

Dissent of Commissioner Carla Peterman

D.15-12-047 in A. 14-11-007

Application of Southern California Edison Company (U338E) for Approval of its Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for Program Years 2015-2017.

I dissent from the majority opinion in this matter for the reasons articulated below. I agree with the Decision's findings that the CHANGES program is useful for Californians in providing outreach, education, and bill issue assistance to limited English proficiency ratepayers in their own communities, and with messages delivered by trusted community organizations.

I support the Decision's findings to transition CHANGES from a pilot to a standing program, increase the program budget to more than double that of the pilot, identify issues encountered by limited English proficiency customers that regulators and IOUs could address, and develop tracking categories that will better enable a rigorous trends analysis.

However, I have concerns with the Decision's prescriptive language regarding CPUC division coordination, reporting to the Commission, and the evaluation requirement to identify ways in which customer information can be used to inform CPUC proceedings. The adoption of the CHANGES program as a standing program is a sufficient condition to enable staff to pursue contractor terms that reflect the CPUC's interest in data collection and trend analysis. Moreover, absent this Decision, CPUC divisions and the Executive Director already have the authority to implement -- and Commissioners have the authority to request -- division coordination, reporting to the Commission and the Low Income Oversight Board, and incorporation of lessons learned from the CHANGES program into the decision making process.

I am concerned that by being too prescriptive, the Commission places undue expectations on this specific program's evaluation and contractor, and downplays staff's existing ability to pursue potentially superior means for strengthening the connections between the CHANGES program and Commission activities.

Issues of trend analysis and how to incorporate data into CPUC proceedings are relevant to a wide array of Commission public facing programs and the Commission should develop comprehensive, systematic guidance on how best to coordinate trend analysis and Commission

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feedback. A comprehensive solution will involve input from a host of internal stakeholders including Commissioner offices, CSID, News and Outreach, industry divisions, legal, and the Administrative Law Judge Division as well as a regulated entities, interested stakeholders and the public. As such I would prefer for the Commission to address this issue more systematically, via our strategic planning process for example, instead of solely for one program and with a focus on two divisions.

Dated December 28, 2015 in San Francisco California

/s/ CARLA J. PETERMAN

Carla J. Peterman, Commissioner