 2.8. (New Optional Task) Prepare New Level of Documentation for WIS Changes

As discussed in Section 3 and under Task 1.9, this optional task relates to the quantitative assessment of the impacts of all WIS changes and their alternatives. We expect that the cost of providing this higher level of impact assessment for WIS changes will be a minimum of $68,400. It should be understood that the Team's consultants cannot provide a firm estimate of these costs without spending a considerable amount of time examining the individual utility databases, so this estimate is subject to increase in the future.

Task 3. New Measure Analysis

Only two subtasks under Task 3 require budget augmentations.

Task 3.5. Develop Installation Standards for New Measures

Standards development will include two types of efforts: 1) Revision of existing standard for measures that were once in the LIEE program; and 2) the development of new measures.

During the various evolutions of the LIEE program and prior to the Standardization Team efforts, duct sealing and high efficiency central air conditioning (AC) were offered by

the California investor-owned utilities. Unfortunately, there was not a comprehensive set of policies or standards in existence at that time. In addition, there have been significant Title 24 and other Code changes which must be considered and incorporated before these measures can be considered for the current WIS and P&P Manuals.

Duct Sealing presently exists in the LIEE Weatherization Program, not as a stand-alone measure, but as a supplemental requirement when catastrophic leaks exist and an attic requires additional insulation. The proposed new measures, including Duct Testing and Sealing, will require standards to be written that address Duct Sealing as a measure and the protocols for duct testing. To achieve consistency within the field, duct testing protocols will be written as individual measures. This will also allow the utilities' post inspectors and the contractors' crews to be judged by the same yardstick. From these various existing standards, three new sections will be developed:

- Duct Testing
- Duct Sealing
- Central AC Repair and Replacement

One new measure (central air conditioning diagnostics and tune-up) that has been proposed will require a completely new set of standards to be developed, from research to publication. Similar to the four previous phases of the Standardization Project, the task of developing draft standards will be undertaken by the consultants, in collaboration with a subcommittee of the LIEE Standardization Team. The subcommittee-developed draft will then be brought to the full Team for input. Below is an abbreviated list of the steps/tasks associated with this process:

- Develop measure drafts based on research and previous work drafts of the four measures, which include: duct testing, duct sealing, central AC repair and replacement, and AC diagnostics/tune-up.

- Submit a draft to the joint utilities group and provide technical support during a meeting of this group.
- Revise the document based upon input provided from the joint utilities group.
- Submit document to California Public Utilities Commission for review/approval.

The budget for the development of installation standards for new measures is currently $70,000. This budget was set on the condition that the number of new measures would be no more than two. Given that four distinct measures are likely to be recommended for the program, and given that standards for air conditioner diagnostics and tuning will be particularly expensive to develop, this budget is not expected to be sufficient for the four measures, as stated above. The augmentation cost is estimated to be $46,400 to develop installation standards for the new measures.

Task 3.7. Revise WIS Manual to Reflect New Measures

An additional cost of $4,000 has been estimated to revise the WIS Manual to reflect the new measures. This augmentation is the result of a greater number of new measures being added than anticipated, as stated above in Task 3.5.

5. Summary of Proposed Budget Augmentations

Table 1 summarizes the proposed budget augmentations by task and subtask. As shown, the budget augmentation depends upon whether or not the Commission requires the level of quantitative impact analysis specified in the March 25 ACR. If this level of analysis is not required, the Team requests an augmentation of $332,677. If it is required, the augmentation request is $475,077.

Table 1. Summary of Proposed Phase 5 Budget Augmentations

Task/Subtask	Initial Phase 5 Budget	Augmentation Request	New Phase 5 Budget
Task 1. Revise P&P Manual for PY2005			
Task 1.1. Identify Proposed Revisions	$6,084	$0	$6,084
Task 1.2. Develop Recommendations for Revisions	$24,194	$0	$24,194
Task 1.3 Update P&P Manual	$7,905	$8,900	$16,805
Task 1.4. Responding to LIOB	$0	$13,540	$13,540
Task 1.5. Additional Team Meetings	$0	$55,680	$55,680
Task 1.6. Workshops	$0	$27,840	$27,840
Task 1.7. Title 24 Requirements Scoping Study	$0	$35,060	$35,060
Task 1.8. Prepare New Recommendations	$0	$37,777	$37,777
Task 1.9. (Optional) Provide New Level of Documentation for P&P Changes	$0	$74,000	$74,000
Task 1.10. Prepare No-Heat Matrix, Flowcharts , & Energy Star Matrix	$0	$7,440	$7,440
Task 2. Revise WIS Manual for PY2005			
Task 2.1. Identify Proposed Revisions	$5,677	$0	$5,677
Task 2.2. Develop Recommendations for Revisions	$28,194	$0	$28,194
Task 2.3 Update WIS Manual	$6,200	$8,761	$14,961
Task 2.4. Rework NGAT Standards	$0	$24,000	$24,000
Task 2.5. Prepare WIS Masters w/ Prefaces	$0	$5,250	$5,250
Task 2.6. Modify WIS for Title 24 Requirements	$0	$17,820	$17,820
Task 2.7. Prepare New WIS Recommendations	$0	$40,209	$40,209
Task 2.8. (optional) Prepare New Level of Documentation for WIS Changes	$0	$68,400	$68,400
Task 3. New Measure Analysis			
Task 3.1. Develop RFP for New Measures	$22,158	$0	$22,158
Task 3.2. Solicit New Measures	$0	$0	$0
Task 3.3. Evaluate Cost-Effectiveness of New Measures	$40,353	$0	$40,353
Task 3.4. Prepare Recommendations	$32,877	$0	$32,877
Task 3.5. Develop Installation Standards for New Measures	$70,000	$46,400	$116,400
Task 3.6 Revise P&P Manual to Reflect New Measures	$5,612	$0	$5,612
Task 3.7 Revise WIS Manual to Reflect New Measures	$6,000	$4,000	$10,000
Total Base Budget	**$255,254**	**$332,677**	**$587,931**
Budget with Optional Tasks	**$255,254**	**$475,077**	**$730,331**

6. Proposed Schedule for Remainder of Phase 5

Table 2 presents a proposed schedule for the remainder of Phase 5 of the Standardization Project. This schedule is contingent upon the Commission's acceptance of

the revisions to the Phase 5 work scope by May 15, 2005. As shown in Table 2, the scheduled date for workshops and for filing recommended WIS and P&P changes depends upon the level of documentation required to quantify the impacts of these recommendation and their alternatives.

Table 2. Remaining Phase 5 Schedule

Task/Milestone	Date
Submission of Recommendations for New Measures for PY2006	April 30, 2005
Workshops on WIS and P&P Changes necessary to accommodate new measures for PY2006 and Title 24 requirements for duct testing and sealing	July or August, 2005
Workshops on other P&P and WIS Recommendations If standard documentation is required If higher level of documentation is required	 Early August, 2005 Early November, 2005
Submission of WIS and P&P Changes necessary to accommodate new measures for PY2006 and Title 24 requirements for duct testing and sealing	October 1, 2005
Submission of P&P and WIS Recommendations to the Commission If standard documentation is required If higher level of documentation is required	 September 1, 2005 December 1, 2005

Respectfully submitted,

Georgetta J. Baker
Attorney for San Diego Gas & Electric Company
and Southern California Gas Company
101 Ash Street HQ 13
San Diego, CA. 92101
619-699-5064
619-699-5027 (Facsimile)
gbaker@sempra.com

April 25, 2005

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **LOW INCOME ENERGY EFFICIENCY STANDARDIZATION PROJECT PROPOSED AMENDMENTS TO THE PHASE 5 WORK PLAN, BUDGET AND SCHEDULE** on the service list in the R.04-01-006, et al. docket provided by the California Public Utilities Commission Docket Office.

Dated at San Diego, California, this 25th day of April 2005.

Laurie Delaney

Laurie Delaney

(END OF ATTACHMENT 1)