



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Application of Southern California Edison Company (U338E) for Approval of its 2012-2014 California Alternate Rates for Energy (CARE) and Energy Savings Assistance Programs and Budgets

Application 11-05-017
(Filed May 16, 2011)

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

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

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

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

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

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

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

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SUBJECT INDEX OF RECOMMENDATIONS, CONCERNS AND COMMENTS

Dated: May 23, 2012

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I. INTRODUCTION

La Cooperativa thanks the ALJ and the CPUC in its Proposed Decision on ESAP for including previously submitted comments by La Cooperativa regarding redesigning ESAP program delivery as an “evolving program of services and smart infrastructure producing a wide array of benefits to qualified low-income customers.” La Cooperativa believes that this comprehensive services delivery approach best meets the CPUC’s intent given recent language in Draft Decision on ESA (A.11-05-017): “The approach going forward must comprise of purposeful program strategies that understand low-income communities and must be tailored to the remaining ESA Program eligible and untreated households.”

As an umbrella organization of statewide community rural service providers, La Cooperativa and its member agencies best understand the cost-effective value of a “regional single service provider” in servicing hard-to-reach populations with energy education, conservation practices and energy services given a concept that leverages resources and integrates energy services program delivery.

La Cooperativa advocates for a regional single service provider concept that would best meet the CPUC’s stated objective for the integration of programs and the stated direction in the PD to the IOU’s to continue all their ongoing integration efforts among the IOU’s ESA Program, CARE Program, Energy Efficiency programs, Demand Response programs, etc. La Cooperativa further recommends that the working group process take up this concept; we believe a balanced group of energy and rate payer stakeholders is the ideal way to research, plan and design this integrated regional energy services delivery model.

II. PROPOSED DECISION WORKING GROUPS

The CPUC Strategic Plan and other ongoing planning and operational working groups (ordered in the PD) would benefit greatly by a larger presence of Community-Based-Organizations (CBO’s) with the experience, track-record and working relationships given energy services, WE&T Programs and more importantly, exceptional job placement performance. Unfortunately, the inclusion of CBO’s from rural communities with the

aforementioned qualifications has not been the case in former efforts to research, plan and design program delivery. La Cooperativa, IOUs and the California State Agency of Community Services & Development are quite familiar with rural community based energy service providers that work with and successfully provide LIHEAP, WAP and the ESA programs, and together could assist in advising the CPUC on candidates for these working groups.

As an outcome of working group selection, La Cooperativa would like to see, and strongly recommends an equitable balance between CBO's, Community Colleges, WIBs and Labor to play a part in these "Working Groups."

La Cooperativa requests that qualified CBO's servicing rural communities across California be part of the future PD's "working groups," i.e. (A) ESA Integration Working Group, (B) Cost-Effectiveness Working Group, (C) WE&T Working Group, (D) Mid-Cycle Working Group, and others.

La Cooperativa views the CPUC challenge to the PD's working groups, IOUs, service providers, ratepayers and all energy stakeholders as the following:

- Ways to strike the proper balance between achieving cost effective energy savings versus providing health, comfort, and safety benefits;
- How to effectively leverage and integrate the EE program with other utility core energy efficiency programs and other State, Federal and local programs to streamline and improve program delivery and achieve maximum energy efficiency savings;
- How to deliver energy education in a manner that yields optimal energy efficiency benefits and forms long term conservation behaviors;
- How to better reach and serve the remaining eligible low income population, including those residing in low income multifamily households?
- Developing and integrating ESA Program workforce training requirements into the Workforce Education and Training (WE&T) strategy aimed at reaching minority and other disadvantaged communities.

- How to develop an effective strategy to meet the workforce, education and training needs to support the most effective and readied workforce to yield success of the program by 2020?

III. AIR CONDITIONER APPLIANCES AND CLIMATE ZONE 13

La Cooperativa takes issue with the PD's decision to remove "room air conditioners" from Climate Zone 13 as a result of not meeting energy efficiency savings; that too was the case with Climate Zone 14; however, the CPUC approved the inclusion of room air conditioners.

Page #16 of the PD clearly states that "The ESA Program has been designed to provide an improved quality of life¹ for the low-income population by delivering no cost² home weatherization services and efficiency measures to low income households to help: (1) conserve energy; (2) reduce their energy costs; and (3) improve their health, comfort, and safety.

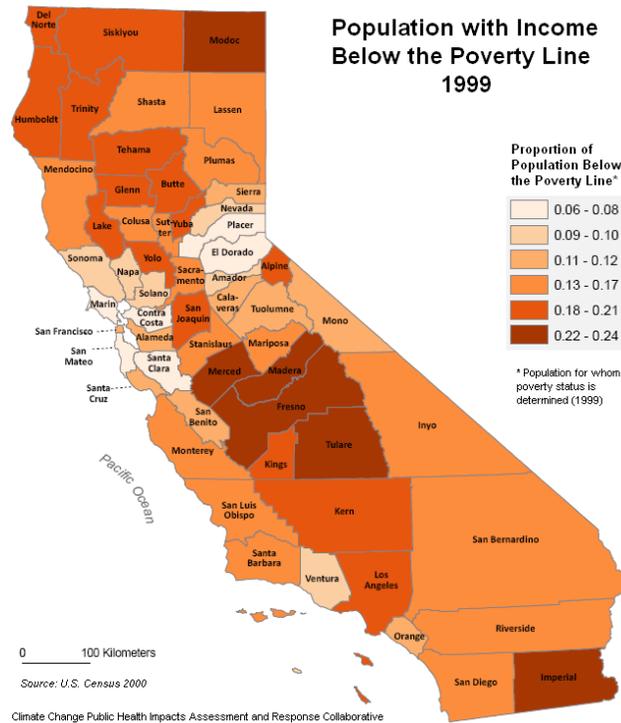
In a previous CPUC Decision, precedence for such a change in decision-making and inclusion of a previously eliminated Climate Zone given similar energy efficiency measures exists. It was opined by the CPUC that "Indeed, one of our clear goals in D.03-11-020 was the reduction of hardship. We found that avoidance of hardship could consist of lowering the amount of a customer's energy bill, as well as producing non-energy benefits – such as comfort – to the recipient." We believe, based on the Baseline proceeding data, SCE's comments, and on D.03-11-020's reliance on customer benefits as well as cost-effectiveness, that we should reinstate LIEE funding for room air conditioning and evaporative coolers in zone 10. We order SCE and SDG&E to immediately reinstate these measures in zone 10 so that the measures are available for the remainder of 2005.³

¹ *Id.* at 184; *see also* Strategic Plan which provides "The complementary objectives of the... [ESA Program] are to provide an energy resource for California and to produce energy savings, while reducing low-income customer bills." *Id.* at 25.

² Generally, the energy efficiency measures are provided at no cost to the resident, with the exception of a few measures owned by the landlords. In those instances, the landlord must make co-pay.

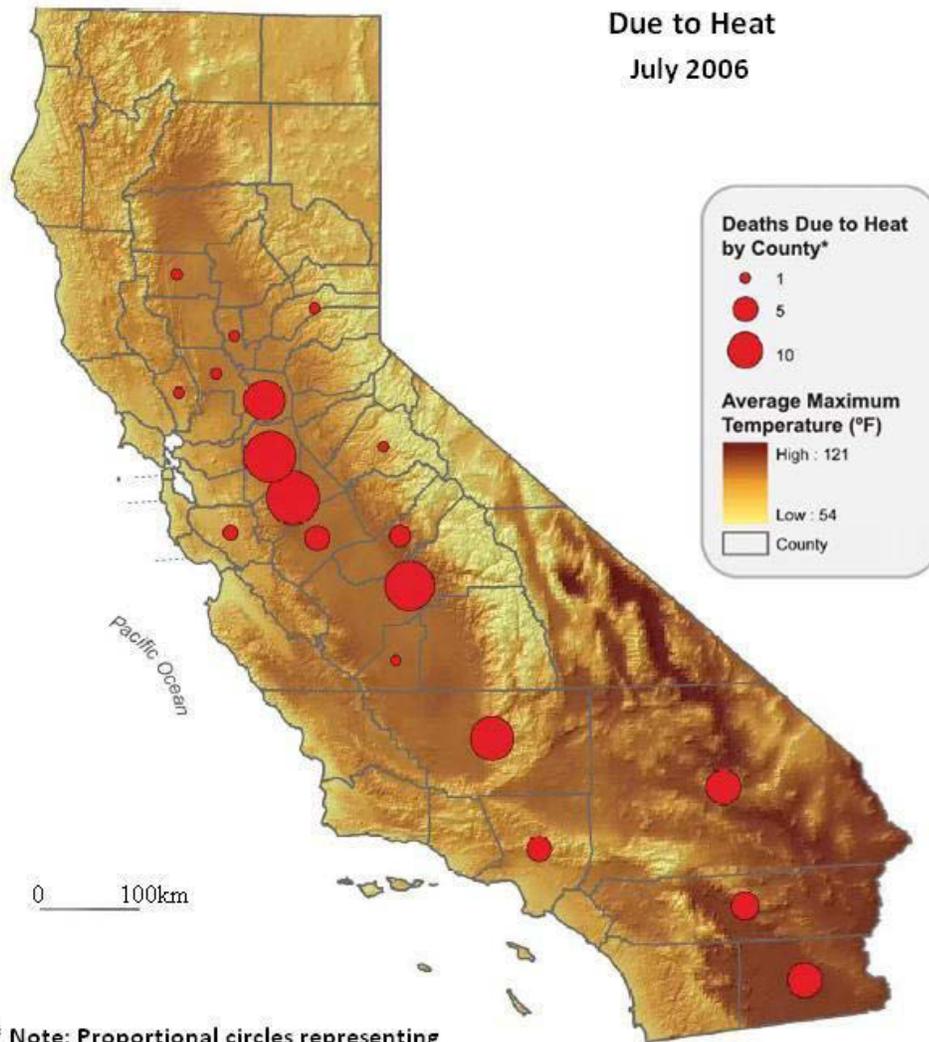
³ http://docs.cpuc.ca.gov/published/Final_decision/45905-05.htm#P2333_140529

The California Department of Public Health states: “The urban areas of California such as Los Angeles, San Diego, and the San Francisco Bay Area, have the largest absolute numbers of people vulnerable to heat such as children and the elderly. **Yet, other areas of the State, which are away from the major urban centers, especially counties with lower socioeconomic status, have high proportions of populations of socially isolated elderly and elderly living in nursing homes.**” Zone 13 is primarily dependant on agriculture as an industry and employer; farmworker deaths due to excessive heat in this region are well documented.⁴ The following graphics reflect heat related deaths and the locations for higher poverty rates; both graphics reveal significant portions of Climate Zone 13.



⁴ “Heat-Related Deaths Climb in California,” New York Times, July 27, 2006, Author: Jennifer Steinhauer

**Geographic Distribution of Deaths
Due to Heat
July 2006**



*** Note: Proportional circles representing the number of deaths per county have been placed at the counties' geographic centers.**

Source: California Department of Public Health

Climate Change Public Health Impacts Assessment and Response Collaborative

La Cooperativa strongly recommends that Climate Zone 13 be reinstated in the ESA for room air-conditioners and that central air-conditioning be considered where eligibility and extreme temperatures exist.

IV. LA COOPERATIVA'S AFFIRMATION OF PARTY CONCERNS REGARDING COST-EFFECTIVENESS FRAMEWORK

In Section 3.5.3 Parties' Concerns of the PD, La Cooperativa agrees with "some parties raise the concern that the current benefit-cost methodologies do not adequately reflect the societal equity values promoted by the ESA Program, such as health, comfort and safety. Most parties, in their responses to the December 2011 Ruling, restated that the cost-effectiveness framework currently used to evaluate the ESA Program measures needs to be revisited."

La Cooperativa recommends that this issue regarding the cost-effectiveness framework and an equitable solution (re-calibrated formula) be taken up by the appropriate Working Group in this PD.

V. MARKETING EDUCATION AND OUTREACH (ME&O) COMMENTS

La Cooperativa agrees with the ALJ's conclusion: "Our ultimate plan is a unified ME&O approach. Yet our efforts to deliver an integrated message have been hampered by differing program cycles and proceedings among energy efficiency, demand response, distributed generation, and low income programs, among other reasons." La Cooperativa has Member Agencies that work with all the IOUs energy programs and state and federal government energy services grant programs that best understand how to address the issue of integration, job creation, cost-effectiveness, effectual media & message, culture and language barriers with program understanding and adherence.

La Cooperativa recommends a rural ME&O Pilot Program to test integrated marketing strategies with this hard-to reach population (consistent with the CPUC customer segment strategy). This recommendation and request is not to discount the marketing and outreach efforts of the IOUs given their direct access programs that are both effective and have generated numerous energy service applications for our energy service agencies. These La Cooperativa Members know the value of IOU marketing and outreach programs and are uniquely positioned to merge this ME&O pilot project with existing IOU marketing programs given tailored

strategies that would address the rural hard-to-reach market segments with a broader program understanding and acceptance.

VI. CONCLUSION

La Cooperativa agrees with the ALJ's conclusion: "It seems reasonable to proactively anticipate that as we near the 2020 date, the final remaining homes to be treated will be increasingly tougher to identify, target and perhaps even more costly to treat."

La Cooperativa further agrees with the PD's direction to the IOU's to continue all their ongoing integration efforts amongst the IOUs' ESA Program, CARE Program, Energy Efficiency programs, Demand Response programs, California Solar Initiative, and any other of the IOUs' demand side programs; we believe the working groups and an integrated pilot project of both marketing, outreach, services delivery, WE&T and job placement programs makes sense, especially in rural California where populations suffer high unemployment, are poorer and temperatures extreme.

The CPUC orders that "working groups" be formed to determine and guide these processes and objectives, however, La Cooperativa recommends a "working balance of CBOs, IOUs, WIBs and Labor" to make up these important working groups to seek the best solutions to the delineated issues contained in the PD.

La Cooperativa recommends the cost-effectiveness framework and an equitable solution (re-calibrated formula) be taken up by the appropriate Working Group in this PD to avoid future decision of the elimination of energy efficiency measures represent undue hardship on market populations that are poorer and subject to severe temperatures.

La Cooperativa further recommends that Climate Zone 13 be reinstated in the ESA for room air-conditioners and that central air-conditioning be considered where eligibility and extreme temperatures exist in that Climate Zone designation.

La Cooperativa advocates for a regional single service provider concept that would best meet the CPUC's stated objective for the integration of programs and the stated direction

in the PD to the IOU's to continue all their ongoing integration efforts among the IOU's ESA Program, CARE Program, Energy Efficiency programs, Demand Response programs.

VII. BACKGROUND LA COOPERATIVA DE CAMPESINA

La Cooperativa Campesina de California is a statewide association of rural service providers implementing Workforce Investment Act Title I Section 167 and CSBG farmworker service programs. Other community services include: rural emergency services, hard-to-reach outreach/education programs, LIHEAP, WAP and statewide communication projects that are in-language and in-culture. La Cooperativa is a California 501 c (3) corporation, and the Board of Directors consists of representatives from member agencies across California and the Employment Development Department (EDD).

The La Cooperativa Association infrastructure and capability include: Eight-Five (85) service and access sites primarily in California's agricultural counties providing farmworker and rural outreach capability, diverse workforce training, self-sufficiency services, job placement and emergency services (partial services list). This comprehensive service delivery model utilizes a one-stop shop service center concept aiding collaboration, leveraging and cost-effectiveness.

Training services include ESL, GED, adult and family literacy, basic education, vocational education, and employer based training. Related services such as childcare, transportation, emergency services, housing, counseling, job placement, and follow up services enhance these training efforts. In times of crisis, La Cooperativa has quickly implemented community training & employment projects to provide replacement income to disaster affected workers and communities. La Cooperativa assists its members with programs of technical assistance, linkages, coordination, information, and direct funding for projects such as disaster relief. Member agencies are fully linked through a web-based case management system providing eligibility determination as well as real time reporting with participant file sharing throughout the State of California.

La Cooperativa owns and operates a Statewide Rural Communication Vehicle, La Voz – Voice of the Fields; it is the only integrated media channel that communicates directly to a statewide base of agricultural workers and rural communities across most of California; La Voz has a printed bulletin with a distribution of 40,000 and a radio network reaching over 500,000 people in a one hour program format per month. La Voz and La Cooperativa is both known and trusted by this hard-to-reach community thus providing the critical imprimatur to a community that does not trust, respond or adhere to general market messaging – even when it is done in language.

Dated; May 23, 2012

Respectfully submitted,

By: _____/s/_____

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