CPUC Docket: A.26-01-003 et al.
Exhibit Number: TURN-01E
EWitness: Jennifer Kallay

PREPARED TESTIMONY OF JENNIFER KALLAY

ON THE ENERGY SAVINGS ASSISTANCE (ESA) PROGRAMS

ADDRESSING PACIFIC GAS AND ELECTRIC COMPANY, SAN DIEGO GAS & ELECTRIC COMPANY, SOUTHERN CALIFORNIA EDISON COMPANY, AND SOUTHERN CALIFORNIA GAS COMPANY'S 2028-2033 INCOME-QUALIFIED PROGRAM APPLICATIONS AND RELATED MATTERS

Submitted on Behalf of

THE UTILITY REFORM NETWORK

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INTRODUCTION AND OVERVIEW

Q. Please state your name, title, and employer.

A. My name is Jennifer Kallay. I am a Principal Associate at Synapse Energy Economics ("Synapse"), located at 485 Massachusetts Avenue, Suite 3, Cambridge, MA 02139.

Q. Please describe Synapse Energy Economics.

A. Synapse Energy Economics is a research and consulting firm specializing in electricity and gas industry regulation, planning, and analysis. Our work covers a range of issues, including economic and technical assessments of demand-side and supply-side energy resources; energy efficiency policies and programs; power sector transformation; integrated resource planning; electricity market modeling and assessment; renewable resource technologies and policies; and climate change strategies. Synapse works for a wide range of clients, including state attorneys general, offices of consumer advocates, trade associations, public utility commissions, environmental advocates, the U.S. Environmental Protection Agency, U.S. Department of Energy, U.S. Department of Justice, the Federal Trade Commission, and the National Association of Regulatory Utility Commissioners. Synapse has over 40 professional staff with extensive experience in the electricity and natural gas industries.

Q. Please summarize your professional and educational experience.

A. I have 19 years of professional experience analyzing the benefits and costs of energy efficiency efforts for jurisdictions in the United States and Canada including California, Massachusetts, Rhode Island, Hawaii, Vermont, New Jersey, Arkansas, Minnesota, Virginia, Prince Edward Island, Ontario, New Mexico, Alberta, New Brunswick, and Nova Scotia. Since 2012, I have supported the Rhode Island Division of Public Utilities & Carriers in assessing the impacts of utility energy efficiency plans and delivery strategies on customers. My work entails reviewing different regulatory approaches to spur energy efficiency; assessing the ability of utility energy efficiency plans to tap into cost-effective

potential; researching best practice program designs and policies; understanding and accounting for the full benefits of energy efficiency; and conducting rate and bill impact, participant, and cost-effectiveness analyses. I received a Bachelor of Arts in Journalism from the University of Maryland and a Master of Energy and Environmental Analysis Degree from Boston University. My resume is attached as Appendix A.

Q. Have you previously testified before the California Public Utilities Commission?

A. Yes, I filed testimony on behalf of The Utility Reform Network (TURN) on the Energy Savings Assistance (ESA) Bridge Year Program and Budgets for program year 2027 in Dockets Application (A.) 25-06-022 (SDG&E), A.25-06-023 (SoCalGas), A.25-06-024 (PG&E) and A.25-06-025 (SCE), consolidated in A.25-06-022 et al. I also assisted with TURN's initial comments on the Staff Proposal for Phase Out of Natural Gas Efficiency Incentives in Rulemaking (R.) 25-04-010.[1]

Q. On whose behalf are you providing evidence in this case?

A. I am providing evidence on behalf of TURN.

Q. What is the purpose of this testimony?

A. The purpose of this testimony is to describe and assess the applications of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas) (collectively, the utilities or investor-owned utilities) for the proposed 2028-2033 ESA Plans.

Q. How is this testimony organized?

A. I summarize my findings and recommendations in tables at the outset of this testimony. In the sections that follow, I discuss each finding and recommendation

[1] CPUC. Rulemaking 25-04-010. Order Instituting Rulemaking for Oversight of Energy Efficiency Portfolios, Policies, Programs, Evaluation. *Comments of The Utility Reform Network on Staff Proposal for Phase Out of Natural Gas Efficiency Incentives.* April 24, 2025.

in more detail. I organize these tables and the rest of my testimony according to the scoping issues set forth by the Scoping Memo and Ruling.[2] Each issue contains headers to identify the topics that I address within that issue.

Q. Are any issues in this testimony carried over from the 2027 Bridge Year proceeding?

A. Yes. In the 2027 Bridge Year proceeding, I presented recommendations on the inclusion of escalation in ESA budgets and offered three ESA reporting requirement enhancements. The Commission declined to issue any direction regarding both escalation and reporting in the 2027 Bridge Year decision and encouraged stakeholders to raise these issues in the 2028-2033 Income Qualified Programs (IQP) cycle applications, to the extent these issues persist.[3,4] I include findings and recommendations on these issues in this testimony as they remain relevant.

SUMMARY OF FINDINGS AND RECOMMENDATIONS

Q. Please describe your findings and recommendations.

A. Table 1 below provides a summary of my findings and recommendations.

[2] CPUC. Applications 26-01-003, 26-01-005, 26-01-010, and 26-01-011. *Assigned Commissioner's Scoping Memo and Ruling.* April 7, 2026.
[3] CPUC. Decision 26-07-007. *Decision Authorizing 2027 Bridge Funding for Investor-Owned Utilities' Income-Qualified Assistance Programs.* Issued July 8, 2026. Page 57.
[4] Id., pages 53-54 and Findings of Fact No. 26.

Table 1. Summary of findings and recommendations

Scoping Issue & Topic	Findings	Recommendations
3.A. Budgets	SoCalGas and SDG&E propose to maintain or slightly decrease the percent investment in gas-burning space heating and conventional water heating measures over the plan period. PG&E has higher investments in these measures in the early years of the cycle.	In 3.C. Expanding Access to Cooling and Electrification and Bill Impact Analysis below, I make several recommendations to require collaboration among utilities on electrification and further constrain the utilities' implementation of gas-burning space heating and conventional water heating measures during this program cycle. I recommend the Commission require the investor-owned utilities (IOU) to provide updated budgets, reflecting the implementation of these recommendations.
	SCE and SDG&E applied Commission guidance for allocating energy efficiency program fuel substitution costs to ratepayers and PG&E did not.	The Commission should require PG&E to allocate its electrification costs to electric ratepayers, consistent with the Commission's guidance for energy efficiency programs and approach taken by the other IOUs for ESA.
	The Commission has not issued guidance on how to allocate electrification costs for fuel switching.	The Commission should issue guidance on cost allocation for ESA fuel switching that is consistent with the guidance for fuel substitution, and the IOUs should allocate the costs of fuel switching to ratepayers according to this guidance.
	PG&E is authorized to install some fuel switching measures now and does not explain why it does not propose to implement these measures now.	The Commission should require PG&E to implement authorized fuel switching measures through ESA Main now.
3.A. Escalation	The presentation of budgets is not transparent in the utility filings with respect to escalation.	The Commission should direct the utilities to provide budgets with and without escalation and isolate for any proposed escalation by program and cost category.
	The application of the escalation rate assumptions by program and cost category is not clear.	The Commission should direct the utilities to provide the methodology used to calculate escalation by program and cost category and the justification for the applied methodology.

Scoping Issue & Topic	Findings	Recommendations
3.A. Goals	The households treated goal may undermine the priorities of the ESA program by conflicting with the kWh and therm savings goals.	While the Commission should continue to require reporting on the number of households treated as a metric, it should suspend the number of households treated as a goal to enable the IOUs to focus on meeting the priority needs of ESA customers.
	The utilities are not using consistent approaches to report kWh and therm savings from electrification efforts.	The Commission should require the utilities to report kWh and therm savings from electrification efforts consistently and specify an approach for this reporting.
3.B. Coordination on Electrification	SoCalGas proposes to install gas appliance measures that will compete with the fuel substitution measures proposed by SCE. The two utilities do not plan to coordinate to help customers assess which option is more affordable.	The Commission should require SCE and SoCalGas to work together to determine if fuel substitution measures can save customers money. I discuss this in more detail in the 3.C. Expanding Access to Cooling and Electrification and Bill Impact Analysis section.
3.B. Health, Comfort, and Safety (HCS) Measures	SCE is not following the Commission's guidance to characterize HCS measures as those with less than one kWh or one therm of annual energy savings. As a result, SCE identifies many more measures as HCS than the other IOUs and appears to be allocating a surprising portion of its budgets to HCS.	The Commission should require SCE to characterize its HCS measures in a way that is consistent with the approach defined by the Commission and taken by the other IOUs. This will allow the Commission and other stakeholders to compare SCE's proposed HCS spending with that of other IOUs and confirm is it reasonable.

Scoping Issue & Topic	Findings	Recommendations
3.C. Expanding Access to Cooling and Electrification and Bill Impact Analysis	There is a lack of formal guidance on coordination on the development of the bill impact analysis and the application of the results.	• The Commission should require all utilities to coordinate on the development and application of an electrification bill impact analysis for this program cycle; for SoCalGas, this requires cooperation with SCE if the customer is also served by SCE. • The Commission should issue formal guidance on the application of an electrification bill impact analysis to ESA. Regarding the guidance on the application of electrification bill impact analysis to ESA, I suggest the following: o In cases where electrification is projected to result in bill savings or no change in bills for a customer as compared to the fossil-fueled alternative, ratepayer funds must be used to support electrification so long as electrification is technically feasible. In no case should the installation of fossil-fueled equipment be allowed if technically feasible electrification is projected to cost the same or less than the fossil-fueled equipment. o In cases where technically feasible electrification is projected to result in a bill increase for a customer as compared to the fossil-fueled alternative, ratepayer funds may support electrification if the customer is informed about it and chooses it. The Commission should require the IOUs to document this choice.

1

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Scoping Issue & Topic	Findings	Recommendations
3.D. Multifamily Whole Building Program (MFWB)	SCE and SoCalGas propose to deliver multifamily as a segment within ESA Main and therefore propose to merge planning and reporting for ESA Main and MFWB. This proposal does not allow the Commission and stakeholders to monitor the performance of the shift from regional to local administration models.	The Commission should require all IOUs to continue to plan and report MFWB separately from ESA Main.
3.E. Fund-Shifting, Unspent and Uncommitted Funds, and Carryover Rules	The utilities' proposal to allow shifting funds between years does not constrain their ability to hold onto underspent budgets that could offset ESA ratepayer charges and address affordability.	The Commission should require application of all unspent and uncommitted funds to offset the budget in the next program year. The Commission should further require the submittal of a Tier 1 Advice Letter to confirm the application of all unspent and uncommitted funds and identify the remaining collection needed.
	There is a potential for significant and persistent overspending, such that borrowing against future years depletes future year budgets to the point that the funds cannot sustain the programs.	The Commission should limit borrowing from future year budgets to a specified percent of those budgets. I recommend 10 percent as a reasonable cap for borrowing from future year budgets without more formal notification and modification.
4.B. Income-Qualified Potential Study	The IOUs did not use the 2025 Income-Qualified Potential Study's fuel substitution potential to set goals due to several shortcomings. The 2025 Income-Qualified Potential Study did not include an estimate of fuel switching potential.	The Commission should address the shortcomings of the fuel substitution potential and include fuel switching in the scope of the next Income Qualified Potential Study. The IOUs should update their fuel substitution and fuel switching budgets and goals for the remaining years of the plan to reflect the potential from the next Income Qualified Potential Study.
4.B. Pilots	There is not sufficient evidence to support SDG&E's proposal to pilot electrification. SDG&E's current rates make electrification a better deal for customers in its service territory. PG&E and SCE have been offering electrification and have documented their learnings and challenges.	The Commission should reject SDG&E's proposal to pilot electrification and require SDG&E to leverage the experiences of the other utilities to roll out electrification as part of ESA.

Scoping Issue & Topic	Findings	Recommendations
4.B. Reporting	The IOUs do not identify HCS measures or report investments, savings, benefits, and cost-effectiveness for these measures in their ESA Plans.	The Commission should require the IOUs to identify HCS measures in plans and reports and provide the costs, savings, benefits, and cost-effectiveness associated with these measures.
	The tables included in the 2028-2033 ESA Plan do not provide a separate accounting of the costs, savings, benefits, and cost-effectiveness for electric and gas portfolios.	The Commission should require the IOUs to separately plan and report electric and gas portfolio costs, savings, benefits, and cost-effectiveness.
	SCE is converting gas and propane therm savings from electrification to kWhs and combining these savings with their kWh savings from other energy savings measures. This practice is not transparent, it diverges from the way other utilities are reporting their goals, and it makes it difficult to compare the goals and cost of attaining those goals across the IOUs. The introduction of fuel substitution and fuel switching in this planning cycle is exacerbating this issue as there are more fuel types with different units of reporting.	I propose that the Commission require the IOUs to plan and report savings separately for each fuel, in native units for that fuel type. The Commission should also require the IOUs to provide energy savings aggregated across all fuel types in MMBtus.
	Greenhouse gas emissions reductions are a priority for the state and missing from the ESA plans and reports.	The Commission should require the IOUs to include greenhouse gas emissions reductions in ESA planning and reporting.

ESA PROGRAM – ISSUE 3.A.

Budgets

Q. Please summarize the proposed budgets for electric and gas ESA portfolios.

A. Table 2 below shows the 2028 to 2033 proposed budgets for each utility, by year and across years. The table shows that the utilities propose to invest 53 percent of total ESA funding in gas portfolios from 2028 to 2033. SoCalGas' budget accounts for 58 percent of the total ESA funding for gas portfolios.

Table 2. ESA proposed budgets, 2028-2033[5,6]

		Proposed						
Utility	**Units**	**2028**	**2029**	**2030**	**2031**	**2032**	**2033**	**2028-2033**
Electric								
PG&E	$	70,465,884	78,493,182	80,721,168	82,179,105	84,003,273	78,899,703	474,762,315
SCE	$	104,794,099	107,699,038	110,867,623	113,892,246	116,968,056	120,311,238	674,532,300
SDG&E	$	10,745,632	12,482,904	12,859,290	12,868,269	13,265,458	12,631,503	74,853,056
Total	**$**	**186,005,615**	**198,675,124**	**204,448,081**	**208,939,620**	**214,236,787**	**211,842,444**	**1,224,147,671**
Gas								
SoCalGas	$	124,172,251	127,733,769	131,548,296	135,363,828	139,274,896	143,273,452	801,366,491
PG&E	$	67,702,516	75,415,018	77,555,632	78,956,395	80,709,027	75,805,597	456,144,185
SDG&E	$	16,118,450	19,524,542	20,113,250	20,995,599	21,643,643	21,507,693	119,903,177
Total	**$**	**207,993,217**	**222,673,329**	**229,217,178**	**235,315,822**	**241,627,566**	**240,586,742**	**1,377,413,853**

Q. How are the utilities' proposed ESA electric budgets changing as compared to the 2027 proposed plan?

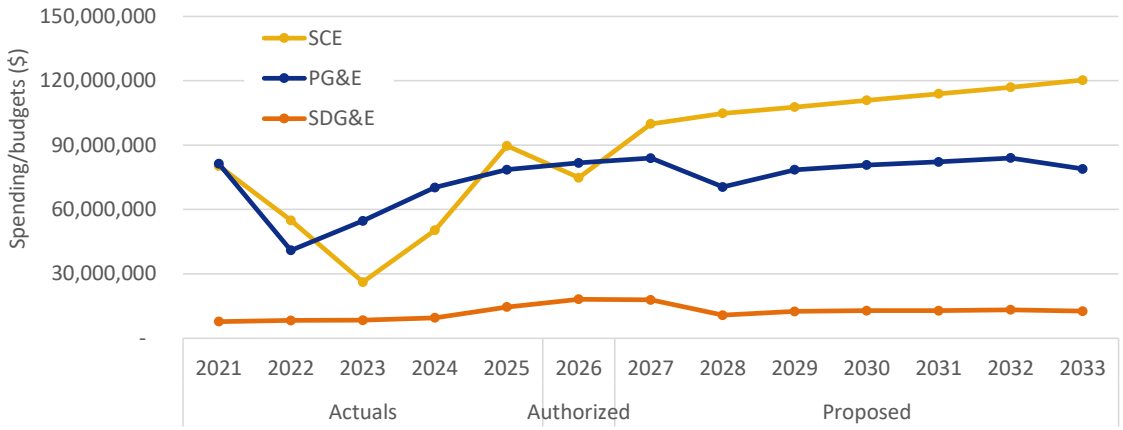
A. Figure 1 below shows the 2028 to 2033 proposed electric utility budgets as compared to actuals for 2021 to 2025, the authorized plans for 2026, and the proposed plans for 2027. 2027 reflects the budgets proposed in the 2027 Bridge Year applications (A.25-06-022 et al.) rather than the authorized budgets, as the electric and gas portfolios are not broken out in the authorized budgets determined by the Commission in D.26-07-007. SCE is proposing to increase the 2033 budget

[5] Sources: TURN PG&E 001 Q004 tab 02 (Q4) of IQPPY28-33_DR_TURN_001-Q001Atch001.xlsx, TURN SCE 002 Q004 tab 02 of TURN SCE-02_ Discovery Tables_Q1.xlsx, TURN SDG&E 001 Q004 tab 02 of Discovery Tables_Final_5-11_AMENDMENT.xlsx, and TURN SoCalGas 002 Q004 tab 02 of SoCalGas Response_TURN-DR-SoCalGas_Discovery Tables_04.27.2026.xlsx.

[6] All the discovery responses referenced in this and the following footnotes are attached to this testimony as Appendix B.

by 20 percent as compared to 2027 while PG&E and SDG&E are proposing to decrease budgets by 6 and 29 percent respectively (also relative to 2027).[7]

Figure 1. ESA electric actual spending and authorized and proposed budgets, 2021-2033[8]



Q. What proportion of the ESA budgets do the electric utilities allocate to electrification?

A. The three figures below show SCE (Figure 2), PG&E (Figure 3), and SDG&E's (Figure 4) ESA budgets for electrification[9] and energy efficiency programs, administration, direct implementation, marketing and outreach, and evaluation,

[7] PG&E and SDG&E propose lower budgets in 2033 as compared to 2032. If I compare 2032 to 2027, PG&E's budget is level and SDG&E's budget declines 26 percent.

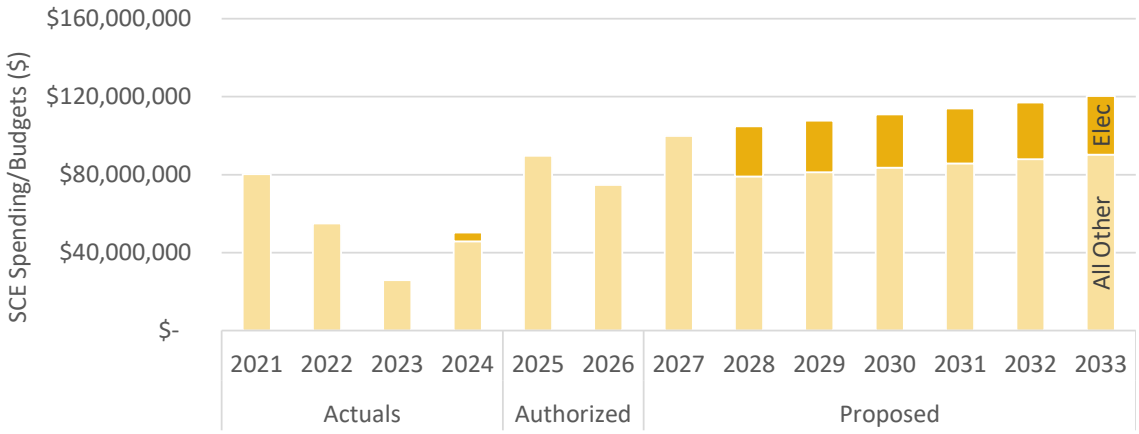
[8] Sources:

- 2021-2025 actuals are from the ESA Summary Table 1A - Expenses Summary tab of the Annual Reports.
- 2026 authorized: 2027 Bridge Year Proceeding TURN PG&E 002 Q01, D.21-06-015, Attachment 1 – Approved Budgets, Goals and Targets for CARE, FERA, and ESA (Program Years 2021-2026), Table 6 (for SCE), and 2027 Bridge Year Proceeding TURN SDG&E 001 Q15.
- 2027-2033 proposed: TURN PG&E 001 Q004 tab 02 (Q4) of IQPPY28-33_DR_TURN_001-Q001Atch001.xlsx, TURN SCE 002 Q004 tab 02 of TURN SCE-02_ Discovery Tables_Q1.xlsx, and TURN SDG&E 001 Q004 tab 02 of Discovery Tables_Final_5-11_AMENDMENT.xlsx.

[9] Electrification can include fuel substitution and fuel switching. Fuel substitution is defined as energy efficiency projects where all or a portion of the measures involve converting an existing energy use from one regulated fuel to another (e.g., natural gas to electricity). Fuel switching is defined as energy efficiency projects where all or a portion of the measures involve converting an existing energy use from one regulated fuel to another non-regulated fuel (e.g., propane, wood, or oil, to electricity).

measurement, and verification (EM&V) (identified as all other) from 2021 to 2033. The budget that the electric IOUs propose to allocate to electrification differs greatly by utility. From 2028 to 2033, SCE, PG&E, and SDG&E propose to spend 25, 10, and 9 percent of their total electric budgets on electrification respectively.

Figure 2. SCE ESA electric budgets for electrification and all other, 2021-2033 [10]



[10] Sources:

- Electrification Budgets: TURN PG&E 001 Q014 and Q015.
- All Other Budgets: Calculated by subtracting the electrification budgets from the electric portfolio budgets (see sources for Figure 1).

Notes:

- For 2025, electric portfolio budgets are actuals and electrification budgets are authorized.
- 2027 reflects the budgets proposed in the 2027 Bridge Year applications rather than the authorized budgets, as the electric and gas portfolios are not broken out in the authorized budgets.

Figure 3. PG&E ESA electric budgets for electrification and all other, 2021-2033 [11]

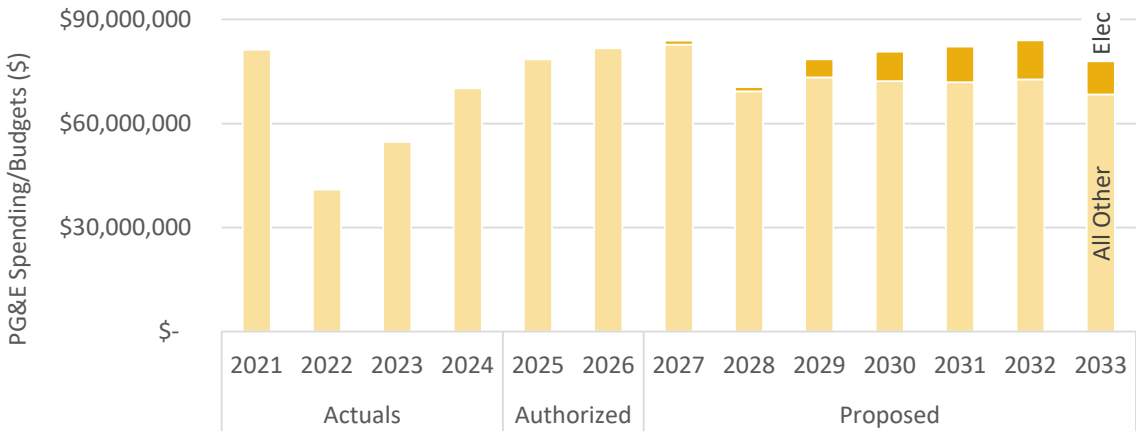
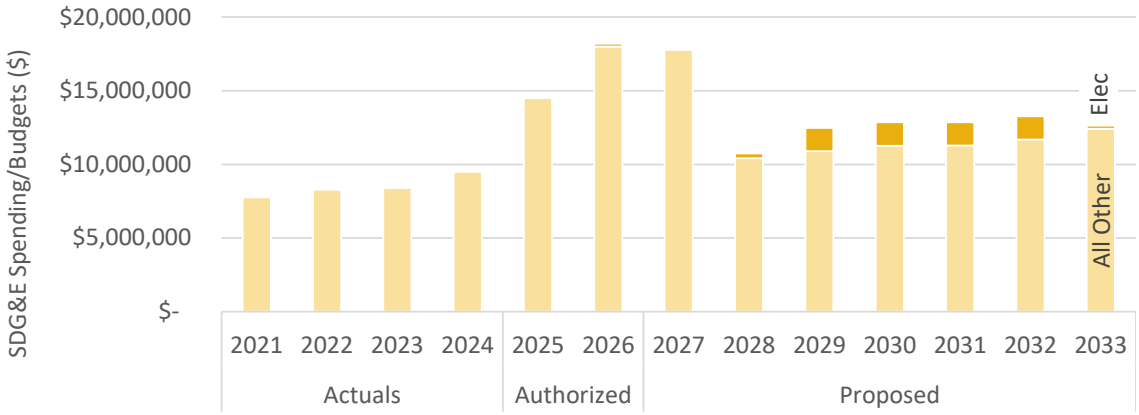


Figure 4. SDG&E ESA electric budgets for electrification and all other, 2021-2033 [12]



[11] Sources:

- Electrification Budgets: TURN SCE 002 Q014 and Q015
- All Other Budgets: Calculated by subtracting the electrification budgets from the electric portfolio budgets (see sources for Figure 1).

Notes:

- For 2025, electric portfolio budgets are actuals and electrification budgets are authorized.
- 2027 reflects the budgets proposed in the 2027 Bridge Year applications rather than the authorized budgets, as the electric and gas portfolios are not broken out in the authorized budgets.

[12] Sources:

- Electrification Budgets: TURN SDG&E 001 Q014 and Q015 plus the Pilot for 2028-2033
- All Other Budgets: Calculated by subtracting the electrification budgets from the electric portfolio budgets (see sources for Figure 1).

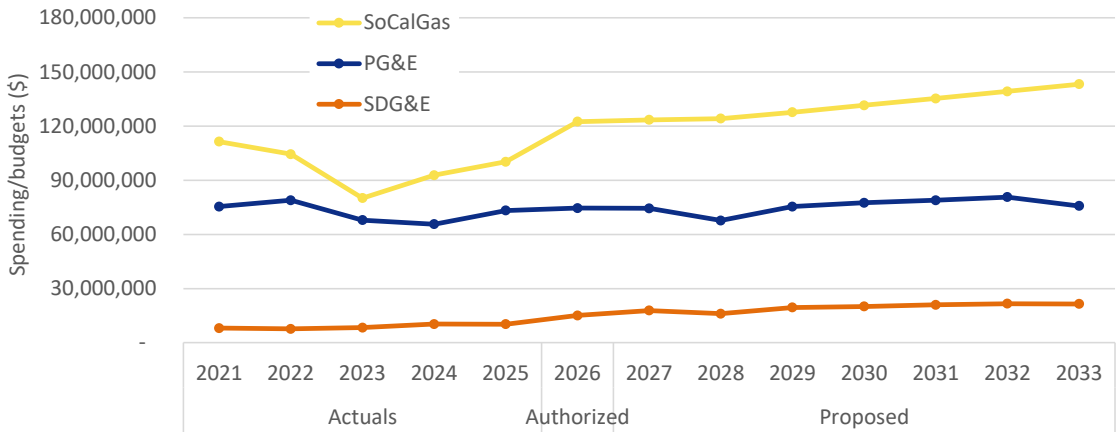
Notes:

- For 2025, electric portfolio budgets are actuals and electrification budgets are authorized.

Q. How are the utilities' proposed gas ESA budgets changing as compared to the 2027 proposed plan?

A. Figure 5 below shows the 2028 to 2033 proposed gas utility ESA budgets as compared to actuals for 2021 to 2025, the authorized plans for 2026, and the proposed plans for 2027. 2027 reflects the budgets proposed in the 2027 Bridge Year applications (A.25-06-022 et al.) rather than the authorized budgets, as the electric and gas portfolios are not broken out in the authorized budgets determined by the Commission in D.26-07-007. SDG&E and SoCalGas are proposing to increase annual budgets between 2027 and 2033 by 20 and 16 percent, respectively. PG&E is proposing a 2 percent increase in annual budgets over the same period.[13]

Figure 5. ESA gas actual spending and authorized and proposed budgets, 2021-2033[14]



- 2027 reflects the budgets proposed in the 2027 Bridge Year applications rather than the authorized budgets, as the electric and gas portfolios are not broken out in the authorized budgets.

[13] PG&E and SDG&E propose lower budgets in 2033 as compared to 2032. If I compare 2032 to 2027, PG&E's budget is 8 percent higher and SDG&E's budget is 21 percent higher.

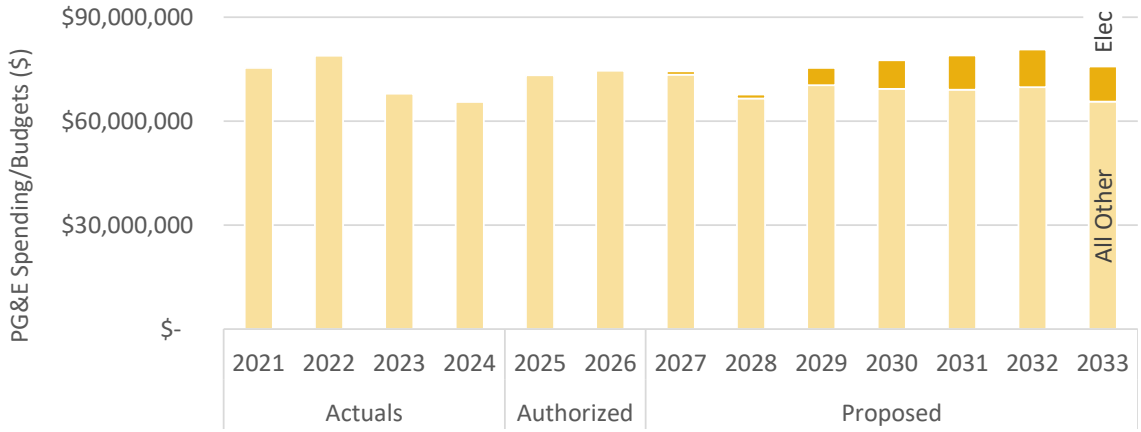
[14] Sources:

- 2021-2025 actuals are from the ESA Summary Table 1A - Expenses Summary tab of the Annual Reports.
- 2026 authorized: 2027 Bridge Year Proceeding TURN PG&E 002 Q01, 2027 Bridge Year Proceeding TURN SDG&E 001 Q15, D.21-06-015, Attachment 1 – Approved Budgets, Goals and Targets for CARE, FERA, and ESA (Program Years 2021-2026), Table 6 (for SoCalGas).

Q. What proportion of total ESA budgets do the gas utilities allocate to electrification?

A. The three figures below show PG&E (Figure 6), SDG&E (Figure 7), and SoCalGas's (Figure 8) ESA budgets for electrification and energy efficiency programs, administration, direct implementation, marketing and outreach, and EM&V (identified as all other) from 2021 to 2033. The budget that the gas IOUs propose to allocate to electrification also differs greatly by utility. For 2028 to 2033, PG&E proposes to spend 10 percent of its gas budget on electrification, SDG&E proposes 2 percent of its gas budget, and SoCalGas proposes no allocation of funds.

Figure 6. PG&E ESA gas budgets for electrification and all other, 2021-2033 [15]



- 2027-2033 proposed: TURN PG&E 001 Q004 tab 02 (Q4) of IQPPY28-33_DR_TURN_001-Q001Atch001.xlsx, TURN SDG&E 001 Q004 tab 02 of Discovery Tables_Final_5-11_AMENDMENT.xlsx, and TURN SoCalGas 002 Q004 tab 02 of SoCalGas Response_TURN-DR-SoCalGas_Discovery Tables_04.27.2026.xlsx.

Notes: 2027 reflects the budgets proposed in the 2027 Bridge Year applications rather than the authorized budgets, as the electric and gas portfolios are not broken out in the authorized budgets.

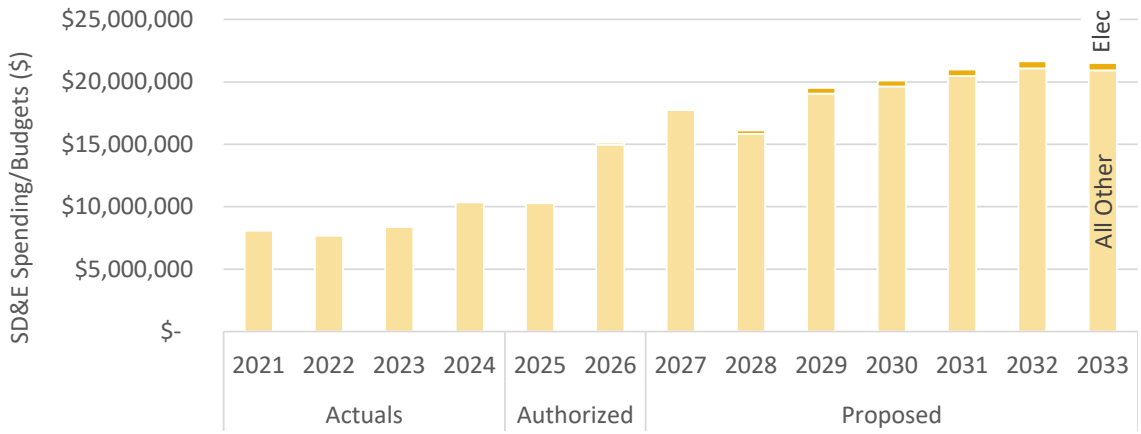
[15] Sources:

- Electrification Budgets: PG&E: TURN PG&E 001 Q014 and Q015.
- All Other Budgets: Calculated by subtracting the electrification budgets from the gas portfolio budgets (see sources for Figure 5).

Notes:

- For 2025, gas portfolio budgets are actuals and electrification budgets are authorized.

Figure 7. SDG&E ESA gas budgets for electrification and all other, 2021-2033 [16]



- 2027 reflects the budgets proposed in the 2027 Bridge Year applications rather than the authorized budgets, as the electric and gas portfolios are not broken out in the authorized budgets.

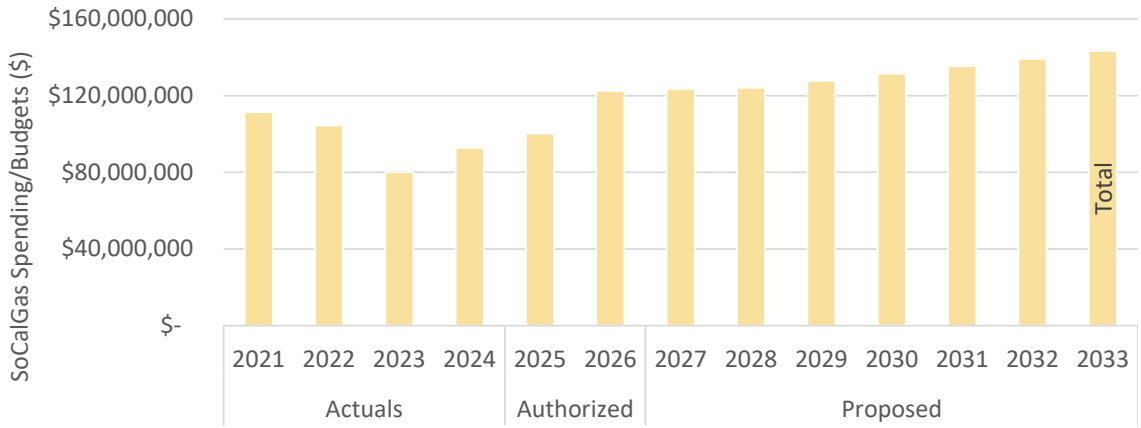
[16] Sources:

- Electrification Budgets: TURN SDG&E 001 Q014 and Q015.
- All Other Budgets: Calculated by subtracting the electrification budgets from the gas portfolio budgets (see sources for Figure 5).

Notes:

- For 2025, gas portfolio budgets are actuals and electrification budgets are authorized.
- 2027 reflects the budgets proposed in the 2027 Bridge Year applications rather than the authorized budgets, as the electric and gas portfolios are not broken out in the authorized budgets.

Figure 8. SoCalGas total ESA gas budgets (no planned electrification), 2021-2033 [17]



Q. What investments do the gas IOUs make in gas-burning space heating measures?

A. Table 3 below provides a summary of gas IOU proposed investments in gas-burning space heating measures and the percent of the total ESA gas budget that this investment represents. SDG&E proposes to invest the most in gas-burning space heating measures as a percent of its gas budget (18 percent on average from 2028 to 2033). These investments increase from $3.3 million in 2028 to $3.9 million in 2033. PG&E investments represent 0.5 percent of gas budgets in 2028 and decline to nearly zero percent from 2032 on. SoCalGas investments remain steady at 3.9 percent of its annual ESA budget throughout the plan period.

[17] Sources:

- Electrification Budgets: TURN SoCalGas 002 Q014 and Q015 and tabs 06 and 07 of SoCalGas Response_TURN-DR-SoCalGas_Discovery Tables_04.27.2026.xlsx.
- Total Budgets: see Figure 5.

Notes:

- For 2025, gas portfolio budgets are actuals and electrification budgets are authorized.
- 2027 reflects the budgets proposed in the 2027 Bridge Year applications rather than the authorized budgets, as the electric and gas portfolios are not broken out in the authorized budgets.

Table 3. IOU proposed ESA investments in gas-burning space heating systems[18,19]

		Proposed						
Utility	Units	2028	2029	2030	2031	2032	2033	2028-2033
PG&E	$	346,566	401,650	325,622	298,133	36,192	28,104	1,436,267
PG&E	% of gas budget	0.5%	0.5%	0.4%	0.4%	0.0%	0.0%	0.3%
SDG&E	$	3,267,876	3,410,656	3,526,557	3,644,995	3,767,481	3,890,375	21,507,941
SDG&E	% of gas budget	20.3%	17.5%	17.5%	17.4%	17.4%	18.1%	17.9%
SoCalGas	$	4,836,395	4,981,486	5,130,931	5,284,860	5,443,405	5,606,707	31,283,784
SoCalGas	% of gas budget	3.9%	3.9%	3.9%	3.9%	3.9%	3.9%	3.9%

Q. What ESA investments do the gas IOUs make in conventional water heating measures?

A. Table 4 below provides a summary of gas IOU proposed ESA investments in conventional water heating measures and the percent of the total gas budget that this investment represents. SoCalGas investments in conventional water heating measures are the largest of the gas IOUs and remain steady at 21 percent of its ESA budget throughout the plan period. SDG&E proposes a slight decline in investments from 6.6 percent in 2028 to 6.0 percent in 2033 though the absolute dollars invested increase from $1.1 million to $1.3 million. PG&E investments represent 2.5 percent of gas budgets in 2028 and decline to 1.2 percent in 2033.

Table 4. IOU proposed ESA investments in conventional water heating measures[20,21]

		Proposed						
Utility	Units	2028	2029	2030	2031	2032	2033	2028-2033
PG&E	$	1,700,317	1,035,681	1,148,640	1,163,690	1,187,951	922,474	7,158,753
PG&E	% of gas budget	2.5%	1.4%	1.5%	1.5%	1.5%	1.2%	1.6%
SDG&E	$	1,056,930	1,135,654	1,129,443	1,213,701	1,253,967	1,294,411	7,084,105
SDG&E	% of gas budget	6.6%	5.8%	5.6%	5.8%	5.8%	6.0%	5.9%
SoCalGas	$	26,261,967	27,049,827	27,861,321	28,697,160	29,558,076	30,444,817	169,873,168
SoCalGas	% of gas budget	21.1%	21.2%	21.2%	21.2%	21.2%	21.2%	21.2%

[18] PY 2028 - 2033 ESA Table A-1, Planning Assumptions for the ESA Main and PY 2028 - 2033 ESA Table A-1A, Planning Assumptions for the ESA MFWB Program.

[19] Includes boilers, furnaces, furnace replacements, and high efficiency forced air units. Does not include furnace repairs and health, comfort, and safety furnace repair/replacements.

[20] PY 2028 - 2033 ESA Table A-1, Planning Assumptions for the ESA Main and PY 2028 - 2033 ESA Table A-1A, Planning Assumptions for the ESA MFWB Program.

[21] Includes boilers, tankless and storage water heaters, other domestic hot water, water heater replacements, and water heater repairs/replacements that are not identified as health, comfort,

Q. Are you concerned about the level of proposed investment in gas-burning space heating and conventional water heating measures?

A. Yes. I am most concerned about SoCalGas' and SDG&E's proposals to maintain or slightly decrease the percent of investment in gas-burning space heating and conventional water heating measures throughout the plan period. SCE's ramp-up of electrification should reduce these types of investments. It would also be good for PG&E to taper investments in gas-burning space heating and conventional water heating measures earlier in the cycle.

California has aggressive goals to limit greenhouse gas emissions and decarbonize the economy. Senate Bill 1279 establishes a state policy to achieve net zero greenhouse gas emissions by 2045.[22] Assembly Bill 3232 requires greenhouse gas emissions reductions in the building stock to 40 percent below 1990 levels by 2032.[23] The California Air Resources Board's *2022 Scoping Plan for Achieving Carbon Neutrality* calls for 100 percent of appliance sales to be electric by 2035 for existing residential buildings and by 2045 for existing commercial buildings.[24] The 2022 Scoping Plan scenario assumes that almost 90 percent of energy demand from buildings will be electrified by 2045.[25]

In 2024, the Commission phased out incentives for non-exempt, non-cost-effective gas energy efficiency measures installed in residential and commercial new construction with no existing gas line, or with an existing gas line if gas usage would materially increase.[26] Building envelope measures, which provide energy benefits irrespective of fuel, are not a concern. Phase 2 of that phase-out is underway with a draft proposal to include ratepayer-funded energy efficiency

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and safety measures. Does not include water heater repairs and health, comfort, and safety water heater repair/replacements.

[22] California Senate Bill 1279. August 27, 2026.

[23] Assembly Bill No. 3232. Chapter 373. Approved September 13, 2018.

[24] California Air Resources Board. *2022 Scoping Plan for Achieving Carbon Neutrality.* Table 2-1: Actions for the Scoping Plan Scenario: AB 32 GHG Inventory Sectors. Page 76.

[25] Id., pages 212-213.

[26] CPUC. D.23-04-035. *Decision Addressing Codes and Standards Subprograms Budgets and Staff Proposal on Reducing Ratepayer-Funded Incentives for Gas Energy Efficiency Measures*. April 6, 2023.

incentives for non-cost-effective gas measures in existing homes with a Viable Electric Alternative (VEA) and for cost-effective gas measures with a VEA installed in new construction projects.[27] These policy changes do not impact ESA. However, they signal the Commission's recognition that phasing out energy efficient gas appliances is an important step to ensuring that California will achieve its decarbonization goals and avoid stranded ratepayer investments in gas energy efficient appliances.

Q. Should low-income customers be included in this transition?

A. Yes. Some low-income customers should be included in this transition away from ratepayer-funded gas measures during this program cycle, specifically those who are unharmed by electrification or can reduce their energy bills.

Q. What do you recommend?

A. In the 3.C. Expanding Access to Cooling and Electrification and Bill Impact Analysis section below, I make several recommendations to require collaboration among utilities and further constrain the utilities' implementation of gas-burning space heating and conventional water heating measures during this program cycle. I recommend the Commission require the IOUs to provide updated ESA budgets that reflect implementation of these recommendations.

Q. Do you have any concerns with the IOUs' approaches to cost allocation for electrification?

A. Yes. PG&E proposes to allocate 50 percent of fuel substitution measure costs to electric customers and 50 percent to gas customers to approximate the share of savings attributable to each fuel type by these measures.[28] SCE and SDG&E follow the Commission's guidance for energy efficiency programs and propose to allocate all costs for fuel substitution to electric customers.[29,30] The utilities are

[27] CPUC Rulemaking 25-04-010. Order Instituting Rulemaking for Oversight of Energy Efficiency Portfolios, Policies, Programs, Evaluation. *Comments of The Utility Reform Network on Staff Proposal for Phase Out of Natural Gas Efficiency Incentives.* April 24, 2025.
[28] TURN PG&E 001 Q010(b).
[29] TURN SCE 002 Q017.
[30] TURN SDG&E 001 Q010(a).

not using a consistent approach to allocate electrification costs to electric and gas ratepayers.

Q. Has the Commission issued guidance on how to allocate electrification costs to ratepayers?

A. Yes, though not specifically for ESA. The Commission issued guidance related to fuel substitution, specifically for fuel substitution programs funded through the energy efficiency portfolios. The Commission found that "fuel substitution measures and associated program costs shall be funded by the ratepayers of the new fuel, not ratepayers of the fuel being substituted."[31] PG&E's approach to cost allocation for its fuel substitution budgets does not adhere to this guidance. The Commission has not adopted guidance with regards to fuel switching for ESA or for the energy efficiency portfolios.

Q. What do you recommend?

A. I recommend the Commission require PG&E to allocate its electrification costs to electric ratepayers, consistent with Commission's guidance for the energy efficiency portfolios and approach taken by the other IOUs. I also recommend that the Commission issue guidance for ESA fuel switching that is consistent with the guidance for fuel substitution. I recommend that the Commission require the IOUs allocate the costs of fuel switching to ratepayers according to this guidance.

Q. Do you have any concerns with the IOUs' approach to fuel switching?

A. SCE and SDG&E propose both fuel substitution and fuel switching[32,33] while PG&E proposes fuel substitution only.[34] PG&E states that it is authorized to install some fuel switching measures including heat pump HVAC, heat pump

[31] CPUC Decision 19-08-009. *Order Instituting Rulemaking Concerning Energy Efficiency Rolling Portfolios, Policies, Programs, Evaluation, and Related Issues.* Rulemaking 13-11-005. August 1, 2019. Page 59. Available at: https://www.cpuc.ca.gov/about-cpuc/divisions/energy-division/building-decarbonization/fuel-substitution-in-energy-efficiency (accessed 9/2/26).
[32] TURN SCE 002 Q008.
[33] TURN SDG&E 001 Q008.
[34] TURN PG&E 001 Q008(a).

water heaters, and induction cooking appliances.[35] PG&E does not explain in its application and supporting testimony why it does not propose to implement the approved fuel switching measures now.[36]

Q. Why is it important for PG&E to include fuel switching for low-income customers in its ESA Plan?

A. It is important to include fuel switching because some low-income customers do not receive utility-provided natural gas. SDG&E included fuel switching in its ESA Plan "in recognition that many Tribal communities lack access to utility-provided natural gas, which would otherwise prevent them from participating in SDG&E's electrification pilot."[37] Thus, as explained by SDG&E, "[a]llowing fuel switching for Tribal households advances California's equity, decarbonization, and energy access goals and ensures these communities can fully participate in programs that improve energy efficiency and reduce greenhouse gas emissions."[38] PG&E also serves customers who cannot access the gas system and has already piloted fuel switching solutions for some of those customers.[39] Further, PG&E's low-income customers should not be deprived of the opportunity to switch fuels if it will reduce their energy bills. The Commission should ensure that PG&E offers fuel switching to eligible electrification measures through ESA Main, not only fuel substitution.

Q. What do you recommend?

A. I recommend the Commission require PG&E to implement authorized ESA Main fuel switching measures now.

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[35] TURN PG&E 006 Q011.

[36] PG&E provided further discussion on fuel switching in its August 10, 2026 supplemental testimony and this discussion did not address a broader roll-out of fuel switching to individual customers outside of the San Joaquin Valley (SJV) Pilot.

[37] TURN SDG&E 001 Q029(a).

[38] *Id.*

[39] CPUC. Rulemaking 15-03-010. Order Instituting Rulemaking to Identify Disadvantaged Communities in the San Joaquin Valley and Analyze Economically Feasible Options to Increase Access to Affordable Energy in those Disadvantaged Communities. *Pacific Gas and Electric Company Pilot Evaluation Report.* December 11, 2024.

Escalation

Q. What findings on budget escalation did you provide in the 2027 Bridge Year proceeding?

A. I found that the utilities' definitions of the term 'escalation' were inconsistent, the presentation of budgets with and without escalation was not transparent in the utility filings, and the application of the escalation rate assumptions by program and cost category was not clear.

Q. What proposed changes related to escalation did you recommend in the 2027 Bridge Year proceeding?

A. I recommended the following with regards to escalation:

- Requiring the utilities to clarify that the term 'escalation' refers to the increase in the costs of goods and services due to inflation and does not include other changes to the budget;
- Directing the utilities to provide budgets without escalation, budgets with escalation, and isolate for any proposed escalation by program and cost category for transparency for 2027 and moving forward; and
- Directing the utilities to provide the methodology used to calculate escalation by program and cost category and the justification for the applied methodology.[40]

Q. Are the utilities' filings clear that the escalation rate captures inflation and not other changes to the budget?

A. Yes. SDG&E states that it "applied a 3% annual escalation rate to labor and material costs, consistent with SDG&E's latest General Rate Case (GRC) decision for post-test-year base margin revenue increase, with long-term inflationary trends and utility sector cost forecasts."[41] SoCalGas proposes 3 percent escalation "to keep up with inflation."[42] PG&E applies escalation rates of 3.75 percent for labor and 3 percent for non-labor, for inflation and cost of living

[40] CPUC Decision 26-07-007. *Decision Authorizing 2027 Bridge Funding for Investor-Owned Utilities' Income-Qualified Assistance Programs.* Issued July 8, 2026. Page 56.

[41] See page ESA-32 of SDG&E-03, Prepared Direct Testimony of Roland Mollen, Horace (TY) Tantum, and Mia Graff.

[42] See page OV and RC-97 of the Prepared Direct Testimony of Octavio Verduzco and Roy Christian.

adjustments.[43] SCE assumes a 3 percent escalation for labor and a 2 percent escalation for non-labor, except for marketing, education, and outreach costs "which are escalated at five percent per year given historically higher observed and expected cost inflation." [44]

Q. Do you know what the proposed budgets are without escalation?

A. No. None of the tables in the 2028-2033 ESA Plan filing provide this information.

Q. Can you estimate the proposed budget without escalation?

A. No. The utilities provide the percentages that they use to escalate the costs in their filings and the sources for those assumptions. However, they escalate each program and cost category differently in practice. The methodology the utilities use to escalate costs is not straightforward and they provide no explanation or rationale for the methodology they use. As a result, I cannot replicate their methodology.

Q. Do the issues that you raised in the 2027 Bridge Year proceeding remain?

A. Yes. Most of these issues continue to be present in the 2028-2033 ESA Plan filings. In the 2028-2033 IQP applications, the utilities' filings are clear that the escalation rate captures inflation and no other changes to the budget.

Q. Do you make the same recommendations in this proceeding?

A. I make two of the three recommendations again. I recommend:

- The Commission direct the utilities to provide budgets without escalation, budgets with escalation, and isolate for any proposed escalation by program and cost category for transparency.

[43] See page 4-126 of Pacific Gas and Electric Company's (U 39) Application for Approval of its 2028-2033 Income-Qualified Programs.

[44] See footnote 33 on page 33 of SCE-02, Testimony Supporting Southern California Edison Company's Energy Savings Assistance (ESA) Program and Budget for Program Years 2028-2033.

- The Commission direct the utilities to provide the methodology used to calculate escalation by program and cost category and the justification for the applied methodology.

Goals

Q. What types of goals do PG&E, SCE, SDG&E, and SoCalGas propose in their 2028-2033 ESA Plans?

A. PG&E, SCE, SDG&E, and SoCalGas propose goals for portfolio-level kWh savings, kW savings, therm savings, and number of households treated for 2028 to 2033 in aggregate. The IOUs are proposing to allow shifts in savings across programs and years, in alignment with their proposal to modify fund-shifting.

Q. Are the types of goals proposed by PG&E, SCE, SDG&E, and SoCalGas for 2028 to 2033 different from the 2021 to 2026 and 2027 goals?

A. Yes. The 2021 to 2026[45] and 2027[46] goals were at the program level rather than at the portfolio level. In other words, there were separate goals for ESA Main and the Multifamily Whole Building Program (MFWB).

Q. Do you have any concerns with the proposed changes to the goals?

A. No. I do not have concerns with the proposed changes to the goals.

Q. Do you have any other input on the goals for the 2028-2033 ESA Plan?

A. Yes. The Commission is proceeding with "a new post 2020 design and delivery concept that would shift the focus of the ESA program away from a program treating a number of households, to one focusing on deeper savings and coordination across multiple clean energy programs."[47] This means that the

[45] CPUC. D.21-06-015, Attachment 1 – Approved Budgets, Goals and Targets for CARE, FERA, and ESA (Program Years 2021-2026), Table 7.

[46] CPUC. Decision 26-07-007. *Decision Authorizing 2027 Bridge Funding for Investor-Owned Utilities' Income-Qualified Assistance Programs.* Attachment 1 – Energy Savings Assistance, California Alternate Rates for Energy, and Family Electric Rate Assistance Programs and Budgets for Program Year 2027. Issued July 8, 2026.

[47] CPUC. Decision 21-06-015. *Decision on Large Investor-Owned Utilities' and Marin Clean Energy's California Alternate Rates for Energy (CARE), Energy Savings Assistance (ESA), and Family Electric Rate Assistance (FERA) Program Applications for Program Years 2021-2026.* Issued June 7, 2021. Pages 116-132.

number of households treated goal is a lower priority as compared to the energy savings goals. Also, the number of households treated goal conflicts with the energy savings goals in that treating more households is more administratively burdensome and can result in lower energy savings per dollar spent.

Q. What is the difference between a metric and a goal?

A. Metrics define the information that utilities, regulators, and other stakeholders use to monitor performance. A goal is the desired level of performance set for priority metrics.

Q. Can the Commission continue to monitor the number of households treated?

A. Yes. It makes sense to continue to track households treated to monitor the breadth of participation and depth of engagement by household.

Q. What do you recommend?

A. I recommend continuing to report on the number of households treated as a metric while suspending households treated as a goal.[48] Suspending this goal will enable the IOUs to focus on meeting the priority needs of ESA customers.

Q. Do you have concerns with how the kWh and therm goals are estimated?

A. Yes. SCE is converting gas and propane therm savings from electrification to kWhs and combining these savings with their kWh savings from other energy savings measures.[49] PG&E and SDG&E are reporting therm savings from fuel substitution along with their therm savings from energy efficiency.[50] The utilities are not using consistent approaches to report kWh and therm savings from electrification efforts.

[48] It may make sense to shift to goals in MMBtus over the longer term to better capture the changes in energy use due to fuel substitution and fuel switching, though it may be premature to shift goals to MMBtus in this proceeding. If the state moves to MMBtu goals, utilities should continue to track and report savings by fuel type in native units as well as in aggregate across fuel types in MMBtus.

[49] TURN SCE 004 Q006.

[50] TURN PG&E 001 Q015, tab 07 of IQPPY28-33_DR_TURN_001-Q001Atch001.xlsx and TURN SDG&E 001 Q015, tab 07 of Discovery Tables_Final_5-11_AMENDMENT.xlsx.

Q. What do you recommend?

A. I recommend the Commission require the utilities to report kWh and therm savings from electrification efforts consistently and specify an approach for this reporting.

ESA PROGRAM – ISSUE 3.B.

Coordination on Electrification

Q. Are the utilities' electrification proposals well-coordinated?

A. No. While I appreciate that most of the utilities included electrification in their 2028-2033 ESA Plans, I find that the electrification proposals are not well-coordinated. I identify critical coordination issues related to electrification in the 3.A. Budget and 3.A. Goals sections above, and in the 3.C. Expanding Access to Cooling and Electrification and Bill Impact Analysis section below. These sections of my testimony include my recommendations to address these issues.

Q. Do you have additional concerns about coordination on electrification?

A. Yes. I am concerned about coordination between SCE and SoCalGas on electrification. PG&E and SDG&E are dual-fuel utilities and therefore coordination on fuel substitution can occur internally. I am more concerned about SCE and SoCalGas as they are single-fuel utilities with overlapping service territories in which coordination on fuel substitution must occur externally. External coordination is typically more challenging than internal coordination.

Q. Do SCE and SoCalGas propose to coordinate to implement electrification?

A. No. The two utilities do not propose to coordinate on the implementation of electrification in their 2028-2033 ESA Plans.[51,52]

[51] TURN SoCalGas 002 Q009.

[52] TURN SCE 004 Q015(d) states, "Each utility independently administers its programs, including program design, funding, cost- effectiveness evaluation, and reporting, which inherently limits the degree of coordination at the individual-customer level."

Q. Why should SCE and SoCalGas coordinate on electrification implementation?

A. SoCalGas proposes to install gas appliance measures that will compete with the fuel substitution measures proposed by SCE. The two utilities do not plan to coordinate to help the customer assess which option is more affordable.[53]

Q. What do you recommend?

A. I recommend the Commission require SCE and SoCalGas to work together to determine if fuel substitution measures can save customers money. I discuss this in more detail in the 3.C. Expanding Access to Cooling and Electrification and Bill Impact Analysis section.

Health, Comfort, and Safety (HCS) Measures

Q. How should IOUs define HCS measures in their 2028-2033 ESA Plans?

A. According to Commission guidance, IOUs should characterize measures with less than one kWh or one therm of annual energy savings as HCS measures.[54,55]

Q. Are the IOUs defining HCS measures in this way in their 2028-2033 ESA Plans?

A. No, not all of them. Through discovery, I asked each utility to determine which measures are HCS measures and to better understand the costs, savings, and benefits associated with these measures. Based on this data, it does not appear that SCE is following the Commission guidance. Table 5 below includes the annual

[53] TURN SCE 004 Q014 states, "CE and gas utilities do not reconcile competing cost effectiveness determinations at the individual customer level. Each utility conducts cost effectiveness analysis at the portfolio level and evaluates only the measures it administers. At the customer level, SCE may perform bill and rate impact analysis as a decision support tool during the home assessment process; however, this analysis is intended to inform customer choice and affordability, not to resolve or decide between competing utility offerings. Accordingly, if both a heat pump and a gas system could be considered "cost effective" under separate utility frameworks, no inter-utility reconciliation occurs."

[54] CPUC. Decision 21-06-015. *Decision on Large Investor-Owned Utilities' and Marin Clean Energy's California Alternate Rates for Energy (CARE), Energy Savings Assistance (ESA), and Family Electric Rate Assistance (FERA) Program Applications for Program Years 2021-2026.* Issued June 7, 2021. Section 6.10.8.5. Page 254.

[55] TURN SoCalGas 004 Q006.

kWh or therm savings for HCS measures in the IOUs' 2028-2033 ESA Plans, among other metrics.[56] SCE provided significant annual kWh savings for electric HCS measures, which is inconsistent with the Commission's definition.

Table 5. HCS measure budgets, savings, benefits, and cost-effectiveness in 2028-2033 ESA plans[57]

	2028-2033 Proposed			
	Budgets ($)	Savings (kWh or therms)	ESACET Benefits ($)	ESACET BCA
Electric				
PG&E	$578,860	-	$153,149	0.3
SCE	$477,376,188	193,523,607	$262,083,792	0.5
SDG&E	$5,041,322	-	$4,042,310	0.8
Gas				
PG&E	$21,204,866	-	$7,479,643	0.4
SDG&E	$5,902,667	-	$404,887	0.1
SoCalGas	$18,554,111	-	-$12,573,035	less than 0

Q. Which HCS measures are electric IOUs offering?

A. Table 6 below shows the HCS measures in the electric 2028-2033 ESA Plans. SCE appears to be an anomaly in that it offers many more and different electric HCS measures than PG&E and SDG&E.

[56] TURN SoCalGas 004 Q006(a) states that SoCalGas shows negative benefits for HCS measures, such as furnace repair/replacements, as these measures have negative benefits associated with additional gas use that are offsetting other positive benefits.

[57] Sources:

- Budgets, Savings, and ESACET Benefits: TURN PG&E 006 Q019 and tab 01 of IQPPY2833_DR_TURN_006-Q019Atch01.xlsx, TURN SCE 002 Q006 and TURN SCE-02_ Discovery Tables_Q6_Tab 03.xlsx, TURN SDG&E 001 Q006 and tab 03 of Discovery Tables_Final_5-11.xlsx, and TURN SoCalGas 002 Q006 and tab 03 of SoCalGas Response_TURN-DR-SoCalGas_Discovery Tables_04.27.2026.xlsx.
- ESACET BCA: Calculated by dividing the ESACET Benefits by the Costs.

Table 6. HCS measures offered in electric 2028-2033 ESA plans[58]

	Measure Offered (Y/N)		
Measure	**PG&E**	**SCE**	**SDG&E**
Air Purifiers	Y	N	Y
Air Sealing/Envelope	N	N	N
Central A/C replacement	N	Y	N
Central A/C Tune up	N	Y	N
Clothes Dryer	N	Y	N
CO and Smoke Alarms	N	N	N
Cold Storage	N	N	N
Comprehensive Home Health and Safety Checkups	N	N	N
Condenser Coil Cleaning	N	Y	N
Ductless Mini-split	N	Y	N
Electrical MHR for Fuel Sub	N	Y	N
Energy Efficient Fan Control	N	Y	N
Evaporative Cooler	N	Y	N
Evaporative Cooler Maintenance	N	Y	N
Evaporator Coil	N	Y	N
Exterior Hard wired LED fixtures	N	Y	N
Fan Control Adjust	N	Y	N
Faucet Aerator	N	Y	N
Freezer	N	Y	N
Heat Pump Replacement	N	Y	N
Heat Pump Water Heater	N	Y	N
Home Energy Monitor	N	Y	N
HVAC Air Filter Service	N	Y	N
Induction Cooktop/Range	N	Y	N
Laundry Duct Cleaning	N	N	Y
LED A-Lamps	N	Y	N
LED R/BR Lamps	N	Y	N
LED Reflector Bulbs	N	Y	N
Other Domestic Hot Water	N	Y	N
Pool Pumps	N	Y	N
Portable A/C	Y	Y	N
Refrigerant Charge Adjustment	N	Y	N
Refrigerator	N	Y	N
Room A/C Replacement	N	Y	Y
Room HP Replacement	N	Y	N
Smart Strip Tier II	N	Y	N
Thermostatic Shower Valve	N	Y	N
Wholehouse Fan	N	Y	N

[58] Sources: TURN PG&E 006 Q019 and tab 01 of IQPPY2833_DR_TURN_006-Q019Atch01.xlsx, TURN SCE 002 Q006 and TURN SCE-02_ Discovery Tables_Q6_Tab

Q. Which HCS measures are gas IOUs offering?

A. Table 7 below shows the HCS measures included in the gas 2028-2033 ESA Plans. Most gas IOUs offer the furnace clean and tune, furnace repair/replacement, and air sealing measures. SDG&E offers water heater repair, and SoCalGas offers CO (carbon monoxide) and Smoke Alarms.

Table 7. HCS measures offered in gas 2028-2033 ESA plans[59]

	Measure Offered (Y/N)		
Measure	**PG&E**	**SDG&E**	**SoCalGas**
Air Sealing	N	Y	N
Air Sealing/Envelope	N	N	Y
CO and Smoke Alarms	N	N	Y
Comprehensive Home Health and Safety Checkups	N	N	N
Furnace Clean and Tune	N	Y	Y
Furnace Repair/Replacement	Y	Y	Y
Natural Gas Appliance Testing (NGAT)	N	N	N
Water Heater Repair	N	Y	N
Water Heater Tank and Pipe Insulation	N	N	N

Q. How much are the IOUs investing in HCS measures?

A. Table 8 below shows the proportion of ESA budgets allocated to HCS measures. SCE proposes spending a high proportion of its ESA budget on HCS (71 percent) likely due to the number of measures it classifies as HCS measures. By comparison, the other IOUs propose 0.1 to 7 percent of their ESA budgets for HCS which is a much more reasonable allocation of spending.

03.xlsx, TURN SDG&E 001 Q006 and tab 03 of Discovery Tables_Final_5-11.xlsx, and TURN SoCalGas 002 Q006 and tab 03 of SoCalGas Response_TURN-DR-SoCalGas_Discovery Tables_04.27.2026.xlsx.

[59] *Id.*

Table 8. HCS measure budgets as percent of ESA budgets[60]

	2028-2033 Proposed		
	HCS Budgets ($)	ESA Budgets ($)	HCS % of ESA Budgets
Electric			
PG&E	$578,860	$ 474,762,315	0.1%
SCE	$477,376,188	$ 674,532,300	71%
SDG&E	$5,041,322	$ 74,853,056	7%
Gas			
PG&E	$21,204,866	$ 456,144,185	5%
SDG&E	$5,902,667	$ 119,903,177	5%
SoCalGas	$18,554,111	$ 801,366,491	2%

Q. What do you recommend?

A. I recommend that SCE characterize its HCS measures in a way that is consistent with the approach defined by the Commission and taken by the other IOUs. This will allow the Commission and other stakeholders to confirm that the HCS spending allocations proposed by the IOUs are reasonable.

ESA PROGRAM – ISSUE 3.C.

Expanding Access to Cooling and Electrification and Bill Impact Analysis

Q. Do you have any concerns about the proposals by several IOUs to expand access to electrification measures?

A. Yes. PG&E, SCE, and SDG&E's 2028-2033 ESA Plan filings mention conducting bill impact analysis to determine if electrification is more affordable for customers.[61,62] As the primary purpose of ESA is to address affordability, it is

[60] Sources:
- HCS Budgets are from **Error! Reference source not found.**.
- ESA Budgets are from Table 2.
- HCS % of ESA Budgets is calculated by dividing HCS Budgets by ESA Budgets.

[61] Electrification measures can include multiple types of electrification measures (such as heating, cooling, clothes drying, and cooking) packaged with energy efficiency measures (such as weatherization).

[62] Sources: Page 4-48 of Pacific Gas and Electric Company. California Alternative Rates for Energy (CARE), Family Electric Rate Assistance (FERA), and Energy Savings Assistance (ESA) Programs and Budgets Application for the 2028-2033 Program Years (PYs) Prepared Testimony, Pages 60-61 of SCE-02 Testimony Supporting Southern California Edison Company's Energy Savings Assistance (ESA) Program and Budget for Program Years 2028-

essential to assess if electrification will save ESA customers money as compared to gas, propane, wood, and oil alternatives. The ESA Policy and Procedures Manual states, "Utilities are encouraged to evaluate the potential impact of fuel substitution measures on customer energy bills."[63] I am concerned that the Commission does not require utilities to evaluate the impacts of electrification on customer energy bills.

Q. Has the Commission provided any guidance regarding how to evaluate customer bill impacts?

A. Yes. The CPUC's bill impact calculator should ultimately be used to estimate bill impacts. However, the CPUC bill impact calculator is not available yet. The most recent version of the ESA Policy and Procedures Manual provides alternative methodologies for making this assessment in the interim.[64] I am concerned that the lack of formal guidance on coordination on the development of the bill impact analysis and the application of the results will result in lost opportunities for electrification and higher bills for some customers.

Q. Are the utilities planning to coordinate to develop a bill impact analysis tool for electrification?

A. No. The utilities are not planning on coordinating on electrification bill impact tool development.[65]

Q. Are the utilities planning to coordinate on how to apply the results of a bill impact analysis to make decisions?

A. No. The utilities are not planning to coordinate on how to use the outputs of the electrification bill impact analysis tool to make decisions.[66]

2033, and Page ESA-94 of SDG&E-03 Prepared Direct Testimony of Roland Mollen, Horace (TY) Tantum, and Mia Graff.

[63] Statewide ESA 2021-2026 Cycle Policy and Procedures Manual, v.1.6, Attachment G, Section 3.

[64] *Id.*

[65] Sources: TURN PG&E 001 Q009, TURN PG&E 006 Q015, TURN SCE 002 Q009, and TURN SDG&E 001 Q009.

[66] *Id.*

Q. Can customers install measures that are more costly to operate, if they prefer it?

A. Yes. Customers can opt to install more costly measures.[67] Also, IOUs can promote gas measures that are more costly for customers to operate than electric alternatives.

Q. Does it make sense for ratepayer funds to be used to sustain or install new gas measures that will cost customers more to operate?

A. No. Ratepayer funding should not support uneconomic gas measures. Repair or replacement of an inoperable space or water heater to address health, comfort, and safety will increase energy bills, and the bill impacts from gas appliances versus electrification warrant assessment.

Q. Does it make sense to use ratepayer funds for electrifying customers if that would increase their energy bills?

A. Generally speaking, no. Ratepayer funding should be supporting measures that reduce ESA customers' bills, so long as those measures are technically feasible. However, it is not clear how the bill impact analysis will address customers who want to add cooling. Some customers may want to add cooling, even though it will increase their energy bills. Customers should be allowed to add cooling by selecting the technology that is most economic for them and operating that technology in a way that is cost-efficient and meets their needs.

Q. What do you recommend?

A. I recommend the Commission:

- Require that all utilities coordinate on the development and application of a bill impact analysis for this program cycle; for SoCalGas, this requires cooperation with SCE if the customer is also served by SCE.
- Require that all utilities evaluate the bill impacts of all projects that contain at least one electric alternative and maximize the bill savings for electrification projects by including other energy efficiency measures such as weatherization.

[67] Sources: TURN PG&E 001 Q022, TURN SCE 004 Q012, TURN SCE 004 Q016, and TURN SDG&E 001 Q022.

- Issue formal guidance on the application of bill impact analysis to ESA.

Regarding the guidance on the application of bill impact analysis to ESA, I suggest the following:

- In cases where electrification is projected to result in bill savings or no change in bills for a customer as compared to the fossil-fueled alternative, ratepayer funds must be used to support electrification so long as electrification is technically feasible. In no case should the installation of fossil-fueled equipment be allowed if technically feasible electrification is projected to cost the same or less than the fossil-fueled equipment.
- In cases where technically feasible electrification is projected to result in a bill increase for a customer as compared to the fossil-fueled alternative, ratepayer funds may support electrification if the customer chooses it. The Commission should require the IOUs to document the customer's choice.

ESA PROGRAM – ISSUE 3.D.

Multifamily Whole Building Program (MFWB)

Q. Which utilities propose a transition to a local administration model for MFWB?

A. In their 2028-2033 ESA Plans, SCE, SDG&E, and SoCalGas propose a transition from a regional administration model to a local administration model for MFWB.

Q. Do you have concerns about SCE, SDG&E, and SoCalGas' proposal to transition to a local administration model for MFWB?

A. No, I do not have concerns about this transition, so long as SCE, SDG&E, and SoCalGas continue to transparently plan and report MFWB investments, savings, and benefits. Transparent planning and reporting means that MFWB is broken out as its own row in planning and reporting tables and not merged with other programs such as ESA Main. For TURN, the Commission, and other stakeholders to observe if the transition to a local administration model is leading to changes in planned or actual performance, MFWB must be broken out separately from the other programs.

Q. Do PG&E, SCE, SDG&E, and SoCalGas break out proposed MFWB budgets, savings, and benefits in the 2028-2033 ESA Plan tables?

A. PG&E and SDG&E provide MFWB budgets, savings, and benefits separately from ESA Main budgets, savings, and benefits.[68,69] However, SCE[70] and SoCalGas[71] do not separate MFWB planning from ESA Main.

Q. Do SCE and SoCalGas have good reason for merging MFWB with ESA Main?

A. No. SCE declined to disaggregate MFWB data as it does not propose implementing multifamily as a distinct program separate from ESA Main. For 2028-2033, SCE states that it proposes to return to the prior integrated ESA program where multifamily customers were served as a housing segment within the ESA portfolio.[72] SoCalGas states that it proposes portfolio-level goals, consistent with the request made by the other IOUs.[73] SoCalGas provides proposed MFWB-specific budgets and savings in its testimony, but not in the

[68] See SDG&E's Attach G - A.26-01-xxx ESA CARE FERA Attachment G 2028-2033 Tables 1 16 26.xlsx, Table 7: ESA Portfolio Budget by Category. PYs 2028-2033 include budgets for ESA Main and MFWB.

[69] PG&E plans MFWB separately from ESA Main for 2028 to 2033 as it is not proposing to change the administration model for this program. Table 7: ESA Portfolio Budget by Category PYs 2028-2033 includes budgets for ESA Main and MFWB.

[70] See page 93 of SCE-02, Testimony Supporting Southern California Edison Company's Energy Savings Assistance (ESA) Program and Budget for Program Years 2028-2033, which states: "SCE respectfully requests that the CPUC: …Authorize SCE to manage all aspects of MF ESA implementation within its service territory, including in-unit and common-area measures, and to integrate these services under the ESA Main program using a utility-led SPOC model to enhance trust, improve coordination, and simplify navigation for property owners and tenants." Also, Table 7: ESA Budget by Category PYs 2028-2033 include budgets for ESA Main and the MFWB row is blank.

[71] See Section 10.1.1. Budget on page OV and RC-139 of the Prepared Direct Testimony of Octavio Verduzco and Roy Christian which states, "SoCalGas requests $105,031,616 for MFWB (MF In-unit, MF CAM, and MFWB Admin) treatments for PYs 2028-2033. These budget requests are incorporated into the program-wide requests found in ESA Application Table 7 ESA Budget by Category for PYs 2028-2033." Also, Table 7: ESA Budget by Category PYs 2028-2033 include budgets for ESA Main and the MFWB row is blank.

[72] TURN-SCE-001-001(a).

[73] See Page OV and RC-10 of the Prepared Direct Testimony of Octavio Verduzco and Roy Christian.

tables associated with the filing.[74] There is nothing that prevents SCE and SoCalGas from planning and reporting MWFB efforts separately from ESA Main in its 2028-2033 ESA Plan.

Q. Why is it important to see MFWB separately?

A. The utilities faced challenges serving MFWB over the years and MFWB savings lagged the goals for the program. If the goal of this transition is to enable SDG&E, SCE, and SoCalGas to better serve multifamily properties, stakeholders should be able to see evidence of improved MFWB performance from 2028 to 2033 and as compared to the prior cycle. If the plans for these two utilities are approved without modification, the Commission and other stakeholders will not be able to monitor MFWB performance.

Q. What do you recommend?

A. I recommend the Commission require SCE and SoCalGas to show MFWB efforts separately from ESA Main in their 2028-2033 ESA Plans and ESA reporting.

ESA PROGRAM – ISSUE 3.E.

ESA Fund-Shifting, Unspent and Uncommitted Funds, and Carryover Rules

Q. What modifications do PG&E, SCE, SDG&E, and SoCalGas propose to the fund-shifting rules established previously by the Commission?

A. PG&E, SCE, SDG&E, and SoCalGas propose to have the flexibility to shift funds between programs and across all years in their 2028-2033 ESA Plans. From 2021 to 2026, the Commission required the IOUs to use uncommitted and unspent ESA Main funds at the end of each year to offset ESA collections for the next program year. The Commission did not allow the IOUs to shift funds from MFWB and pilot programs to ESA Main, without seeking authorization through a Tier 2 advice letter. The Commission did allow the IOUs to carry unspent MFWB,

[74] See Pages OV and RC-139 to OV and RC-140 of the Prepared Direct Testimony of Octavio Verduzco and Roy Christian and Attachment E, ESA Table 7: ESA Portfolio Budget by Category.

pilots, and studies funds forward from one year to the next, and to borrow funds from a future year to support implementation in a current year. Finally, the Commission required the IOUs to report all funds-shifting activities.[75]

Q. Why do PG&E, SCE, SDG&E, and SoCalGas propose these modifications?

A. PG&E, SCE, SDG&E, and SoCalGas state they want greater flexibility to apply approved funds during the six-year program cycle. They want the flexibility to respond to changes in program bandwidth and customer need by program and over time.

Q. Did the Commission support some flexibility in the application of unspent funds in the 2027 Bridge Year?

A. Yes. In D. 26-07-007 the Commission determined that, "[i]t is reasonable to apply unspent funds within ESA, to reduce rate pressures for ratepayers. All IOUs are authorized to utilize unspent MFWB and pilot funds remaining at the end of program year 2026 to reduce ESA Main collections for program year 2027. SCE may also shift funds from its CEH [Clean Energy Homes] Pilot to ESA Main."[76] For program year 2027, the Commission allowed the application of unspent funds from one program or pilot to meet a higher-than-anticipated need in another program or pilot. However, the same decision also required that "all unspent funds should be expended to offset 2027 collections and to address immediate affordability concerns."[77]

Q. Do you have concerns with PG&E, SCE, SDG&E, and SoCalGas' proposed modifications to fund-shifting for the 2028-2033 ESA Plans?

A. Yes. I am most concerned that utilities have historically underspent budgets and held onto funds that should have been used to promptly reconcile ESA ratepayer charges in subsequent years. I am concerned that this proposed modification may

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[75] CPUC. Decision 21-06-015. *Decision on Large Investor-Owned Utilities' and Marin Clean Energy's California Alternate Rates for Energy (CARE), Energy Savings Assistance (ESA), and Family Electric Rate Assistance (FERA) Program Applications for Program Years 2021-2026.* Issued June 7, 2021. Pages 428-429.

[76] CPUC Decision 26-07-007. *Decision Authorizing 2027 Bridge Funding for Investor-Owned Utilities' Income-Qualified Assistance Programs.* Issued July 8, 2026. Page 48.

[77] Id., Page 58.

encourage these four utilities to stockpile ratepayer contributions to meet an uncertain and unspecified needs in future years of the plan, in the event of significant and persistent underspending. ESA plays an important role in improving affordability for participants. Stockpiling budgets takes funds from low-income customers to support the implementation of the programs without providing them with the opportunity to benefit from the implementation of the programs. I am also concerned about the opposite extreme whereby a utility experiences significant and persistent overspending, such that borrowing against future years depletes future year budgets to the point that the funds cannot sustain the programs. I understand that unanticipated issues can arise in any six-year planning period that require shifts. However, the utilities' proposal maximizes flexibility by eliminating all guardrails. This proposal provides too much flexibility.

Q. What do you recommend?

A. I recommend the Commission establish guardrails to prevent specific types of misuse of ratepayer funds. More specifically, I recommend the Commission:

- Require application of all unspent and uncommitted funds to offset the budget in the next program year.
- Require submittal of a Tier 1 Advice Letter by June 1 of each year to transparently document the application of all unspent and uncommitted funds and identify the remaining collection needed.[78]
- Limit borrowing from future year budgets within this program cycle to a specified percent of those budgets. Based on other jurisdictions, 10 percent is a reasonable limit to place on borrowing from future year budgets without more formal notification and modification.[79]

[78] This approach is similar to requirements adopted by the Commission for Bridge Year 2027 in D.26-07-007 at pages 59-60.

[79] A mid-term modification filing is required by the Massachusetts energy efficiency program administrators if certain criteria are met, such as if a more than 10 percent increase or decrease in three-year plan budgets at the sector level is anticipated. (See: Massachusetts

OTHER CARE/ESA/FERA ISSUES – ISSUE 4.B. IQP EVALUATIONS, STUDIES, PILOTS, WORKING GROUPS, AND REPORTING

Income-Qualified Potential Study

Q. Did the Commission procure an income-qualified potential study to support goal-setting in the 2028-2033 ESA Plan proceeding?

A. Yes. Guidehouse conducted an Income Qualified Potential and Goals Study in 2025.[80] The purpose of this study was to inform the 2028-2033 ESA Plan goals.

Q. What measures did this potential study assess?

A. The potential study included electric and gas energy savings measures and fuel substitution measures. The potential study did not include fuel switching measures.

Q. Did the IOUs leverage this potential study to set their goals?

A. Not completely. In particular, the IOUs took issue with the projections of fuel substitution potential, as the study did not account for additional electrical infrastructure or auxiliary costs to enable electrification and the possibility of customer bill increases.[81] Therefore, the IOUs did not fully leverage the fuel substitution potential to set their goals. Also, fuel switching potential was not available to inform the goals.

Department of Public Utilities, Case 20-150-A, *Investigation by the Department of Public Utilities on its own Motion into Updating its Energy Efficiency Guidelines, Guidelines for the Methods and Procedures for the Evaluation and Approval of Energy Efficiency Plans and Energy Efficiency Reports*, May 3, 2021, pg. 14-15. https://www.mass.gov/order/investigation-by-the-dpu-into-updating-its-ee-guidelines).

[80] Guidehouse, Inc. Prepared for the California Public Utilities Commission. *2025 Income Qualified Potential and Goals Study*. July 9, 2025.

[81] TURN PG&E 001 Q026, TURN SCE 002 Q026, TURN SDG&E 001 Q026, and TURN SoCalGas 002 Q026.

Q. Do you have concerns that the potential study was not leveraged in developing some of the goals?

A. Yes. I am concerned that the fuel substitution potential was not used to set fuel substitution goals. In addition, I am concerned that fuel switching potential was not included in the study.

Q. What do you recommend?

A. I recommend the Commission address the shortcomings of the fuel substitution potential and include fuel switching potential in the next iteration of the study, two years from now. I also recommend that the IOUs update the fuel substitution and fuel switching budgets and goals for the remaining plan years to reflect the updated potential.

Pilots

Q. Which utilities propose pilots in their 2028-2033 ESA Plans?

A. SDG&E is the only IOU that proposes a pilot.

Q. What pilot does SDG&E propose?

A. SDG&E proposes to pilot fuel substitution and fuel switching for single-family homes.

Q. Why did SDG&E propose to pilot electrification?

A. SDG&E's 2028-2033 ESA Plan states, "SDG&E aims to ensure fuel substitution and electrification measures do not inadvertently increase energy burden for vulnerable customers. As such, SDG&E is proposing the Pilot to test and learn how these measures can be implemented purposefully without having negative impacts."[82]

[82] SDG&E-03. Prepared Direct Testimony of Roland Mollen, Horace (TY) Tantum, and Mia Graff. Page ESA-50.

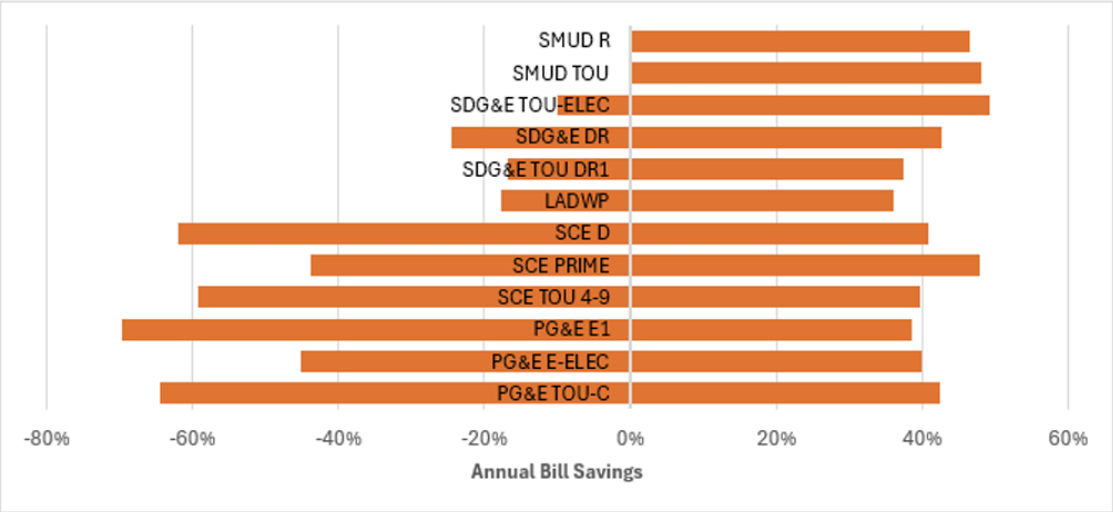
Q. Is there sufficient evidence to support the need for SDG&E to pilot electrification?

A. No. SDG&E does not make the case for differential treatment in its filing. SDG&E's filing states, "Given SDG&E's mild climate, diverse housing stock, and limited data on electrification impacts for income-qualified customers in its service territory, SDG&E will implement the Pilot at a small scale to identify the most effective approach before including measures into ESA Main. This strategy will help prevent unintended cost increases or hardships for low-income customers and provide critical insights into program design and implementation."[83]

The California Energy Commission investigated the potential for reduced energy costs by utility and summarized its findings in a report released in June 2026. Figure 9 below shows ESA customer electric and gas annual bill savings for heat pumps by utility rate from this study. The figure shows the range of annual bill savings, with potential bill increases to the left and potential bill savings to the right. The figure indicates that some low-income gas customers in SDG&E's service territory can reduce their energy bills by adopting heat pumps.

[83] Id., Page ESA-88.

Figure 9. Annual bill savings of heat pump retrofit prototypes by utility rate (*with low-income rate discounts applied)*[84]



Also, PG&E and SCE have been offering electrification for some time and have documented their learnings and challenges. SDG&E should leverage the experiences from the other utilities to roll out electrification.

Q. What do you find?

A. I do not see sufficient evidence to support SDG&E's proposal to pilot electrification.

Q. What do you recommend?

A. I recommend that SDG&E implement electrification in ESA now, instead of conducting a pilot.

Reporting

Q. What findings on reporting did you provide in the 2027 Bridge Year proceeding?

A. I found that:

[84] California Energy Commission. Staff Report. CEC-300-2026-003. *Low-Income Residential Energy Bill Impact Analysis: Modeling the Impact of Decarbonization Activities on Energy Bills in California.* June 2026. Figure 3, Page 27. Available at: https://www.energy.ca.gov/sites/default/files/2026-06/CEC-300-2026-003.pdf (accessed 8/31/26).

- The utilities do not report investments, savings, and benefits for HCS measures;
- PG&E's and SDG&E's reporting does not break out electric and gas costs and benefits; and
- The reporting of energy savings in annual kWh for electric investments and annual therms for gas investments does not allow for direct comparisons of the annual and lifetime cost of saved energy of electric and gas investments.[85]

Q. What proposed changes related to reporting did you recommend in the 2027 Bridge Year proceeding?

A. I recommended that the IOUs:

- Identify measures in monthly and annual reporting and provide the costs, savings, and benefits that are associated with health, comfort and safety measures starting in Program Year 2027;
- Separately account for gas and electric costs across the entire ESA budget starting with Program Year 2027 to permit a direct examination of the costs, savings, and benefits associated with gas ESA investments by dual fuel utilities; and
- Provide energy savings in annual and lifetime MMBtus to facilitate direct comparisons.[86]

Q. Are you able to identify the HCS measures proposed by each utility in the 2028-2033 cycle applications?

A. No. I asked each utility for this data in discovery as the tables included in the 2028-2033 ESA Plan do not identify which measures are HCS.[87]

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[85] Prepared Testimony of Jennifer Kallay. *Addressing Proposals of Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and Southern California Gas Company Related to the Energy Savings Assistance (ESA) Bridge Program and Budgets for Program Year 2027. In Applications 25-06-022, 25-06-023, 25-06-024 AND 25-06-025.* Submitted on behalf of The Utility Reform Network. November 21, 2025. Pages 23-26.

[86] CPUC Decision 26-07-007. *Decision Authorizing 2027 Bridge Funding for Investor-Owned Utilities' Income-Qualified Assistance Programs.* Issued July 8, 2026. Page 52.

[87] PY 2028 - 2033 ESA Table A-1, Planning Assumptions for the ESA Main and PY 2028 - 2033 ESA Table A-1A, Planning Assumptions for the ESA MFWB Program.

Q. Are you able to assess the costs, savings, benefits, and cost-effectiveness of HCS measures?

A. No. I asked each utility for this data in discovery as I cannot calculate the costs and savings associated with these measures since I cannot identify which measures are HCS measures. Benefits and cost-effectiveness are not provided by measure in the 2028-2033 ESA Plan tables.[88]

Q. Are you able to examine the costs, savings, benefits, and cost-effectiveness of electric and gas portfolio investments?

A. No. I asked each utility for this data in discovery as the tables included in the 2028-2033 ESA Plan do not provide a separate accounting of the costs, savings, benefits, and cost-effectiveness for electric and gas portfolios. Cost, savings, and cost-effectiveness data is typically provided by program and includes both fuels. Benefits are not provided by program in the 2028-2033 ESA Plan tables.[89]

Q. Are you able to directly compare the cost-effectiveness of the electric and gas portfolios?

A. No. The ESACET BCA is not provided for the electric and gas portfolios of each utility. This makes direct comparisons of the utilities challenging as some utilities are electric only, some are gas only, and some have both fuels.

Q. Do you make the same recommendations in this proceeding?

A. Yes. Since the issues that I identified in the 2027 Bridge Year proceeding persist in the 2028-2033 proceeding, I make the same recommendations in this proceeding. I recommend:

- The Commission require the IOUs to identify HCS measures in plans and reports and provide the costs, savings, benefits, and cost-effectiveness associated with these measures.

[88] *Id.*

[89] PY 2028 - 2033 ESA Program Tables 5a, 5b, 5c, and 5d: Total Cycle Energy Savings Goals (kWh, kW, Therms) Budget, Cost Effectiveness Tests for ESA Portfolio, ESA Main, and ESA MFWB, and Pilots.

- The Commission require the IOUs to plan and report electric and gas portfolio costs, savings, benefits, and cost-effectiveness.
- The Commission require the IOUs to provide aggregate energy savings across fuels in MMBtus.

Q. Do you want to clarify your findings and recommendations regarding reporting in this proceeding?

A. Yes. As I mentioned previously, SCE is converting gas and propane therm savings from electrification to kWhs and combining these savings with their kWh savings from other energy savings measures. This practice is not transparent, it diverges from the way other utilities are reporting their goals, and it makes it difficult to compare the goals and cost of attaining those goals across the IOUs. The introduction of fuel substitution and fuel switching in this planning cycle is exacerbating this issue as there are more fuel types with different units of reporting.

Q. What do you recommend?

A. I propose that the Commission require the IOUs to plan and report savings separately for each fuel, in native units for that fuel type. The Commission should also require the IOUs to provide energy savings aggregated across all fuel types in MMBtus.

Q. Is it important to include greenhouse gas emissions reductions in reporting?

A. Yes. Greenhouse gas emissions reductions are a priority for the state as evidenced by the proposed inclusion of electrification measures in this planning cycle. If greenhouse gas emissions reductions are not documented in the 2028-2033 ESA Plans, the planning and reporting of state greenhouse gas emissions reductions from electrification as well as energy efficiency is incomplete.

Q. What do you recommend?

A. I recommend that the Commission require that all utilities add greenhouse gas emissions reductions to their plans and reports.

Q. Does this conclude your testimony?

A. Yes, it does.

CPUC Docket: A.26-01-003 et al
Exhibit Number: TURN-01-Appendix A
Witness: Jennifer Kallay

PREPARED TESTIMONY OF JENNIFER KALLAY ON THE ENERGY SAVINGS ASSISTANCE (ESA) PROGRAMS

ADDRESSING PACIFIC GAS AND ELECTRIC COMPANY, SAN DIEGO GAS & ELECTRIC COMPANY, SOUTHERN CALIFORNIA EDISON COMPANY, AND SOUTHERN CALIFORNIA GAS COMPANY'S 2028-2033 INCOME-QUALIFIED PROGRAM APPLICATIONS AND RELATED MATTERS

APPENDIX A: RESUME OF JENNIFER KALLAY

Submitted on Behalf of

THE UTILITY REFORM NETWORK

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September 14, 2026

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PROFESSIONAL EXPERIENCE

Synapse Energy Economics, Inc., Cambridge, MA. *Principal Associate*, April 2023 – Present; *Senior Associate*, June 2013 – April 2023; *Associate,* July 2008 – June 2013; *Research Associate*, January 2007 – July 2008.

More than 19 years of experience researching and analyzing distributed energy resource plans, program design and performance; funding and incentive mechanisms; and cost-effectiveness screening to achieve policy goals in jurisdictions in the United States and Canada.

- Improves grid resilience planning and practices through work on goal setting, scoping, evaluation and prioritization criteria, performance monitoring and incentives, regulatory approaches, and cost recovery mechanisms.
- Assesses the disparate impacts of electric and natural gas infrastructure on economic, social, and health outcomes and identifies and evaluates solutions for improving energy equity.
- Leads stakeholder workshops to provide context on regulatory practices and opportunities for public engagement, collect public input, and integrate public input into electric and gas system regulation and planning.

Boston University's Center for Energy and Environmental Studies, Boston, MA. *Research Assistant for Professor Robert Kaufmann*, January 2006 – January 2007.

Modeled land-use change in the Amazon using spatial, economic, climatic, and physical variables, and GIS and regression techniques.

Digitas, Inc, Boston, MA. *Manager*, November 1999 – August 2005.

Researched, designed, and executed reporting solutions to assess the effectiveness of marketing strategies based on consumer behavior. Customized analyses to gain insight into environmental influences on marketing performance and designed and built models to predict sales/revenue and inform business economics using relational databases.

PROFESSIONAL ACTIVITIES

Gas and Light Commissioner. *Elected Public Official*. 2018-present. Serves on Wakefield Massachusetts' Municipal Gas and Light Department Board of Commissioners.

EDUCATION

Boston University, Boston, MA
Master of Arts in Energy and Environmental Analysis, Spring 2007. Graduate course work in multivariate statistical analysis, environmental economics, risk assessment, energy, GIS, climate change, and environmental policy.

University of Maryland, College Park, MD
Bachelor of Arts in Journalism, Spring 1999. Presidential Scholarship and Honors Program.

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TESTIMONY

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Rhode Island Public Utilities Commission (Docket 25-37-EE): Direct Testimony regarding the Narragansett Electric Co. d/b/a Rhode Island Energy's Annual Energy Efficiency Plan for 2026. On behalf of the Division of Public Utilities and Carriers, November 7, 2025.

Nova Scotia Energy Board (M12178): Direct Testimony of Jennifer Kallay and Melissa Whited regarding Smart Grid Asset Disposition and Updates to Solar Garden Program. On behalf of Counsel to Nova Scotia Energy Board, July 3, 2025.

Rhode Island Public Utilities Commission (Docket 24-39-EE): Direct Testimony regarding the Narragansett Electric Co. d/b/a Rhode Island Energy's Annual Energy Efficiency Plan for 2025. On behalf of the Division of Public Utilities and Carriers, November 15, 2024.

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Rhode Island Public Utilities Commission (Docket 23-35-EE): Direct Testimony regarding the Narragansett Electric Co. d/b/a Rhode Island Energy's 2024-2026 Energy Efficiency Three-Year Plan and Annual Energy Efficiency Plan for 2024. On behalf of the Division of Public Utilities and Carriers, November 10, 2023.

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CPUC Docket: A.26-01-003 et al
Exhibit Number: TURN-01-Appendix B
Witness: Jennifer Kallay

PREPARED TESTIMONY OF JENNIFER KALLAY ON THE ENERGY SAVINGS ASSISTANCE (ESA) PROGRAMS

ADDRESSING PACIFIC GAS AND ELECTRIC COMPANY, SAN DIEGO GAS & ELECTRIC COMPANY, SOUTHERN CALIFORNIA EDISON COMPANY, AND SOUTHERN CALIFORNIA GAS COMPANY'S 2028-2033 INCOME-QUALIFIED PROGRAM APPLICATIONS AND RELATED MATTERS

APPENDIX B: DISCOVERY RESPONSES REFERENCED IN TESTIMONY

Submitted on Behalf of

THE UTILITY REFORM NETWORK

Jennifer Kallay, Principal Associate
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September 14, 2026

PACIFIC GAS AND ELECTRIC COMPANY
Income Qualified Programs Bridge Funding
Application 25-06-024
Data Response

PG&E Data Request No.:	TURN_002-Q001
PG&E File Name:	IQPBridgeFundingPY27_DR_TURN_002-Q001
Request Date:	October 28, 2025
Requester DR No.:	002
Requesting Party:	The Utility Reform Network
Requester:	Hayley Goodson
Date Sent:	November 10, 2025
PG&E Witness(es):	Jack Pilutti – Customer and Enterprise Solutions

SUBJECT: ENERGY SAVINGS ASSISTANCE PROGRAM

QUESTION 001

Footnotes 3 and 5 of PG&E's attachment IQPBridgeFundingPY27_DR_TURN_001-Q019Atch01.xlsx states, "The spending reported here includes ESA Main direct implementation spending (measures, implementer fees, bulk purchasing)."

a. Please explain why PG&E only included data for ESA Main in this response.

b. Please provide data for the entire portfolio.

ANSWER 001

a. PG&E included data for its ESA Main Program in *"IQPBridgeFundingPY27_DR_TURN_001-Q019Atch01.xlsx"* because PG&E had interpreted Question 19 of TURN's Data Request, TURN-PG&E-01, to apply to its ESA Main Program.

b. PG&E provides data for its entire ESA portfolio, which includes the ESA Main, the Northern Multifamily Whole Building (N. MFWB) Program, ESA Multifamily Common Area Measures (MF CAM), and Pilot Plus/Pilot Deep in *"IQPBridgeFundingPY27_DR_TURN_002-Q001Atch01.xlsx".*

IQPBridgeFundingPY27_DR_TURN_001-Q019Atch01, as provided 10/17/2025

Please provide authorized and achieved values (as available) for each year of the 2021-2026 plan period for the following:

ESA Main Authorized and Achieved Values 2021-2026

METRIC		2021 [1]		2022 [1]		2023 [1]		2024 [2]		2025 [2]		2026 [2]
		Authorized	Achieved [5]	Authorized [10]	Achieved [5]	Authorized	Achieved [5]	Authorized [9]	Achieved [5] [9]	Authorized	Achieved (YTD August) [5] [8]	Authorized
a.	Electric budget/spending [3]	$ 80,608,925	$ 72,943,337	$ 55,281,202	$ 36,566,278	$ 58,945,006	$ 48,455,665	$ 54,440,210	$ 52,996,542	$ 53,105,356	$ 35,805,954	*$ 52,041,047*
b.	Gas budget/spending [3]	$ 69,585,887	$ 68,089,483	$ 48,451,221	$ 73,223,264	$ 53,624,282	$ 61,555,345	$ 49,891,068	$ 50,458,026	$ 48,956,432	$ 32,863,156	*$ 48,264,666*
c.	Energy savings in kWh [4]	N/A	60,224,095	15,093,167	24,601,916	35,773,079	28,694,608	34,253,799	29,359,542	33,818,185	19,454,791	*33,214,979.00*
d.	Demand savings in kW [4]	N/A	7,784	2,859	5,516	3,238	6,738	2,941	11,292	2,854	7,711	*2,737.00*
e.	Energy savings in therms [4]	N/A	54,036	629,105	1,165,638	1,458,655	1,276,687	1,393,298	1,353,831	1,370,794	837,537	*1,348,961.00*
f.	Participating households [6]	50,000 (July 1-Dec 31)	103,169	59,340	67,567	60,437	65,518	54,876	50,768	52,954	32,984	51,099
g.	Spending per participating household [7]	N/A	$ 1,367	$ 1,748	$ 1,625	$ 1,863	$ 1,679	$ 1,901	$ 2,038	$ 1,927	$ 2,082	$ 1,963
h.	kWh saved per participating household [7]	N/A	583.74	254.35	364.11	591.91	437.97	624.20	578.31	638.63	589.83	*650.01*
i.	therms saved per participating household [7]	N/A	0.52	10.60	17.25	24.14	19.49	25.39	26.67	25.89	25.39	*26.40*
j.	Electric ratepayer cost per kWh saved [7]	N/A	$ 1.21	$ 3.66	$ 1.49	$ 1.65	$ 1.69	$ 1.59	$ 1.81	$ 1.57	$ 1.84	*$ 1.57*
k.	Gas ratepayer cost per therm saved [7]	N/A	$ 1,260.08	$ 77.02	$ 62.82	$ 36.76	$ 48.21	$ 35.81	$ 37.27	$ 35.71	$ 39.24	*$ 35.78*
l.	Electric benefits	$ 14,271,425	$ 71,914,983	$ 15,917,429	$ 23,221,744	$ 16,329,390	$ 28,934,375	$ 13,893,061	$ 33,816,839	$ 19,847,594	N/A	$ 19,354,493
m.	Gas benefits	$ 6,125,070	$ (5,525,131)	$ 6,291,280	$ 17,502,815	$ 6,972,410	$ 21,130,183	$ 6,119,009	$ 27,721,053	$ 12,597,751	N/A	$ 12,759,933
n.	Non-energy benefits	$ 55,995,585	$ 57,123,504	$ 53,594,727	$ 41,407,828	$ 57,614,346	$ 43,277,589	$ 53,579,553	$ 54,671,764	$ 26,774,631	N/A	$ 26,419,191
o.	Total benefits	$ 76,392,079	$ 123,513,355	$ 75,803,436	$ 82,132,387	$ 80,916,147	$ 93,342,147	$ 73,591,623	$ 116,209,656	$ 59,219,976	N/A	$ 58,533,617
p.	Energy benefits associated with electric budget/spending	$ 13,685,405	$ 54,067,093	$ 15,917,429	$ 12,075,501	$ 16,321,338	$ 29,388,936	$ 13,950,278	$ 43,905,563	$ 20,870,398	N/A	$ 20,547,741
q.	Non-energy benefits associated with electric budget/spending	$ 32,550,051	$ 21,024,222	$ 31,623,903	$ 11,072,331	$ 33,161,410	$ 17,319,614	$ 30,759,674	$ 27,704,339	$ 11,268,912	N/A	$ 11,129,873
r.	Total benefits associated with electric budget/spending	$ 46,235,456	$ 75,091,315	$ 47,541,332	$ 23,147,832	$ 49,482,748	$ 46,708,549	$ 44,709,952	$ 71,609,902	$ 32,139,310	N/A	$ 31,677,613
s.	Energy benefits associated with gas budget/spending	$ 6,711,090	$ 12,322,758	$ 6,291,280	$ 28,649,058	$ 6,980,462	$ 20,675,622	$ 6,061,792	$ 17,632,329	$ 11,574,948	N/A	$ 11,566,685
t.	Non-energy benefits associated with gas budget/spending	$ 23,445,537	$ 36,099,282	$ 21,970,824	$ 30,335,497	$ 24,452,936	$ 25,957,975	$ 22,819,878	$ 26,967,425	$ 15,505,717	N/A	$ 15,289,317
u.	Total benefits associated with gas budget/spending.	$ 30,156,627	$ 48,422,040	$ 28,262,104	$ 58,984,555	$ 31,433,398	$ 46,633,598	$ 28,881,671	$ 44,599,754	$ 27,080,665	N/A	$ 26,856,003

[1] The 2021-2023 forecasts and 2021-2022 achieved results reported for questions Q019l-o utilize previous vintages of the CET Version (as a part of the CEDARS tool) and a previous version of Non-Energy Benefits (NEBS). The 2023 achieved results reported for questions Q019l-o utilize an updated NEBs 3.0 tool.
[2] Forecasted and achieved results for PY 2024, as well as forecast data for PY 2025 and PY 2026, reported in response to questions Q019l–o, were developed using upgraded tools: CET Version 25.1 (as part of the CEDARS platform) and Non-Energy Benefits (NEBs) Version 4.0.
[3] The spending reported here includes ESA Main direct implementation spending (measures, implementer fees, bulk purchasing)
[4] D.21-06-015 authorized portfolio-level (ESA Main and MFWB only, not including PP/PD) energy savings goals along with 2023-26 cycle-length MFWB energy goals. Source for Authorized: D.21-06-015, Attachment 1, Table 5
[5] The achieved results reported here include only ESA Main goal/target attainment and direct implementation spending (measures, implementer fees, bulk purchasing). Source for Achieved: 2021-2024 ESA/CARE/FERA Annual Report, Summary Table, ESA Table 1; August 2025 CARE/FERA/ESA Monthly Report, ESA Table 1 and ESA Table 2
[6] Home Treated authorized and achieved targets here include ESA Main. Source for Authorized: D.21-06-015, Attachment 1, Table 6
[7] D.21-06-015 does not authorize these specific metrics as requested. However, interested parties may review an estimate of these metrics from calculations based on the authorized goals listed above in Q019 a-f.
[8] PG&E does not calculate cost-effectiveness results in its monthly reporting. Cost-effectiveness results, including electric, gas, and non-energy, will be calculated in the production of PG&E's 2025 annual report.
[9] PY 2024 Authorized and Achieved values were initially sourced from bridge funding and aligned with the 2026 Avoided Cost Calculator (ACC). Rows L–O were updated to match the 2024 Annual Report benefit and prior authorized data using a prior vintage of the ACC, ensuring consistency across all sources provided in this data request.
[10] A minor correction was made to the PY 2022 Authorized Benefit in columns L–O due to a clerical error in the origiN/Al submission. The error resulted from referencing an older file during the update.

IQPBridgeFundingPY27_DR_TURN_002-Q001bAtch01

Please provide authorized and achieved values (as available) for each year of the 2021-2026 plan period for the following:

ESA MF CAM Authorized and Achieved Values 2021-2026

METRIC		2021		2022		2023 [1]		2024 [1]		2025 [1]		2026 [1]
		Authorized	Achieved [5]	Authorized	Achieved [5]	Authorized	Achieved [5]	Authorized	Achieved	Authorized	Achieved	Authorized
a.	Electric budget/spending [3]	$ 6,866,408	$ 8,332,343	$ 13,721,921	$ 3,887,115	N/A	$ 247,654	N/A	N/A	N/A	N/A	N/A
b.	Gas budget/spending [3]	$ 6,089,079	$ 7,307,681	$ 12,168,496	$ 5,272,511	N/A	$ 247,205	N/A	N/A	N/A	N/A	N/A
c.	Energy savings in kWh [4]	N/A	6,954,599	N/A	1,755,800	N/A	N/A	N/A	N/A	N/A	N/A	N/A
d.	Demand savings in kW [4]	N/A	112	N/A	39	N/A	N/A	N/A	N/A	N/A	N/A	N/A
e.	Energy savings in therms [4]	N/A	50,523	N/A	115,338	N/A	N/A	N/A	N/A	N/A	N/A	N/A
f.	Participating households [6]	N/A	144	N/A	45	N/A	N/A	N/A	N/A	N/A	N/A	N/A
g.	Spending per participating household [7]	N/A	$ 108,611	N/A	$ 203,547	N/A	N/A	N/A	N/A	N/A	N/A	N/A
h.	kWh saved per participating household [7]	N/A	48,296	N/A	39,018	N/A	N/A	N/A	N/A	N/A	N/A	N/A
i.	therms saved per participating household [7]	N/A	351	N/A	2,563	N/A	N/A	N/A	N/A	N/A	N/A	N/A
j.	Electric ratepayer cost per kWh saved [7]	N/A	$ 1	N/A	$ 2	N/A	N/A	N/A	N/A	N/A	N/A	N/A
k.	Gas ratepayer cost per therm saved [7]	N/A	$ 145	N/A	$ 46	N/A	N/A	N/A	N/A	N/A	N/A	N/A
l.	Electric benefits	N/A	4,624,668	N/A	1,019,767	N/A	N/A	N/A	N/A	N/A	N/A	N/A
m.	Gas benefits	N/A	1,255,412	N/A	2,140,671	N/A	N/A	N/A	N/A	N/A	N/A	N/A
n.	Non-energy benefits [8]	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
o.	Total benefits	N/A	$ 5,880,080	N/A	$ 3,160,438	N/A	N/A	N/A	N/A	N/A	N/A	N/A
p.	Energy benefits associated with electric budget/spending	N/A	$ 3,116,442	N/A	$ 1,675,032	N/A	N/A	N/A	N/A	N/A	N/A	N/A
q.	Non-energy benefits associated with electric budget/spending [8]	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
r.	Total benefits associated with electric budget/spending	N/A	$ 3,116,442	N/A	$ 1,675,032	N/A	N/A	N/A	N/A	N/A	N/A	N/A
s.	Energy benefits associated with gas budget/spending	N/A	$ 2,763,638	N/A	$ 1,485,406	N/A	N/A	N/A	N/A	N/A	N/A	N/A
t.	Non-energy benefits associated with gas budget/spending [8]	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
u.	Total benefits associated with gas budget/spending.	N/A	$ 2,763,638	N/A	$ 1,485,406	N/A	N/A	N/A	N/A	N/A	N/A	N/A

[1] MF CAM sunset in 2022 with closing expenses recorded in the first half of 2023 and transitioned to the MFWB program, which launched in mid-2023.
[2] Achieved results for PYs 2021-2022, reported in response to questions Q019l–o, were developed using utilize previous vintages of the CET Version (as a part of the CEDARS tool) and a previous version of Non-Energy Benefits.
[3] The authorized budget reported here includes MF CAM and SPOC.
[4] D.21-06-015 authorized portfolio-level (ESA Main and MF CAM) energy savings goals for 2021-2022, and did not authorize specific MF CAM energy savings goals. Source for Authorized: D.21-06-015, Attachment 1, Table 5
[5] Source for Achieved: 2021-2022 ESA/CARE/FERA Annual Report, Summary Table, ESA Table 1
[6] For MF-CAM, PG&E reports several metrics including: Multifamily Properties Treated, Master-metered Multifamily Properties Treated, and Multifamily TeN/Ant Units w/in Properties Treated. MF Properties Treated was used here. The other metrics referenced here may be found in the 2021 and 2022 ESA/CARE/FERA Annual Repor
[7] D.21-06-015 does not authorize these specific metrics as requested.
[8] PG&E did not include NEBs in the benefits calculations for ESA MF CAM.

IQPBridgeFundingPY27_DR_TURN_002-Q001bAtch01

Please provide authorized and achieved values (as available) for each year of the 2021-2026 plan period for the following:

ESA MFWB Authorized and Achieved Values 2021-2026

METRIC		2021 [1]		2022 [1]		2023 [1] [2]		2024 [2]		2025 [2]		2026 [2]
		Authorized	Achieved	Authorized [9]	Achieved	Authorized	Achieved [5]	Authorized	Achieved [5]	Authorized	Achieved (YTD August) [5] [8]	Authorized
a.	Electric budget/spending [3]	N/A	N/A	N/A	N/A	$ 19,341,749	$ 3,795,712	$ 23,591,404	$ 12,032,687	$ 24,299,146	$ 9,284,088	$ 25,028,121
b.	Gas budget/spending [3]	N/A	N/A	N/A	N/A	$ 17,152,117	$ 4,211,303	$ 20,920,679	$ 10,584,879	$ 21,548,299	$ 8,199,440	$ 22,194,749
c.	Energy savings in kWh [4]	N/A	N/A	N/A	N/A	N/A	499,590	N/A	4,591,624	N/A	3,451,160	N/A
d.	Demand savings in kW [4]	N/A	N/A	N/A	N/A	N/A	60	N/A	1,107	N/A	821	N/A
e.	Energy savings in therms [4]	N/A	N/A	N/A	N/A	N/A	36,319	N/A	200,719	N/A	144,163	N/A
f.	Participating households [6]	N/A	N/A	N/A	N/A	N/A	3,468	N/A	17,771	N/A	10,393	N/A
g.	Spending per participating household [7]	N/A	N/A	N/A	N/A	N/A	$ 2,309	N/A	$ 1,273	N/A	$ 1,682	N/A
h.	kWh saved per participating household [7]	N/A	N/A	N/A	N/A	N/A	144	N/A	258	N/A	332	N/A
i.	therms saved per participating household [7]	N/A	N/A	N/A	N/A	N/A	10	N/A	11	N/A	14	N/A
j.	Electric ratepayer cost per kWh saved [7]	N/A	N/A	N/A	N/A	N/A	$ 8	N/A	$ 3	N/A	$ 3	N/A
k.	Gas ratepayer cost per therm saved [7]	N/A	N/A	N/A	N/A	N/A	$ 116	N/A	$ 53	N/A	$ 57	N/A
l.	Electric benefits [9]	N/A	N/A	N/A	N/A	$ 2,182,098	$ 458,261	$ 10,047,695	$ 4,073,829	$ 10,536,284	N/A	$ 11,103,607
m.	Gas benefits [9]	N/A	N/A	N/A	N/A	$ 2,011,335	$ 498,146	$ 9,565,164	$ 2,683,590	$ 9,988,373	N/A	$ 10,605,106
n.	Non-energy benefits [9]	N/A	N/A	N/A	N/A	$ 3,223,650	$ 893,602	$ 5,145,232	$ 5,203,706	$ 5,307,499	N/A	$ 5,549,864
o.	Total benefits [9]	N/A	N/A	N/A	N/A	$ 7,417,083	$ 1,850,009	$ 24,758,091	$ 11,961,125	$ 25,832,157	N/A	$ 27,258,576
p.	Energy benefits associated with electric budget/spending [9]	N/A	N/A	N/A	N/A	$ 2,222,520	$ 506,896	$ 10,394,815	$ 3,581,432	$ 10,878,069	N/A	$ 11,505,618
q.	Non-energy benefits associated with electric budget/spending [9]	N/A	N/A	N/A	N/A	$ 1,708,534	$ 473,609	$ 2,726,973	$ 2,757,964	$ 2,812,975	N/A	$ 2,941,428
r.	Total benefits associated with electric budget/spending [9]	N/A	N/A	N/A	N/A	$ 3,931,054	$ 980,505	$ 13,121,788	$ 6,339,396	$ 13,691,043	N/A	$ 14,447,045
s.	Energy benefits associated with gas budget/spending [9]	N/A	N/A	N/A	N/A	$ 1,970,914	$ 449,511	$ 9,218,044	$ 3,175,987	$ 9,646,589	N/A	$ 10,203,095
t.	Non-energy benefits associated with gas budget/spending [9]	N/A	N/A	N/A	N/A	$ 1,515,115	$ 419,993	$ 2,418,259	$ 2,445,742	$ 2,494,525	N/A	$ 2,608,436
u.	Total benefits associated with gas budget/spending. [9]	N/A	N/A	N/A	N/A	$ 3,486,029	$ 869,504	$ 11,636,303	$ 5,621,729	$ 12,141,114	N/A	$ 12,811,531

[1] D.21-06-015 authorized the launch of ESA MFWB in 2023. PG&E recorded the first MFWB in-unit treatments in 2023.
[2] Forecasted and achieved results for PYs 2023, 2024, 2025 and 2026, reported in response to questions Q019I–o, were developed using utilize previous vintages of the CET Version (as a part of the CEDARS tool) and a previous version of Non-Energy Benefits.
[3] The authorized and achieved budget/spending reported here includes ESA MFWB direct implementation spending (measures, implementer fees, bulk purchasing), including SPOC.
[4] The approved MFWB portfolio savings goals for program years 2023-2026 are 76,960,131 kWh and 2,992,244 therms (D.21-06-015, OP 142). D.21-06-015 authorized portfolio-level (ESA Main and MFWB only, not including PP/PD) energy savings goals for each year along with 2023-26 cycle-length MFWB energy goals and did not provide annual MFWB energy savings goals. Source for Authorized: D.21-06-015, Attachment 1, Table 5
[5] Sources for Achieved: 2021-2024 ESA/CARE/FERA Annual Report, Summary Table, ESA Table 1; August 2025 CARE/FERA/ESA Monthly Report, ESA Table 1 and ESA Table 2a
[6] D.21-06-015 authorized a 2023-2026 cycle MFWB in-unit household treatment target of 71,400 and does not authorize annual targets. Source: D.21-06-016, OP 141
[7] D.21-06-015 does not authorize these specific metrics as requested.
[8] PG&E does not calculate cost-effectiveness results in its monthly reporting. Cost-effectiveness results, including electric, gas, and non-energy benefits, will be calculated in the production of PG&E's 2025 annual report.
[9] D.21-06-015 does not authorize these specific metrics as requested. However, PG&E provides the benefits as forecasted to support PGE AL 4707-G_6842-E that interested parties may review.

IQPBridgeFundingPY27_DR_TURN_002-Q001bAtch01

Please provide authorized and achieved values (as available) for each year of the 2021-2026 plan period for the following:

ESA Pilot Plus/Pilot Deep Authorized and Achieved Values 2021-2026

METRIC		2021 [1]		2022 [1]		2023 [1]		2024 [2]		2025 [2]		2026 [2]
		Authorized	Achieved [5]	Authorized	Achieved [5]	Authorized	Achieved [5]	Authorized	Achieved [5]	Authorized	Achieved (YTD August) [5] [6]	Authorized
a.	Electric budget/spending [3]	N/A	$ 17,653	$ 4,654,782	$ 481,113	$ 4,654,782	$ 2,186,725	$ 4,654,782	$ 5,205,389	$ 4,654,782	$ 2,908,060	$ 4,654,782
b.	Gas budget/spending [3]	N/A	$ 15,655	$ 4,127,825	$ 426,647	$ 4,127,825	$ 1,939,171	$ 4,127,825	$ 4,616,100	$ 4,127,825	$ 2,578,846	$ 4,127,825
c.	Energy savings in kWh [4]	N/A	N/A	N/A	N/A	N/A	49,592	N/A	216,907	N/A	165,789	N/A
d.	Demand savings in kW [4]	N/A	N/A	N/A	N/A	N/A	48	N/A	279	N/A	206	N/A
e.	Energy savings in therms [4]	N/A	N/A	N/A	N/A	N/A	4,796	N/A	26,843	N/A	24,267	N/A
f.	Participating households [4]	N/A	N/A	N/A	N/A	N/A	56	N/A	295	N/A	264	N/A
g.	Spending per participating household [4]	N/A	N/A	N/A	N/A	N/A	$ 73,677	N/A	$ 33,293	N/A	$ 20,784	N/A
h.	kWh saved per participating household [4]	N/A	N/A	N/A	N/A	N/A	886	N/A	735	N/A	628	N/A
i.	therms saved per participating household [4]	N/A	N/A	N/A	N/A	N/A	86	N/A	91	N/A	92	N/A
j.	Electric ratepayer cost per kWh saved [4]	N/A	N/A	N/A	N/A	N/A	$ 44	N/A	$ 24	N/A	$ 18	N/A
k.	Gas ratepayer cost per therm saved [4]	N/A	N/A	N/A	N/A	N/A	$ 404	N/A	$ 172	N/A	$ 106	N/A
l.	Electric benefits [4]	N/A	N/A	N/A	N/A	N/A	80,010	N/A	350,876	N/A	N/A	N/A
m.	Gas benefits [4]	N/A	N/A	N/A	N/A	N/A	107,032	N/A	739,222	N/A	N/A	N/A
n.	Non-energy benefits [4]	N/A	N/A	N/A	N/A	N/A	79,558	N/A	468,178	N/A	N/A	N/A
o.	Total benefits [4]	N/A	N/A	N/A	N/A	N/A	266,600	N/A	1,558,275	N/A	N/A	N/A
p.	Energy benefits associated with electric budget/spending [4]	N/A	N/A	N/A	N/A	N/A	99,132	N/A	577,752	N/A	N/A	N/A
q.	Non-energy benefits associated with electric budget/spending [4]	N/A	N/A	N/A	N/A	N/A	42,166	N/A	248,134	N/A	N/A	N/A
r.	Total benefits associated with electric budget/spending [4]	N/A	N/A	N/A	N/A	N/A	141,298	N/A	825,886	N/A	N/A	N/A
s.	Energy benefits associated with gas budget/spending [4]	N/A	N/A	N/A	N/A	N/A	87,910	N/A	512,346	N/A	N/A	N/A
t.	Non-energy benefits associated with gas budget/spending [4]	N/A	N/A	N/A	N/A	N/A	37,392	N/A	220,044	N/A	N/A	N/A
u.	Total benefits associated with gas budget/spending. [4]	N/A	N/A	N/A	N/A	N/A	125,302	N/A	732,389	N/A	N/A	N/A

[1] D.21-06-015 authorized the launch of the PP/PD program in 2022. PP/PD recorded the first expenses in 2021 and recorded its first completed projects in 2023.
[2] Achieved results for PY 2023 and 2024, reported in response to questions Q019l–o, were developed using were developed using utilize previous vintages of the CET Version (as a part of the CEDARS tool) and a previous version of Non-Energy Benefits.
[3] The spending reported here includes PP/PD direct implementation spending.
[4] D.21-06-015 does not authorize these goals or metrics for PP/PD.
[5] Source for Achieved: 2021-2024 ESA/CARE/FERA Annual Report, Summary Table, ESA Table 1; August 2025 CARE/FERA/ESA Monthly Report, ESA Table 1 and ESA Table 2B
[6] PG&E does not calculate cost-effectiveness results in its monthly reporting. Cost-effectiveness results, including electric, gas, and non-energy, will be calculated in the production of PG&E's 2025 annual report.

PACIFIC GAS AND ELECTRIC COMPANY
Income Qualified Programs PY28-33
Application 26-01-003
Data Response

PG&E Data Request No.:	TURN_001-Q004
PG&E File Name:	IQPPY28-33_DR_TURN_001-Q004
Request Date:	April 13, 2026
Requester DR No.:	001
Requesting Party:	The Utility Reform Network
Requester:	Reina Yanagiba
Date Sent:	May 11, 2026

SUBJECT: BUDGETS, SAVINGS AND BENEFITS

QUESTION 004

Please provide a breakout of the proposed budgets, savings, households treated, and benefits for each program (ESA Main, ESA MFWB, and ESA Pilots) in each program year (2028-2033) by electric and gas using the template provided in Discovery Tables.xlsx, tab 02. Please note that there are three tables for electric and three tables for gas. Please provide all data that is applicable and available. Please leave any cells blank that cannot be populated because they are not applicable (for example, electric table inputs for a gas utility). If some data is not available, please identify that data in the written response, explain why it is not available, and populate those cells with a "n/a".

ANSWER 004

PG&E provides the response to this question in Tab 02 (Q4) of "*IQPPY28-33_DR_TURN_001-Q001Atch001.xlsx*" The attachment also includes PG&E's table annotations and assumptions in the footnotes.

PACIFIC GAS AND ELECTRIC COMPANY
Income Qualified Programs PY28-33
Application 26-01-003
Data Response

PG&E Data Request No.:	TURN_001-Q008
PG&E File Name:	IQPPY28-33_DR_TURN_001-Q008
Request Date:	April 13, 2026
Requester DR No.:	001
Requesting Party:	The Utility Reform Network
Requester:	Reina Yanagiba
Date Sent:	April 27, 2026

SUBJECT: ELECTRIFICATION

QUESTION 008

Please define the term electrification as it was applied in the proposed plan. In particular, please respond to the following questions:

a. Does electrification include fuel switching? Why or why not?

b. Does electrification include fuel substitution? Why or why not?

c. Does the plan aim to electrify a minimum number and type(s) of end uses? If so, what is the minimum?

ANSWER 008

a. PG&E defines "electrification" as such in its Application:

*Electrification entails changing the fuel source of an end use, such as an appliance, to electricity. D.19-08-009, which established the Fuel Substitution Test, delineates two types of electrification. Fuel substitution refers to measures that result in fuel replacement (typically from gas to electric) where both fuels are provided by one or two CPUC-regulated utilities. Fuel switching, on the other hand, refers to measures the result in replacement of non-utility fuel commodities, such as wood or propane. PG&E does not limit its ESA Program design to one type or the other.**1***

Yes, electrification as applied in PG&E's proposed plan does allow for fuel switching. While PG&E ESA is currently authorized during the 2021-2026

1 PG&E 2028-2033 Opening Direct Testimony, Chapter 4, p. 4-37, FN 69.

program cycle to install both fuel switching and substitution measures,[2] PG&E did not forecast fuel switching measure installations in the development of its 2028-2033 Application. However, as stated in its application, this is subject to change and "PG&E expects to continue using the measure modification process to propose additional electrification technologies during 2028-2033 program cycle."[3]

b. Yes. Please see PG&E's response to Q008a, above, for the definition of "electrification." PG&E's 2028-2033 ESA proposals and planning assumptions forecast fuel substitution measure installations.

c. PG&E's ESA proposals do not propose a minimum number or type of end uses for electrification. The electrification proposals are detailed in Chapter 4, Sections G.1.b. and G.3.b, of the Application.

   PG&E does forecast the quantity and type of electrification installations by the ESA program during the 2028-2033 cycle as planning assumptions to develop goals and budgets, which are detailed in Table A-1 and A-1a of its Application, Appendix A, but we have not set any minimum thresholds.4

[2] While authorized, as of April, 2026, PG&E ESA programs have not installed fuel-switching measures. While not considered a part of the ESA portfolio, The San Joaquin Disadvantaged Communities Pilot (SJV DAC), which concluded in 2023, did prioritize fuel-switching measures.

[3] Opening Direct Testimony, p. 4-77 lines 18-20

[4] PG&E's 2028-2033 Opening Direct Testimony, Appendix A, Tables A-1 and A-1a.

PACIFIC GAS AND ELECTRIC COMPANY
Income Qualified Programs PY28-33
Application 26-01-003
Data Response

PG&E Data Request No.:	TURN_001-Q009
PG&E File Name:	IQPPY28-33_DR_TURN_001-Q009
Request Date:	April 13, 2026
Requester DR No.:	001
Requesting Party:	The Utility Reform Network
Requester:	Reina Yanagiba
Date Sent:	May 11, 2026

SUBJECT: ELECTRIFICATION

QUESTION 009

How will the plan target customers and conduct outreach for electrification, especially for customers who use multiple fuel sources to heat their home?

a. Which utilities are responsible for targeting? Please describe the roles and responsibilities of each utility and how they will coordinate with one another.

b. Which utilities are responsible for conducting the cost-effectiveness and rate and bill impacts assessment for each customer? Please describe the roles and responsibilities of each utility and how they will coordinate with one another.

c. Which utilities are responsible for outreach to customers? Please describe the roles and responsibilities of each utility and how they will coordinate with one another.

d. Is the responsibility for targeting, cost-effectiveness and rate and bill impact assessment, and outreach shared between electric and gas utilities? If so, how? What is each utility responsible for and how do they carry out these responsibilities in coordination with the other utilities?

e. How are electric and gas utilities coordinating to ensure that multiple utilities are not reaching out to the same customer with different and competing measure offerings?

ANSWER 009

PG&E objects to this question as (1) vague, ambiguous, and overbroad as to time and regarding the terms “utility” and “utilities”, and (2) calls for speculation to the extent that it seeks information that is not within PG&E’s knowledge and/or authority. PG&E reserves its right to object to the admissibility and use of such data in this proceeding.

Notwithstanding and subject to this objection, PG&E responds as follows:

PG&E interprets the terms “utility” and “utilities” to refer to California electric and/or gas utilities. As a preliminary matter, PG&E notes that as a dual-fuel energy utility, PG&E operates ESA as one program in its service territory and does not propose a different program design for its gas and electric utilities in its 2028-2033 application.

a. PG&E ESA expects to be the primary utility responsible for targeting customers for participation in ESA’s electrification services. PG&E proposes electrification-related activities in its 2028-2033 application where PG&E—in collaboration with its implementation partners—facilitates targeting. PG&E details its proposals regarding targeting in Chapter 4, Section J of its Opening Direct Testimony.[1] The 2028-2033 proposals, however, do not preclude additional coordination with other energy utilities should projects be identified in areas where PG&E does not provide both fuel types. In those instances, PG&E may coordinate with other energy utilities to facilitate targeting, or may undertake targeting alone, depending on the scenario encountered for that local community. Should PG&E coordinate targeting with another energy utility during the program cycle, it anticipates collaboration to clearly define roles and responsibilities.

b. PG&E—in coordination with its implementation partners—expects to be responsible for conducting the cost-effectiveness and rate and bill impacts assessment for ESA electrification customers. PG&E details its electrification proposals in Chapter 4, Sections G.1 and G.3.[2] PG&E also included cost-effectiveness analysis for its electrification proposals in Section F.4 of the same chapter.[3]

c. See PG&E’s response to subpart (a) above.

d. To the extent that this question is referring to collaboration with other non-PG&E utilities, see PG&E’s response to subparts (a) and (b) above.

e. As a preliminary matter, PG&E notes that it cannot ensure the actions of other utilities, as this is not within PG&E’s authority.

   For the purpose of this question, PG&E interprets this question as TURN requesting information on collaboration with other utilities. PG&E ESA and the other investor-owned utilities currently collaborate on an ongoing basis to consider aligning ESA offerings and program implementation strategies, which may include collaboration on measure offerings and outreach strategies. PG&E intends to continue during the 2028-2033 cycle. PG&E provides this proposal

[1] Opening Direct Testimony, Chapter 4, pp. 4-80 to 4-93

[2] Opening Direct Testimony, Chapter 4, pp. 4-32 to 4-54.

[3] Opening Direct Testimony, Chapter 4, pp. 4-26 to 4-29

and more information on its program coordination activities in Chapter 4, Section O of its 2028-2033 Opening Direct Testimony, titled [4].[5]

PG&E additionally states in its Testimony that the ESA program intends to "explore additional partnerships and opportunities to improve customer access to programs that may provide benefits."[6]

[5] Opening Direct Testimony, Chapter 4, pp. 4-112 to 4-117.

[6] Opening Direct Testimony, Chapter 4, p. 4-117, at lines 7-9.

PACIFIC GAS AND ELECTRIC COMPANY
Income Qualified Programs PY28-33
Application 26-01-003
Data Response

PG&E Data Request No.:	TURN_001-Q010
PG&E File Name:	IQPPY28-33_DR_TURN_001-Q010
Request Date:	April 13, 2026
Requester DR No.:	001
Requesting Party:	The Utility Reform Network
Requester:	Reina Yanagiba
Date Sent:	May 11, 2026

SUBJECT: BUDGETS, SAVINGS, AND BENEFITS

QUESTION 10

How will the plan allocate the costs of electrification across electric and gas?

a. Are electric utilities responsible for the costs associated with electrification for all customers? If so, do electric utilities receive all the benefits regardless of fuel type? If not, please explain.

b. Is the responsibility for paying for the costs of electrification shared between electric and gas utilities? If so, how are the costs and benefits shared?

c. How are the electric and gas utilities coordinating to ensure that costs and benefits are allocated correctly and not double counted?

ANSWER 010

PG&E objects to this question as (1) vague, ambiguous, and overbroad as to time and regarding the terms “responsible” and “electrification of all customers,” and (2) on the grounds that it calls for speculation to the extent that it seeks information that is not within PG&E’s knowledge and/or authority. PG&E reserves its right to object to the admissibility and use of such data in this proceeding.

Notwithstanding and subject to this objection, PG&E responds as follows:

a. For the purpose of this response, PG&E as a dual fuel utility, understands the term “responsible for the costs” and “electrification of all customers” as referring to whether ESA funds all or part of PG&E’s ESA electrification measures from the electric portion of its ESA budget. Based on this understanding, PG&E responds below.

   No, PG&E proposes cost recovery for ESA electrification measures from both gas and electric rates. Additionally, as PG&E provides both electric and gas utility

services, its ESA program is funded through both electric and gas cost recovery.[1]

In the event that PG&E ESA should fund electrification measures where the substituted equipment is not powered by PG&E natural gas, PG&E anticipates those measure installation costs will be funded via electric rates.

b. The responsibility for paying for the costs of PG&E's ESA electrification measures is shared between electric and gas customers. PG&E proposes to split the ESA Portfolio funding 51% to electric customers and 49% to gas customers in Chapter 6 of its Opening Direct Testimony.[2] The 2028-2033 proposed split is within 2% of the electric/gas split approved for the 2021-2026 cycle.[3] The electric and gas split is based on an allocation approach, where ESA Program Portfolio costs are allocated to the gas/electric split based on the impacts of program expenses on its electric and gas customers.[4]

   For the 2028-2033 electric/gas split, PG&E allocated measure costs proportionally considering the fuel source(s) and ESA participant savings and benefits resulting from installed measures; for the proposed electrification measure costs,[5] PG&E ESA plans to allocate 50% of electrification measure costs to electric and 50% to gas.[6] ESA proposed this allocation approach because both natural gas savings and electric benefits are forecasted from the installation of fuel-substitution measures.

   As a dual-fuel utility, PG&E records benefits for its eligible electric and gas ESA offerings. For example, if a natural gas water heater is replaced with an electric high efficiency heat pump hot water heater for a dual-fuel customer, then PG&E ESA will claim both positive Therms savings and negative kWh savings.[7]

c. In the event that PG&E ESA collaborates with other ratepayer-funded programs in the joint funding of electrification services during the 2028-2033 program cycle,[8] PG&E ESA intends to actively engage with the program administrators or

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1 PG&E Opening Direct Testimony, p. 6-13, at lines 2-5.

2 PG&E Opening Direct Testimony, p. 6-13, at lines 2-5.

3 Ibid.

4 D.21-06-015, p. 429.

5 For the purpose of this response, "electrification measure costs" includes measure materials and installation costs.

6 For more information on the rationale for the cost allocation between electric and natural gas customers, please see PG&E's response to IQPPY28-33_DR_TURN_001-Q016 .

7 See PG&E's Opening Direct Testimony, Appendix A, Tables A-1 and A-1a for measure-level savings forecasts, including fuel-substitution measures, for the ESA Main and MFWB programs.

8 PG&E detailed its proposals for coordination with other programs in Chapter 4, Section O of its Opening Direct Testimony. PG&E has developed guidelines for tracking and reporting measure funding and benefits from multiple sources.

implementers when determining funding arrangements and correct allocation of benefits.[9]

[9] Currently, PG&E ESA typically claims benefits for the installation of measures that the program funds and where energy savings are related to a PG&E-provided fuel source. PG&E does not propose differentiating benefits between electric and gas in 2028-2033.

PACIFIC GAS AND ELECTRIC COMPANY
Income Qualified Programs PY28-33
Application 26-01-003
Data Response

PG&E Data Request No.:	TURN_001-Q014
PG&E File Name:	IQPPY28-33_DR_TURN_001-Q014
Request Date:	April 13, 2026
Requester DR No.:	001
Requesting Party:	The Utility Reform Network
Requester:	Reina Yanagiba
Date Sent:	May 11, 2026

SUBJECT: ELECTRIFICATION

QUESTION 014

Please provide data on the actual, authorized, and proposed electrification efforts to date, for electric and gas from 2021 through 2027 using the template provided in Discovery Tables.xlsx, tab 06. Please note that there is one table for electric and one table for gas. Please provide all data that is applicable and available. Please leave any cells blank that cannot be populated because they are not applicable (for example, electric table inputs for a gas utility). If some data is not available, please identify that data in the written response, explain why it is not available, and populate those cells with a "n/a".

ANSWER 014

For the purpose of this data request, PG&E interprets "electrification efforts" as relating to its ESA projects where one or more appliance is converted from one fuel source to electric. For budgets, PG&E provides the measure costs, which include materials and installation. Because all ESA programs are integrated to provide fuel-substitution measures as one offering among others in the portfolio, this does not include implementation or administrative costs. PG&E does not track administrative and implementation expenses that support electrification separately from other measures offered. For example, PG&E's Pilot Deep program operates as a whole home program where any home that received electrification measures in 2024 also received multiple energy efficiency measures.[1] As such, the budget information provided does not allocate portions of implementation or administration to electrification specifically.

PG&E provides the data requested for Q014 in Tab 06 (Q14) *"IQPPY28-33_DR_TURN_001-Q001Atch001.xlsx"*

[1] Cite.

PACIFIC GAS AND ELECTRIC COMPANY
Income Qualified Programs PY28-33
Application 26-01-003
Data Response

PG&E Data Request No.:	TURN_001-Q015
PG&E File Name:	IQPPY28-33_DR_TURN_001-Q015
Request Date:	April 13, 2026
Requester DR No.:	001
Requesting Party:	The Utility Reform Network
Requester:	Reina Yanagiba
Date Sent:	May 11, 2026

SUBJECT: ELECTRIFICATION

QUESTION 015

Please provide data on electrification efforts as proposed in the new program years (the 2028-2033 plan) for electric and gas using the template provided in Discovery Tables.xlsx, tab 07. Please note that there is one table for electric and one table for gas. Please provide all data that is applicable and available. Please leave any cells blank that cannot be populated because they are not applicable (for example, electric table inputs for a gas utility). If some data is not available, please identify that data in the written response, explain why it is not available, and populate those cells with a "n/a".

ANSWER 015

For the purpose of this data request, PG&E interprets "electrification efforts" as relating to PG&E's ESA projects where one or more appliance is converted from one fuel source to electric. For budgets, PG&E provides the measure costs, which include materials and installation.

Because all ESA programs are integrated to provide fuel-substitution measures as one offering among others in the portfolio, this does not include implementation or administrative costs. PG&E does not track administrative and implementation expenses that support electrification separately from the administrative and implementation expenses that support other measures offered. For example, PG&E proposes electrification activities in 2028-2033 that are integrated within ESA Main, where admin[1] [OBJ] As such, the budget information provided does not allocate portions of implementation or administration to electrification specifically.

[1] For example, a home can receive a host of energy efficiency measures alongside electrification offerings. PG&E details its electrification proposals in Chapter 4, Sections G.1 and G.3, pp. 4-37 to 4-54.

PG&E provides the data requested for Q015 in Tab 06 (Q15) “IQPPY28-33_DR_TURN_001-Q001Atch001.xlsx”

PACIFIC GAS AND ELECTRIC COMPANY
Income Qualified Programs PY28-33
Application 26-01-003
Data Response

PG&E Data Request No.:	TURN_001-Q022
PG&E File Name:	IQPPY28-33_DR_TURN_001-Q022
Request Date:	April 13, 2026
Requester DR No.:	001
Requesting Party:	The Utility Reform Network
Requester:	Reina Yanagiba
Date Sent:	May 11, 2026

SUBJECT: ELECTRIFICATION

QUESTION 022

Please describe what happens when it is cost-effective and/or lower cost for customers to electrify, and they prefer not to.

a. Is the customer allowed to install a measure that will cost them more to operate over the lifetime of the measure?

b. If so, do ESA programs provide ratepayer funding for the customer to proceed with installation of a measure that will cost them more to operate over the lifetime of the measure? Do these ratepayer funds cover 100% of the cost of the measure? If not, please explain.

c. What other programs provide funding for the customer to proceed with installation of a measure that will cost them more to operate over the lifetime of the measure? Do these funds cover 100% of the cost of the measure? If not, please explain.

d. If the customer is not allowed to install the measures, please explain.

ANSWER 022

PG&E objects to this question (1) as vague, ambiguous, and overbroad and (2) on the grounds that it calls for speculation to the extent that it seeks information that is not within PG&E's knowledge and/or authority. PG&E reserves its right to object to the admissibility and use of such data in this proceeding.

Notwithstanding and subject to this objection, PG&E responds as follows:

PG&E interprets this question to refer to PG&E's 2028-2033 proposals for ESA electrification measures.

a. PG&E details its Electrification proposals, including those regarding bill impacts, in Chapter 4, Section G.1.b.2, of its Opening Direct Testimony.[1] Customers are allowed to install a measure that may cost them more to operate over the lifetime of the measure. However, PG&E notes that "Customers may also decline electrification measures," and that "PG&E plans to provide post installation customer care services such as enrollment in eligible discount programs, customer education, load shifting awareness and bill comparison resources so that customers are able to manage the tradeoffs between comfort and cost."

b. PG&E interprets this question to refer to using ratepayer funds for the one-time installation of the ESA measure. Based on this interpretation, yes, PG&E's ESA program proposals may provide ratepayer funding for the customer to proceed with the installation of a measure that may cost them more to operate over the lifetime of the measure. However, it is PG&E's intent to focus on identifying and targeting customers who would be more likely to see savings benefits from electrifying. Most ESA Main and MFWB In-Unit electrification measures proposed are at no cost to the ESA participant.[2] MFWB common-area and whole-building measures, however, may offer incentives that cover less than 100% of the measure installation.[3]

c. As a preliminary matter, PG&E does not attest to the completeness of this response in assessing the entire market of all programs offering electrification incentives, nor does it attest to the accuracy of responses where the programs are not administered by PG&E or where program requirements may have changed.

   As of the date of this response, PG&E is aware of multiple programs that provide funding for the customer to proceed with installation of a measure that may cost them more to operate over the lifetime of the measure. Some programs that may provide funding in the case outlined by this question include: TECH Clean California, BayREN's Home+ Rebates, BayREN's Bay Area Multifamily Building Enhancements (BAMBE) Program, PG&E Energy Smart Homes, GoGreen Financing, the City of Palo Alto Utility Switch Your Water Heater Program, CleanPowerSF Water Heater Upgrade Program, CleanPowerSF Climate Equity Hub Incentives.

   These programs, and others not mentioned in the context of this response, vary in the incentive amount provided, incentive type and mechanism, and reasoning for providing said incentives or services.

d. See PG&E's response to subpart (a) above. There might be other reasons an ESA customer may not be allowed to electrify, for example if it may not be safe to

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[1] Opening Direct Testimony, Chapter 4, pp. 4-37 to 4-54.

[2] One exception to this is where the ESA customer is a renter and the property owner may be required to provide a co-pay that reduces ratepayer costs. PG&E proposes and comments on co-pays for electrification measures in its Opening Direct Testimony, Chapter 4, p. 4-43 and p 4-80.

[3] Opening Direct Testimony, Chapter 4, p. 4-57, lines 19-25.

do so. However, each situation is different and PG&E is unable to speculate or assume all the reasons an ESA customer may not be allowed to electrify.

PACIFIC GAS AND ELECTRIC COMPANY
Income Qualified Programs PY28-33
Application 26-01-003
Data Response

PG&E Data Request No.:	TURN_001-Q026
PG&E File Name:	IQPPY28-33_DR_TURN_001-Q026
Request Date:	April 13, 2026
Requester DR No.:	001
Requesting Party:	The Utility Reform Network
Requester:	Reina Yanagiba
Date Sent:	April 27, 2026

SUBJECT: POTENTIAL & GOALS STUDY

QUESTION 026

Did you use the 2025 Potential & Goals Study to develop the proposed 2028-2033 ESA plan goals? Please discuss electrification measures separately from the other measures in the portfolio.

a. If so, how?
b. If not, why not? Is the methodology flawed and if so, how?
c. Are the fuel substitution assumptions and analysis in the study relevant to ESA? If so, how? If not, why not?

ANSWER 026

a. Yes. PG&E explains how it used the Potential and Goals (P&G) Study to develop the proposed 2028-2033 ESA Plan goals in PG&E's Opening Direct Testimony.[1]
b. PG&E comments on the methodology of the study, including flaws, in Chapter 4 of its Opening Direct Testimony, from pages 4-17 to 4-20.[2] PG&E also provided public

[1] Exh. (PGE-01) Chapter 4, pp. 4-17 to 4-20.
[2] Exh. (PGE-01), Chapter 4, pp. 4-17 to 4-20.

comment on the methodology of the study, including flaws, specifically commenting on the electrification [34]quoted below:[5]

"For the fuel substitution forecast, the report states "cost data for the associated installed electric measures does not include additional infrastructure or auxiliary costs". The replacement of gas appliances with electric alternatives may require in-home retrofits such as panel upgrade, rewiring, and remediation, as well as upgrades to electric service infrastructure and gas infrastructure decommissioning, all of which could incur substantial costs. The exclusion of these cost items may result in over-estimating the achievable potential for fuel substitution measures. In addition, fuel switching may result in positive bill impacts for some households due to electricity being a more expensive fuel, and other households may not experience positive bill impacts due to specific usage patterns or other factors. The behavioral aspects of whether energy usage will increase or decrease after the appliance replacement are also not well understood at this time. PG&E believes these factors should be carefully considered if the fuel substitution forecast will be used to inform ESA goal setting."[6]

c. Yes. See PG&E's response to subpart (b).

[5] PG&E's Comments on the 2025 Income Qualified Program Potential study (June 6, 2025), available at: <https://pda.energydataweb.com/#!/documents/4152/view> (accessed Apr 21, 2026).

[6] Comment 3, PG&E's Comments on the 2025 Income Qualified Program Potential study (June 6, 2025), available at: <https://pda.energydataweb.com/#!/documents/4152/view> (accessed Apr 21, 2026).

Electric

ESA Main		2027 proposed [5]	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets [1] [2]	$	55,933,347	50,117,394	55,899,417	56,737,908	57,588,945	58,857,366	56,469,189	335,670,219
Energy savings	annual kWh	N/A	18,209,877	17,810,928	16,317,747	15,304,101	14,887,453	13,788,081	96,318,188
Energy savings	lifetime kWh	N/A	175,169,557	158,405,759	132,191,916	115,205,508	108,364,125	99,362,382	788,699,247
Demand savings	kW	N/A	6,489	6,770	6,566	6,406	6,339	5,903	38,473
Other fuel savings [7]	annual MMBtus	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other fuel savings [7]	lifetime MMBtus	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Households treated [4]	#	51,099	41,224	42,979	41,640	40,577	40,091	37,291	243,802
Energy benefits (ESACET)	$	36,843,926	21,250,865	25,777,446	27,661,308	29,220,917	30,622,358	29,800,696	164,333,590
Non-energy benefits (ESACET)	$	18,638,571	15,370,715	17,543,379	18,191,697	20,038,590	20,141,265	19,515,502	110,801,147

ESA MFWB		2027 proposed [5]	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets [1] [2] [3]	$	19,331,267	13,934,262	15,976,271	17,342,245	17,862,501	18,398,424	15,597,472	99,111,175
Energy savings	annual kWh	N/A	3,488,151	4,281,818	5,206,840	5,397,375	5,337,669	4,030,289	27,742,142
Energy savings	lifetime kWh	N/A	32,323,720	37,504,113	45,509,273	47,555,763	46,834,206	35,431,546	245,158,621
Demand savings	kW	N/A	1,091	1,353	1,571	1,618	1,604	1,209	8,447
Other fuel savings [7]	annual MMBtus	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other fuel savings [7]	lifetime MMBtus	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Households treated [4]	#	17,000	15,163	17,606	17,762	17,515	16,849	12,816	97,711
Energy benefits (ESACET)	$	6,913,388	2,823,260	4,086,583	5,061,045	5,328,691	5,487,891	4,236,552	27,024,022
Non-energy benefits (ESACET)	$	2,933,660	2,064,125	2,524,630	2,712,079	2,853,765	2,963,319	2,306,268	15,424,186

ESA Pilots		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets [1]	$	1,533,566	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Energy savings	annual kWh	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Energy savings	lifetime kWh	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Demand savings	kW	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other fuel savings [7]	annual MMBtus	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other fuel savings [7]	lifetime MMBtus	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other fuel savings [7]	annual MMBtus	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other fuel savings [7]	lifetime MMBtus	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Households treated	#	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Energy benefits (ESACET)	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non-energy benefits (ESACET)	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Gas

ESA Main		2027 proposed [5]	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets [1] [2]	$	49,601,270	48,152,006	53,707,283	54,512,892	55,330,555	56,549,234	54,254,711	322,506,681
Gas savings	annual therms	N/A	1,169,136	1,364,923	1,418,013	1,445,539	1,457,794	1,366,814	8,222,219
Gas savings	lifetime therms	N/A	11,673,327	15,158,741	16,828,691	17,828,014	18,281,467	17,245,457	97,015,697
Households treated [4]	#	51,099	41,224	42,979	41,640	40,577	40,091	37,291	243,802
Energy benefits (ESACET)	$	27,866,115	21,548,834	25,979,678	27,766,058	29,220,106	30,503,223	29,696,822	164,714,721
Non-energy benefits (ESACET)	$	24,987,598	18,349,823	19,340,880	18,258,359	18,676,356	18,280,364	17,478,359	110,384,140

ESA MFWB		2027 proposed [5]	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets [1] [2] [3]	$	17,142,821	13,387,821	15,349,751	16,662,157	17,162,010	17,676,917	14,985,806	95,224,462
Gas savings	annual therms	N/A	229,264	275,153	287,704	291,183	288,781	216,913	1,588,999
Gas savings	lifetime therms	N/A	2,148,680	2,807,237	3,026,269	3,006,481	2,986,083	2,235,352	16,210,102
Households treated [4]	#	17,000	15,163	17,606	17,762	17,515	16,849	12,816	97,711
Energy benefits (ESACET)	$	4,871,698	4,388,061	5,587,524	6,339,013	6,704,211	6,944,474	5,461,113	35,424,396
Non-energy benefits (ESACET)	$	4,676,984	3,192,029	3,859,142	4,065,923	4,149,700	4,143,329	3,228,788	22,638,911

ESA Pilots		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets [1]	$	1,359,954	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gas savings	annual therms	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gas savings	lifetime therms	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Households treated	#	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Energy benefits (ESACET)	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non-energy benefits (ESACET)	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

General Notes:

Reporting values may vary marginally due to rounding.

Footnotes:

[1] For PY 2027, the ESA program budgets are provided in the gas/electric tables requested as allocated by the proposed electric and gas budget split of 53 percent electric and 47 percent gas. See PG&E's 2027 Bridge Funding Opening Direct Testimony, Chapter 1, p. 72, at lines 10-15.

[2] For PY 2028-2033, the ESA program budgets are provided in the gas/electric tables requested as allocated by the proposed electric and gas budget split of 51 percent electric and 49 percent gas. See PG&E's 2028-2033 Opening Direct Testimony, Chapter 6, p. 6-13 at lines 2-5.

[3] The MFWB budgets provided in this table did not include the SPOC budget.

[4] PG&E is a dual-fuel utility. As such, PG&E does not separate homes treated into gas and electric categories as detailed in this request. Accordingly, PG&E reports the **total** homes treated forecasts in both gas and electric tables.

[5] PG&E only proposed energy savings goals for the ESA portfolio in its 2027 Bridge Funding application, and did not propose program-level goals. As such, PG&E annotates these fields as "N/A".

[6] Electric, gas, and non energy benefits were calculated using a budget-weighted allocation methodology. Total benefits were first determined at the aggregate level. These benefits were then allocated between electric and gas based on the proportion of each measures budget attributed to electric ratepayers versus gas ratepayers for the applicable program year. The electric-gas allocation percentages were applied to distribute energy benefits (electric and gas) as well as associated non energy benefits (NEBs) to either gas or electric budget.

[7] PG&E did not propose any other fuel savings.

Electric

Electrification		2021 actual	2022 actual	2023 actual [4]	2024 actual	2025 authorized [5]	2026 authorized [5]	2027 proposed [2]
ESA Main								
Households Treated	#	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Budgets [1]	$	N/A	N/A	N/A	N/A	N/A	N/A	$ 1,160,507
Electricity Savings or (Increase)	annual kWh	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Electricity Savings or (Increase)	lifetime kWh	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Electricity Savings or (Increase)	kW	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other Fuel Savings	annual MMB	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other Fuel Savings	lifetime MMI	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Energy Benefits (ESACET)	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non-Energy Benefits (ESACET)	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ESA MFWB [3]								
Households Treated	#	N/A	N/A	-	-	N/A	N/A	N/A
Budgets	$	N/A	N/A	-	-	N/A	N/A	N/A
Electricity Savings or (Increase)	annual kWh	N/A	N/A	-	-	N/A	N/A	N/A
Electricity Savings or (Increase)	lifetime kWh	N/A	N/A	-	-	N/A	N/A	N/A
Electricity Savings or (Increase)	kW	N/A	N/A	-	-	N/A	N/A	N/A
Other Fuel Savings	annual MMB	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other Fuel Savings	lifetime MMI	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Energy Benefits (ESACET)	$	N/A	N/A	-	-	N/A	N/A	N/A
Non-Energy Benefits (ESACET)	$	N/A	N/A	-	-	N/A	N/A	N/A
ESA Pilots[6]								
Households Treated[8]	#	N/A	N/A	-	24	N/A	N/A	N/A
Budgets[7]	$	N/A	N/A	-	19,059	N/A	N/A	N/A
Electricity Savings or (Increase)	annual kWh	N/A	N/A	-	(2,426)	N/A	N/A	N/A
Electricity Savings or (Increase)	lifetime kWh	N/A	N/A	-	(24,709)	N/A	N/A	N/A
Electricity Savings or (Increase)	kW	N/A	N/A	-	1	N/A	N/A	N/A
Other Fuel Savings	annual MMB	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other Fuel Savings	lifetime MMI	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Energy Benefits (ESACET)	$	N/A	N/A		5,437	N/A	N/A	N/A
Non-Energy Benefits (ESACET)	$	N/A	N/A		1,319	N/A	N/A	N/A

Gas

Electrification		2021 actual	2022 actual	2023 actual [4]	2024 actual	2025 authorized	2026 authorized	2027 proposed [2]
ESA Main [4]								
Households Treated	#	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Budgets [1]	$	N/A	N/A	N/A	N/A	N/A	N/A	1,029,129
Electricity (Increase)	annual kWh	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Electricity (Increase)	lifetime kWh	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Electricity (Increase)	kW	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gas Savings	annual therm	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gas Savings	lifetime ther	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Energy Benefits (ESACET)	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non-Energy Benefits (ESACET)	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A
ESA MFWB [3]								
Households Treated	#	N/A	N/A	N/A	-	N/A	N/A	N/A
Budgets	$	N/A	N/A	N/A	-	N/A	N/A	N/A
Electricity (Increase)	annual kWh	N/A	N/A	N/A	-	N/A	N/A	N/A
Electricity (Increase)	lifetime kWh	N/A	N/A	N/A	-	N/A	N/A	N/A
Electricity (Increase)	kW	N/A	N/A	N/A	-	N/A	N/A	N/A
Gas Savings	annual therm	N/A	N/A	N/A	-	N/A	N/A	N/A
Gas Savings	lifetime ther	N/A	N/A	N/A	-	N/A	N/A	N/A
Energy Benefits (ESACET)	$	N/A	N/A	N/A	-	N/A	N/A	N/A
Non-Energy Benefits (ESACET)	$	N/A	N/A	N/A	-	N/A	N/A	N/A
ESA Pilots[6]								
Households Treated	#	N/A	N/A	-	See Electric Ta	N/A	N/A	N/A
Budgets[7]	$	N/A	N/A	-	16,901	N/A	N/A	N/A
Electricity (Increase)	annual kWh	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Electricity (Increase)	lifetime kWh	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Electricity (Increase)	kW	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gas Savings	annual therm	N/A	N/A	-	786	N/A	N/A	N/A
Gas Savings	lifetime ther	N/A	N/A	-	8,070	N/A	N/A	N/A
Energy Benefits (ESACET)	$	N/A	N/A	-	5,437	N/A	N/A	N/A
Non-Energy Benefits (ESACET)	$	N/A	N/A	-	1,319	N/A	N/A	N/A

in 2027. For the purpose of this request, PG&E applies the portfolio split of 53% electric and 47% gas as proposed in its Bridge Funding Application to these costs in order to report in gas and electric tables.

with no modications. As such, PG&E did not propose specific energy savings goals, energy benefits, nor non-energy benefits for ESA main in 2027, which includes those attributed specifically to electrification measures, and does not populate this table for ESA Main or MFWB, with the exception of the requested ESA Main budget to comply with BAAD rules.

[3] While D.21-06-015 ordered MFWB to offer electrification, it did not authorize specific budgets, goals, or benefits for electrification measures or activities. MFWB did install electrification measures in 2025, and interested parties may review Table 2A in PG&E's 2025 ESA Annual Report, expected to be filed in May 2026, for a summary of

[4] ESA MFWB launched in 2023

[5] D.21-06-015 did not authorize budgets or savings specifically at the individual measure-level or for specific electrification activities.

[6] PG&E reports activities from its Pilot Plus/Pilot Deep programs in this response. PG&E ESA does not operate any other pilots, other than PP/PD, that provide electrification efforts.

[7] For this purpose of this response, PG&E provides actual expenses for installed fuel substitution measures, which includes materials and installation costs. Because PP/PD treats whole homes that install energy efficiency and weatherization measures alongside fuel substitution measures, PG&E does not actively track specific administrative or implementation costs related to electrification efforts. For example, the average total measures installation costs for PP/PD homes that received at least one electrification measure in 2024 is approximately $23,400 (this includes materials and measure installation-specific labor, assessments, NGAT, permits). However, electrification measures are only a portion of this whole home installation cost. As such, PG&E provides the measure installation costs as reported in Table 2c of PG&E's 2024 ESA Annual Report, and may not include other costs related to electrification measures such as permitting, remeditation, minor home repair, etc. Accordingly, these budges as reported may omit additional costs.

[8] For the purpose of this data request, PG&E reports actual "homes treated" as the count of homes that received at least one electrification measure through PP/PD.

Electric [1]

Electrification		2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
ESA Main								
Households Treated	#	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Budgets [2]	$	1,109,540	4,670,150	7,711,454	9,566,363	10,295,269	9,808,249	43,161,025
Electricity Savings or (Increase)	annual kWh	(403,947)	(1,611,818)	(2,528,324)	(3,095,178)	(3,332,293)	(3,185,657)	(14,157,217)
Electricity Savings or (Increase)	lifetime kWh	(8,595,477)	(33,470,682)	(54,203,783)	(67,034,267)	(72,407,587)	(69,247,577)	(304,959,373)
Electricity Savings or (Increase)	kW	-	-	-	-	-	-	-
Other Fuel Savings	annual MMBtus	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other Fuel Savings	lifetime MMBtus	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Energy Benefits (ESACET)	$	451,643	2,952,245	4,473,843	5,531,428	6,069,923	6,004,441	25,483,522
Non-Energy Benefits (ESACET)	$	222,542	1,266,857	2,107,121	3,001,104	3,088,870	2,938,553	12,625,047
ESA MFWB								
Households Treated	#	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Budgets [2]	$	113,320	546,197	828,523	696,403	1,013,552	750,251	3,948,247
Electricity Savings or (Increase)	annual kWh	(134,857)	(332,453)	(343,834)	(321,572)	(330,462)	(242,961)	(1,706,139)
Electricity Savings or (Increase)	lifetime kWh	(2,313,779)	(6,236,844)	(6,606,007)	(6,139,435)	(6,383,870)	(4,689,999)	(32,369,935)
Electricity Savings or (Increase)	kW	0	0	0	0	0	0	-
Other Fuel Savings	annual MMBtus	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other Fuel Savings	lifetime MMBtus	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Energy Benefits (ESACET)	$	226,146	617,340	730,335	708,379	771,660	594,521	3,648,382
Non-Energy Benefits (ESACET)	$	9,511	122,717	196,939	162,517	251,300	187,639	930,622
ESA Pilots								
Households Treated	#	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Budgets	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Electricity Savings or (Increase)	annual kWh	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Electricity Savings or (Increase)	lifetime kWh	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Electricity Savings or (Increase)	kW	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other Fuel Savings	annual MMBtus	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other Fuel Savings	lifetime MMBtus	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other Fuel Savings	annual MMBtus	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other Fuel Savings	lifetime MMBtus	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Energy Benefits (ESACET)	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non-Energy Benefits (ESACET)	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Gas [1]

Electrification		2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
ESA Main								
Households Treated	#	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Budgets [2]	$	1,066,029	4,487,006	7,409,044	9,191,212	9,891,532	9,423,612	41,468,435
Electricity (Increase)	annual kWh	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table
Electricity (Increase)	lifetime kWh	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table
Electricity (Increase)	kW	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table
Gas Savings	annual therms	47,637	194,935	283,172	338,119	361,759	346,127	1,571,749
Gas Savings	lifetime therms	996,525	4,006,716	5,988,123	7,221,016	7,749,435	7,415,652	33,377,466
Energy Benefits (ESACET)	$	451,643	2,952,245	4,473,843	5,531,428	6,069,923	6,004,441	25,483,522
Non-Energy Benefits (ESACET)	$	222,542	1,266,857	2,107,121	3,001,104	3,088,870	2,938,553	12,625,047
ESA MFWB								
Households Treated	#	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Budgets [2]	$	108,877	524,777	796,032	669,093	973,805	720,830	3,793,413
Electricity (Increase)	annual kWh	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table
Electricity (Increase)	lifetime kWh	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table
Electricity (Increase)	kW	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table	See Electric Table
Gas Savings	annual therms	13,716	35,281	39,975	36,996	37,718	27,620	191,307
Gas Savings	lifetime therms	205,293	621,043	694,424	630,218	652,591	475,739	3,279,307
Energy Benefits (ESACET)	$	226,146	617,340	730,335	708,379	771,660	594,521	3,648,382
Non-Energy Benefits (ESACET)	$	9,511	122,717	196,939	162,517	251,300	187,639	930,622
ESA Pilots								
Households Treated	#	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Budgets	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Electricity (Increase)	annual kWh	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Electricity (Increase)	lifetime kWh	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Electricity (Increase)	kW	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gas Savings	annual therms	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gas Savings	lifetime therms	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Energy Benefits (ESACET)	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non-Energy Benefits (ESACET)	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A

[1] PG&E notes that both the Electric and Gas tables include kWh savings, while only the gas table includes therms savings. As such, PG&E elected to provide all electric savings (increases) in the electric table and all gas savings in the gas table.
[2] For the purposes of this response, PG&E provides the total measures installation budgets for electrification measures, which includes materials and installation costs, as provided in Appendix A, Tables A-1 and A-1a of PG&E's Opening Direct Testimony. To respond in the gas and electric tables as requested, PG&E provides the forecasted budgets proportionally by PG&E's proposed 2028-2033 gas/electric split.

PACIFIC GAS AND ELECTRIC COMPANY
Income Qualified Programs – Program Years 2028-2033
Application 26-01-003
Data Response

PG&E Data Request No.:	TURN_006-Q011
PG&E File Name:	IQPPY28-33_DR_TURN_006-Q011
Request Date:	July 29, 2026
Requester DR No.:	006
Requesting Party:	The Utility Reform Network
Requester:	Reina Yanagiba
Date Sent:	August 12, 2026
PG&E Witness(es):	Jack Pilutti

SUBJECT: ENERGY SAVINGS ASSISTANCE PROGRAM – ELECTRIFICATION

Please refer to PG&E's Application 26-01-003 et al. and Supporting Testimony, and responses to TURN-PG&E-01

QUESTION 011

Please refer to PG&E's response to TURN-PG&E-001 Q008(a) which states,

> "While PG&E ESA is currently authorized during the 2021-2026 program cycle to install both fuel switching and substitution measures, PG&E did not forecast fuel switching measure installations in the development of its 2028-2033 Application. However, as stated in its application, this is subject to change and "PG&E expects to continue using the measure modification process to propose additional electrification technologies during 2028-2033 program cycle."

Please discuss why fuel switching was not proposed at the outset and needs to be addressed using the measure modification process.

ANSWER 011

The Deep Savings tier will offer electrification measures for replacement of aging and inefficient space and water heating equipment. Customers will be targeted for this tier based on criteria such as climate zone, housing stock, home vintage, and energy use characteristics. The Deep Savings tier program design was informed by findings from the ESA Pilot Plus/Pilot Deep program,[2] which only installed fuel substitution measures. As the learnings are related to fuel substitution measures, PG&E prioritized proposing fuel substitution in 2028-2033.

While PG&E is authorized to install some fuel switching measures including heat pump HVAC, heat pump water heaters, and induction cooking appliances, any additional fuel

2 Exhibit (PG&E-01E), p. 4-49, lines 24-27.

switching measures proposed to be added, modified, or removed must go through the modification process.

PACIFIC GAS AND ELECTRIC COMPANY
Income Qualified Programs – Program Years 2028-2033
Application 26-01-003
Data Response

PG&E Data Request No.:	TURN_006-Q015
PG&E File Name:	IQPPY28-33_DR_TURN_006-Q015
Request Date:	July 29, 2026
Requester DR No.:	006
Requesting Party:	The Utility Reform Network
Requester:	Reina Yanagiba
Date Sent:	August 19, 2026
PG&E Witness(es):	Jack Pilutti

SUBJECT: ENERGY SAVINGS ASSISTANCE PROGRAM – TARGETING/SEGMENTATION

Please refer to PG&E's Application 26-01-003 et al. and Supporting Testimony, and responses to TURN-PG&E-01

QUESTION 015

Please refer to PG&E's response to TURN-PG&E-001 Q022(a) which states,

> "Customers are allowed to install a measure that may cost them more to operate over the lifetime of the measure."

a. Please provide the project level affordability and bill impact screening criteria used to make decisions. Please describe how these criteria are applied to make decisions.

b. Please provide the project level affordability and bill impact screening tool that will be used to make decisions. Was this tool developed in coordination with the other IOUs who are offering electrification measures?

   i. If the tool is not yet available, when will the tool be developed?

   ii. If the tool is not yet available, will the tool be developed in partnership with the other IOUs who are offering electrification measures? Please describe this process.

c. Are bill impacts assessed for each individual measure or for bundles of measures? Please discuss whether weatherization and heating/cooling systems will be assessed as a package or individually.

d. Does the 2028-2033 ESA Plan assume more weatherization than in the 2027 Bridge Year, in tandem with electrification? Please explain.

e. In which program(s) will weatherization spending and savings that are related to electrification be recorded?

f. In which program(s) will electrification spending and savings be recorded?

g. Is electrification expected to result in a negative bill impact relative to a like for like replacement of existing measures when the existing measure is fueled by gas? Please explain.

ANSWER 015

PG&E objects to this question on the grounds that it vague, ambiguous, and calls for speculation in that that it relies on PG&E's response to IQPPY28-33 _DR_ TURN _ 006 -Q 015, which is subject to an objection. PG&E reserves its right to object to the admissibility and use of such data in this proceeding.

Notwithstanding and subject to this objection, PG&E responds as follows:

a. PG&E interprets "decision" to mean screening decisions regarding project level affordability and bill impact screening for its 2028-2033 ESA program. Based on this interpretation, PG&E intends to use multiple criteria to support both targeting and eligibility decision-making. PG&E detailed its proposed plans for targeting criteria in the 2028-2033 its testimony as follows:

> Customer selection for the Targeted Deep Savings tier is expected to be based on criteria such as climate zone, housing stock, home vintage, and energy use characteristics." These criteria are based on the targeting methods tested and deployed in PP/PD. Customer selection will be driven primarily by advanced data analytics, customer surveys, and other tactics developed through PP/PD to identify high energy savings potential and high probability of positive bill impacts. Because data-driven targeting techniques are anticipated to evolve based on improvements in analytics, technology, and data availability, PG&E intends to refine and adapt customer selection criteria and targeting methods throughout the 2028-2033 program cycle.**2**

After a customer has expressed interest in receiving measures from the Targeted Deep Savings tier, PG&E plans to screen customers for eligibility and feasibility through initial virtual and advanced home energy assessments:

> Customers who are targeted for the Targeted Deep Savings tier will be offered an initial virtual home assessment. This assessment is intended to gather preliminary feasibility information prior to an in-person assessment. After the virtual assessment, customers who express interest in and are eligible for the Targeted Deep Savings offerings are expected to receive an advanced home energy assessment, covering high saving opportunities such as HVAC, water heating, large appliances and building envelope, as well as electrification feasibility. This advanced assessment is intended to be based on the comprehensive approach used in PP/PD. Based on the results of the advanced assessment, PG&E plans to offer a tailored package of high savings and electrification measures.**3**

PG&E intends to use criteria such as those noted in the above, which may influence forecasted project costs and bill impacts, to target households for participation in Targeted Deeper Savings tier, screen eligibility or feasibility for participation in the Targeted Deep Savings tier, and also to communicate forecasted bill impacts to customers to support customer decision-making. The aforementioned characteristics—

2 Exhibit (PG&E-01E), p. 4-51, lines 1-16.

3 Exhibit (PG&E-01E), pp. 4-51 to 4-52.

and more—will support forecasting project level costs, technical feasibility, and customer bill impacts to predict or screen for customer eligibility.

For customer bill impact, PG&E plans to estimate the ESA participant's average post-treatment annual electric and natural gas bills resulting from the offered Targeted Deeper Savings tier measures[4] PG&E similarly plans to screen for technical feasibility—such as existing home conditions that are within the scope of the program—and project level cost. Project cost criteria include individual measure cost limits as well as project-level and category cost controls including minor home repair [5] and remediation controls[6]

b. PG&E objects to this question as it is vague and ambiguous, calls for speculation and is an incomplete hypothetical regarding screening tools that PG&E may use in the undefined future.

PG&E intends to develop and/or identify bill impact tool(s) at the time of program implementation and evolve these tools over time. The Pilot Plus/Pilot Deep ESA Program (PP/PD), which offers customers electrification measures, currently uses Snugg Pro, a home energy assessment and modeling tool that evaluates residential energy improvement opportunities.[7] The platform uses home assessment data to estimate energy savings, model measure package scenarios, and generate treatment plans. Snugg Pro has been used to determine whether projects meet required savings thresholds and estimate bill impacts. PG&E plans to use Snugg Pro or develop another tool with potentially similar offerings and capabilities to assess bill impact.

Another available tool PG&E plans to utilize as a supplemental resource is the Clean Energy Calculator[8] to support project-level affordability and bill impact screening for electrification measures. The Clean Energy Calculator, which is available to all customers and was not developed for ESA specifically, was launched by PG&E in 2024 and is available for use in evaluating potential customer energy bill impacts associated with the installation of electrification measures. PG&E envisions using the calculator to assist customers in reviewing potential bill impacts and to help inform implementation decisions consistent with PG&E's proposed program design and applicable Commission direction. This tool was not developed in direct coordination with other IOUs.

i. As stated above, PG&E intends to develop and/or identify bill impact tool(s) at the time of program implementation and evolve these tools over time. PG&E cannot speculate as to what will be the best available tool(s) at the time of program implementation and is therefore unable to identify what tool PG&E will use. However, PG&E intends to "refine

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[4] For example, ESA PP/PD used smart meter data and property data to develop a savings potential score based on seasonal heating and cooling consumption, annual loads, and energy use intensity.

[5] See D.21-06-015, pp. 197-198, which sets the minor home repair cap to up to $2,500, with additional delegation to the ESA Working Group to adjust the cap if needed.

[6] Electrification remediation rules and limits can be found in Appendix G, Section 7.4 of the California Statewide Energy Savings Assistance Program Policy and Procedures Manual. <https://pda.energydataweb.com/#!/documents/5342/view> (Accessed 8/14/2026)

[7] <https://snuggpro.com/> (Accessed Aug 14, 2026)

[8] PG&E Clean Energy Calculator. < https://www.pge.com/en/clean-energy/clean-energy-calculator.html> (Accessed August 11, 2026).

and adapt customer selection criteria and targeting methods throughout the 2028-2033 program cycle."[9]

ii. As PG&E has not proposed developing a common tool in partnership with other IOUs for 2028-2033, PG&E cannot describe a process at this time. However, the IOUs have established relationships and processes for coordination that could be leveraged here, such as standing IOU meetings, ED-IOU meetings, and public working groups such as the ESA Working Group.

c. As stated in subparts (a) and (b), bill impact assessment inputs are proposed to be developed and/or identified at the time of implementation and may be adapted or refined throughout the program cycle. Yes, PG&E plans to assess individual measure or bundles of measures, including weatherization and heating/cooling systems. As detailed in subpart (b), the Snugg Pro tools were used during the 2021-2026 program cycle for PP/PD estimate proposed bundles of measures for household-level bill impact. PG&E plans to continue this process and refine tools in 2028-2033.

d. Yes, the 2028-2033 plan does forecast an increase in weatherization (attic insulation and air sealing) as a part the bundled measure packages proposed in its Deeper Savings tier proposals.[10]

e. As a preliminary matter, PG&E's proposed program design does not allow households to participate in multiple ESA programs at the same time, such as ESA Main and MFWB.[11] As such, weatherization spending and savings that are related to electrification will be recorded within the respective program in which the work is completed. For example, if electrification-related weatherization work is performed for an ESA Main Program participant, the associated spending and any applicable savings will also be recorded under ESA Main.

f. As a preliminary matter, PG&E's proposed program design does not allow households to participate in multiple ESA programs at the same time.[12] As such, electrification-related spending and savings will be recorded within the respective program in which the work is completed. For example, if electrification work is performed for an ESA Main Program participant, the associated expenditure and any applicable savings will be recorded under ESA Main.

g. The bill impact of electrification will vary from customer to customer depending on factors such as climate zone, housing stock, home vintage, and energy use characteristics. As such, PG&E cannot provide a general response regarding bill impact for electrification measures relative to a like for like replacement of existing measures.

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[9] Exhibit (PG&E-01E), p. 4-51, lines 14-16.

[10] See Exhibit (PG&E-01E), Appendix A, Table A-1, for the list of Deeper Savings tier measures.

[11] Eligibility for either ESA Main or MFWB is determined by property type. For details on property type eligibility, please see Statewide Energy Savings Assistance Program 2021-2026 Cycle Policy and Procedures Manual (v1.6). <CPUC Energy Evaluation Public Comment> (Accessed 8/12/2026)

[12] Ibid.

PACIFIC GAS AND ELECTRIC COMPANY
Income Qualified Programs – Program Years 2028-2033
Application 26-01-003
Data Response

PG&E Data Request No.:	TURN_006-Q019
PG&E File Name:	IQPPY28-33_DR_TURN_006-Q019
Request Date:	July 29, 2026
Requester DR No.:	006
Requesting Party:	The Utility Reform Network
Requester:	Reina Yanagiba
Date Sent:	August 12, 2026
PG&E Witness(es):	Jack Pilutti

SUBJECT: ENERGY SAVINGS ASSISTANCE PROGRAM – HEALTH, COMFORT, AND SAFETY

Please refer to PG&E's Application 26-01-003 et al. and Supporting Testimony, and responses to TURN-PG&E-01

QUESTION 019

Please refer to PG&E's Response to TURN-PG&E-001 Q006, file IQPPY28 33_DR_TURN_001-Q001Atch001.xlsx, tab 03 (Q6). There are benefits for furnace repair/replacement, but no quantities, spending, or savings for this measure. If this is an error, please provide an updated version of this table. If this is not an error, please explain.

ANSWER 019

Please see attachment, "*IQPPY2833_DR_TURN_006-Q019Atch01.xlsx"*, tab 01 (Q019), for the added furnace repair/replacement quantities, spending, and savings for this measure.

Electric

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS)	**Offered? (Y/N)**	**#**	**#**	**#**	**#**	**#**	**#**
Cold Storage	Y*	N/A	51	50	31	3	759
Air Purifiers	Y	N/A	120	627	470	414	5,667
Portable A/C	Y	N/A	74	24	10	8	595
~~Comprehensive Home Health and Safety Checkups~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N	N/A	N/A	N/A	N/A	N/A	N/A
Total		-	245	701	511	425	7,021

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS)	**Offered? (Y/N)**	**$**	**$**	**$**	**$**	**$**	**$**
Cold Storage	Y*	N/A	16,305	15,845	9,907	932	432,626
Air Purifiers	Y	N/A	29,429	153,776	107,876	86,198	1,915,677
Portable A/C	Y	N/A	42,199	12,413	5,060	3,954	401,932
~~Comprehensive Home Health and Safety Checkups~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N	N/A	N/A	N/A	N/A	N/A	N/A
Total		-	87,933	182,034	122,843	91,084	2,750,235

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS)	**Offered? (Y/N)**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**
Cold Storage	Y*	N/A	-	-	-	-	-
Air Purifiers	Y	N/A	-	-	-	-	-
Portable A/C	Y	N/A	-	-	-	-	-
~~Comprehensive Home Health and Safety Checkups~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N	N/A	N/A	N/A	N/A	N/A	N/A
Total		-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS)	**Offered? (Y/N)**	**$**	**$**	**$**	**$**	**$**	**$**
Cold Storage	Y	N/A	1,885	1,728	3,073	85,968	84,108
Air Purifiers	Y	N/A	3,403	26,658	33,458	379,026	372,432
Portable A/C	Y	N/A	18,963	4,790	2,058	89,815	87,885
~~Comprehensive Home Health and Safety Checkups~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N	N/A	N/A	N/A	N/A	N/A	N/A
Total		-	24,251	33,176	38,589	554,809	544,425

Note: Please add rows for measures that are missing from this table.

Gas

Health, Comfort, and Safety (HCS)	Offered? (Y/N)	2021 actual #	2022 actual #	2023 actual #	2024 actual #	2025 authorized #[3]	2026 authorized #
~~Comprehensive Home Health and Safety Checkups~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Natural Gas Appliance Testing (NGAT~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Furnace Clean and Tune~~	N	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement[2]	Y	2,006	1,729	1,845	1,960	666	642
Total		2,006	1,729	1,845	1,960	666	642

Note: Please add rows for measures that are missing from this table.

Health, Comfort, and Safety (HCS)	Offered? (Y/N)	2021 actual $	2022 actual $	2023 actual $	2024 actual $	2025 authorized $[3]	2026 authorized $
~~Comprehensive Home Health and Safety Checkups~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Natural Gas Appliance Testing (NGAT~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Furnace Clean and Tune~~	N	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement[2]	Y	6,370,975	6,434,934	7,752,875	8,424,506	2,836,005	2,770,092
Total		6,370,975	6,434,934	7,752,875	8,424,506	2,836,005	2,770,092

Note: Please add rows for measures that are missing from this table.

Health, Comfort, and Safety (HCS)	Offered? (Y/N)	2021 actual annual therms	2022 actual annual therms	2023 actual annual therms	2024 actual annual therms	2025 authorized annual therms[3]	2026 authorized annual therms
~~Comprehensive Home Health and Safety Checkups~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Natural Gas Appliance Testing (NGAT~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Furnace Clean and Tune~~	N	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement[1]	Y	(48,978)	(42,218)	(45,142)	(47,851)	(16,261)	(15,677)
Total		(48,978)	(42,218)	(45,142)	(47,851)	(16,261)	(15,677)

Note: Please add rows for measures that are missing from this table.

Health, Comfort, and Safety (HCS)	Offered? (Y/N)	2021 actual $	2022 actual $	2023 actual $	2024 actual $	2025 authorized $	2026 authorized $
~~Comprehensive Home Health and Safety Checkups~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Natural Gas Appliance Testing (NGAT~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Furnace Clean and Tune~~	N	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement	Y	4,329,269	3,298,373	3,446,944	3,469,092	711,676	703,900
Total		4,329,269	3,298,373	3,446,944	3,469,092	711,676	703,900

Note: Please add rows for measures that are missing from this table.

* PG&E proposes sunsetting Cold Storage in the 2028-2033 cycle.

[1] Therms savings are shown for 2028–2033 to be zero, because the measure savings assumptions utilized for 2028-2033 estimate zero therms for furnace repair & replacement.

[2] The 2025–2026 figures reflect the measure installation forecasts used to support the proposals approved in D.21-06-015, Table 8, ESA Approved Budgets , Attachment 1. PG&E expects that the installation quantity, spending, savings, and benefits trends will be more similar to 2024-2025 actuals than the forecasts provided.

[3] The 2025 actuals for installation quantity and budget are available in the 2025 Annual Report, Appendix A, ESA Table 2.

Electric

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS)	#	#	#	#	#	#	#
Cold Storage	29	N/A	N/A	N/A	N/A	N/A	N/A
Air Purifiers	443	456	485	475	469	463	414
Portable A/C	9	15	15	15	15	14	13
~~Comprehensive Home Health and Safety Checkups~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	481	471	500	490	484	477	427

Note: Please add rows for measures that

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS)	$	$	$	$	$	$	$
Cold Storage	10,201	N/A	N/A	N/A	N/A	N/A	N/A
Air Purifiers	111,077	85,187	91,478	91,287	91,625	93,243	89,333
Portable A/C	5,210	5,768	6,194	6,181	6,203	6,313	6,048
~~Comprehensive Home Health and Safety Checkups~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	126,487	90,955	97,672	97,468	97,828	99,556	95,381

Note: Please add rows for measures that

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS)	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh
Cold Storage	-	N/A	N/A	N/A	N/A	N/A	N/A
Air Purifiers	-	-	-	-	-	-	-
Portable A/C	-	-	-	-	-	-	-
~~Comprehensive Home Health and Safety Checkups~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS)	$	$	$	$	$	$	$
Cold Storage	3,468	n/a	n/a	n/a	n/a	n/a	n/a
Air Purifiers	37,766	21,533	23,328	22,994	25,369	24,857	24,101
Portable A/C	2,275	1,808	1,938	1,882	1,824	1,785	1,730
~~Comprehensive Home Health and Safety Checkups~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	43,509	23,341	25,266	24,876	27,193	26,642	25,831

Note: Please add rows for measures that

Gas

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS)	#	#	#	#	#	#	#
~~Comprehensive Home Health and Safety Checkups~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Natural Gas Appliance Testing (NGAT~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Furnace Clean and Tune~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement[2]	1,882	1,661	1,564	870	458	332	309
Total	1,882	1,661	1,564	870	458	332	309

Note: Please add rows for measures that

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS)	$	$	$	$	$	$	$
~~Comprehensive Home Health and Safety Checkups~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Natural Gas Appliance Testing (NGAT~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Furnace Clean and Tune~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement[2]	8,841,634	8,132,027	7,702,155	3,629,117	1,117,760	323,190	300,617
Total	8,841,634	8,132,027	7,702,155	3,629,117	1,117,760	323,190	300,617

Note: Please add rows for measures that

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS)	annual therms	annual therms	annual therms	annual therms	annual therms	annual therms	annual therms
~~Comprehensive Home Health and Safety Checkups~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Natural Gas Appliance Testing (NGAT~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Furnace Clean and Tune~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement[1]	(45,959)	-	-	-	-	-	-
Total	(45,959)	-	-	-	-	-	-

Note: Please add rows for measures that

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS)	$	$	$	$	$	$	$
~~Comprehensive Home Health and Safety Checkups~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Natural Gas Appliance Testing (NGAT~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Furnace Clean and Tune~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement	3,787,161	2,857,368	2,690,590	1,316,328	398,539	111,716	105,102
Total	3,787,161	2,857,368	2,690,590	1,316,328	398,539	111,716	105,102

Note: Please add rows for measures that

* PG&E proposes sunsetting Cold Storag

[1] Therms savings are shown for 2028–2
replacement.
[2] The 2025–2026 figures reflect the me
, Attachment 1. PG&E expects that the ir
to 2024-2025 actuals than the forecasts p
[3] The 2025 actuals for installation quan

Electric

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS)	**Offered? (Y/N)**	**#**	**#**	**#**	**#**	**#**	**#**
Cold Storage	Y*	N/A	51	50	31	3	759
Air Purifiers	Y	N/A	120	627	470	414	5,667
Portable A/C	Y	N/A	74	24	10	8	595
~~Comprehensive Home Health and Safety Checkups~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N	N/A	N/A	N/A	N/A	N/A	N/A
Total		-	245	701	511	425	7,021

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS)	**Offered? (Y/N)**	**$**	**$**	**$**	**$**	**$**	**$**
Cold Storage	Y*	N/A	16,305	15,845	9,907	932	432,626
Air Purifiers	Y	N/A	29,429	153,776	107,876	86,198	1,915,677
Portable A/C	Y	N/A	42,199	12,413	5,060	3,954	401,932
~~Comprehensive Home Health and Safety Checkups~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N	N/A	N/A	N/A	N/A	N/A	N/A
Total		-	87,933	182,034	122,843	91,084	2,750,235

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS)	**Offered? (Y/N)**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**
Cold Storage	Y*	N/A	-	-	-	-	-
Air Purifiers	Y	N/A	-	-	-	-	-
Portable A/C	Y	N/A	-	-	-	-	-
~~Comprehensive Home Health and Safety Checkups~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N	N/A	N/A	N/A	N/A	N/A	N/A
Total		-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS)	**Offered? (Y/N)**	**$**	**$**	**$**	**$**	**$**	**$**
Cold Storage	Y	N/A	1,885	1,728	3,073	85,968	84,108
Air Purifiers	Y	N/A	3,403	26,658	33,458	379,026	372,432
Portable A/C	Y	N/A	18,963	4,790	2,058	89,815	87,885
~~Comprehensive Home Health and Safety Checkups~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N	N/A	N/A	N/A	N/A	N/A	N/A
Total		-	24,251	33,176	38,589	554,809	544,425

Note: Please add rows for measures that are missing from this table.

Gas

Health, Comfort, and Safety (HCS)	Offered? (Y/N)	2021 actual #	2022 actual #	2023 actual #	2024 actual #	2025 authorized #[3]	2026 authorized #
~~Comprehensive Home Health and Safety Checkups~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Natural Gas Appliance Testing (NGAT~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Furnace Clean and Tune~~	N	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement[2]	Y	2,006	1,729	1,845	1,960	666	642
Total		2,006	1,729	1,845	1,960	666	642

Note: Please add rows for measures that are missing from this table.

Health, Comfort, and Safety (HCS)	Offered? (Y/N)	2021 actual $	2022 actual $	2023 actual $	2024 actual $	2025 authorized $[3]	2026 authorized $
~~Comprehensive Home Health and Safety Checkups~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Natural Gas Appliance Testing (NGAT~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Furnace Clean and Tune~~	N	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement[2]	Y	6,370,975	6,434,934	7,752,875	8,424,506	2,836,005	2,770,092
Total		6,370,975	6,434,934	7,752,875	8,424,506	2,836,005	2,770,092

Note: Please add rows for measures that are missing from this table.

Health, Comfort, and Safety (HCS)	Offered? (Y/N)	2021 actual annual therms	2022 actual annual therms	2023 actual annual therms	2024 actual annual therms	2025 authorized annual therms[3]	2026 authorized annual therms
~~Comprehensive Home Health and Safety Checkups~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Natural Gas Appliance Testing (NGAT~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Furnace Clean and Tune~~	N	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement[1]	Y	(48,978)	(42,218)	(45,142)	(47,851)	(16,261)	(15,677)
Total		(48,978)	(42,218)	(45,142)	(47,851)	(16,261)	(15,677)

Note: Please add rows for measures that are missing from this table.

Health, Comfort, and Safety (HCS)	Offered? (Y/N)	2021 actual $	2022 actual $	2023 actual $	2024 actual $	2025 authorized $	2026 authorized $
~~Comprehensive Home Health and Safety Checkups~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Natural Gas Appliance Testing (NGAT~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N	N/A	N/A	N/A	N/A	N/A	N/A
~~Furnace Clean and Tune~~	N	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement	Y	4,329,269	3,298,373	3,446,944	3,469,092	711,676	703,900
Total		4,329,269	3,298,373	3,446,944	3,469,092	711,676	703,900

Note: Please add rows for measures that are missing from this table.

* PG&E proposes sunsetting Cold Storage in the 2028-2033 cycle.

[1] Therms savings are shown for 2028–2033 to be zero, because the measure savings assumptions utilized for 2028-2033 estimate zero therms for furnace repair & replacement.

[2] The 2025–2026 figures reflect the measure installation forecasts used to support the proposals approved in D.21-06-015, Table 8, ESA Approved Budgets , Attachment 1. PG&E expects that the installation quantity, spending, savings, and benefits trends will be more similar to 2024-2025 actuals than the forecasts provided.

[3] The 2025 actuals for installation quantity and budget are available in the 2025 Annual Report, Appendix A, ESA Table 2.

Electric

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS)	#	#	#	#	#	#	#
Cold Storage	29	N/A	N/A	N/A	N/A	N/A	N/A
Air Purifiers	443	456	485	475	469	463	414
Portable A/C	9	15	15	15	15	14	13
~~Comprehensive Home Health and Safety Checkups~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	481	471	500	490	484	477	427

Note: Please add rows for measures that

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS)	$	$	$	$	$	$	$
Cold Storage	10,201	N/A	N/A	N/A	N/A	N/A	N/A
Air Purifiers	111,077	85,187	91,478	91,287	91,625	93,243	89,333
Portable A/C	5,210	5,768	6,194	6,181	6,203	6,313	6,048
~~Comprehensive Home Health and Safety Checkups~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	126,487	90,955	97,672	97,468	97,828	99,556	95,381

Note: Please add rows for measures that

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS)	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh
Cold Storage	-	N/A	N/A	N/A	N/A	N/A	N/A
Air Purifiers	-	-	-	-	-	-	-
Portable A/C	-	-	-	-	-	-	-
~~Comprehensive Home Health and Safety Checkups~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS)	$	$	$	$	$	$	$
Cold Storage	3,468	n/a	n/a	n/a	n/a	n/a	n/a
Air Purifiers	37,766	21,533	23,328	22,994	25,369	24,857	24,101
Portable A/C	2,275	1,808	1,938	1,882	1,824	1,785	1,730
~~Comprehensive Home Health and Safety Checkups~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	43,509	23,341	25,266	24,876	27,193	26,642	25,831

Note: Please add rows for measures that

Gas

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS)	#	#	#	#	#	#	#
~~Comprehensive Home Health and Safety Checkups~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Natural Gas Appliance Testing (NGAT~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Furnace Clean and Tune~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement[2]	1,882	1,661	1,564	870	458	332	309
Total	1,882	1,661	1,564	870	458	332	309

Note: Please add rows for measures that

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS)	$	$	$	$	$	$	$
~~Comprehensive Home Health and Safety Checkups~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Natural Gas Appliance Testing (NGAT~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Furnace Clean and Tune~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement[2]	8,841,634	8,132,027	7,702,155	3,629,117	1,117,760	323,190	300,617
Total	8,841,634	8,132,027	7,702,155	3,629,117	1,117,760	323,190	300,617

Note: Please add rows for measures that

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS)	annual therms	annual therms	annual therms	annual therms	annual therms	annual therms	annual therms
~~Comprehensive Home Health and Safety Checkups~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Natural Gas Appliance Testing (NGAT~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Furnace Clean and Tune~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement[1]	(45,959)	-	-	-	-	-	-
Total	(45,959)	-	-	-	-	-	-

Note: Please add rows for measures that

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS)	$	$	$	$	$	$	$
~~Comprehensive Home Health and Safety Checkups~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~CO and Smoke Alarms~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Natural Gas Appliance Testing (NGAT~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Air Sealing/Envelope~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
~~Furnace Clean and Tune~~	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement	3,787,161	2,857,368	2,690,590	1,316,328	398,539	111,716	105,102
Total	3,787,161	2,857,368	2,690,590	1,316,328	398,539	111,716	105,102

Note: Please add rows for measures that

* PG&E proposes sunsetting Cold Storag

[1] Therms savings are shown for 2028–2
replacement.
[2] The 2025–2026 figures reflect the me
, Attachment 1. PG&E expects that the ir
to 2024-2025 actuals than the forecasts p
[3] The 2025 actuals for installation quan

Southern California Edison
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DATA REQUEST SET T U R N - S C E - 0 0 1

To: TURN
Prepared by: Galaxy H Kaji
Job Title: Advisor
Received Date: 2/24/2026

Response Date: 3/10/2026

Question 01.a:
Please refer to Table A-1 Planning Assumptions ESA Program on pages B-6 to B-13 and Table A-1a Planning Assumptions ESA MFWB Program on pages B-16 to B-21 of Ex. SCE-05.

a. Please disaggregate the regional Multifamily Whole Building (MFWB) program from the Energy Savings Assistance Main (ESA Main) program. Specifically, please update the data in Table A-1 Planning Assumptions ESA Program on pages B-6 to B-13 of Ex. SCE-05 and add data to Table A-1a Planning Assumptions ESA MFWB Program on pages B-16 to B-21 of Ex. SCE-05. While TURN recognizes that SCE is proposing to close the regional MFWB program and transition all aspects of the multifamily ESA delivery to SCE's ESA program, SCE will still be administering a local MFWB program and segregating these line items is essential for ensuring accurate budget tracking for each distinct initiative implemented by SCE.

Response to Question 01.a:

TURN requests that SCE disaggregate multifamily data from Table A-1 on pages B-6 through B-13 and add that data to ESA Multifamily Whole Building (MFWB) planning assumptions table on pages B-16 through B-21 in Exhibit SCE-05. However, SCE's 2028-2033 proposal does not implement multifamily segment delivery as a distinct program, separate from the ESA program. Instead, for the 2028-2033 program cycle, SCE proposes to transition away from the regionally administered Southern MFWB program and deliver multifamily in-unit and common-area measures through an integrated ESA program,[1] consistent with program cycles prior to 2021-2026 (the current cycle). Prior to the current cycle, multifamily customers were included in the ESA program. During the current cycle, however, multifamily delivery changed to be delivered through a separate and distinct program, the regional Southern MFWB program, which included a separate contractor network and goal.

For 2028-2033, SCE proposes to return to the prior integrated ESA program where multifamily customers were served as a housing segment within the ESA portfolio, alongside single family and mobile/manufactured homes, through a single contractor network.[2] Because SCE proposes to close that separate Southern MFWB program and return multifamily delivery through an integrated ESA program with a single ESA program cycle goal and an overall ESA program budget,

[1] *See* SCE-02, p.76.
[2] *Id*

disaggregating multifamily data from the ESA program portfolio tables could introduce an artificial distinction that is inconsistent with SCE's proposed program design, planning assumptions, and delivery model described in the Application.

For these reasons, based on the structure and rationale presented in the Application and the data provided through the attachments to this response, disaggregating multifamily data from the ESA portfolio tables in the Application is not necessary to evaluate SCE's ESA portfolio.

SCE's Application provides tables with its planning assumptions (Table A-1), budgets (Table 7), participant counts (Table A-2), and bill savings (Table A-3a), which reflect ESA delivery inclusive of multifamily households. SCE estimates that during the 2028-2033 program cycle approximately nine percent of ESA's proposed $586 million budget for Energy Efficiency measures may support multifamily customers, and that multifamily households may account for approximately twenty-three percent of ESA's proposed cycle target of 387,265 homes treated.[3] These estimates reflect SCE's planning assumptions used to develop the integrated ESA portfolio and do not represent a separate multifamily program budget or target.

That said, SCE provides the attached tables that support SCE's multifamily planning assumptions including budgets for proposed measure installations. The attached tables represent a subset of SCE's ESA program planning assumptions specific to multifamily customers and do not include the remainder of housing subsets. As discussed above, the Application presents ESA program budgets at the portfolio level because SCE is proposing an integrated ESA program. SCE's projected participant counts for multifamily (CAM and in-units) can be found in Table A-2 in the Application.[4] SCE is unable to provide disaggregated bill savings for multifamily since bill savings are calculated using the total program cost.[5]

[3] *See* SCE-02, p. 42.
[4] *See* SCE-05, p. B-22.
[5] *See* SCE-05, p. B-23.

2028 Multi-Family Measures

CAM

Measures	Units	Budget	kW (Annual)	kWh (Annual)	Therms (Annual)
Exterior Hard wired LED fixtures	2,439	$253,352	12	8,736	-
Pool Pumps	8	$12,500	7	78,975	-
CAM Total	**2,447**	**$265,852**	**19**	**87,711**	**-**

In-Unit

Measures	Units	Budget	kW (Annual)	kWh (Annual)	Therms (Annual)
Freezer	5	$6,545	-	1,662	(23)
High Efficiency Clothes Washer	1	$1,284	0	132	13
Refrigerator	2,600	$3,587,826	180	1,502,800	-
Faucet Aerator	12	$613	0	2,071	-
Low Flow Showerhead	306	$15,629	4	28,917	-
Thermostatic Shower Valve	10	$617	0	660	-
Air Sealing	1,968	$136,346	12	96,432	-
Central A/C replacement	134	$1,148,617	140	154,521	(281)
Heat Pump Replacement	17	$254,898	17	45,508	-
Smart Fan Controller	1	$367	1	399	22
Smart Thermostat	127	$47,181	-	5,939	312
LED A-Lamps	21,492	$225,610	-	65,766	(1,075)
LED R/BR Lamps	4,651	$46,277	22	143,251	(2,372)
Lifecycle Refrigerant Management	11	$5,196	13	26,732	-
Home Energy Monitor	62	$28,674	-	18,885	-
Smart Strip Tier II	13,363	$912,810	35	2,707,210	(7)
In-Unit Total	**44,760**	**$6,418,488**	**424**	**4,800,883**	**(3,410)**

2029 Multi-Family Measures

CAM

Measures	Units	Budget	kW (Annual)	kWh (Annual)	Therms (Annual)
Exterior Hard wired LED fixtures	2,439	$260,953	12	8,736	-
Pool Pumps	8	$12,875	7	78,975	-
CAM Total	**2,447**	**$273,828**	**19**	**87,711**	**-**

In-Unit

Measures	Units	Budget	kW (Annual)	kWh (Annual)	Therms (Annual)
Freezer	5	$6,741	-	1,662	(23)
High Efficiency Clothes Washer	1	$1,323	0	132	13
Refrigerator	2,600	$3,695,460	180	1,502,800	-
Faucet Aerator	12	$631	0	2,071	-
Low Flow Showerhead	306	$16,098	4	28,917	-
Thermostatic Shower Valve	10	$636	0	660	-
Air Sealing	1,968	$140,436	12	96,432	-
Central A/C replacement	134	$1,183,075	140	154,521	(281)
Heat Pump Replacement	17	$262,545	17	45,508	-
Smart Fan Controller	1	$378	1	399	22
Smart Thermostat	127	$48,596	-	5,939	312
LED A-Lamps	23,631	$255,506	-	72,311	(1,182)
LED R/BR Lamps	4,651	$47,665	22	143,251	(2,372)
Lifecycle Refrigerant Management	11	$5,352	13	26,732	-
Home Energy Monitor	62	$29,534	-	18,885	-
Smart Strip Tier II	13,363	$940,194	35	2,707,210	(7)
In-Unit Total	**46,899**	**$6,634,171**	**424**	**4,807,428**	**(3,517)**

2030 Multi-Family Measures

CAM

Measures	Units	Budget	kW (Annual)	kWh (Annual)	Therms (Annual)
Exterior Hard wired LED fixtures	2,439	$268,781	12	8,736	-
Pool Pumps	8	$13,261	7	78,975	-
CAM Total	**2,447**	**$282,043**	**19**	**87,711**	**-**

In-Unit

Measures	Units	Budget	kW (Annual)	kWh (Annual)	Therms (Annual)
Freezer	5	$6,944	-	1,662	(23)
High Efficiency Clothes Washer	1	$1,362	0	132	13
Refrigerator	2,600	$3,806,324	180	1,502,800	-
Faucet Aerator	12	$650	0	2,071	-
Low Flow Showerhead	306	$16,580	4	28,917	-
Thermostatic Shower Valve	10	$655	0	660	-
Air Sealing	1,968	$144,649	12	96,432	-
Central A/C replacement	134	$1,218,568	140	154,521	(281)
Heat Pump Replacement	17	$270,421	17	45,508	-
Smart Fan Controller	1	$390	1	399	22
Smart Thermostat	127	$50,054	-	5,939	312
LED A-Lamps	25,986	$289,399	-	79,517	(1,299)
LED R/BR Lamps	4,651	$49,095	22	143,251	(2,372)
Lifecycle Refrigerant Management	11	$5,512	13	26,732	-
Home Energy Monitor	62	$30,420	-	18,885	-
Smart Strip Tier II	13,363	$968,400	35	2,707,210	(7)
In-Unit Total	**49,254**	**$6,859,422**	**424**	**4,814,634**	**(3,635)**

2031 Multi-Family Measures

CAM

Measures	Units	Budget	kW (Annual)	kWh (Annual)	Therms (Annual)
Exterior Hard wired LED fixtures	2,439	$276,845	12	8,736	-
Pool Pumps	8	$13,659	7	78,975	-
CAM Total	**2,447**	**$290,504**	**19**	**87,711**	**-**

In-Unit

Measures	Units	Budget	kW (Annual)	kWh (Annual)	Therms (Annual)
Freezer	5	$7,152	-	1,662	(23)
High Efficiency Clothes Washer	1	$1,403	0	132	13
Refrigerator	2,600	$3,920,514	180	1,502,800	-
Faucet Aerator	12	$670	0	2,071	-
Low Flow Showerhead	306	$17,078	4	28,917	-
Thermostatic Shower Valve	10	$674	0	660	-
Air Sealing	1,968	$148,988	12	96,432	-
Central A/C replacement	134	$1,255,125	140	154,521	(281)
Heat Pump Replacement	17	$278,534	17	45,508	-
Smart Fan Controller	1	$402	1	399	22
Smart Thermostat	127	$51,556	-	5,939	312
LED A-Lamps	28,576	$327,790	-	87,443	(1,429)
LED R/BR Lamps	4,651	$50,568	22	143,251	(2,372)
Lifecycle Refrigerant Management	11	$5,678	13	26,732	-
Home Energy Monitor	62	$31,333	-	18,885	-
Smart Strip Tier II	13,363	$997,452	35	2,707,210	(7)
In-Unit Total	**51,844**	**$7,094,915**	**424**	**4,822,560**	**(3,764)**

2032 Multi-Family Measures

CAM

Measures	Units	Budget	kW (Annual)	kWh (Annual)	Therms (Annual)
Exterior Hard wired LED fixtures	2,439	$285,150	12	8,736	-
Pool Pumps	8	$14,069	7	78,975	-
CAM Total	**2,447**	**$299,219**	**19**	**87,711**	**-**

In-Unit

Measures	Units	Budget	kW (Annual)	kWh (Annual)	Therms (Annual)
Freezer	5	$7,366	-	1,662	(23)
High Efficiency Clothes Washer	1	$1,445	0	132	13
Refrigerator	2,600	$4,038,129	180	1,502,800	-
Faucet Aerator	12	$690	0	2,071	-
Low Flow Showerhead	306	$17,590	4	28,917	-
Thermostatic Shower Valve	10	$694	0	660	-
Air Sealing	1,968	$153,458	12	96,432	-
Central A/C replacement	134	$1,292,779	140	154,521	(281)
Heat Pump Replacement	17	$286,890	17	45,508	-
Smart Fan Controller	1	$414	1	399	22
Smart Thermostat	127	$53,102	-	5,939	312
LED A-Lamps	31,424	$371,273	-	96,157	(1,571)
LED R/BR Lamps	4,651	$52,085	22	143,251	(2,372)
Lifecycle Refrigerant Management	11	$5,848	13	26,732	-
Home Energy Monitor	62	$32,273	-	18,885	-
Smart Strip Tier II	13,363	$1,027,375	35	2,707,210	(7)
In-Unit Total	**54,692**	**$7,341,411**	**424**	**4,831,275**	**(3,907)**

2033 Multi-Family Measures

CAM

Measures	Units	Budget	kW (Annual)	kWh (Annual)	Therms (Annual)
Exterior Hard wired LED fixtures	2,439	$293,705	12	8,736	-
Pool Pumps	8	$14,491	7	78,975	-
CAM Total	**2,447**	**$308,196**	**19**	**87,711**	**-**

In-Unit

Measures	Units	Budget	kW (Annual)	kWh (Annual)	Therms (Annual)
Freezer	5	$7,587	-	1,662	(23)
High Efficiency Clothes Washer	1	$1,489	0	132	13
Refrigerator	2,600	$4,159,273	180	1,502,800	-
Faucet Aerator	12	$711	0	2,071	-
Low Flow Showerhead	306	$18,118	4	28,917	-
Thermostatic Shower Valve	10	$715	0	660	-
Air Sealing	1,968	$158,062	12	96,432	-
Central A/C replacement	134	$1,331,562	140	154,521	(281)
Heat Pump Replacement	17	$295,497	17	45,508	-
Smart Fan Controller	1	$426	1	399	22
Smart Thermostat	127	$54,695	-	5,939	312
Exterior Hard wired LED fixtures	22,986	$2,574,084	115	82,336	-
LED A-Lamps	34,558	$420,550	-	105,747	(1,728)
LED R/BR Lamps	4,651	$53,647	22	143,251	(2,372)
Lifecycle Refrigerant Management	11	$6,024	13	26,732	-
Home Energy Monitor	62	$33,241	-	18,885	-
Smart Strip Tier II	13,363	$1,058,197	35	2,707,210	(7)
In-Unit Total	**80,812**	**$10,173,876**	**539**	**4,923,201**	**(4,063)**

Southern California Edison
A.26-01-003 et al – 2026 IQP Application

DATA REQUEST SET T U R N - S C E - 0 0 2

To: TURN
Prepared by: Truc Nguyen
Job Title: Cust Prgrms Consvrtion/Effcy, Advisor
Received Date: 4/13/2026

Response Date: 5/8/2026

Question 04:
"Budgets, Savings, and Benefits

Please provide a break out of the proposed budgets, savings, households treated, and benefits for each program (ESA Main, ESA MFWB, and ESA Pilots) in each program year (2028-2033) by electric and gas using the template provided in Discovery Tables.xlsx, tab 02. Please note that there are three tables for electric and three tables for gas. Please provide all data that is applicable and available. Please leave any cells blank that cannot be populated because they are not applicable (for example, electric table inputs for a gas utility). If some data is not available, please identify that data in the written response, explain why it is not available, and populate those cells with a "n/a"."

Response to Question 04:

Please see response provided on TURN SCE-02_ Discovery Tables_Tab 2. Note that multifamily units are included in the ESA Main table.

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DATA REQUEST SET T U R N - S C E - 0 0 2

To: TURN
Prepared by: Truc Nguyen
Job Title: Cust Prgrms Consvrtion/Effcy, Advisor
Received Date: 4/13/2026

Response Date: 5/11/2026

Question 06:
"Cost-effectiveness

Please provide a break out of the actual, authorized, and proposed number of health, comfort, and safety (HCS) measures, the spending or budget allocated to HCS measures, and the savings and the benefits attributable to HCS measures for each program year in the previous cycle (2021-2026), 2027 bridge year, and each year in the new cycle (2028-2033) for electric and gas. Please provide the response using the template provided in Discovery Tables.xlsx, tab 03. Please note that there are four tables for electric and four tables for gas--one for measures, one for spending/budgets, one for savings, and one for benefits. Please add rows for any measures that are missing from these tables and use the Offered (Y/N) column to indicate which measures are offered and which are not offered. Please provide all data that is applicable and available. Please leave any cells blank that cannot be populated because they are not applicable (for example, electric table inputs for a gas utility). If some data is not available, please identify that data in the written response, explain why it is not available, and populate those cells with a "n/a"."

Response to Question 06:

See Excel file titled: TURN SCE-02_ Discovery Tables_Q6_Tab 03

Please note that 2025 and 2026 Authorized data are not available as ESA is authorized at the program level under D.21-06-015 and not at the individual measure level.

Southern California Edison
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DATA REQUEST SET T U R N - S C E - 0 0 2

To: TURN
Prepared by: Davi Ibarra
Job Title: Senior Advisor
Received Date: 4/13/2026

Response Date: 5/11/2026

Question 08:
"Electrification

Please define the term electrification as it was applied in the proposed plan. In particular, please respond to the following questions:

a. Does electrification include fuel switching? Why or why not?

b. Does electrification include fuel substitution? Why or why not?

c. Does the plan aim to electrify a minimum number and type(s) of end uses? If so, what is the minimum?

d. Does the plan aim to install certain type(s) of measures? If so, which type(s)? Is space heating always included? How about water heating, clothes drying, and cooking?

e. Is a customer receiving one or more electrification measures using any other fuels post-electrification? Is their home all-electric?"

Response to Question 08:

In SCE's 2028–2033 Energy Savings Assistance (ESA) Program Application, electrification is the delivery and installation of high-efficiency electric end-use technologies to replace existing combustion-based appliances, as part of a comprehensive, customer-centric service offering for income-qualified households.

As applied in the proposed plan, electrification encompasses fuel substitution and fuel switching measures such as:

- Heat pump space heating and cooling systems,
- Heat pump water heaters,
- Induction cooking equipment, and
- Electric clothes dryers.

8a. Yes. Electrification under the proposed plan includes fuel switching, where electric technologies replace non-utility fuels such as propane, wood, or fuel oil.

SCE included fuel switching in its proposed ESA portfolio because it is an integral and Commission-approved element of SCE's proposed ESA framework.

8b. Yes. Electrification under the proposed plan includes fuel substitution, where electric technologies replace CPUC-regulated natural gas appliances.

SCE included fuel substitution in its proposed ESA portfolio because it is an integral and Commission-approved element of SCE's proposed ESA framework.

8c. No. The 2028–2033 ESA Program does not establish a minimum number or required type of end uses that must be electrified.

However, SCE will prioritize opportunities to electrify space heating and water heating, as these end uses represent the largest sources of residential energy consumption and associated greenhouse gas emissions. Focusing on these end uses allows the program to target the most significant emissions-reduction opportunities while advancing affordability, health, and comfort objectives.

8d. Yes. The proposed plan identifies a set of electrification measure types, including heat pump space heating and cooling, heat pump water heaters, induction cooking equipment, and electric clothes dryers, but none are required in every household.

Space heating may not always be included in a customer's installed measures, and water heating, clothes drying, and cooking measures are optional offerings. Installation of any electrification measure depends on household needs, existing conditions, technical feasibility, and affordability, consistent with ESA's customer-centric, whole-home service model.

8e. A customer may receive one or more electrification measures while continuing to use other fuels for end uses not addressed by ESA. Homes receiving electrification measures are not required to become all-electric. Instead, electrification is implemented on an end-use-specific basis through ESA's established whole-home service model. SCE conducts a comprehensive home assessment that evaluates existing equipment, housing conditions, feasibility, and anticipated bill impacts, and then develops a customized scope of work for each participating household.

Under this approach, customers may electrify certain end uses—such as space heating, water heating, cooking, or clothes drying—while retaining existing natural gas or other non-electric fuels for remaining end uses.

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DATA REQUEST SET T U R N - S C E - 0 0 2

To: TURN
Prepared by: Davi Ibarra
Job Title: Senior Advisor
Received Date: 4/13/2026

Response Date: 5/11/2026

Question 09:
"Electrification

How will the plan target customers and conduct outreach for electrification, especially for customers who use multiple fuel sources to heat their home?
a. Which utilities are responsible for targeting? Please describe the roles and responsibilities of each utility and how they will coordinate with one another.
b. Which utilities are responsible for conducting the cost-effectiveness and rate and bill impacts assessment for each customer? Please describe the roles and responsibilities of each utility and how they will coordinate with one another.
c. Which utilities are responsible for outreach to customers? Please describe the roles and responsibilities of each utility and how they will coordinate with one another.
d. Is the responsibility for targeting, cost-effectiveness and rate and bill impact assessment, and outreach shared between electric and gas utilities? If so, how? What is each utility responsible for and how do they carry out these responsibilities in coordination with the other utilities?
e. How are electric and gas utilities coordinating to ensure that multiple utilities are not reaching out to the same customer with different and competing measure offerings?"

Response to Question 09:

As described in SCE's 2028–2033 Energy Savings Assistance (ESA) Program Application, SCE plans to target customers and conduct outreach for electrification through a data-informed approach that is integrated into ESA's established whole-home service delivery model, rather than implemented as a stand-alone or fuel-specific effort.

Customer targeting for electrification leverages ESA's existing eligibility frameworks and program infrastructure, including income-qualification indicators, housing characteristics, geographic equity considerations, and available utility usage information. This approach enables SCE to identify income-qualified households that may benefit from electrification.

Consistent with the ESA Program design, outreach emphasizes voluntary participation, informed customer choice, and affordability, regardless of whether customers have multiple fuel sources or a single fuel source. Electrification outreach does not occur in isolation; once a customer enrolls, SCE conducts a comprehensive home assessment that evaluates existing equipment, housing conditions, site feasibility, and health, comfort, and safety needs.

9a. Each utility is solely responsible for conducting targeting and outreach within its service territory, including targeting customers with single or multiple fuel sources. SCE uses ESA eligibility indicators, housing characteristics, geographic equity considerations, and available utility usage information to identify income-qualified customers that may benefit from ESA services, including electrification.

Where appropriate, SCE coordinates with gas utilities through established inter-utility processes. SCE serves as the lead program administrator and primary point of accountability, while gas utilities support targeting refinement by providing gas-side information where authorized. This coordination enables more accurate identification of mixed-fuel households and supports aligned, whole-home program delivery.

9b. Each utility is responsible for conducting cost-effectiveness at its portfolio level, not at the individual customer level. At the customer level, SCE proposed to conduct rate and bill impact analysis solely as an impact-screening and decision support tool to inform customer choice and affordability during the home assessment and scope-of-work development process.

For customers receiving both electric and gas ESA services, each utility independently evaluates and claims only the costs, benefits, and bill impacts associated with the measures it administers. Utilities do not conduct joint cost-effectiveness testing or joint bill impact analysis for individual customers.

9c. Each utility is solely responsible for outreach to its respective customers under the ESA Program, including outreach related to electrification, if applicable. Outreach is conducted through ESA's established marketing and outreach framework, which includes utility-led communications, contractor-led outreach, customer service referrals, online enrollment channels, and partnerships with community-based organizations.

In areas where electric and gas utility service territories overlap, each utility conducts outreach to its own customers consistent with its respective ESA program. SCE coordinates, where appropriate, with gas utilities to align messaging, outreach timing, and enrollment processes and support a consistent customer experience.

9d. No. Responsibility for targeting, cost-effectiveness and rate and bill impact assessment, and outreach is not shared between electric and gas utilities.

As described in the responses to Questions 9.b and 9.c, each utility retains sole responsibility for these functions for the ESA services it administers within its respective service territory.

9e. Electric and gas utilities coordinate existing targeting, enrollment, and service-delivery processes, where applicable, to engage customers through a whole-home approach.

As described in responses to Questions 9 through 9.d., each utility is responsible for outreach to its own customers; however, coordination occurs at the implementation level to align outreach timing and enrollment sequencing for jointly served households. In addition, utility-authorized ESA

contractors play a key coordination role at the point of customer engagement. Where applicable, contractors may enroll customers in both electric and gas ESA services during a single interaction, consistent with program rules and data-sharing protocols. This utility-led, contractor-supported model reduces customer confusion, minimizes overlapping outreach, and facilitates coordinated delivery of whole-home services.

Southern California Edison
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DATA REQUEST SET T U R N - S C E - 0 0 2

To: TURN
Prepared by: Galaxy H Kaji
Job Title: Advisor
Received Date: 4/13/2026

Response Date: 5/11/2026

Question 10:
"Electrification

How will the plan allocate the costs of electrification across electric and gas?
a. Are electric utilities responsible for the costs associated with electrification for all customers? If so, do electric utilities receive all the benefits regardless of fuel type? If not, please explain.
b. Is the responsibility for paying for the costs of electrification shared between electric and gas utilities? If so, how are the costs and benefits shared?
c. How are the electric and gas utilities coordinating to ensure that costs and benefits are allocated correctly and not double counted?"

Response to Question 10:
As described in SCE's 2028–2033 ESA Application, electrification is proposed as a core offering of SCE's ESA Program and is funded entirely through the ESA program budgets, regardless of the customer's pre-existing fuel source.

Electrification measures delivered by SCE —including heat pump HVAC, heat pump water heaters, induction cooking equipment, and electric clothes dryers—are administered, funded, and reported within the ESA portfolio. Consistent with this approach, SCE claims all associated savings attributable to installed electrification measures, including electric savings (kWh), gas savings (therms), and claimable kWh savings calculated using Commission adopted fuel substitution methodologies. This approach supports clear alignment between funding responsibility, program administration, and savings attribution under a single utility framework.

Response to Question 10.a:
Yes. Electrification measures are funded by SCE and delivered through the ESA Program, regardless of the customer's existing fuel source. Accordingly, SCE receives, and reports all associated savings and benefits, including electric savings, gas savings where applicable, and claimable kWh savings, consistent with Commission guidance.

Response to Question 10.b:
No. The responsibility for funding electrification costs is not shared between electric and gas utilities. Electrification measures are fully funded through SCE's ESA budget, and costs and benefits are not allocated between utilities. This approach simplifies administration and supports clear alignment between funding, delivery, and savings attribution.

Response to Question 10.c:
Electrification measures are funded, administered, and reported solely within the SCE's portfolio, and gas utilities do not claim costs or savings associated with these measures. Savings are calculated and reported using Commission approved methodologies, including claimable kWh calculations for fuel substitution, which define how electric and gas impacts are accounted for, so that each impact is counted once and attributed to the administering utility. This framework provides transparency, consistency, and avoids double counting.

Southern California Edison
A.26-01-003 et al – 2026 IQP Application

DATA REQUEST SET T U R N - S C E - 0 0 2

To: TURN
Prepared by: Galaxy H Kaji
Job Title: Advisor
Received Date: 4/13/2026

Response Date: 5/11/2026

Question 14:
"Electrification

Please provide data on the actual, authorized, and proposed electrification efforts to date, for electric and gas from 2021 through 2027 using the template provided in Discovery Tables.xlsx, tab 06. Please note that there is one table for electric and one table for gas. Please provide all data that is applicable and available. Please leave any cells blank that cannot be populated because they are not applicable (for example, electric table inputs for a gas utility). If some data is not available, please identify that data in the written response, explain why it is not available, and populate those cells with a "n/a"."

Response to Question 14:

Please see the attached "TURN SCE-02_Discovery Tables Tab 06 Question 14 Response.xlsx" for the table response to this request.

For the period 2021 through 2026, electrification activity reflected in Discovery Tables.xlsx, Tab 06 relates exclusively to Energy Savings Assistance (ESA) Main and the Building Electrification (BE) Pilot. No electrification activity was implemented under the ESA Multifamily Whole Building (MFWB) program during this period.

Electrification activity reported for ESA Main reflects a carve-out of electrification measures implemented through ESA delivery, which is not how the program was authorized, tracked, and reported during the current program cycle. All data in ESA Pilots are reflective of the BE Pilot only, which reflects all the measures including non-electrification such as panel upgrades, permits, and enrollment costs.

With respect to budget status:

Actual values represent electrification activity implemented during the applicable program years, as reflected in ESA Main and the BE Pilot.

Authorized values for 2025 and 2026 are shown as "N/A" because the BE Pilot was approved under CPUC Decision 21-06-015 with a program-level budget not to exceed $40.8 million, including authority to carry over unspent funds across program years, rather than discrete annual authorization

amounts.

Proposed values for 2027 are shown as “N/A” within the BE Pilot because electrification activity for that year was incorporated into the overall ESA Main proposed budget, savings, and portfolio planning, and is therefore not presented as a standalone pilot.

Where data fields are marked “n/a”, this reflects either the non-applicability of the requested field to the BE Pilot’s authorization structure or the absence of annualized authorization data consistent with how the pilot was approved and tracked. Electric and gas tables are presented in Tab 06 consistent with the template provided; gas tables are blank where not applicable, as Southern California Edison is an electric utility and does not administer gas programs.

Southern California Edison
A.26-01-003 et al – 2026 IQP Application

DATA REQUEST SET T U R N - S C E - 0 0 2

To: TURN
Prepared by: Galaxy H Kaji
Job Title: Advisor
Received Date: 4/13/2026

Response Date: 5/11/2026

Question 15:
"Electrification

Please provide data on electrification efforts as proposed in the new program years (the 2028-2033 plan) for electric and gas using the template provided in Discovery Tables.xlsx, tab 07. Please note that there is one table for electric and one table for gas. Please provide all data that is applicable and available. Please leave any cells blank that cannot be populated because they are not applicable (for example, electric table inputs for a gas utility). If some data is not available, please identify that data in the written response, explain why it is not available, and populate those cells with a "n/a"."

Response to Question 15:

Please see the attached "Discovery Table Tab 07 Question 15 Response.xlsx" for the requested data. The electrification values provided are not separately found in SCE's application, as they represent breakouts of the figures contained in SCE's ESA cycle application tables and are considered planning assumptions for the proposed 2028–2033 program cycle.

Southern California Edison
A.26-01-003 et al – 2026 IQP Application

DATA REQUEST SET T U R N - S C E - 0 0 2

To: TURN
Prepared by: Davi Ibarra
Job Title: Senior Advisor
Received Date: 4/13/2026

Response Date: 5/11/2026

Question 17:
"Electrification

How are electrification efforts funded for oil, propane, and other heating fuel customers? Do funds come solely from electric customers? Do natural gas customers contribute any funds to this effort? Please explain the rationale for the cost allocation between electric and natural gas customers. If the funds come from both electric and natural gas customers, please identify how much funding comes from each."

Response to Question 17:

Electrification efforts for customers who use oil, propane, or other non-utility fuels for space heating are funded entirely through SCE's ESA Program budget. No funding for these electrification activities is contributed by natural gas utility ESA programs.

Natural gas utilities do not contribute funding for these electrification efforts, and costs and benefits are not shared. The funding structure mirrors that described in response to Question 16.

Southern California Edison
A.26-01-003 et al – 2026 IQP Application

DATA REQUEST SET T U R N - S C E - 0 0 2

To: TURN
Prepared by: Aaiysha Khursheed
Job Title: Senior Advisor
Received Date: 4/13/2026

Response Date: 5/11/2026

Question 26:
"Potential & Goals Study

Did you use the 2025 Potential & Goals Study to develop the proposed 2028-2033 ESA plan goals? Please discuss electrification measures separately from the other measures in the portfolio.
a. If so, how?
b. If not, why not? Is the methodology flawed and if so, how?
c. Are the fuel substitution assumptions and analysis in the study relevant to ESA? If so, how? If not, why not?"

Response to Question 26:

SCE used the 2025 Income Qualified Program (IQP) Potential and Goals Study ("Study") as an informational input only to develop its ESA plan goal of 195.4 million kWh for PY 2028 - 2033, as presented on page 13 of the *Testimony Supporting Policy Considerations for Southern California Edison Company's Energy Savings Assistance (ESA), California Alternative Rates for Energy (CARE), and Family Electric Rate Assistance (FERA) Programs and Budgets for the Program Years 2028 – 2033* (SCE-01). Guidehouse initially relied on the list of measures SCE referenced in its IQP monthly and annual reports as a starting point for the Study, not the other way around.

a. Page 59 of the *Cross-cutting Issues Impacting SCE's ESA, CARE, and FERA Programs* portion of SCE's Application for the years 2028 – 2033 (SCE-04) notes that the Study is only one consideration when setting ESA program goals. In SCE's experience implementing the ESA program, achievable potential energy savings in this and past Potential and Goals Studies serve as a theoretically based upper bound. "Since 2023, the ESA Program has repeatedly demonstrated that a significant difference can exist between achievable potential energy savings and what can be realistically achieved through actual

program implementation."[1,2]

b. SCE did not explicitly rely on the Study's achievable potential because the rate of achievable potential, even for the most conservative base scenario, exceeds the rate implicitly assumed in SCE forecast for the ESA program over the next program cycle. One reason for the gap between SCE's ESA program goals and achievable potential stems from SCE's overestimated baseline savings and adoption rates of measures. Page 60 of SCE-04 notes, "The forecasted savings provided by the IOUs that inform the potential forecasts have shown to be significantly higher than realized (or ex-post) savings, which likely has led to over-estimated savings potential for the forecasting period."[3] The initial inflated baseline assumptions lead to potential savings estimates that escalate over an entire forecasting period.

c. The assumptions and analysis in the Study are relevant to ESA, but do not fully account for all benefits and costs of fuel substitution (FS) measures. Appendix D of the Study summarizes stakeholder comments and responses from Guidehouse, the consultant that completed the study on behalf of the CPUC. On page 47, the report reproduces SCE's comment on the characterization of FS measures installed through the ESA program and notes that it is incomplete because, "in addition to not fully accounting for installation costs, the study does not account for the full value of the FS measures."[4] This leads to a sub-optimal quantity of FS measures according to microeconomic theory.

   Page 46 reproduces PG&E's comment that FS results may overestimate true potential in the income qualified sector because replacement of gas appliances with electric equivalents may entail costs associated with panel upgrades, rewiring, and remediation. Other costs that may not be accounted for are those associated with upgrades to electric service infrastructure and decommissioning of natural gas infrastructure.

   Guidehouse responded by noting its agreement with these limitations to the FS methodology and stated that the IOUs should account for these limitations in their PY 2028 – 2033 ESA goal setting.

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[1] *Cross-cutting Issues Impacting SCE's ESA, CARE, and FERA Programs* (SCE-04), p. 59.
[2] Other inputs, such as the program's historical performance, program realization rates, ESA measure saturation of treated homes, and the PY 2015 – 2017 ESA Program Impact Evaluation (the most recent impact analysis available for the program) more directly factor into forecasting electric savings goals for the next program cycle.
[3] *Ibid,* p. 60.
[4] *2025 Income Qualified Energy Efficiency Potential Study*, Guidehouse. (March 7,2025), p.46-47; available at: https://pda.energydataweb.com/#!/documents/4152/view

Electric

ESA Main		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets [1]	$	$ 73,200,176	$ 90,812,193	$ 93,226,922	$ 96,062,287	$ 98,986,793	$ 102,003,597	$ 105,116,013	$ 586,207,805
Energy savings	annual kWh	25,051,480	32,519,646	32,552,375	32,565,311	32,573,236	32,581,951	32,591,541	195,384,060
Energy savings	lifetime kWh	231,153,899	376,470,878	376,575,603	376,690,904	376,817,710	376,957,148	378,514,535	2,262,026,779
Demand savings	kW	9,855	3,249	3,261	3,264	3,264	3,264	3,264	19,567
Other fuel savings [2]	annual MMBtus	28,931	(33)	(44)	(56)	(69)	(83)	(99)	(383)
Other fuel savings [2]	lifetime MMBtus	74,524	(13,046)	(13,217)	(13,406)	(13,613)	(13,841)	(14,091)	(81,214)
Households treated	#	56,806	60,309	61,913	63,582	65,320	67,128	69,013	387,265
Energy benefits (ESACET)	$	$ 23,370,014	$ 33,523,397	$ 33,006,707	$ 31,804,336	$ 30,276,196	$ 28,730,685	$ 27,604,066	$ 184,945,388
Non-energy benefits (ESACET)	$	$ 10,183,231	$ 13,100,672	$ 13,427,651	$ 13,759,653	$ 14,100,520	$ 14,452,063	$ 14,902,173	$ 83,742,732

[1] Budgets includes $ for ESA measures only and excludes Administrative, Direct Implementation, Marketing & Outreach, and EM&V.

[2] Therm value converted to MMBtus (1 therm = 0.1 MMBtu).

ESA MFWB		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets [1]	$	17,677,931							$ -
Energy savings	annual kWh	4,567,451							-
Energy savings	lifetime kWh	28,258,284							-
Demand savings	kW	343							-
Other fuel savings [2]	annual MMBtus								-
Other fuel savings [2]	lifetime MMBtus								-
Households treated	#	12,540							-
Energy benefits (ESACET)	$	2,729,799							$ -
Non-energy benefits (ESACET)	$	7,288,494							$ -

[1] Budgets includes $ for ESA MFWB measures only and excludes Administrative, Direct Implementation, Marketing & Outreach, and EM&V.

[2] Therm goals for ESA MFWB is not applicable to SCE as it is an electric utility company.

[3] 2028-2033 data are not applicable as SCE proposes to close the regionally administered MFWB program and transition all aspects of the MF ESA delivery to SCE's ESA Program.

ESA Pilots		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets	$								
Energy savings	annual kWh								
Energy savings	lifetime kWh								
Demand savings	kW								
Other fuel savings	annual MMBtus								
Other fuel savings	lifetime MMBtus								
Households treated	#								
Energy benefits (ESACET)	$								
Non-energy benefits (ESACET)	$								

[1] Data for 2027-2033 are not applicable as the BE Pilot is included in ESA Main.

Gas

ESA Main		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets	$								
Gas savings	annual therms								
Gas savings	lifetime therms								
Households treated	#								
Energy benefits (ESACET)	$								
Non-energy benefits (ESACET)	$								

[1] Data for 2027-2033 are not applicable to SCE as it is an electric utility and does not provide gas services.

ESA MFWB		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets	$								
Gas savings	annual therms								
Gas savings	lifetime therms								
Households treated	#								
Energy benefits (ESACET)	$								
Non-energy benefits (ESACET)	$								

[1] Data for 2027-2033 are not applicable to SCE as it is an electric utility and does not provide gas services.

ESA Pilots		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets	$								
Gas savings	annual therms								
Gas savings	lifetime therms								
Households treated	#								
Energy benefits (ESACET)	$								
Non-energy benefits (ESACET)	$								

[1] Data for 2027-2033 are not applicable to SCE as it is an electric utility and does not provide gas services.

Electric

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized [1]	2026 authorized [1]
Health, Comfort, and Safety (HCS) Measures	**Offered? (Y/N)**	**#**	**#**	**#**	**#**	**#**	**#**
Air Purifier	N	-	-	-	-	n/a	n/a
Central A/C replacement	Y	4,932	3,615	176	505	n/a	n/a
Central A/C Tune up	Y	-	-	673	918	n/a	n/a
Clothes Dryer	Y	-	-	-	-	n/a	n/a
Cold Storage	N	-	-	-	-	n/a	n/a
Comprehensive Home Health and Safety Checkups	N	-	-	-	-	n/a	n/a
CO and Smoke Alarms	N	-	-	-	-	n/a	n/a
Condenser Coil Cleaning	Y	-	-	-	-	n/a	n/a
Ductless Mini-split	Y	-	-	-	-	n/a	n/a
Energy Efficient Fan Control	Y	82	47	18	17	n/a	n/a
Electrical MHR for Fuel Sub	Y	-	-	-	-	n/a	n/a
Evaporative Cooler	Y	4,451	2,812	832	1,750	n/a	n/a
Evaporative Cooler Maintenance	Y	-	-	1,080	1,409	n/a	n/a
Evaporator Coil	Y	-	-		-	n/a	n/a
Exterior Hard wired LED fixtures	Y	342	87	99	1,497	n/a	n/a
Fan Control Adjust	Y	-	-	195	-	n/a	n/a
Faucet Aerator	Y	-	-		-	n/a	n/a
Freezer	Y	337	199	118	853	n/a	n/a
Heat Pump Replacement	Y	88	73	2	113	n/a	n/a
Heat Pump Water Heater	Y	-	-	22	666	n/a	n/a
Home Energy Monitor	Y	-	-	-	-	n/a	n/a
HVAC Air Filter Service	Y	-	-	674	707	n/a	n/a
Induction Cooktop/Range	Y	-	-	-	-	n/a	n/a
LED A-Lamps	Y	339,646	83,212	34,032	139,274	n/a	n/a
LED R/BR Lamps	Y	-	-	-	1,309	n/a	n/a
LED Reflector Bulbs	Y	5,237	1,186	686	-	n/a	n/a
Other Domestic Hot Water	Y	200	95	90	46	n/a	n/a
Pool Pumps	Y	1,326	984	201	360	n/a	n/a
Portable A/C	Y	-	-	26	24	n/a	n/a
Refrigerant Charge Adjustment	Y	-	-	-	-	n/a	n/a
Refrigerator	Y	10,139	10,223	3,062	8,784	n/a	n/a
Room A/C Replacement	Y	397	192	27	57	n/a	n/a
Room HP Replacement	Y	-	-	-	-	n/a	n/a
Smart Strip Tier II	Y	97,421	26,612	11,792	45,316	n/a	n/a
Thermostatic Shower Valve	Y	29	22	65	-	n/a	n/a
Wholehouse Fan	Y	-	-	-	-	n/a	n/a
Total		464,627	129,359	53,870	203,605	n/a	n/a

[1] 2025 and 2026 Authorized is not available as ESA is authorized at the program level under D.21 06 015, not at the individual measure level.

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized [1]	2026 authorized [1]
Health, Comfort, and Safety (HCS) Spending/Buc	Offered? (Y/N)	$	$	$	$	$	$
Air Purifier	N	-	-	-	-	n/a	n/a
Central A/C replacement	Y	25,132,755	21,905,755	1,205,943	3,409,893	n/a	n/a
Central A/C Tune up	Y	-	-	135,860	112,386	n/a	n/a
Clothes Dryer	Y	-	-	-	-	n/a	n/a
Cold Storage	N	-	-	-	-	n/a	n/a
Comprehensive Home Health and Safety Checkups	N	-	-	-	-	n/a	n/a
CO and Smoke Alarms	N	-	-	-	-	n/a	n/a
Condenser Coil Cleaning	Y	-	-	-	-	n/a	n/a
Ductless Mini-split	Y	-	-	-	-	n/a	n/a
Energy Efficient Fan Control	Y	28,231	14,805	6,025	11,048	n/a	n/a
Electrical MHR for Fuel Sub	Y	-	-	-	-	n/a	n/a
Evaporative Cooler	Y	4,932,810	3,652,282	1,076,930	942,173	n/a	n/a
Evaporative Cooler Maintenance	Y	-	-	160,348	296,463	n/a	n/a
Evaporator Coil	Y	-	-		-	n/a	n/a
Exterior Hard wired LED fixtures	Y	34,302	8,124	9,233	136,690	n/a	n/a
Fan Control Adjust	Y	-	-	23,380	-	n/a	n/a
Faucet Aerator	Y	-	-	-	-	n/a	n/a
Freezer	Y	292,719	173,808	145,367	1,038,774	n/a	n/a
Heat Pump Replacement	Y	485,851	438,524	19,680	2,485,138	n/a	n/a
Heat Pump Water Heater	Y	-	-	95,941	3,240,199	n/a	n/a
Home Energy Monitor	Y	-	-	-	-	n/a	n/a
HVAC Air Filter Service	Y	-	-	36,642	42,256	n/a	n/a
Induction Cooktop/Range	Y	-	-	-	-	n/a	n/a
LED A-Lamps	Y	3,050,553	738,826	251,547	1,214,841	n/a	n/a
LED R/BR Lamps	Y	-	-		12,393	n/a	n/a
LED Reflector Bulbs	Y	43,433	9,714	4,366	-	n/a	n/a
Other Domestic Hot Water	Y	9,024	3,895	2,384	1,208	n/a	n/a
Pool Pumps	Y	1,745,427	1,295,749	316,944	647,780	n/a	n/a
Portable A/C	Y	-	-	20,706	18,985	n/a	n/a
Refrigerant Charge Adjustment	Y	-	-		-	n/a	n/a
Refrigerator	Y	11,328,987	14,191,335	4,032,426	11,989,708	n/a	n/a
Room A/C Replacement	Y	435,178	207,641	29,453	56,325	n/a	n/a
Room HP Replacement	Y	-	-	-	-	n/a	n/a
Smart Strip Tier II	Y	6,218,590	1,993,612	663,776	2,813,747	n/a	n/a
Thermostatic Shower Valve	Y	2,494	1,892	3,444	-	n/a	n/a
Wholehouse Fan	Y	-	-	-	-	n/a	n/a
Total		53,740,352	44,635,963	8,240,394	28,470,008	n/a	n/a

[1] 2025 and 2026 Authorized is not available as ESA is authorized at the program level under D.21 06 015, not at the individual measure level.

Note: Please add rows for measures that are missing from this table.

Health, Comfort, and Safety (HCS) Savings	Offered? (Y/N)	2021 actual annual kWh	2022 actual annual kWh	2023 actual annual kWh	2024 actual annual kWh	2025 authorized [1] annual kWh	2026 authorized [1] annual kWh
Air Purifier	N	-	-	-	-	n/a	n/a
Central A/C replacement	Y	1,658,736	1,234,486	1,205,943	163,829	n/a	n/a
Central A/C Tune up	Y	-	-	135,860	66,108	n/a	n/a
Clothes Dryer	Y	-	-	-	-	n/a	n/a
Cold Storage	N	-	-	-	-	n/a	n/a
Comprehensive Home Health and Safety Checkups	N	-	-	-	-	n/a	n/a
CO and Smoke Alarms	N	-	-	-	-	n/a	n/a
Condenser Coil Cleaning	Y	-	-	-	-	n/a	n/a
Ductless Mini-split	Y	-	-	-	-	n/a	n/a
Energy Efficient Fan Control	Y	7,471	3,206	6,025	2,571	n/a	n/a
Electrical MHR for Fuel Sub	Y	-	-	-	-	n/a	n/a
Evaporative Cooler	Y	2,493,148	1,576,971	460,301	942,173	n/a	n/a
Evaporative Cooler Maintenance	Y	-	-	188,402	296,463	n/a	n/a
Evaporator Coil	Y	-	-		-	n/a	n/a
Exterior Hard wired LED fixtures	Y	4,995	1,271	9,233	21,776	n/a	n/a
Fan Control Adjust	Y	-	-	23,380	-	n/a	n/a
Faucet Aerator	Y	-	-		-	n/a	n/a
Freezer	Y	285,776	168,752	145,367	718,765	n/a	n/a
Heat Pump Replacement	Y	117,660	92,458	19,680	473,194	n/a	n/a
Heat Pump Water Heater	Y	-	-	(34,521)	(889,688)	n/a	n/a
Home Energy Monitor	Y	-	-	-	-	n/a	n/a
HVAC Air Filter Service	Y	-	-	36,642	6,007	n/a	n/a
Induction Cooktop/Range	Y	-	-	-	-	n/a	n/a
LED A-Lamps	Y	13,177,777	3,220,076	251,547	4,521,279	n/a	n/a
LED R/BR Lamps	Y	-	-		23,841	n/a	n/a
LED Reflector Bulbs	Y	112,418	25,263	4,366	-	n/a	n/a
Other Domestic Hot Water	Y	22,260	5,406	2,384	-	n/a	n/a
Pool Pumps	Y	1,327,326	983,983	316,944	360,360	n/a	n/a
Portable A/C	Y	-	-	20,706	(9,025)	n/a	n/a
Refrigerant Charge Adjustment	Y	-	-		-	n/a	n/a
Refrigerator	Y	5,910,911	5,971,066	4,032,426	5,075,847	n/a	n/a
Room A/C Replacement	Y	(66,867)	(29,637)	29,453	(9,690)	n/a	n/a
Room HP Replacement	Y	-	-	-	-	n/a	n/a
Smart Strip Tier II	Y	13,617,885	3,722,835	663,776	6,328,089	n/a	n/a
Thermostatic Shower Valve	Y	1,381	1,003	3,444	-	n/a	n/a
Wholehouse Fan	Y	-	-	-	-	n/a	n/a
Total		38,670,877	16,977,139	7,521,358	18,091,900	n/a	n/a

[1] 2025 and 2026 Authorized is not available as ESA is authorized at the program level under D.21 06 015, not at the individual measure level.

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized [1]	2026 authorized [1]
Health, Comfort, and Safety (HCS) ESACET Ben	Offered? (Y/N)	$	$	$	$	$	$
Air Purifier	N	-	-	-	-	n/a	n/a
Central A/C replacement	Y	3,269,021	9,674,354	809,558	404,108	n/a	n/a
Central A/C Tune up	Y	-	-	112,786	2,096	n/a	n/a
Clothes Dryer	Y	-	-	-	-	n/a	n/a
Cold Storage	N	-	-	-	-	n/a	n/a
Comprehensive Home Health and Safety Checkups	N	-	-	-	-	n/a	n/a
CO and Smoke Alarms	N	-	-	-	-	n/a	n/a
Condenser Coil Cleaning	Y	-	-	-	-	n/a	n/a
Ductless Mini-split	Y	-	-	-	-	n/a	n/a
Energy Efficient Fan Control	Y	4,911	6,952	5,372	2,514	n/a	n/a
Electrical MHR for Fuel Sub	Y	-	-	-	-	n/a	n/a
Evaporative Cooler	Y	4,911,261	3,914,205	1,480,335	5,282,156	n/a	n/a
Evaporative Cooler Maintenance	Y	-	-	443,798	53,062	n/a	n/a
Evaporator Coil	Y	-	-		-	n/a	n/a
Exterior Hard wired LED fixtures	Y	8,775	1,744	2,238	40,433	n/a	n/a
Fan Control Adjust	Y	-	-	-	-	n/a	n/a
Faucet Aerator	Y	-	-	-	-	n/a	n/a
Freezer	Y	311,308	134,747	87,281	728,191	n/a	n/a
Heat Pump Replacement	Y	127,178	196,393	-	654,635	n/a	n/a
Heat Pump Water Heater	Y	-	-	32,492	1,532,966	n/a	n/a
Home Energy Monitor	Y	-	-	-	-	n/a	n/a
HVAC Air Filter Service	Y	-	-	27,858	15,498	n/a	n/a
Induction Cooktop/Range	Y	-	-	-	-	n/a	n/a
LED A-Lamps	Y	23,152,130	3,512,258	1,507,763	2,563,008	n/a	n/a
LED R/BR Lamps	Y	-	-	-	16,953	n/a	n/a
LED Reflector Bulbs	Y	197,501	27,746	17,230	-	n/a	n/a
Other Domestic Hot Water	Y	17,648	4,946	2,485	1,574	n/a	n/a
Pool Pumps	Y	1,040,676	523,964	116,371	234,152	n/a	n/a
Portable A/C	Y	-	-	(14,825)	(14,726)	n/a	n/a
Refrigerant Charge Adjustment	Y	-	-	-	-	n/a	n/a
Refrigerator	Y	8,146,726	8,987,837	4,232,052	6,809,404	n/a	n/a
Room A/C Replacement	Y	(82,271)	34,269	11,920	(1,000)	n/a	n/a
Room HP Replacement	Y	-	-	-	-	n/a	n/a
Smart Strip Tier II	Y	7,365,549	1,717,055	820,406	1,865,728	n/a	n/a
Thermostatic Shower Valve	Y	1,095	1,608	4,601	-	n/a	n/a
Wholehouse Fan	Y	-	-	-	-	n/a	n/a
Total		48,471,507	28,738,078	9,699,720	20,190,753	n/a	n/a

[1] 2025 and 2026 Authorized is not available as ESA is authorized at the program level under D.21 06 015, not at the individual measure level.

Note: Please add rows for measures that are missing from this table.

Gas [1]

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS) Measures	Offered? (Y/N)	#	#	#	#	#	#
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Natural Gas Appliance Testing (NGAT)							
Air Sealing/Envelope							
Furnace Clean and Tune							
Furnace Repair/Replacement							
Total		-	-	-	-	-	-

[1] Data is not applicable to SCE as it is an electric utility and does not provide gas services.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS) Spending/Buc	Offered? (Y/N)	$	$	$	$	$	$
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Natural Gas Appliance Testing (NGAT)							
Air Sealing/Envelope							
Furnace Clean and Tune							
Furnace Repair/Replacement							
Total		-	-	-	-	-	-

[1] Data is not applicable to SCE as it is an electric utility and does not provide gas services.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS) Savings	Offered? (Y/N)	annual therms	annual therms	annual therms	annual therms	annual therms	annual therms
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Natural Gas Appliance Testing (NGAT)							
Air Sealing/Envelope							
Furnace Clean and Tune							
Furnace Repair/Replacement							
Total		-	-	-	-	-	-

[1] Data is not applicable to SCE as it is an electric utility and does not provide gas services.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS) ESACET Ben	Offered? (Y/N)	$	$	$	$	$	$
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Natural Gas Appliance Testing (NGAT)							
Air Sealing/Envelope							
Furnace Clean and Tune							
Furnace Repair/Replacement							
Total		-	-	-	-	-	-

[1] Data is not applicable to SCE as it is an electric utility and does not provide gas services.

Electric

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Measures	#	#	#	#	#	#	#
Air Purifier	-	-	-	-	-	-	-
Central A/C replacement	295	1,099	1,099	1,099	1,099	1,099	1,099
Central A/C Tune up	205	89	89	89	89	89	89
Clothes Dryer	-	254	254	254	254	254	254
Cold Storage	-	-	-	-	-	-	-
Comprehensive Home Health and Safety Checkups	-	-	-	-	-	-	-
CO and Smoke Alarms	-	-	-	-	-	-	-
Condenser Coil Cleaning	1,923	541	541	541	541	541	541
Ductless Mini-split	-	143	143	143	143	143	161
Energy Efficient Fan Control	81	82	82	82	82	82	82
Electrical MHR for Fuel Sub	-	1,375	1,375	1,375	1,375	1,375	1,375
Evaporative Cooler	2,528	3,286	3,286	3,286	3,286	3,286	3,286
Evaporative Cooler Maintenance	1,888	1,128	1,128	1,128	1,128	1,128	1,128
Evaporator Coil	-	182	182	182	182	182	182
Exterior Hard wired LED fixtures	2,253	4,693	4,693	4,693	4,693	4,693	27,679
Fan Control Adjust	271	182	182	182	182	182	182
Faucet Aerator	-	12	12	12	12	12	12
Freezer	1,166	588	588	588	588	588	588
Heat Pump Replacement	495	1,090	1,090	1,090	1,090	1,090	1,090
Heat Pump Water Heater	870	1,103	1,103	1,103	1,103	1,103	1,103
Home Energy Monitor	-	309	309	309	309	309	309
HVAC Air Filter Service	2,154	2,155	2,155	2,155	2,155	2,155	2,155
Induction Cooktop/Range	-	189	189	189	189	189	189
LED A-Lamps	164,559	186,051	188,190	190,545	193,135	195,983	199,117
LED R/BR Lamps	-	4,651	4,651	4,651	4,651	4,651	4,651
LED Reflector Bulbs	1,459	688	688	688	688	688	688
Other Domestic Hot Water	127	432	432	432	432	432	432
Pool Pumps	999	521	521	521	521	521	521
Portable A/C	140	219	219	219	219	219	219
Refrigerant Charge Adjustment	218	90	90	90	90	90	90
Refrigerator	11,987	12,070	12,070	12,070	12,070	12,070	12,070
Room A/C Replacement	152	-	-	-	-	-	-
Room HP Replacement	-	152	152	152	152	152	152
Smart Strip Tier II	53,100	66,462	66,462	66,462	66,462	66,462	66,462
Thermostatic Shower Valve	28	37	37	37	37	37	37
Wholehouse Fan	-	265	265	265	265	265	265
Total	246,898	290,138	292,277	294,632	297,222	300,070	326,208

[1] 2025 and 2026 Authorized is not available as ESA is a

Note: Please add rows for measures that are missing fro

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Spending/Buc	$	$	$	$	$	$	$
Air Purifier	-	-	-	-	-	-	-
Central A/C replacement	2,496,382	9,420,374	9,702,985	9,994,074	10,293,897	10,602,714	10,920,795
Central A/C Tune up	41,659	16,768	17,271	17,789	18,323	18,873	19,439
Clothes Dryer	-	790,537	814,253	838,681	863,841	889,756	916,449
Cold Storage	-	-	-	-	-	-	-
Comprehensive Home Health and Safety Checkups	-	-	-	-	-	-	-
CO and Smoke Alarms	-	-	-	-	-	-	-
Condenser Coil Cleaning	253,166	70,119	72,222	74,389	76,620	78,919	81,287
Ductless Mini-split	-	2,111,108	2,174,441	2,239,674	2,306,864	2,376,070	2,733,831
Energy Efficient Fan Control	28,897	30,132	31,036	31,967	32,926	33,913	34,931
Electrical MHR for Fuel Sub	-	6,007,689	6,187,920	6,373,558	6,564,764	6,761,707	6,964,558
Evaporative Cooler	3,370,694	4,512,810	4,648,194	4,787,640	4,931,270	5,079,207	5,231,583
Evaporative Cooler Maintenance	421,645	216,610	223,108	229,801	236,695	243,796	251,110
Evaporator Coil	-	36,972	38,081	39,224	40,401	41,613	42,861
Exterior Hard wired LED fixtures	227,215	487,488	502,112	517,176	532,691	548,671	3,139,216
Fan Control Adjust	25,913	66,444	68,438	70,491	72,606	74,784	77,027
Faucet Aerator	-	613	631	650	670	690	711
Freezer	1,481,841	769,693	792,784	816,568	841,065	866,297	892,285
Heat Pump Replacement	4,669,938	16,476,715	16,971,016	17,480,146	18,004,551	18,544,687	19,101,028
Heat Pump Water Heater	4,806,012	6,438,808	6,631,973	6,830,932	7,035,860	7,246,935	7,464,344
Home Energy Monitor	-	142,906	147,194	151,609	156,158	160,842	165,668
HVAC Air Filter Service	115,921	119,454	123,038	126,729	130,531	134,447	138,480
Induction Cooktop/Range	-	641,016	660,247	680,054	700,456	721,469	743,113
LED A-Lamps	1,677,130	1,953,055	2,034,774	2,122,044	2,215,415	2,315,526	2,423,131
LED R/BR Lamps	-	46,277	47,665	49,095	50,568	52,085	53,647
LED Reflector Bulbs	14,094	6,845	7,051	7,262	7,480	7,705	7,936
Other Domestic Hot Water	6,297	22,064	22,726	23,408	24,110	24,833	25,578
Pool Pumps	1,515,483	814,068	838,490	863,644	889,554	916,240	943,728
Portable A/C	120,238	213,314	219,714	226,305	233,094	240,087	247,290
Refrigerant Charge Adjustment	6,501	46,486	47,880	49,316	50,796	52,320	53,889
Refrigerator	16,059,471	16,655,790	17,155,464	17,670,128	18,200,232	18,746,238	19,308,625
Room A/C Replacement	144,719	-	-	-	-	-	-
Room HP Replacement	-	129,896	133,793	137,807	141,941	146,199	150,585
Smart Strip Tier II	3,521,548	4,539,936	4,676,134	4,816,418	4,960,910	5,109,738	5,263,030
Thermostatic Shower Valve	1,677	2,283	2,351	2,422	2,495	2,569	2,647
Wholehouse Fan	-	506,063	521,244	536,882	552,988	569,578	586,665
Total	41,006,442	73,292,331	75,514,229	77,805,882	80,169,769	82,608,510	87,985,467

[1] 2025 and 2026 Authorized is not available as ESA is a

Note: Please add rows for measures that are missing fro

Health, Comfort, and Safety (HCS) Savings	2027 proposed annual kWh	2028 proposed annual kWh	2029 proposed annual kWh	2030 proposed annual kWh	2031 proposed annual kWh	2032 proposed annual kWh	2033 proposed annual kWh
Air Purifier	-	-	-	-	-	-	-
Central A/C replacement	96,170	1,654,007	1,654,007	1,654,007	1,654,007	1,654,007	1,654,007
Central A/C Tune up	9,635	7,070	7,070	7,070	7,070	7,070	7,070
Clothes Dryer	-	98,929	98,929	98,929	98,929	98,929	98,929
Cold Storage	-	-	-	-	-	-	-
Comprehensive Home Health and Safety Checkups	-	-	-	-	-	-	-
CO and Smoke Alarms	-	-	-	-	-	-	-
Condenser Coil Cleaning	55,825	14,237	14,237	14,237	14,237	14,237	14,237
Ductless Mini-split	-	44,509	44,509	44,509	44,509	44,509	48,273
Energy Efficient Fan Control	11,380	39,065	39,065	39,065	39,065	39,065	39,065
Electrical MHR for Fuel Sub	-	-	-	-	-	-	-
Evaporative Cooler	1,418,208	1,843,446	1,843,446	1,843,446	1,843,446	1,843,446	1,843,446
Evaporative Cooler Maintenance	445,278	91,100	91,100	91,100	91,100	91,100	91,100
Evaporator Coil	-	3,673	3,673	3,673	3,673	3,673	3,673
Exterior Hard wired LED fixtures	32,904	16,810	16,810	16,810	16,810	16,810	99,146
Fan Control Adjust	4,238	3,626	3,626	3,626	3,626	3,626	3,626
Faucet Aerator	-	2,071	2,071	2,071	2,071	2,071	2,071
Freezer	988,768	195,451	195,451	195,451	195,451	195,451	195,451
Heat Pump Replacement	8,246	1,865,445	1,865,445	1,865,445	1,865,445	1,865,445	1,865,445
Heat Pump Water Heater	(1,222,460)	3,247,138	3,247,138	3,247,138	3,247,138	3,247,138	3,247,138
Home Energy Monitor	-	154,703	154,703	154,703	154,703	154,703	154,703
HVAC Air Filter Service	18,667	35,980	35,980	35,980	35,980	35,980	35,980
Induction Cooktop/Range	-	5,468	5,468	5,468	5,468	5,468	5,468
LED A-Lamps	3,314,586	569,316	575,861	583,068	590,993	599,708	609,298
LED R/BR Lamps	-	143,251	143,251	143,251	143,251	143,251	143,251
LED Reflector Bulbs	20,536	3,433	3,433	3,433	3,433	3,433	3,433
Other Domestic Hot Water	-	43,287	43,287	43,287	43,287	43,287	43,287
Pool Pumps	999,999	1,266,781	1,266,781	1,266,781	1,266,781	1,266,781	1,266,781
Portable A/C	(107,996)	151,705	151,705	151,705	151,705	151,705	151,705
Refrigerant Charge Adjustment	88,973	207,696	207,696	207,696	207,696	207,696	207,696
Refrigerator	6,928,486	6,976,460	6,976,460	6,976,460	6,976,460	6,976,460	6,976,460
Room A/C Replacement	(25,840)	-	-	-	-	-	-
Room HP Replacement	-	33,818	33,818	33,818	33,818	33,818	33,818
Smart Strip Tier II	7,439,496	13,464,537	13,464,537	13,464,537	13,464,537	13,464,537	13,464,537
Thermostatic Shower Valve	1,296	2,440	2,440	2,440	2,440	2,440	2,440
Wholehouse Fan	-	35,410	35,410	35,410	35,410	35,410	35,410
Total	20,526,393	32,220,860	32,227,405	32,234,612	32,242,537	32,251,252	32,346,942

[1] 2025 and 2026 Authorized is not available as ESA is a

Note: Please add rows for measures that are missing fro

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) ESACET Ben	$	$	$	$	$	$	$
Air Purifier	-	-	-	-	-	-	-
Central A/C replacement	833,516	$ 5,244,750	$ 5,173,246	$ 5,062,219	$ 4,927,158	$ 4,796,481	$ 4,611,181
Central A/C Tune up	15,700	$ 6,605	$ 6,859	$ 6,908	$ 6,793	$ 6,695	$ 6,370
Clothes Dryer	-	$ 195,070	$ 195,932	$ 195,116	$ 193,203	$ 191,239	$ 184,454
Cold Storage	-	-	-	-	-	-	-
Comprehensive Home Health and Safety Checkups	-	-	-	-	-	-	-
CO and Smoke Alarms	-	-	-	-	-	-	-
Condenser Coil Cleaning	83,360	$ 21,557	$ 22,190	$ 22,414	$ 22,310	$ 22,243	$ 21,210
Ductless Mini-split	-	$ 544,724	$ 552,126	$ 558,657	$ 564,992	$ 571,646	$ 632,001
Energy Efficient Fan Control	12,550	$ 105,204	$ 103,680	$ 101,306	$ 98,496	$ 95,714	$ 92,691
Electrical MHR for Fuel Sub	-	$ 647,124	$ 667,331	$ 687,759	$ 708,711	$ 730,328	$ 716,237
Evaporative Cooler	2,827,595	$ 3,350,754	$ 3,280,095	$ 3,181,044	$ 3,068,980	$ 2,960,680	$ 2,829,032
Evaporative Cooler Maintenance	99,736	$ 86,081	$ 89,445	$ 90,100	$ 88,579	$ 87,230	$ 82,981
Evaporator Coil	-	$ 9,873	$ 10,102	$ 10,225	$ 10,263	$ 10,313	$ 9,848
Exterior Hard wired LED fixtures	85,671	$ 70,291	$ 71,690	$ 72,763	$ 73,688	$ 74,654	$ 456,676
Fan Control Adjust	6,004	$ 8,591	$ 8,917	$ 9,139	$ 9,281	$ 9,439	$ 9,206
Faucet Aerator	-	$ 2,741	$ 2,750	$ 2,736	$ 2,714	$ 2,691	$ 2,652
Freezer	1,341,882	$ 280,100	$ 283,009	$ 281,803	$ 278,201	$ 274,037	$ 264,470
Heat Pump Replacement	3,152,026	$ 7,389,822	$ 7,363,983	$ 7,295,631	$ 7,209,325	$ 7,125,333	$ 6,927,815
Heat Pump Water Heater	3,675,730	$ 5,151,410	$ 5,043,889	$ 4,900,765	$ 4,749,392	$ 4,601,916	$ 4,412,543
Home Energy Monitor	-	$ 164,396	$ 164,111	$ 160,645	$ 155,397	$ 149,787	$ 142,999
HVAC Air Filter Service	51,615	$ 50,154	$ 51,299	$ 51,998	$ 52,254	$ 52,589	$ 47,762
Induction Cooktop/Range	-	$ 77,241	$ 79,206	$ 81,080	$ 82,949	$ 84,886	$ 83,015
LED A-Lamps	3,559,501	$ 806,688	$ 806,426	$ 794,044	$ 775,032	$ 755,451	$ 723,914
LED R/BR Lamps	-	$ 155,567	$ 152,207	$ 145,772	$ 137,699	$ 129,508	$ 121,045
LED Reflector Bulbs	22,654	$ 5,882	$ 5,785	$ 5,616	$ 5,410	$ 5,203	$ 4,956
Other Domestic Hot Water	6,367	$ 74,372	$ 75,061	$ 75,303	$ 75,394	$ 75,457	$ 75,085
Pool Pumps	767,315	$ 757,089	$ 740,406	$ 717,728	$ 693,182	$ 667,698	$ 634,923
Portable A/C	(92,621)	$ 188,966	$ 189,087	$ 185,770	$ 180,865	$ 176,005	$ 169,415
Refrigerant Charge Adjustment	37,253	$ 209,411	$ 209,766	$ 203,588	$ 192,905	$ 182,367	$ 171,756
Refrigerator	12,254,621	$ 11,708,251	$ 11,616,499	$ 11,373,440	$ 11,048,906	$ 10,717,697	$ 10,281,788
Room A/C Replacement	17,226	$ -	$ -	$ -	$ -	$ -	$ -
Room HP Replacement	-	$ 62,571	$ 63,041	$ 62,758	$ 62,138	$ 61,541	$ 59,972
Smart Strip Tier II	3,036,851	$ 8,027,910	$ 8,190,559	$ 8,024,443	$ 7,715,526	$ 7,392,612	$ 7,037,796
Thermostatic Shower Valve	2,650	$ 6,110	$ 6,206	$ 6,279	$ 6,345	$ 6,412	$ 6,440
Wholehouse Fan	-	$ 178,789	$ 178,372	$ 177,089	$ 175,287	$ 173,680	$ 165,140
Total	31,797,201	45,588,094	45,403,275	44,544,141	43,371,378	42,191,530	40,985,373

[1] 2025 and 2026 Authorized is not available as ESA is a

Note: Please add rows for measures that are missing fro

Gas [1]

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Measures	#	#	#	#	#	#	#
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Natural Gas Appliance Testing (NGAT)							
Air Sealing/Envelope							
Furnace Clean and Tune							
Furnace Repair/Replacement							
Total	-	-	-	-	-	-	-

[1] Data is not applicable to SCE as it is an electric utili

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Spending/Buc	$	$	$	$	$	$	$
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Natural Gas Appliance Testing (NGAT)							
Air Sealing/Envelope							
Furnace Clean and Tune							
Furnace Repair/Replacement							
Total	-	-	-	-	-	-	-

[1] Data is not applicable to SCE as it is an electric utili

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Savings	annual therms	annual therms	annual therms	annual therms	annual therms	annual therms	annual therms
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Natural Gas Appliance Testing (NGAT)							
Air Sealing/Envelope							
Furnace Clean and Tune							
Furnace Repair/Replacement							
Total	-	-	-	-	-	-	-

[1] Data is not applicable to SCE as it is an electric utili

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) ESACET Ben	$	$	$	$	$	$	$
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Natural Gas Appliance Testing (NGAT)							
Air Sealing/Envelope							
Furnace Clean and Tune							
Furnace Repair/Replacement							
Total	-	-	-	-	-	-	-

[1] Data is not applicable to SCE as it is an electric utili

Electric

Electrification		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized [9]	2026 authorized [9]	2027 proposed [10]
ESA Main[1]								
Households Treated [2]	#	-	-	22	720	n/a	n/a	n/a
Budgets [3]	$	$ -	$ -	$ 95,941	$ 2,105,782	n/a	n/a	n/a
Electricity Savings or (Increase)	annual kWh	-	-	(34,521)	(957,979)	n/a	n/a	n/a
Electricity Savings or (Increase)	lifetime kWh	-	-	(345,212)	(10,053,886)	n/a	n/a	n/a
Electricity Savings or (Increase)	kW	-	-	(2)	76	n/a	n/a	n/a
Other Fuel Savings [4]	annual MMBtus	-	-	392	11,599	n/a	n/a	n/a
Other Fuel Savings [4]	lifetime MMBtus	-	-	3,923	122,245	n/a	n/a	n/a
Energy Benefits (ESACET)	$	$ -	$ -	$ (16,823)	$ 1,501,961	n/a	n/a	n/a
Non-Energy Benefits (ESACET)	$	$ -	$ -	$ 36,585	$ 281,157	n/a	n/a	n/a
ESA MFWB [5]								
Households Treated	#							
Budgets	$							
Electricity Savings or (Increase)	annual kWh							
Electricity Savings or (Increase)	lifetime kWh							
Electricity Savings or (Increase)	kW							
Other Fuel Savings	annual MMBtus							
Other Fuel Savings	lifetime MMBtus							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA Pilots [6]								
Households Treated	#	-	-	4	116	n/a	n/a	
Budgets [3]	$	$ -	$ -	$ 106,276	$ 2,341,654	n/a	n/a	
Electricity Savings or (Increase) [7]	annual kWh	-	-	49,936	1,009,120	n/a	n/a	
Electricity Savings or (Increase) [7]	lifetime kWh	-	-	689,091	12,993,196	n/a	n/a	
Electricity Savings or (Increase)	kW	-	-	0.02	-	n/a	n/a	
Other Fuel Savings [4]	annual MMBtus	-	-	1,987	4,480	n/a	n/a	
Other Fuel Savings [4]	lifetime MMBtus	-	-	26,916	55,755	n/a	n/a	
Energy Benefits (ESACET)	$	$ -	$ -	56,346	$ 491,345	n/a	n/a	
Non-Energy Benefits (ESACET) [8]	$	$ -	$ -	$ -	$ 36,192	n/a	n/a	

[1] Actuals for ESA Main include space heating and water heating electrification measures delivered through ESA Main and the Building Electrification (BE) Pilot during the 2021–2024 period, consistent with how electrification activity was tracked and reported for the pilot.

[2] ESA Main household treated refers to one heat pump measure installed, while the BE Pilot refers to a comprehensive electrification package, which includes a minimum of a heat pump space and water heater installed.

[3] Budgets includes $ for ESA measures only and excludes Administrative, Direct Implementation, Marketing & Outreach, and EM&V.

[4] Therm value converted to MMBtus (1 therm = 0.1 MMBtu).

[5] During the 2021–2024 period, the MFWB program did not implement electrification measures. Accordingly, no electrification treatment assumptions or associated energy savings were reported or filed for the current program cycle or the bridge year.

[6] The Building Electrification (BE) Pilot is the sole ESA Pilot offering electrification services during the 2021–2026 period. All participating homes replaced, at a minimum, space heating and water heating equipment with electric heat pump technology. Authorized values are shown as "N/A" because the BE Pilot was approved under CPUC Decision 21-06-015 with a single program level budget and authority to carry over unspent funds across program years, rather than discrete annual authorizations.

[7] Annual and Lifetime kWh are provided as Claimable kWh. Claimable kWh Savings was calculated using methodology in Fuel Substitution Technical Guidance Document in accordance to D.19-08-009; Claimable kWh = kWh + (Therm * 29.3).

[8] Non-Energy Benefits (ESACET) was not calculated for ESA Pilots in 2023.

[9] Authorized values for 2025 and 2026 are shown as "N/A" because ESA and the BE Pilot were authorized at the program level under CPUC Decision 21-06-015, not as discrete annual authorizations, and therefore annual authorized values are not available.

[10] Proposed 2027 funding reflects electrification activity incorporated within the overall ESA Main proposed budget, savings, and portfolio planning, including continuation of BE Pilot activity. ESA Main and BE Pilot electrification efforts are not shown separately.

Gas [1]

Electrification		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized	2027 proposed
ESA Main								
Households Treated	#							
Budgets	$							
Electricity (Increase)	annual kWh							
Electricity (Increase)	lifetime kWh							
Electricity (Increase)	kW							
Gas Savings	annual therms							
Gas Savings	lifetime therms							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA MFWB								
Households Treated	#							
Budgets	$							
Electricity (Increase)	annual kWh							
Electricity (Increase)	lifetime kWh							
Electricity (Increase)	kW							
Gas Savings	annual therms							
Gas Savings	lifetime therms							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA Pilots								
Households Treated	#							
Budgets	$							
Electricity (Increase)	annual kWh							
Electricity (Increase)	lifetime kWh							
Electricity (Increase)	kW							
Gas Savings	annual therms							
Electricity (Increase)	kW							
Gas Savings	annual therms							
Gas Savings	lifetime therms							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							

[1] Data is not applicable to SCE as it is an electric utility and does not provide gas services.

Response to Q15

Electric

Electrification		2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed [6]
ESA Main								
Households Treated [1]	#	1,070	1,102	1,135	1,169	1,204	1,240	6,920
Budgets [2]	$	$25,716,709	$26,488,211	$27,282,857	$28,101,343	$28,944,383	$30,099,194	$166,632,696
Electricity Savings or (Increase) [3]	annual kWh	5,162,358	5,162,358	5,162,358	5,162,358	5,162,358	5,166,122	30,977,913
Electricity Savings or (Increase) [3]	lifetime kWh	107,428,013	107,428,013	107,428,013	107,428,013	107,428,013	107,514,586	644,654,654
Electricity Savings or (Increase)	kW	26	26	26	26	26	28	158
Other Fuel Savings [3]	annual MMBtus	0	0	0	0	0	0	0
Other Fuel Savings [3]	lifetime MMBtus	0	0	0	0	0	0	0
Energy Benefits (ESACET)	$	$8,526,121	$8,899,513	$9,188,374	$9,433,296	$9,661,262	$9,877,278	$55,585,843
Non-Energy Benefits (ESACET)	$	$4,967,714	$5,086,054	$5,206,289	$5,329,752	$5,457,075	$5,518,873	$31,565,757
ESA MFWB [4]								
Households Treated	#	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Budgets	$	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Electricity Savings or (Increase)	annual kWh	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Electricity Savings or (Increase)	lifetime kWh	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Electricity Savings or (Increase)	kW	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Other Fuel Savings	annual MMBtus	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Other Fuel Savings	lifetime MMBtus	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Energy Benefits (ESACET)	$	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Non-Energy Benefits (ESACET)	$	n/a	n/a	n/a	n/a	n/a	n/a	n/a
ESA Pilots [5]								
Households Treated	#	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Budgets	$	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Electricity Savings or (Increase)	annual kWh	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Electricity Savings or (Increase)	lifetime kWh	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Electricity Savings or (Increase)	kW	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Other Fuel Savings	annual MMBtus	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Other Fuel Savings	lifetime MMBtus	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Energy Benefits (ESACET)	$	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Non-Energy Benefits (ESACET)	$	n/a	n/a	n/a	n/a	n/a	n/a	n/a

[1] Households treated consists of single family, multifamily, and mobile home dwelling types.

[2] Budgets includes $ for ESA measures only and excludes Administrative, Direct Implementation, Marketing & Outreach, and EM&V.

[3] Annual and Lifetime kWh are provided as Claimable kWh. Annual and Lifetime Therms were converted into Claimable kWh. Claimable kWh Savings was calculated using methodology in Fuel Substitution Technical Guidance Document in accordance to D.19-08-009; Claimable kWh = kWh + (Therm * 29.3).

[4] Consistent with the 2028-2033 ESA cycle application and tables, ESA MFWB will exist as a dwelling type within the ESA program, as opposed to its own separate program, and was included within the ESA Main section of this table.

[5] ESA pilots were not proposed for the 2028-2033 cycle.

[6] Total column and rows may not match due to rounding error.

Gas [1]

Electrification		2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
ESA Main								
Households Treated	#							
Budgets	$							
Electricity (Increase)	annual kWh							
Electricity (Increase)	lifetime kWh							
Electricity (Increase)	kW							
Gas Savings	annual therms							
Gas Savings	lifetime therms							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA MFWB								
Households Treated	#							
Budgets	$							
Electricity (Increase)	annual kWh							
Electricity (Increase)	lifetime kWh							
Electricity (Increase)	kW							
Gas Savings	annual therms							
Gas Savings	lifetime therms							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA Pilots								
Households Treated	#							
Budgets	$							
Electricity (Increase)	annual kWh							
Electricity (Increase)	lifetime kWh							
Electricity (Increase)	kW							
Gas Savings	annual therms							
Gas Savings	lifetime therms							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							

[1] Data is not applicable to SCE as it is an electric utility and does not provide gas services.

Southern California Edison
A.26-01-003 et al – 2026 IQP Application

DATA REQUEST SET T U R N - S C E - 0 0 4

To: TURN
Prepared by: Davi Ibarra
Job Title: Senior Advisor
Received Date: 6/22/2026

Response Date: 7/8/2026

Question 06:
Electrification

Please refer to SDG&E's Response to TURN-DR-SDG&E-01_AMENDMENT Q.10.a2 which states, "COL 23. The original-fuel utility program administrator should receive a reduction in their portfolio energy efficiency goals, calculated as the energy savings achieved in the original fuel due to the fuel substitution measure, to account for the loss of energy efficiency potential when its fuel is substituted." Did SCE reduce the electric savings goals in its 2028-2033 Plan due to the proposed electrification? Please explain.

[2] TURN-SDG&E-01-Q10 reads as follows: 10. How will the plan allocate the costs of electrification across electric and gas? a. Are electric utilities responsible for the costs associated with electrification for all customers? If so, do electric utilities receive all the benefits regardless of fuel type? If not, please explain. b. Is the responsibility for paying for the costs of electrification shared between electric and gas utilities? If so, how are the costs and benefits shared? c. How are the electric and gas utilities coordinating to ensure that costs and benefits are allocated correctly and not double counted?

Response to Question 06:
No, SCE did not separately reduce its electric savings goals in the 2028–2033 ESA Plan as a result of proposed electrification measures. As an electric-only utility, SCE does not administer natural gas portfolios or associated therm savings goals.

Instead, the impacts of electrification are incorporated into SCE's overall portfolio modeling and savings accounting framework, consistent with Commission-approved methodologies. The ESACET in SCE's application includes claimable kWh savings, which convert therm savings to kWh in fuel substitution measures. Claimable kWh savings are calculated as: Claimable kWh = kWh + (Therms × 29.3).

This approach reflects the fact that electrification measures can increase electricity use while reducing gas use. SCE accounts for these impacts through its existing savings and cost-effectiveness methodologies rather than by making a separate downward adjustment to electric savings goals. Accordingly, SCE's proposed goals reflect the net effects of its measure mix, including electrification, as incorporated into the portfolio modeling and claimable savings methodology.

Southern California Edison
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DATA REQUEST SET T U R N - S C E - 0 0 4

To: TURN
Prepared by: Galaxy H Kaji
Job Title: Advisor
Received Date: 6/22/2026

Response Date: 7/9/2026

Question 12:
Targeting/Segmentation

Please refer to the response to SCE TURN 002 Q09 which states, "Each utility is solely responsible for conducting targeting and outreach within its service territory, including targeting customers with single or multiple fuel sources." Please explain what happens if a customer is targeted for a cooling/heating system upgrade by both SCE and SoCalGas, and SCE recommends a heat pump and SoCalGas recommends a gas heating system to the same customer. How are these conflicting recommendations reconciled? Please provide as many details as possible about the decision-making process between the two utilities, including the criteria used to decide what recommendation is eventually adopted and why.

Response to Question 12:
SCE does not coordinate with gas utilities to reconcile or select between competing equipment recommendations (e.g., heat pump versus gas heating system). Consistent with the ESA Program design, each utility is responsible for its own outreach and program offerings within its service territory. Outreach is structured to present ESA as a single entry point rather than as separate, competing offers, and customers typically engage through one utility led enrollment and assessment process. Following enrollment, SCE conducts a comprehensive in-home assessment to evaluate existing equipment, site feasibility, health and safety considerations, and customer needs. Recommendations, including whether to propose a heat pump, are developed based on this assessment and are presented as part of a customized scope of work. Where a customer may be eligible for both electric and gas services, utilities maintain their independent programmatic roles. The final decision on whether to proceed with a specific measure rest with the customer, informed by the assessment results, bill impact considerations, and program eligibility requirements. This assessment framework is guided by Statewide Policy & Procedures Manual, Installation Standards (IS) Manual, and applicable workpapers, which establish eligibility, safety, and installation requirements.

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DATA REQUEST SET T U R N - S C E - 0 0 4

To: TURN
Prepared by: Galaxy H Kaji
Job Title: Advisor
Received Date: 6/22/2026

Response Date: 7/10/2026

Question 14:
Targeting/Segmentation

Please refer to the response to SCE TURN 002 Q09 which states, "For customers receiving both electric and gas ESA services, each utility independently evaluates and claims only the costs, benefits, and bill impacts associated with the measures it administers. Utilities do not conduct joint cost-effectiveness testing or joint bill impact analysis for individual customers." Please explain what happens if SCE determines that a heat pump is a cost-effective upgrade for a customer needing a cooling/heating system replacement and SoCalGas also determines that a gas heating system is a cost-effective upgrade for the same customer. How are these two competing results arrived at by analysis by two different utilities reconciled? Please provide as many details as possible about the decision-making process between the two utilities, including the criteria used to decide what recommendation is eventually adopted and why.

Response to Question 14:
Please refer to the response to Question 12.

Consistent with that response, SCE and gas utilities do not reconcile competing cost effectiveness determinations at the individual customer level. Each utility conducts cost effectiveness analysis at the portfolio level and evaluates only the measures it administers. At the customer level, SCE may perform bill and rate impact analysis as a decision support tool during the home assessment process; however, this analysis is intended to inform customer choice and affordability, not to resolve or decide between competing utility offerings.

Accordingly, if both a heat pump and a gas system could be considered "cost effective" under separate utility frameworks, no inter-utility reconciliation occurs. The recommended scope of work is determined through SCE's assessment process and program rules, and the customer ultimately decides whether to proceed with the proposed measures. This approach is guided by Statewide Policy & Procedures Manual, Installation Standards (IS) Manual, and applicable workpapers, which establish eligibility, safety, and installation requirements.

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DATA REQUEST SET T U R N - S C E - 0 0 4

To: TURN
Prepared by: Davi Ibarra
Job Title: Senior Advisor
Received Date: 6/22/2026

Response Date: 7/9/2026

Question 15:
Targeting/Segmentation

Please refer to the response to SCE TURN 002 Q08 which states "As applied in the proposed plan, electrification encompasses fuel substitution and fuel switching measures such as:

- Heat pump space heating and cooling systems,
- Heat pump water heaters,
- Induction cooking equipment, and
- Electric clothes dryers."

Please also refer to SCE TURN 002 Q012 which states, "As indicated in its application A.26 01 003, SCE proposes to integrate building electrification measures into the ESA program. To align with state climate objectives and increase installation of Health, Safety, and Comfort measures, SCE plans to use this data to target zip codes that demonstrate high penetration of natural gas usage (RASS) and high populations of ESA-eligible households (Athens Research)."

a. If SCE is including both fuel substitution and fuel switching in its electrification portfolio, why would it target primarily zip codes with high penetration of natural gas usage? Wouldn't it also be important to target zip codes with high oil and propane usage?

b. Would it make sense to target areas of the gas system that will require update in the coming years? If so, has SCE discussed this with SoCalGas and what did SoCalGas say?

c. How has SoCal Gas been helpful on electrification? Please provide specific examples of how SoCalGas has been helpful.

d. How has SoCalGas not been helpful on electrification? Please provide specific examples of how SoCalGas has not been helpful.

Response to Question 15:

a. Why target zip codes with high natural gas penetration?

SCE's targeting approach is data driven and is not limited to natural gas customers. SCE uses data sources such as Residential Appliance Saturation Study (RASS), along with other customer and geographic information, to help identify concentrations of low-income households with natural gas, propane, and other fuels, as well as prior participation patterns and other relevant targeting factors.

This includes identifying customers using non-utility fuels where fuel-switching opportunities may provide customer benefits and support program objectives. In addition, SCE's application also

states that SCE will use geo-targeting, customer segmentation, propensity modeling, and customer attributes to improve marketing effectiveness and help contractors focus on defined service areas and leads.

Accordingly, while natural gas penetration is one indicator used in targeting, it is not the sole or limiting factor, and SCE's approach is designed to identify customers for whom electrification or fuel-switching measures are appropriate based on a range of customer and housing characteristics.

b. Would it make sense to target areas of the gas system that will require upgrades?

That type of neighborhood-level infrastructure planning is outside the scope of ESA. ESA is a customer program designed to support household-level outreach, assessment, and installation. The CPUC's Long-Term Gas Planning Rulemaking (R.) 24-09-012, addresses long-term gas planning and includes implementation of portions of SB 1221. The CPUC's SB 1221 Implementation efforts similarly address voluntary neighborhood decarbonization and priority zone designation.

SCE is not seeking neighborhood decarbonization authority in this ESA application. ESA targeting is based on customer-level characteristics and does not incorporate infrastructure planning considerations.

Based on Building Electrification (BE) Pilot learnings, including bill and rate analysis, electrification is not uniformly beneficial for all customers. Accordingly, ESA program design and targeting focus on identifying households where measures are appropriate and are likely to provide net customer benefits, rather than targeting areas based on system-level infrastructure considerations. In addition, ESA electrification is implemented on an end-use-specific basis and does not require participating homes to become all-electric; customers may continue using existing natural gas equipment for end uses not addressed through ESA measures.

c. How has SoCalGas been helpful on electrification?

Coordination between SCE and SoCalGas occurs within defined program and regulatory framework. One example is support for the BE Pilot evaluation. With customer consent under the pilot's terms and conditions, SoCalGas has provided post-electrification gas usage data for participating customers to support evaluation of gas usage and bill outcomes to inform program design and analysis.

d. How has SoCalGas not been helpful on electrification?

SCE does not characterize SoCalGas as "not helpful" with respect to electrification. Rather, coordination between the utilities occurs within the framework of each utility's program responsibilities and regulatory requirements.

Each utility independently administers its programs, including program design, funding, cost-effectiveness evaluation, and reporting, which inherently limits the degree of coordination at the individual-customer level. In addition, customer privacy requirements, data-sharing limitations, and

other applicable laws and regulations restrict the extent to which customer-specific information can be shared between utilities.

These constraints are typical of coordination across separate utility programs and do not reflect a lack of support. Accordingly, while coordination occurs where appropriate, the level of coordination is bound by program structure, regulatory requirements, and customer privacy protections.

Southern California Edison
A.26-01-003 et al – 2026 IQP Application

DATA REQUEST SET T U R N - S C E - 0 0 4

To: TURN
Prepared by: Davi Ibarra
Job Title: Senior Advisor
Received Date: 6/22/2026

Response Date: 7/8/2026

Question 16:
Targeting/Segmentation

Please refer to SCE's response to SCE TURN 002 Q022 which states, "A customer may elect to have an individual measure installed that increases operating costs if it is part of an overall project that meets project-level affordability and bill impact screening criteria."

a. Please provide the project level affordability and bill impact screening criteria used to make decisions. Please describe how these criteria are applied to make decisions.

b. Are bill impacts assessed for each individual measure or for bundles of measures? Please discuss whether weatherization and heating/cooling systems will be assessed as a package or individually.

c. Does the 2028-2033 ESA Plan assume more weatherization than in the 2027 Bridge Year, in tandem with electrification? Please explain.

d. In which program(s) will weatherization spending and savings that is related to electrification be recorded?

e. In which program(s) will electrification spending and savings be recorded?

f. Is electrification expected to result in a negative bill impact relative to a like for like replacement of existing measures when the existing measure is fueled by:

i. gas?
ii. oil?
iii. propane?
iv. other types of fuels (please identify the fuels)?

Response to Question 16:
SCE's response to TURN-SCE-002 Question 22 states that a customer may elect to have an individual measure installed that increases operating costs if it is part of an overall project that meets project-level affordability and bill impact screening criteria, and that electrification measures are not installed where they would result in negative bill impacts. SCE's proposed 2028–2033 application builds on that same framework. The application states that each home assessment will include bill analysis and rate optimization to provide customers with clear, data-driven insights into projected energy costs and prevent unintended bill increases. It also states that SCE will develop personalized scopes of work that bundle energy efficiency measures, electrification upgrades, weatherization, and resiliency solutions.

a. Project-level affordability and bill impact screening criteria

SCE applies project-level affordability and bill impact screening through its comprehensive home assessment, bill analysis, and rate optimization process. This assessment compares projected pre- and post-installation energy bills using customer-specific usage data, applicable electric rates, and displaced fuel costs.

At a minimum, SCE requires bill neutrality at the project level. If the proposed scope of work is projected to result in a net increase in customer energy bills, SCE will adjust the scope of work and will not proceed with electrification measures that would cause a negative bill impact. This process is designed to ensure that projects provide net customer benefits and prevent unintended bill increases.

b. Measure-level versus bundled analysis

Bill impacts may be reviewed at a measure level for analytical purposes; however, SCE evaluates and approves projects based on the full bundled scope of work. ESA funding decisions are made based on an integrated evaluation of the complete project rather than on a measure-by-measure basis.

Accordingly, a measure that may increase operating costs on a standalone basis may still be included if the overall project bundle meets affordability and bill impact criteria, including bill neutrality or better. Weatherization and heating/cooling measures may be assessed individually for analysis, but final decisions are made based at the bundled project level.

c. Does the plan assume more weatherization than the 2027 Bridge Year?

SCE's application indicates that, as customers adopt electric technologies such as heat pumps, the program will incorporate increased weatherization and enabling measures. SCE also proposes to expand HVAC offerings across more climate zones.

This reflects the role of weatherization and related measures in supporting the efficient performance of electric technologies and helping maintain or improve customer bill outcomes. As a result, SCE anticipates more weatherization and enabling work in 2028–2033 program cycle compared to the more limited scope of the 2027 Bridge Year.

d. Where will weatherization spending and savings related to electrification be recorded?

SCE's proposed 2028–2033 ESA Program is designed to operate as an integrated model. Weatherization spending and savings related to electrification will be recorded within the ESA Program, consistent with ESA reporting and cost-effectiveness accounting frameworks.

e. Where will electrification spending and savings be recorded?

Electrification spending and savings will likewise be recorded within the ESA Program as part of the integrated 2028–2033 ESA model and associated reporting and cost-effectiveness accounting frameworks.

f. Expected bill impacts by fuel type

Bill impacts associated with electrification may vary depending on the customer's baseline fuel type, energy usage patterns, and applicable fuel and electric rates. For example, electrification may have different cost implications depending on whether it displaces natural gas, propane, fuel oil, or other fuels.

Accordingly, SCE evaluates each project using customer-specific bill analysis and rate optimization to determine projected bill outcomes. SCE does not install electrification measures where the overall project is expected to result in a negative bill impact. At a minimum, projects are required to meet bill neutrality at the bundled project level, regardless of the baseline fuel type.

Application 19-03-002.[2]

SDG&E followed this methodology in Application A.25-06-022 for proposed ESA rates as seen in Table B-3: ESA/CARE/FERA Electric Rate impacts on page SDG&E-12 of Exhibit SDG&E-02 Attachment A. At the time of filing this Application, the Commission had not issued a decision on SDG&E's 2024 GRC Phase 2 Application, A.23-01-008.

On September 18, 2025, a final decision was issued in the 2024 GRC Phase 2 proceeding that maintains the same methodology as adopted in D.21-07-010 for ESA (D.25-09-006, section 10.5 as an uncontested issue).

General

15. Please provide authorized and achieved values (as available) for each year of the 2021-2026 plan period for the following:
    A. Electric budget/spending
    B. Gas budget/spending
    C. Energy savings in kWh
    D. Demand savings in Kw
    E. Energy savings in therms
    F. Participating households
    G. Spending per participating household
    H. kWh saved per participating household
    I. Therms saved per participating household
    J. Electric ratepayer cost per kWh saved
    K. Gas ratepayer cost per therm saved
    L. Energy benefits associated with electric budget/spending
    M. Non-energy benefits associated with electric budget/spending
    N. Total benefits associated with electric budget/spending
    O. Energy benefits associated with gas budget/spending
    P. Non-energy benefits associated with gas budget/spending
    Q. Total benefits associated with gas budget/spending

SDG&E Response to Question 15, A-K:

Please refer to TURN-SDG&E-01_SDG&E RESPONSE ATTACHMENT 10-10-25 Tab Q15.A-K.

[2] A.19-03-002, Chapter 2 Prepared Direct Testimony of Jesse B. Emge on Behalf of San Diego Gas & Electric Company filed March 2019, at JE-6.

SDG&E Response to Question 15, L-Q:

Please refer to TURN-SDG&E-01_SDG&E RESPONSE ATTACHMENT 10-10-25 Tab Q15.L-Q.

16. Please provide the number of customers estimated to be income qualified for ESA in SDG&E's service area, the number of customers SDG&E has served through its ESA Program, and the percentage (%) of low-income qualified customers served, for each year from 2021-2024. Please also provide SDG&E's projections and planned values for these metrics for 2025, 2026, and 2027.

SDG&E Response to Question 16:

Please see TURN-SDG&E-01_SDG&E RESPONSE ATTACHMENT 10-10-25 Tab Q16.

17. Referring to Exhibit SDG&E-02 Attachment A. Please provide the following list of tables, including associated footnotes, in machine readable Excel format with formulae intact:
    - Table 5: ESA Annual Energy Savings Goals (kWh, kW, Therms)
    - Table 6: Annual ESA Household Treatment Goals and Targets
    - Table 5a: Southern Multifamily Whole Building Program Annual Energy Savings Goals (kWh, kW, Therms)
    - ESA Household Treatment Targets
    - Table 6a: Annual ESA Properties Treatment Targets
    - Table 7: ESA Portfolio Budget
    - Table 7a: ESA Southern Multifamily Whole Building Program Budget
    - Table 8: ESA and CARE Studies Budget
    - Table A-1: ESA Portfolio Cost Effectiveness
    - Table A-1a: Southern MFWB Cost Effectiveness
    - Table B-2: ESA/CARE Gas Rate impacts
    - Table B-3: ESA/CARE/FERA Electric Rate impacts

SDG&E Response to Question 17:

Please see TURN-SDG&E-01_SDG&E RESPONSE ATTACHMENT 10-10-25 Tabs Q17. There are 8 tabs associated with this response.

Comparison to other Utility Filings

18. Referring to footnotes 3 and 4 under Table D-3: ESA Program Budget on page B- 8 of SCE-03, which provide SCE assumptions regarding escalation rates including a labor

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ACTUALS	2021	2022	2023	2024	2025	
A. Electric budget/spending (TOTAL PORTFOLIO COSTS)	$ 7,762,167	$ 8,286,881	$ 8,393,025	$ 9,488,191	$7,862,954	*2025 August YTD
B. Gas budget/spending (TOTAL PORTFOLIO COSTS)	$ 8,075,142	$ 7,664,052	$ 8,373,562	$ 10,344,811	$7,190,055	*2025 August YTD
C. Energy savings in kWh	-	1,996,576	949,853	1,394,383	282,697	
D. Demand savings in kW	-	133	110	241	84	
E. Energy savings in therms	-	1,918	33,230	75,763	73,928	
F. Participating households	6,652	12,662	4,533	8,326	1,254	
G. Spending per participating household	$ 2,181	$ 1,135	$ 2,637	$ 1,886		
H. kWh saved per participating household	-	157.68	209.54	167.47	225.44	
I. Therms saved per participating household	-	0.15	7.33	9.10	58.95	
J. Electric ratepayer cost per kWh saved (TOTAL PROGRAM COSTS)	$ -	$ 3.59	$ 5.43	$ 4.97		
K. Gas ratepayer cost per therm saved (TOTAL PROGRAM COSTS)	$ -	$ 3,753.71	$ 204.53	$ 115.77		

GOALS	2021	2022	2023	2024	2025	2026
A. Electric budget/spending (TOTAL PORTFOLIO COSTS)	$ 14,160,026	$ 16,395,682	$ 16,575,300	$ 16,944,337	$ 17,427,594	$ 18,190,333
B. Gas budget/spending (TOTAL PORTFOLIO COSTS)	$ 12,950,847	$ 13,698,175	$ 13,591,968	$ 13,265,875	$ 14,340,989	$ 15,138,709
C. Energy savings in kWh	-	2,955,161	2,593,606	2,769,999	2,906,619	3,169,076
D. Demand savings in kW	-	428	377	404	424	463
E. Energy savings in therms	-	127,171	108,790	115,389	120,065	129,739
F. Participating households	5,973	13,760	11,711	14,138	14,780	16,065
G. Spending per participating household	$ 2,429	$ 1,044	$ 1,021	$ 1,110		
H. kWh saved per participating household	-	0.00	0.00	0.01	0.01	0.01
I. Therms saved per participating household	-	0.11	0.11	0.12	0.12	0.12
J. Electric ratepayer cost per kWh saved (TOTAL PROGRAM COSTS)	$ -	$ 2.43	$ 1.99	$ 2.50		
K. Gas ratepayer cost per therm saved (TOTAL PROGRAM COSTS)	$ -	$ 56.61	$ 62.47	$ 76.02		

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Program Type	Year	Electric Benefits	Gas benefits	Electric Non-Energy Benefit (1)	Gas Non-Energy Benefit (1)	Total Electric Benefits	Total Gas Benefits
ESA Main	**2021**	Not available	Not available	Not available	Not available	Not available	Not available
MFWB	**2021**	Not available	Not available	Not available	Not available	Not available	Not available
ESA Main	**2022**	Not available	Not available	Not available	Not available	Not available	Not available
MFWB	**2022**	Not available	Not available	Not available	Not available	Not available	Not available
ESA Main	**2023**	Not available	Not available	Not available	Not available	Not available	Not available
MFWB	**2023**	Not available	Not available	Not available	Not available	Not available	Not available
ESA Main	**2024**	$ 1,300,783	$ 1,455,482	$ 883,082	$ 752,255	$ 2,183,865	$ 2,207,738
MFWB	**2024**	$ 1,049,364	$ 1,000,277	$ 246,306	$ 209,816	$ 1,295,670	$ 1,210,094
ESA Main	**2025**	$ 1,307,473	$ 1,584,773	$ 896,993	$ 764,105	$ 2,204,466	$ 2,348,877
MFWB	**2025**	$ 1,099,344	$ 1,051,151	$ 256,417	$ 218,430	$ 1,355,762	$ 1,269,581
ESA Main	**2026**	$ 1,406,644	$ 1,798,116	$ 957,501	$ 815,649	$ 2,364,145	$ 2,613,765
MFWB	**2026**	$ 1,145,731	$ 1,104,676	$ 261,046	$ 222,372	$ 1,406,776	$ 1,327,048
ESA Main	**2027**	$ 1,542,342	$ 1,117,351	$ 1,338,959	$ 1,338,959	$ 2,881,301	$ 2,456,310
MFWB	**2027**	$ 1,029,526	$ 1,458,480	$ 592,730	$ 592,730	$ 1,622,257	$ 2,051,210

Notes:
Data source is the CEDARS CET Output Receipts.
(1) Receipt only provides total non-energy benefits.
To esetimate electric and gas non-energy benefits, SDG&E used the gas/electric splits.
For 2021-2026, G/E split is 46%/54%
For 27, G/E split is 50%/50%
(2) Not Available: Unable to complete these cell calculations due to unavailability of historical data

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4. Please provide a break out of the proposed budgets, savings, households treated, and benefits for each program (ESA Main, ESA MFWB, and ESA Pilots) in each program year (2028-2033) by electric and gas using the template provided in Discovery Tables.xlsx, tab 02. Please note that there are three tables for electric and three tables for gas. Please provide all data that is applicable and available. Please leave any cells blank that cannot be populated because they are not applicable (for example, electric table inputs for a gas utility). If some data is not available, please identify that data in the written response, explain why it is not available, and populate those cells with a "n/a".

SDG&E Response to Q.4:

Please see attached file "Discovery Tables_Final_5-11.xlsx", tab 02.

Cost-effectiveness

5. Please provide electronic versions of all supporting workpapers for the proposed plan, including benefit-cost analysis models.

   SDG&E Response to Q.5:

   Please see the attached folder "Table 5 ESA Savings Budget CE" provided.

6. Please provide a break out of the actual, authorized, and proposed number of health, comfort, and safety (HCS) measures, the spending or budget allocated to HCS measures, and the savings and the benefits attributable to HCS measures for each program year in the previous cycle (2021-2026), 2027 bridge year, and each year in the new cycle (2028-2033) for electric and gas. Please provide the response using the template provided in Discovery Tables.xlsx, tab 03. Please note that there are four tables for electric and four tables for gas--one for measures, one for spending/budgets, one for savings, and one for benefits. Please add rows for any measures that are missing from these tables and use the Offered (Y/N) column to indicate which measures are offered and which are not offered. Please provide all data that is applicable and available. Please leave any cells blank that cannot be populated because they are not applicable (for example, electric table inputs for a gas utility). If some data is not available, please identify that data in the written response, explain why it is not available, and populate those cells with a "n/a".

   SDG&E Response to Q.6:

   Please see the attached file "Discovery Tables_Final_5-11.xlsx", tab 03.

7. In weighing the cost-effectiveness of the proposed plan, what alternate plans were considered? Why weren't each of the alternate plans pursued? Please share any analyses or other materials prepared for each alternate plan.

SDG&E Response to Q.7:

SDG&E did not consider separate alternate plans. The ESA Program planning process focused on refinements to one plan which began with a review of all potential measures and discussions with subject matter experts (SMEs) to identify and assess feasible installation opportunities based on climate conditions, housing stock, and prior treatments. After finalizing the list of measures and estimating installation quantities, SDG&E ran the cost effectiveness test. The first run focused on identifying any errors or anomalies. The second run produced more reliable results and supported measure level decisions such as removing or reducing quantities of measures with lower cost effectiveness and non-energy benefits or keeping measures to align ESA Main and MFWB Program offerings. Based on those results, SDG&E refined the proposed plan and conducted a third run. These refinements included increasing the remediation budget within the MFWB program to address infrastructure barriers and support broader adoption of electrification measures, while maintaining the Electrification Pilot's focus on single-family

homes. In addition, the Natural Gas Assessment Tool (NGAT) service was added as a Health and Comfort Solution measure for both MFWB and ESA Main. After incorporating these updates, SDG&E completed a final cost-effectiveness run. As a result of this iterative, data-driven approach, separate alternate plans were not pursued; instead, adjustments were made within the proposed plan to optimize cost effectiveness and program outcomes.

Electrification

8. Please define the term electrification as it was applied in the proposed plan. In particular, please respond to the following questions:
   a. Does electrification include **fuel switching**? Why or why not?

SDG&E Response to Q.8.a:
SDG&E has included electrification as part of its proposed implementation of the MFWB Program and the proposed Electrification Pilot. For both plans, electrification is defined as the deployment of high-efficiency electric end use technologies, such as heat pump water heaters, heat pump heating ventilation and air conditioning (HVAC) systems, and induction cooktops to replace fossil-fuel-based services.

Electrification includes fuel switching only within the ESA Pilot, where fuel switching is defined as converting energy use from a non-CPUC regulated fuel (e.g., propane or fuel oil) to electricity (Mollen Testimony, Section 8.3.4, p. 93). Fuel switching is not proposed for broad implementation and is intentionally confined to the Pilot so it can be evaluated in a controlled, data-driven manner.

   b. Does electrification include **fuel substitution**? Why or why not?

SDG&E Response to Q.8.b:

Yes, SDG&E has included fuel substitution in its Pilot and MFWB Program where it is feasible and beneficial to customers, ensuring electrification advances the State's decarbonization objectives while protecting income-qualified customers from bill increases. Fuel substitution refers to converting energy use from one CPUC-regulated fuel to another, such as replacing natural gas appliances with electric alternatives. Electrification inherently includes fuel substitution because it involves replacing regulated fossil-fuel end uses with electric technologies (Prepared direct Testimony of Roland Mollen, Sections 4.4.3, at ESA- 48–49; and Section 4.5.4, at ESA- 51–52).

   c. Does the plan aim to electrify a minimum number and type(s) of end uses? If so, what is the minimum? Does the plan aim to install certain type(s) of measures? If so, which type(s)? Is space heating always included? How about water heating, clothes drying, and cooking?

SDG&E Response to Q.8.c:

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As stated in the Prepared Direct Testimony of Roland Mollen (Section 8.3.2, ESA-89), the pilot program proposes to enroll approximately 300–350 income-qualified, pre-1980 single-family homes. Eligible pilot participants must have at least one of the following natural gas or propane end uses: space heating, water heating, and/or cooking appliances. SDG&E did not propose a minimum number of measures as part of its electrification Pilot.

The Pilot will offer a bundled suite of electrification and weatherization measures, including heat pump water heaters, heat pump HVAC systems, clothes drying, and induction cooktops, together with ESA Main Program weatherization measures such as insulation and air sealing, as well as any other feasible measures, as described in the Prepared Direct Testimony of Roland Mollen, (Section 8.3.9, at ESA-94–ESA-95). The Pilot will only offer electrification measures when the customer approves and ensures the customer will not see a negative bill impact. Therefore, specific measures, such as space heating, may not always be included if it causes a negative bill impact for the customer.

For the MFWB program, SDG&E does not establish a minimum number of end uses to be electrified per property. Instead, the program offers a range of electrification measures, including heat pump water heaters, heat pump HVAC systems, induction cooktops, electric clothes dryers, and other feasible measures, depending on property characteristics and program eligibility.

As reflected in SDG&E's Application, program planning assumptions include that approximately 10% of treatments may receive some form of electrification measure over the program cycle; however, this reflects a forecast for planning and budgeting purposes rather than a minimum requirement or target for individual properties. Planned installation volumes for these measures are provided in Table A-1a of the Application, and measure selection is guided by feasibility and whole-building considerations as described in the Prepared direct Testimony of Roland Mollen (Section 7.1.6, at ESA-76).

SDG&E Response to Q.8.d:

d. Is a customer receiving one or more electrification measures using any other fuels post-electrification? Is their home all-electric?

SDG&E Response to Q.8.d:

A home may still rely on non-electric fuels even after being offered or receiving heat pump technology or other electrification measures. In these cases, the electrification is partial, meaning one or more end uses may still be served by fuels such as natural gas or propane. As a result, the home would not be considered all-electric unless all major end uses, including space heating, water heating, cooking, and clothes drying, are fully electric.

9. How will the plan target customers and conduct outreach for electrification, especially for customers who use multiple fuel sources to heat their home?

    a. Which utilities are responsible for targeting? Please describe the roles and responsibilities of each utility and how they will coordinate with one another.

SDG&E Response to Q.9.a:

SDG&E is responsible for customer targeting and outreach within its service territory for the ESA Main, MFWB Program and ESA Pilot. Because SDG&E operates as a dual-fuel utility across most of its service territory, targeting is primarily conducted within a single-utility framework. In the limited areas with overlapping IOU service territory, each utility remains responsible for its own targeting activities. SDG&E will coordinate with other IOUs, as appropriate, through existing collaboration forums (e.g., ESA Working Group, stakeholder meetings) to support alignment and minimize duplication.

Targeting is guided by SDG&E's location-based customer segmentation strategy, as described in its Application, which prioritizes households based on geographic and demographic indicators of need (See Prepared Direct Testimony of Roland Mollen, (Section 2, at ESA 4–9).

SDG&E's electrification pilot will not be targeting customers in regions with overlap between utilities.

    b. Which utilities are responsible for conducting the cost-effectiveness and rate and bill impacts assessment for each customer? Please describe the roles and responsibilities of each utility and how they will coordinate with one another.

SDG&E Response to Q.9.b:

Cost-effectiveness is evaluated at the program level, consistent with CPUC guidance, and is not performed at the individual customer or project level.[1] Each IOU is responsible for these activities within its respective service territory. Coordination across IOUs is limited; however, where appropriate (e.g., in overlapping areas of Orange County), SDG&E may engage through IOU coordination meetings and collaborative efforts to support alignment in assumptions and customer messaging.

SDG&E intends to include customer-specific rate and bill impact assessments as part of the Program implementers' scope of work, particularly for electrification measures, to evaluate potential changes in energy usage and customer bills and to support informed customer participation.

[1] D.21-06-015, Section 6.10.7.1, at Page 244.

c. Which utilities are responsible for outreach to customers? Please describe the roles and responsibilities of each utility and how they will coordinate with one another.

SDG&E Response to Q.9.c:

Each IOU is responsible for outreach within its respective service territory. Coordination across IOUs is limited, as overlap is minimal (primarily in portions of Orange County); however, where needed, SDG&E may engage through IOU coordination meetings and collaborative efforts to support consistent messaging and customer experience. SDG&E has included detailed Marketing and Outreach plans in the Prepared Direct Testimony of Horace (Ty) Tantum and Mia Graff, (Section 10).

For the MFWB Program, SDG&E will also leverage a Single Point of Contact (SPOC) model to streamline outreach and engagement with property owners and support coordinated communication with tenants, as detailed in the Prepared Direct Testimony of Roland Mollen, (Section 7.2.1, at ESA-80–82)

SDG&E's electrification pilot will not be targeting customers in regions with overlap between utilities.

d. Is the responsibility for targeting, cost-effectiveness and rate and bill impact assessment, and outreach shared between electric and gas utilities? If so, how? What is each utility responsible for and how do they carry out these responsibilities in coordination with the other utilities?

SDG&E Response to Q.9.d:
SDG&E operates as a dual-fuel utility over most of its territory, therefore, the majority of projects fall under its oversight, allowing activities to be managed cohesively by SDG&E and its program implementers.

In the limited areas of overlapping service territory (primarily portions of Orange County with SoCalGas), responsibilities are typically not divided at the customer level, and each utility continues to administer its respective programs. Where appropriate, SDG&E may engage in IOU coordination meetings and other collaborative efforts to promote consistent customer messaging and avoid confusion.

e. How are electric and gas utilities coordinating to ensure that multiple utilities are not reaching out to the same customer with different and competing measure offerings?

SDG&E Response to Q.9.e:

SDG&E operates as a dual-fuel utility across most of its service territory, allowing outreach and offerings to be coordinated through a single utility. This also limits competing offers, since SDG&E only offers electric measures in the overlapping territory, whereas SoCalGas offers gas measures.

For the MFWB Program, SDG&E further reduces the risk of duplicative or conflicting outreach through the Single Point of Contact (SPOC) model, which serves as a centralized coordination function for property owners and ensures that program offerings are presented in a coordinated and integrated manner across utilities and programs (See SDG&E Testimony, Section 7.2.1).

In the limited areas of overlap with SoCalGas (primarily portions of Orange County), which represent a small subset of customers, SDG&E may coordinate through IOU collaboration and meetings to align messaging and avoid duplicative outreach.

10. How will the plan allocate the costs of electrification across electric and gas?

    a. Are electric utilities responsible for the costs associated with electrification for all customers? If so, do electric utilities receive all the benefits regardless of fuel type? If not, please explain. Is the responsibility for paying for the costs of electrification shared between electric and gas utilities? If so, how are the costs and benefits shared?

SDG&E Response to Q.10.a:

The Commission has not established specific guidance regarding the allocation of electrification and fuel substitution cost and benefits for the ESA programs. Therefore, in the absence of explicit ESA-specific guidance, SDG&E applied the current Commission-adopted principles. The Commission has addressed cost and benefit allocation for fuel substitution measures for EE Programs in D.19-08-009.

For EE programs, the Commission determined that fuel substitution measures are generally funded by the ratepayers of the new fuel, and that associated energy savings and impacts are reflected in the sponsoring program administrator's portfolio, with corresponding adjustments to the original-fuel utility's goals.

While the ESA Program's statewide Policy and Procedures (P&P) Manual references EE fuel substitution guidance, ESA is a distinct, low income, direct-install program, and the application of EE cost allocation frameworks to ESA has not been explicitly established by the Commission.

Accordingly, SDG&E considers the allocation of electrification-related costs and benefits within ESA to be subject to Commission direction in this proceeding. In the absence of specific guidance, SDG&E aligns, where appropriate, with existing EE policy frameworks, while recognizing differences in program design, objectives, and funding structure.

With respect to cost, D.19-08-009 states:

> Conclusion of Law (COL) 21. Fuel substitution measures should be funded by the ratepayers of the new fuel, not the original fuel being substituted.
>
> Ordering Paragraph (OP) 5. Fuel substitution measures and associated program costs shall be funded by the ratepayers of the new fuel, not ratepayers of the fuel being substituted.

With respect to benefits, D.19-08-009 states:

> COL 22. Any costs and benefits, including energy savings, of fuel substitution measures or programs should be reflected in the portfolio of the program administrator sponsoring the fuel substitution measure.
> COL 23. The original-fuel utility program administrator should receive a reduction in their portfolio energy efficiency goals, calculated as the energy savings achieved in the original fuel due to the fuel substitution measure, to account for the loss of energy efficiency potential when its fuel is substituted.
>
> OP 6. Each program administrator sponsoring a fuel substitution measure shall reflect energy savings (or credit towards goals) associated with fuel substitution measures in its Energy Efficiency Annual Report and Annual Budget Advice Letter filings in a separate accounting from claims of other energy savings.
> OP 7. A utility whose fuel is being substituted by a fuel substitution measure should include separate accounting of reductions in its energy savings goals due to fuel substitution, with a one-year lag (if necessary), after reflecting the energy savings claims of the new-fuel utility in its Energy Efficiency Annual Report and/or Annual Budget Advice Letter filings.

SDG&E notes that the *California Statewide ESA MFWB Program Policy and Procedures Manual* (Version 3), Attachment D-Electrification Policy for MFWB Program follows the policies established by D.19-08-009.[2]

b. How are the electric and gas utilities coordinating to ensure that costs and benefits are allocated correctly and not double counted?

SDG&E Response to Q.10.b:

D.19-08-009 (at 38) addresses this question:

> In the case of dual-fuel utilities, the impact on both the new fuel and the original fuel consumption can be readily reported at the same time. In the case of single fuel utilities, the original fuel utility may need to wait until the new fuel utility reports the savings impacts of its fuel substitution activities, and then should reflect the original fuel impacts in the following year, either in the Annual Reports or the Annual Budget Advice Letters, unless the utilities mutually agree to share information on a more timely basis.

11. Please provide data on the actual number of ESA-eligible households (defined as up to 250% of the Federal Poverty Guideline income threshold) treated during the current program cycle (for 2021-2024) by primary space heating fuel type using the template provided in Discovery **Tables.xlsx, tab 04**. Please note that there is one table for electric and one table for gas. Please provide all data that is applicable and available. Please leave any cells blank that cannot be populated because they are not applicable (for example, electric table inputs for a gas utility). If some data is not available, please

[2] See 2025-04-18 MFWB P&P Manual v3.0.pdf.

The source of this data is derived from SDG&E's Customer Information System (CIS) which is SAP.

c. For any data that is missing, please explain why the data is missing. Is there a plan to collect this data? If so, when and how?

SDG&E Response to Q.13.c:

Space heating and water heating fuel type values are missing in SAP primarily because the data was not consistently captured in legacy and current systems. As a result, SAP correctly reflects null values rather than inferred data.

There is currently no plan to revise, collect, or update these values in SDG&E's system, SAP.

d. Please explain if and how this data will be used to target ESA-eligible households for electrification.

SDG&E Response to Q.13.d:

SDG&E does not plan to use this data to target ESA eligible households for the electrification Pilot. As described in the Prepared Direct Testimony of Roland Mollen (Section 8.3.2, at ESA-89), SDG&E will focus on income-qualified households that are pre-1980 single-family and mobile homes, high energy-use households, solar-equipped or solar-ready residences, communities in CEI and Justice40 census tracts, regions with elevated asthma rates, and Tribal households using non-utility fuels, such as propane, where electrification and fuel switching can improve efficiency, health, equity, and affordability.

14. Please provide data on the actual, authorized, and proposed electrification efforts to date, for electric and gas from 2021 through 2027 using the template provided in Discovery Tables.xlsx, tab 06. Please note that there is one table for electric and one table for gas. Please provide all data that is applicable and available. Please leave any cells blank that cannot be populated because they are not applicable (for example, electric table inputs for a gas utility). If some data is not available, please identify that data in the written response, explain why it is not available, and populate those cells with a "n/a".

SDG&E Response to Q.14:

Please see the file "Discovery Tables_Final_5-11.xlsx", tab 06.

15. Please provide data on electrification efforts as proposed in the new program years (the 2028-2033 plan) for electric and gas using the template provided in Discovery Tables.xlsx, tab 07. Please note that there is one table for electric and one table for gas. Please provide all data that is applicable and available. Please leave any cells blank that cannot be populated because they are not applicable (for example, electric table inputs for a gas utility). If some data is not available, please identify that data in the written response, explain why it is not available, and populate those cells with a "n/a".

SDG&E Response to Q.15:

Please see the file "Discovery Tables_Final_5-11.xlsx", tab 07.

16. How are electrification efforts funded for natural gas heating customers? Do funds come solely from electric customers, from a combination of electric and natural gas customers, or solely from natural gas customers? Please explain the rationale for the cost allocation between electric and natural gas customers. If the funds come from both electric and natural gas customers, please identify how much funding comes from each.

SDG&E Response to Q.16:

Please see response to Question 10a.

17. How are electrification efforts funded for oil, propane, and other heating fuel customers? Do funds come solely from electric customers? Do natural gas customers contribute any funds to this effort? Please explain the rationale for the cost allocation between electric and natural gas customers. If the funds come from both electric and natural gas customers, please identify how much funding comes from each.

SDG&E Response to Q.17

The Commission does not have specific guidance on this issue for the ESA programs, although, the Commission approved SCE's Electrification Pilot which included fuel switching, e.g., replacing non-regulated utility fuels (e.g., propane) with a regulated fuel.[3] Notwithstanding, SDG&E recommends following D.19-08-009 direction on how costs and benefits are determined for fuel substitution. In this case, the electric utility is providing the new fuel.

With respect to cost, D.19-08-009 states:

> Conclusion of Law (COL) 21. Fuel substitution measures should be funded by the ratepayers of the new fuel, not the original fuel being substituted.
>
> Ordering Paragraph (OP) 5. Fuel substitution measures and associated program costs shall be funded by the ratepayers of the new fuel, not ratepayers of the fuel being substituted.

With respect to benefits, D.19-08-009 states:

> COL 22. Any costs and benefits, including energy savings, of fuel substitution measures or programs should be reflected in the portfolio of the program administrator sponsoring the fuel substitution measure.

[3] D.21-06-015 at 386-387.

informing expected bill impacts and overall customer benefit.

21. Do you assess whether electrifying an end use would be cost-effective from the perspective of the program administrator and/or ratepayers in deciding which measures to offer? If so, what cost-effectiveness test(s) do you use? What costs and benefits do you consider in this assessment? What is the baseline to which you are comparing (i.e., what are you assuming the customer would do if they did not electrify)?

SDG&E Response to Q.21:

Yes, SDG&E assesses whether electrifying an end use would be cost-effective. For the MFWB program, SDG&E evaluates electrification measures at both the program and measure level using the ESA Cost-Effectiveness Tool (CET), consistent with CPUC requirements. Electrification measures may meet applicable guidelines of having an ESACET score of 0.3 or greater for inclusion in the MFWB program offering.[4] The evaluation of these measures assesses costs and benefits in accordance with the CET framework, which includes incorporating both energy and non-energy benefits. The cost-effective analysis relies on standardized baseline assumptions established for ESA programs. The evaluation of electrification measures serves to help determine whether electrification measures are suitable for inclusion in the program; however, installation at individual properties remains contingent on feasibility, site-specific conditions, and program eligibility.

For the proposed electrification Pilot, SDG&E does not use cost-effectiveness as a criterion for determining whether to offer specific measures. The ESA Electrification Pilot is intentionally structured to test and refine electrification approaches before broader deployment, with the results intended to inform future cost-effectiveness methodologies, baselines, and measure eligibility within ESA Main. Accordingly, the Pilot is designed to assess feasibility, customer impacts, and cost-effectiveness through implementation and observed outcomes.

For purposes of Pilot customer assessment, baseline assumptions for bill impact analyses generally reflect continued use of existing equipment or replacement with like-for-like gas equipment at the end of useful life absent electrification. Bill impacts are evaluated by comparing estimated customer bills under this baseline scenario to projected bills following electrification.

22. Please describe what happens when it is cost-effective and/or lower cost for customers to electrify, and they prefer not to.

[4] D.21-06-015, Section 6.10.8.2, at 251.

a. Is the customer allowed to install a measure that will cost them more to operate over the lifetime of the measure?

SDG&E Response to Q.22.a:
ESA is a voluntary program, and customers are not required to accept electrification measures. If a customer prefers not to electrify, SDG&E will not install the electrification measure and will instead proceed with other eligible measures, as applicable.

b. If so, do ESA programs provide ratepayer funding for the customer to proceed with installation of a measure that will cost them more to operate over the lifetime of the measure? Do these ratepayer funds cover 100% of the cost of the measure? If not, please explain.

SDG&E Response to Q.22.b:
ESA is a no-cost, direct-install program in which eligible measures are fully funded; therefore, if a customer elects to proceed, all measure and installation costs would be covered by ratepayers. Remediation and minor home repairs are subject to applicable caps established in the statewide ESA Policy and Procedures (P&P) Manual and Installation Standards (IS) Manual (See Statewide ESA P&P Manual, Sections 5 and 7). To the extent that remediation costs exceed program caps, such costs must be addressed by the customer or may render the project non-feasible for installation.

c. What other programs provide funding for the customer to proceed with installation of a measure that will cost them more to operate over the lifetime of the measure? Do these funds cover 100% of the cost of the measure? If not, please explain.

SDG&E Response to Q.22.c:
SDG&E objects to this request as vague, ambiguous, and overbroad with respect to its reference to "other programs" that may be outside of the Low Income portfolio and/or not operated by SDG&E. Subject to and without waiving the foregoing objection, SDG&E responds as follows: SDG&E is not aware of other programs that broadly provide no-cost installation of measures specifically under conditions where operating costs are expected to increase. Other electrification programs typically provide partial incentives and require customer cost-sharing.

d. If the customer is not allowed to install the measures, please explain.

SDG&E Response to Q.22.d:
ESA installations are limited to eligible measures that meet the requirements of the statewide ESA Policy and Procedures (P&P) Manual and Installation Standards (IS) Manual and are subject to customer acceptance.

Installation may not proceed if program eligibility criteria are not met or if the proposed measure does not meet applicable program rules (See Statewide ESA P&P Manual, Sections 2, 5, and 7). In addition, installation may be precluded if site conditions render

the measure infeasible, including where required remediation or repairs exceed program caps or where health and safety requirements cannot be satisfied consistent with program guidelines.

Coordination

23. Please describe the coordination with one or more of the other utilities in developing the proposed plan for ESA MFWB.
    a. Which utility plans is the proposed plan coordinated with?

SDG&E Response to Q.23:
SDG&E coordinated with the other IOUs through statewide processes to develop ESA MFWB program plans, ensuring consistency with the statewide ESA Policy & Procedures and Installation Standards Manuals. The IOUs held working sessions prior to the filing of the application to obtain alignment where possible, and continue to coordinate through recurring calls, working groups, and the joint development of program procedures. The working sessions led to the agreement between the Southern IOUs to transition away from the regional administrator model and propose local administration for the next cycle.

SDG&E Response to Q.23.a:
SDG&E's proposed plan for MFWB was based on the challenges and lessons learned from the current southern regional program and the benefits of a local program as described in Mollen Testimony Sections 7.1.1 and 7.1.2. All the IOUs coordinated to ensure their proposed locally administered plans align with the statewide manuals.

    b. What was the process for coordination with each utility?

SDG&E Response to Q.23.b:
The process for coordination involved a number of working sessions with the IOUs as well as the program implementers. The results of those sessions were the foundation for SDG&E's proposed plan and are described in Mollen Testimony Sections 7.1.1 and 7.1.2. Additionally, drafts of individual IOU MFWB plans were shared between IOUs prior to submitting their applications.

    c. What aspects of the proposed plan reflect this coordination?

SDG&E Response to Q.23.c:

The aspects of the proposed plan that reflect IOU coordination include implementing with local administration, maintaining similar eligibility requirements, utilizing a direct install model for all services, and providing a remediation budget for electrification projects.

24. Please describe the coordination with one or more of the other utilities in developing the proposed electrification plan.
    a. Which utility plans is the proposed plan coordinated with?

SDG&E Response to Q.24.a:

b. If not, why not?

SDG&E Response to Q.25.b:
N/A

Potential & Goals Study

26. Did you use the 2025 Potential & Goals Study to develop the proposed 2028-2033 ESA plan goals? Please discuss electrification measures separately from the other measures in the portfolio.

a. If so, how?

SDG&E Response to Q.26.a:
As discussed in The Prepared Direct of Rollen Mollen (Section 16.1.2, ESA-163), SDG&E utilized the 2025 Potential & Goals Study as a directional tool to inform the measure mix forecast for the proposed 2028 –2033 ESA portfolio plan. The study provided useful insights into measures with higher potential penetration as well as paths to achieving energy savings goals. However, as noted by the study's author, the study is not intended to be used directly for setting ESA goals or determining program design and implementation, but rather to inform processes.[6] The results of the study are not directly comparable and do not include all the same boundaries and limitations considered for the ESA Portfolio goals.

b. If not, why not? Is the methodology flawed and if so, how?

SDG&E Response to Q.26.b:
As discussed in Mollen Testimony at page 163, SDG&E identified several concerns that limit the study's applicability for forecasting realistic ESA Program outcomes. The study lacked sufficient detail on how the "High" and "Double" scenarios could be realistically achieved when they represented theoretical potential that could result from higher measure adoption without explicitly considering implementation challenges and feasibility.[7] Uncertainty around fuel substitution further undermined the feasibility of the proposed scenarios, and multiple HCS measures were mischaracterized. Additionally, the study did not incorporate the Commission's statewide 60% Willing and Feasible to Participate factor, which is critical to accurately estimating measure adoption.[8] Other factors such as market volatility, driven by rising appliance costs, also affect measure availability, pricing and installations.

c. Are the fuel substitution assumptions and analysis in the study relevant to ESA? If so, how? If not, why not?

SDG&E Response to Q.26.c:

[6] 2025 Income Qualified Potential and Goals Study, Final Report, Guidehouse (July 9, 2025) at viii and 52.
[7] *id*. at 15 and 50.
[8] D.16-11-022, OP 76 at 468-469, adopted a statewide 60% WFTP factor to be used in calculating the willing and feasible population

As stated in The Prepared Direct of Rollen Mollen (Section 4.4.2 at ESA-47–48), the study identified various fuel substitution measures as components of the projected goals for the ESA portfolio. SDG&E evaluated the measure list for applicability. However, Guidehouse notes that the available data to characterize fuel substitution measures does not include aspects such as infrastructure or auxiliary costs (panel upgrades, rewiring, remediation, or gas infrastructure decommissioning) and bill impacts, which can be substantial and are an important source of uncertainty in accounting for the full benefits and costs of FS measures. [9]

For the MFWB Program, SDG&E proposed to include both in-unit and CAM fuel substitution measures such as Heat Pump Water Heater, Central HVAC Heat Pump, Heat Pump Pool Heater, Induction Cooktop, and Clothes Dryer, which are in alignment with the list of measures from the study. SDG&E is also proposing to include Electric Panel Upgrades, which were added to the Remediation line item to help overcome the cost barrier to electrification.

No fuel substitution measures are proposed for the ESA Main Program. Rather, SDG&E is proposing to test implementation of fuel substitution measures in single family and mobile homes with the new Electrification Pilot discussed in Section 8 of Mollen Testimony.

27. Please describe how the energy efficiency component of the 2025 Potential & Goals Study was applied in the 2028-2033 proposed plan for energy efficiency programs and efforts.
    a. Which inputs were adopted? Please explain why each input was adopted.

SDG&E Response to Q.27.a:
As stated in Response to Q.26.a, SDG&E utilized the 2025 Potential & Goals Study as a directional tool to inform the measure mix forecast for the proposed 2028 –2033 ESA plan. SDG&E's plan for ESA Main includes a number of new measures, some of which were in the study, such as Central A/C Replacement, Central Heat Pump Replacement, Duct Sealing and Testing with Duct Optimization, Ductless Heat Pump, and Mini-Split Heat Pump. These new HVAC measures were adopted due to SDG&E's expansion of priority customer segments to include households located within Heat Health Event Areas where residents face greater vulnerability and could benefit significantly from ESA Program services (See The Prepared Direct of Rollen Mollen, Section 2.2.1. at ESA-10).

For MFWB, the new energy efficiency measure adopted from the study is Lifecycle Refrigerant Management, which is installed to ensure efficient operations of air conditioning units.

    b. Which inputs were not adopted? Please explain why.

SDG&E Response to Q.27.b:
Other measures that were not included may have feasibility issues, per the ESA Installation Standards Manual, which means little to no installation opportunities. The other factors driving

[9] 2025 Income Qualified Potential and Goals Study, Final Report, Guidehouse (July 9, 2025) at 6.

adoption include high-cost considerations and low-cost effectiveness results. See Attachment A for a comparison of what measures were in the study and what SDG&E is proposing. For the complete list of SDG&E ESA Program measures, please refer to Low Income Application, Attachment G, ESA Planning Tables A-1 for ESA Main and A-1a for MFWB.

28. Please describe how the fuel substitution component of the 2025 Potential & Goals Study was applied in the 2028-2033 proposed plan for electrification.

    a. Which inputs were adopted? Please explain why each input was adopted.

SDG&E Response to Q.28.a:
The Prepared Direct Testimony of Rollen Mollen (Section 4.4.2, at ESA-47–48) states the study identified various fuel substitution measures as components of the projected goals for the ESA portfolio. For the MFWB Program, SDG&E intends to include both in-unit and CAM measures such as heat pump water heaters, heat pump HVAC, heat pump pool heaters, induction cooktops, and clothes dryers, which are in alignment with the list of measures from the study. SDG&E is also proposing a remediation budget to address infrastructure-related barriers and help offset the financial burden to encourage broader adoption. As discussed in the Prepared Direct Testimony of Rollen Mollen (Section 7.1.6, at ESA-76 –77), many property owners have expressed interest in installing select measures, most commonly heat pump water heaters and efficient heat pump pool heaters. These measures are often selected because they can be installed independently of whole building retrofits and typically align with existing equipment replacement cycles, making them more practical to implement. Additionally, these technologies are known for their energy efficiency, which can lead to lower operating costs over time compared to conventional systems, even though upfront costs may be higher. The MFWB Program currently offers and will continue to offer induction cooktops, clothes dryers, water heaters, and HVAC systems, and include remediation to help increase adoption of electrification measures and support long term decarbonization goals.

    b. Which inputs were not adopted? Please explain why. (doing comparison)

SDG&E Response to Q.28.b:
As discussed in Prepared Direct Testimony of Rollen Mollen (Section 4.4.1, at ESA- 47), SDG&E is not proposing fuel substitution measures within ESA Main. Rather, SDG&E is proposing to test implementation of fuel substitution measures in single family and mobile homes with the new Pilot (See Prepared Direct Testimony of Rollen Mollen, Section 8, at ESA-89). SDG&E will implement the ESA Electrification Pilot at a small scale to identify the most effective approach before including fuel substitution measures in ESA Main. This strategy will help prevent unintended cost increases or hardships for low-income customers and provide critical insights into program design and implementation. Additionally, the study notes that "the cost data for the associated installed electric measures does not include additional infrastructure or auxiliary costs." SDG&E provided comments that excluding these infrastructure costs for fuel substitution measures may lead to an overestimation of their achievable potential.

29. Did the 2025 Potential & Goals Study characterize fuel switching?

a. If so, how?

SDG&E Response to Q.29.a:
No, the 2025 Potential & Goals Study did not characterize fuel switching.

b. If not, and if fuel switching was part of the electrification proposal, what is the basis for the fuel switching proposal?

SDG&E Response to Q.29.b: SDG&E included fuel switching in its proposed electrification Pilot to allow customers to transition from non-utility fuels, such as propane or fuel oil, to electricity, as stated in the Prepared Direct Testimony of Roland Mollen (Section 8.3.4, at ESA-93). Fuel switching was included in recognition that many Tribal communities lack access to utility-provided natural gas, which would otherwise prevent them from participating in SDG&E's electrification pilot. Allowing fuel switching for Tribal households advances California's equity, decarbonization, and energy access goals and ensures these communities can fully participate in programs that improve energy efficiency and reduce greenhouse gas emissions.

Electric

ESA Main		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets	$	$ 9,053,718	$ 8,088,060	$ 8,421,290	$ 8,641,791	$ 8,756,404	$ 8,851,643	$ 8,935,923	$ 51,695,111
Energy savings	annual kWh	1,921,995	1,412,994	1,418,646	1,424,320	1,430,017	1,435,738	1,440,045	8,561,760
Energy savings	lifetime kWh	18,686,161	13,601,016	13,655,420	13,710,042	13,764,882	13,819,942	13,861,401	82,412,703
Demand savings	kW	456	464	465	467	469	471	472	2,808
Other fuel savings	annual MMBtus	6,558	4,821	4,840	4,860	4,879	4,899	4,913	29,212
Other fuel savings	lifetime MMBtus	63,757	46,407	46,592	46,779	46,966	47,154	47,295	281,193
Households treated	#	6,406	5,750	5,750	5,750	5,750	5,750	5,750	34,500
Energy benefits (ESACET)	$	$ 1,569,314	$ 1,207,357	$ 1,279,779	$ 1,330,772	$ 1,365,484	$ 1,398,318	$ 1,425,116	$ 8,006,826
Non-energy benefits (ESACET)	$	$ 2,650,946	$ 4,146,442	$ 4,286,369	$ 4,442,525	$ 4,604,645	$ 4,772,974	$ 4,942,761	$ 27,195,716

ESA MFWB		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets	$	$ 4,483,856	$ 2,486,253	$ 3,499,334	$ 3,660,506	$ 3,634,485	$ 3,686,096	$ 3,758,838	$ 20,725,512
Energy savings	annual kWh	2,017,714	636,423	1,063,064	1,084,565	1,063,038	1,066,003	1,095,097	6,008,190
Energy savings	lifetime kWh	14,383,500	5,861,475	9,248,084	9,187,388	9,253,329	9,281,537	9,605,678	52,437,491
Demand savings	kW	185	109	239	239	238	238	241	1,304
Other fuel savings	annual MMBtus	6,884	2,171	3,627	3,603	3,627	3,637	3,736	20,401
Other fuel savings	lifetime MMBtus	49,077	19,999	31,554	31,347	31,572	31,669	32,775	178,916
Households treated	#	8,360	3,000	4,400	4,400	4,400	4,400	4,400	25,000
Energy benefits (ESACET)	$	$ 1,050,828	$ 611,346	$ 1,035,483	$ 1,071,655	$ 1,106,657	$ 1,136,775	$ 1,184,937	$ 6,146,853
Non-energy benefits (ESACET)	$	$ 1,164,159	$ 1,114,413	$ 1,744,586	$ 1,785,655	$ 1,859,352	$ 1,921,646	$ 1,995,452	$ 10,421,104

ESA Pilots		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets	$	$ 1,791,059	$ 441,028	$ 1,743,607	$ 1,728,201	$ 1,717,273	$ 1,865,299	$ 202,411	$ 7,697,819
Energy savings	annual kWh								
Energy savings	lifetime kWh								
Demand savings	kW								
Other fuel savings	annual MMBtus								
Other fuel savings	lifetime MMBtus								
Households treated	#								
Energy benefits (ESACET)	$								
Non-energy benefits (ESACET)	$								

ESA Pilots proposal included an overall budget and did not include a planning table with annual breakdown of measure budget, savings, households treated or ESACET in SDG&E's Low Income Application, Attachment G Tables.

The proposed budget for ESA Pilot's overall measure installations can be found in Attachment G, Table 7 ESA Budget by Category, line EE-Pilots.

There is no commodity split forecasted for ESA Pilot spending. The total Pilot budget is presented on one line item in the table above.

Gas

ESA Main		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets	$	$ 12,957,502	$ 12,291,106	$ 12,718,154	$ 13,209,283	$ 13,717,753	$ 14,234,335	$ 14,799,019	$ 80,969,650
Gas savings	annual therms	92,536	105,223	105,644	106,067	106,491	106,917	107,238	637,580
Gas savings	lifetime therms	631,045	977,857	981,768	985,695	989,638	993,596	996,577	5,925,131
Households treated	#	6,406	5,750	5,750	5,750	5,750	5,750	5,750	34,500
Energy benefits (ESACET)	$	$ 1,117,351	$ 1,771,218	$ 1,867,253	$ 1,965,911	$ 2,067,919	$ 2,174,074	$ 2,282,226	$ 12,128,601
Non-energy benefits (ESACET)	$ See Electric Table above								

ESA MFWB		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets	$	$ 6,352,060	$ 3,557,634	$ 5,625,062	$ 5,732,759	$ 6,037,952	$ 6,271,730	$ 6,443,004	$ 33,668,141
Gas savings	annual therms	155,195	54,862	99,339	95,624	99,249	99,261	99,164	547,499
Gas savings	lifetime therms	780,654	440,179	800,044	767,326	799,466	799,351	797,354	4,403,720
Households treated	#	8,360	3,000	4,400	4,400	4,400	4,400	4,400	25,000
Energy benefits (ESACET)	$	$ 1,458,480	$ 846,524	$ 1,617,110	$ 1,633,083	$ 1,787,909	$ 1,881,444	$ 1,976,182	$ 9,742,252
Non-energy benefits (ESACET)	$ See Electric Table above								

ESA Pilots		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets	$								
Gas savings	annual therms								
Gas savings	lifetime therms								
Households treated	#								
Energy benefits (ESACET)	$								
Non-energy benefits (ESACET)	$								

Program Budgets were sourced from Low Income Application Attachment G, Table 5 ESA Savings Budget.
Program Savings were sourced from Attachment G, Table A-1,Planning Assumptions, ESA Main and Table A-1a, Planning Assumptions MFWB Program.
Households treated were sourced from Table 6 ESA Treatment Target.
Energy Benefits were sourced from the CET Output Files, which are contained in the Supporting Workpapers folder.
Non-energy benefits were sourced from ESA NEB Tool v4 Results file for each year. Files are contained in the Supporting Workpapers folder.

Electric - ESA Main

		2021 actual	2022 actual	2023 actual	2024 actual	2025 actual	2026 authorized
Health, Comfort, and Safety (HCS) Measures	**Offered? (Y/N)**	**#**	**#**	**#**	**#**	**#**	**#**
Cold Storage	N						
Comprehensive Home Health and Safety Checkups	N						
CO and Smoke Alarms	N						
Air Sealing/Envelope (appears in Gas table below)	N						
Air Purifier/Cleaner	Y				1,248	1,556	
Laundry Duct Cleaning	Y						
Room A/C Replacement	Y	114	188	22			
Total		114	188	22	1,248	1,556	-

Note: Please add rows for measures that are missing from this table.

Each measure was designated under one fuel type, either Electric or Gas.

Air Purifier is replaced by Air Cleaner in PY 2028 - 2033 and is no longer HCS.

Acutal data was sourced from Annual Reports for 2021 -2025. Proposed data was sourced from SDG&E Low Income Programs Application, Attachment G, Table A-1, ESA Main Planning.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 actual	2026 authorized
Health, Comfort, and Safety (HCS) Spending/Budgets	**Offered? (Y/N)**	**$**	**$**	**$**	**$**	**$**	**$**
Cold Storage	N						
Comprehensive Home Health and Safety Checkups	N						
CO and Smoke Alarms	N						
Air Sealing/Envelope	N						
Air Purifier/Cleaner	Y				693,726	921,464	
Laundry Duct Cleaning	Y						
Room A/C Replacement	Y	122,159	193,777	20,017			
Total		122,159	193,777	20,017	693,726	921,464	-

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 actual	2026 authorized
Health, Comfort, and Safety (HCS) Savings	**Offered? (Y/N)**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**
Cold Storage	N						
Comprehensive Home Health and Safety Checkups	N						
CO and Smoke Alarms	N						
Air Sealing/Envelope	N						
Air Purifier/Cleaner	Y						
Laundry Duct Cleaning	Y						
Room A/C Replacement	Y	(7,440)	(58,791)	(8,189)			
Total		(7,440)	(58,791)	(8,189)	-	-	-

Note: Please add rows for measures that are missing from this table. Footnote differences for years

Negative savings are included, per Annual Reports, ESA Table 2.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 actual	2026 authorized
Health, Comfort, and Safety (HCS) ESACET Benefits	**Offered? (Y/N)**	**$**	**$**	**$**	**$**	**$**	**$**
Cold Storage	N						
Comprehensive Home Health and Safety Checkups	N						
CO and Smoke Alarms	N						
Air Sealing/Envelope	N						
Air Purifier/Cleaner	Y				146,637	90,573	
Laundry Duct Cleaning	Y						
Room A/C Replacement	Y	N/A	47,518	3,931			
Total		-	47,518	3,931	146,637	90,573	-

Note: Please add rows for measures that are missing from this table.

Historical ESACET Benefits data for Room A/C Replacement is missing from Annual Report files.

Gas

Health, Comfort, and Safety (HCS) Measures	Offered? (Y/N)	2021 actual #	2022 actual #	2023 actual #	2024 actual #	2025 actual #	2026 authorized #
Comprehensive Home Health and Safety Checkups	N						
CO and Smoke Alarms	N						
Air Sealing	Y		4,255				
Furnace Clean and Tune	Y	1,704					
Furnace Repair/Replacement	Y	1,721	1,233	636			1,335
Natural Gas Appliance Testing (NGAT)	Y						
Water Heater Repair	Y						
Water Heater Tank and Pipe Insulation	Y			43			
Total		3,425	5,488	679	-	-	1,335

Note: Please add rows for measures that are missing from this table.

Air Sealing posted positive savings after PY 2022, and is not included as HCS.

Furnace Repair/Replacement in PY 2026 is based on SDG&E Low Income Programs Application, Attachment G, Table A-1, ESA Main Planning but is expected to change based on new savings methodology introduced in 2024. Accordingly, it has positive savings in PY 2024 2025 and is forecasted with positive savings after PY 2026.

Water Heater Tank and Pipe Insulation posts positive savings after PY 2023 due to new savings methodology.

Health, Comfort, and Safety (HCS) Spending/Budgets	Offered? (Y/N)	2021 actual $	2022 actual $	2023 actual $	2024 actual $	2025 actual $	2026 authorized $
Comprehensive Home Health and Safety Checkups	N						
CO and Smoke Alarms	N						
Air Sealing	Y		2,104,089				
Furnace Clean and Tune	Y	139,904					
Furnace Repair/Replacement	Y	2,156,757	1,328,034	1,577,882			2,157,986
Natural Gas Appliance Testing (NGAT)	Y						
Water Heater Repair	Y						
Water Heater Tank and Pipe Insulation	Y			4,303			
Total		2,296,661	3,432,123	1,582,185	-	-	2,157,986

Note: Please add rows for measures that are missing from this table.

Health, Comfort, and Safety (HCS) Savings	Offered? (Y/N)	2021 actual annual therms	2022 actual annual therms	2023 actual annual therms	2024 actual annual therms	2025 actual annual therms	2026 authorized annual therms
Comprehensive Home Health and Safety Checkups	N						
CO and Smoke Alarms	N						
Air Sealing	Y		(10,688)				
Furnace Clean and Tune	Y	(3,525)					
Furnace Repair/Replacement	Y	(32,519)	(6,894)	(13,517)			(4,575)
Natural Gas Appliance Testing (NGAT)	Y						
Water Heater Repair	Y						
Water Heater Tank and Pipe Insulation	Y			(112)			
Total		(36,044)	(17,582)	(13,629)	-	-	(4,575)

Note: Please add rows for measures that are missing from this table.

Negative savings are included, per Annual Reports, ESA Table 2, and SDG&E Low Income Programs Application, Attachment G, Table A-1, ESA Main Planning.

Health, Comfort, and Safety (HCS) ESACET Benefits	Offered? (Y/N)	2021 actual $	2022 actual $	2023 actual $	2024 actual $	2025 actual $	2026 authorized $
Comprehensive Home Health and Safety Checkups	N						
CO and Smoke Alarms	N						
Air Sealing	Y		238,759				
Furnace Clean and Tune	Y	n/a					
Furnace Repair/Replacement	Y	n/a	325,663	181,133			195,131
Natural Gas Appliance Testing (NGAT)	Y						
Water Heater Repair	Y						
Water Heater Tank and Pipe Insulation	Y			44			
Total		-	564,422	181,177			195,131

Note: Please add rows for measures that are missing from this table.

Historical ESACET Benefits data for Furnace Clean and Tune and Furnace Repair/Replacement are missing from 2021 Annual Report files.

The NGAT measure was inadvertently excluded from ESACET Benefits (NEBs) calculation for PY 2028 - 2033 for ESA Main. This does not impact SDG&E's ESACET scores as presented in Low Impact Application, ESA Table 5, ESA Savings Budget CE.

Electric - ESA Main

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Measures	#	#	#	#	#	#	#
Cold Storage							
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Air Sealing/Envelope (appears in Gas table below)							
Air Purifier/Cleaner	1,476						
Laundry Duct Cleaning		388	390	392	393	395	396
Room A/C Replacement							
Total	1,476	388	390	392	393	395	396

Note: Please add rows for measures that are missing from this table.

Each measure was designated under one fuel type, either Electric or Gas.

Air Purifier is replaced by Air Cleaner in PY 2028 - 2033 and is no longer

Acutal data was sourced from Annual Reports for 2021 -2025. Proposed c

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Spending/Budgets	$	$	$	$	$	$	$
Cold Storage							
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Air Sealing/Envelope							
Air Purifier/Cleaner	1,031,282						
Laundry Duct Cleaning		58,178	60,140	62,173	64,272	66,442	68,619
Room A/C Replacement							
Total	1,031,282	58,178	60,140	62,173	64,272	66,442	68,619

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Savings	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh
Cold Storage							
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Air Sealing/Envelope							
Air Purifier/Cleaner							
Laundry Duct Cleaning							
Room A/C Replacement							
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table. Foot

Negative savings are included, per Annual Reports, ESA Table 2.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) ESACET Benefits	$	$	$	$	$	$	$
Cold Storage							
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Air Sealing/Envelope							
Air Purifier/Cleaner	65,610						
Laundry Duct Cleaning		8,938	9,263	9,624	10,001	10,394	10,792
Room A/C Replacement							
Total	65,610	8,938	9,263	9,624	10,001	10,394	10,792

Note: Please add rows for measures that are missing from this table.

Historical ESACET Benefits data for Room A/C Replacement is missing fro

Gas

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Measures	#	#	#	#	#	#	#
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Air Sealing							
Furnace Clean and Tune							
Furnace Repair/Replacement							
Natural Gas Appliance Testing (NGAT)		3,163	3,738	3,738	3,738	3,738	3,738
Water Heater Repair		35	35	36	36	36	36
Water Heater Tank and Pipe Insulation							
Total	-	3,198	3,773	3,774	3,774	3,774	3,774

Note: Please add rows for measures that are missing from this table.
Air Sealing posted positive savings after PY 2022, and is not included as H
Furnace Repair/Replacement in PY 2026 is based on SDG&E Low Income
introduced in 2024. Accordingly, it has positive savings in PY 2024 2025 a
Water Heater Tank and Pipe Insulation posts positive savings after PY 202

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Spending/Budgets	$	$	$	$	$	$	$
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Air Sealing							
Furnace Clean and Tune							
Furnace Repair/Replacement							
Natural Gas Appliance Testing (NGAT)		426,042	518,396	533,787	549,605	565,900	582,690
Water Heater Repair		28,468	29,428	30,423	31,450	32,512	33,577
Water Heater Tank and Pipe Insulation							
Total	-	454,510	547,824	564,210	581,055	598,412	616,267

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Savings	annual therms	annual therms	annual therms	annual therms	annual therms	annual therms	annual therms
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Air Sealing							
Furnace Clean and Tune							
Furnace Repair/Replacement							
Natural Gas Appliance Testing (NGAT)							
Water Heater Repair							
Water Heater Tank and Pipe Insulation							
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.
Negative savings are included, per Annual Reports, ESA Table 2, and SDG

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) ESACET Benefits	$	$	$	$	$	$	$
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Air Sealing							
Furnace Clean and Tune							
Furnace Repair/Replacement							
Natural Gas Appliance Testing (NGAT)		n/a	n/a	n/a	n/a	n/a	n/a
Water Heater Repair		5,791	5,995	6,222	6,458	6,704	6,952
Water Heater Tank and Pipe Insulation							
Total		5,791	5,995	6,222	6,458	6,704	6,952

Note: Please add rows for measures that are missing from this table.
Historical ESACET Benefits data for Furnace Clean and Tune and Furnace
The NGAT measure was inadvertently excluded from ESACET Benefits (I
Application, ESA Table 5, ESA Savings Budget CE.

Electric - MFWB

		2021 actual	2022 actual	2023 actual	2024 actual	2025 actual	2026 authorized
Health, Comfort, and Safety (HCS) Measures	**Offered? (Y/N)**	**#**	**#**	**#**	**#**	**#**	**#**
Cold Storage	N						
Comprehensive Home Health and Safety Checkups	N						
Air Purifier/Cleaner	Y						70
CO and Smoke Alarm	Y					917	22
CO and Smoke Alarm - CAM	Y				636		25
Evap Cooler - CAM	Y						13
Evaporative Cooler Cover	Y						77
Laundry Duct Cleaning	Y						
Minor Home Repair	Y					13,500	14,828
Minor Home Repair - CAM	Y				2,792	2	90
Remediation - FS	Y						
Remediation - FS - CAM	Y						
Total		-	-	-	3,428	14,419	15,125

Note: Please add rows for measures that are missing from this table.

Each measure was designated under one fuel type, either Electric or Gas, except of Minor Home Repair.

Minor Home Repair Quantity, Savings, Budget and Benefits was split based on the overall commodity allocation from CET outputs. See table in footnotes at the end.

Acutal data was sourced from Annual Reports for 2021 -2025.

PY 2026 Authorized and 2028 - 2033 proposed data was sourced from SDG&E Low Income Programs Application, Attachment G, Table A-1a, ESA M

		2021 actual	2022 actual	2023 actual	2024 actual	2025 actual	2026 authorized
Health, Comfort, and Safety (HCS) Spending/Budgets	**Offered? (Y/N)**	**$**	**$**	**$**	**$**	**$**	**$**
Cold Storage	N						
Comprehensive Home Health and Safety Checkups	N						
Air Purifier/Cleaner	Y						11,914
CO and Smoke Alarm	Y					20,422	790
CO and Smoke Alarm - CAM	Y				30,849		1,722
Evap Cooler - CAM	Y						6,887
Evaporative Cooler Cover	Y						3,173
Laundry Duct Cleaning	Y						
Minor Home Repair	Y					553,842	288,509
Minor Home Repair - CAM	Y				193,476	8,015	12,958
Remediation - FS	Y						
Remediation - FS - CAM	Y						
Total		-	-	-	224,325	582,280	325,953

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 actual	2026 authorized
Health, Comfort, and Safety (HCS) Savings	**Offered? (Y/N)**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**
Cold Storage	N						
Comprehensive Home Health and Safety Checkups	N						
Air Purifier/Cleaner	Y						
CO and Smoke Alarm	Y						
CO and Smoke Alarm - CAM	Y						
Evap Cooler - CAM	Y						
Evaporative Cooler Cover	Y						
Laundry Duct Cleaning	Y						
Minor Home Repair	Y						
Minor Home Repair - CAM	Y						
Remediation - FS	Y						
Remediation - FS - CAM	Y						
Total		-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 actual	2026 authorized
Health, Comfort, and Safety (HCS) ESACET Benefits	**Offered? (Y/N)**	$	$	$	$	$	$
Cold Storage	N						
Comprehensive Home Health and Safety Checkups	N						
Air Purifier/Cleaner	Y						1,773
CO and Smoke Alarm	Y					4,662	118
CO and Smoke Alarm - CAM	Y						
Evap Cooler - CAM	Y						
Evaporative Cooler Cover	Y						670
Laundry Duct Cleaning	Y						
Minor Home Repair	Y					596,170	97,015
Minor Home Repair - CAM	Y						
Remediation - FS	Y						
Remediation - FS - CAM	Y						
Total		-	-	-	-	600,832	99,576

Note: Please add rows for measures that are missing from this table.

There are no ESACET Benefits for CAM HCS measures.

Gas

Health, Comfort, and Safety (HCS) Measures	Offered? (Y/N)	2021 actual #	2022 actual #	2023 actual #	2024 actual #	2025 actual #	2026 authorized #
Comprehensive Home Health and Safety Checkups	N						
Air Sealing	Y				1,262	2,344	
Combustion Ventilation Air (CVA) Repair	Y				2	27	900
Combustion Ventilation Air (CVA) Repair - CAM	Y					1	32
Furnace Repair	Y						24
Furnace Repair - CAM	Y						213
Furnace Replacement	Y				2		16
Natural Gas Appliance Testing - NGAT	Y						
Water Heater Repair	Y				6		2
Minor Home Repair	Y					3,375	12,132
Minor Home Repair - CAM	Y				1,439	1	74
Total		-	-	-	2,711	5,748	13,393

Note: Please add rows for measures that are missing from this table.

Health, Comfort, and Safety (HCS) Spending/Budgets	Offered? (Y/N)	2021 actual $	2022 actual $	2023 actual $	2024 actual $	2025 actual $	2026 authorized $
Comprehensive Home Health and Safety Checkups	N						
Air Sealing	Y				33,020	61,711	
Combustion Ventilation Air (CVA) Repair	Y				83	1,119	24,083
Combustion Ventilation Air (CVA) Repair - CAM	Y					250	5,548
Furnace Repair	Y						10,287
Furnace Repair - CAM	Y						44
Furnace Replacement	Y				10,224		31,523
Natural Gas Appliance Testing - NGAT	Y						
Water Heater Repair	Y				14,155		829
Minor Home Repair	Y					138,461	236,052
Minor Home Repair - CAM	Y				99,670	2,004	10,602
Total		-	-	-	157,151	203,544	318,968

Note: Please add rows for measures that are missing from this table.

Health, Comfort, and Safety (HCS) Savings	Offered? (Y/N)	2021 actual annual therms	2022 actual annual therms	2023 actual annual therms	2024 actual annual therms	2025 actual annual therms	2026 authorized annual therms
Comprehensive Home Health and Safety Checkups	N						
Air Sealing	Y						
Combustion Ventilation Air (CVA) Repair	Y						
Combustion Ventilation Air (CVA) Repair - CAM	Y						
Furnace Repair	Y						
Furnace Repair - CAM	Y						(3,540)
Furnace Replacement	Y						
Natural Gas Appliance Testing - NGAT	Y						
Water Heater Repair	Y						
Minor Home Repair	Y						
Minor Home Repair - CAM	Y						
Total		-	-	-	-	-	(3,540)

Note: Please add rows for measures that are missing from this table.

Health, Comfort, and Safety (HCS) ESACET Benefits	Offered? (Y/N)	2021 actual $	2022 actual $	2023 actual $	2024 actual $	2025 actual $	2026 authorized $
Comprehensive Home Health and Safety Checkups	N						
Air Sealing	Y				1,395	70,729	
Combustion Ventilation Air (CVA) Repair	Y				4	584	5,420
Combustion Ventilation Air (CVA) Repair - CAM	Y						
Furnace Repair	Y						3,199
Furnace Repair - CAM	Y						
Furnace Replacement	Y				432		10,422
Natural Gas Appliance Testing - NGAT	Y						
Water Heater Repair	Y				598		206
Minor Home Repair	Y				-	149,043	79,376
Minor Home Repair - CAM	Y						
Total		-	-	-	2,429	220,356	98,623

Note: Please add rows for measures that are missing from this table.

Minor Home Repair is the only measure where values follow the annual Electric/Gas Split for MFWB total budget spend:

	2024	2025	2026
Electric	66%	80%	55%
Gas	34%	20%	45%

Electric - MFWB

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Measures	#	#	#	#	#	#	#
Cold Storage							
Comprehensive Home Health and Safety Checkups							
Air Purifier/Cleaner							
CO and Smoke Alarm	23	292	560	560	560	560	560
CO and Smoke Alarm - CAM	23	33	96	96	96	96	96
Evap Cooler - CAM							
Evaporative Cooler Cover							
Laundry Duct Cleaning		11	12	12	12	12	12
Minor Home Repair	12,347	480	711	730	709	696	1,183
Minor Home Repair - CAM	116	12	53	55	53	53	90
Remediation - FS		150	220	220	220	220	220
Remediation - FS - CAM		1	3	3	3	3	3
Total	12,509	979	1,656	1,675	1,654	1,640	2,164

Note: Please add rows for measures that are missing from this table.

Each measure was designated under one fuel type, either Electric or Gas, ex

Minor Home Repair Quantity, Savings, Budget and Benefits was split based o

Acutal data was sourced from Annual Reports for 2021 -2025.

PY 2026 Authorized and 2028 - 2033 proposed data was sourced from SDC

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Spending/Budgets	$	$	$	$	$	$	$
Cold Storage							
Comprehensive Home Health and Safety Checkups							
Air Purifier/Cleaner							
CO and Smoke Alarm	1,436	19,966	39,969	41,694	42,728	43,798	44,905
CO and Smoke Alarm - CAM	2,575	3,126	10,172	10,611	10,875	11,146	11,428
Evap Cooler - CAM							
Evaporative Cooler Cover							
Laundry Duct Cleaning		1,666	1,933	2,017	2,067	2,119	2,172
Minor Home Repair	349,861	5,774	10,071	10,778	10,757	11,028	19,238
Minor Home Repair - CAM	20,370	9,373	53,580	57,362	57,277	68,777	120,062
Remediation - FS		403,896	630,145	657,327	673,620	690,468	707,897
Remediation - FS - CAM		8,975	28,643	29,878	30,619	31,385	32,177
Total	374,242	452,776	774,513	809,667	827,942	858,721	937,880

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Savings	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh
Cold Storage							
Comprehensive Home Health and Safety Checkups							
Air Purifier/Cleaner							
CO and Smoke Alarm							
CO and Smoke Alarm - CAM							
Evap Cooler - CAM							
Evaporative Cooler Cover							
Laundry Duct Cleaning							
Minor Home Repair							
Minor Home Repair - CAM							
Remediation - FS							
Remediation - FS - CAM							
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) ESACET Benefits	$	$	$	$	$	$	$
Cold Storage							
Comprehensive Home Health and Safety Checkups							
Air Purifier/Cleaner							
CO and Smoke Alarm	95	20,966	39,380	40,517	41,933	43,339	44,967
CO and Smoke Alarm - CAM							
Evap Cooler - CAM							
Evaporative Cooler Cover							
Laundry Duct Cleaning		282	340	348	365	378	392
Minor Home Repair	256,594	1,242	1,828	1,930	1,946	2,238	3,954
Minor Home Repair - CAM							
Remediation - FS		424,132	620,873	638,764	661,094	683,225	708,866
Remediation - FS - CAM							
Total	256,689	446,622	662,421	681,558	705,338	729,179	758,179

Note: Please add rows for measures that are missing from this table.

There are no ESACET Benefits for CAM HCS measures.

Gas

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Measures	#	#	#	#	#	#	#
Comprehensive Home Health and Safety Checkups							
Air Sealing							
Combustion Ventilation Air (CVA) Repair	750						
Combustion Ventilation Air (CVA) Repair - CAM	32						
Furnace Repair	60						
Furnace Repair - CAM							
Furnace Replacement							
Natural Gas Appliance Testing - NGAT		1,500	2,640	2,640	2,640	2,640	2,640
Water Heater Repair		1	16	16	16	16	16
Minor Home Repair	17,768	690	1,161	1,141	1,158	1,185	695
Minor Home Repair - CAM	167	17	87	85	87	90	53
Total	18,777	2,208	3,903	3,883	3,900	3,931	3,404

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Spending/Budgets	$	$	$	$	$	$	$
Comprehensive Home Health and Safety Checkups							
Air Sealing							
Combustion Ventilation Air (CVA) Repair	36,055						
Combustion Ventilation Air (CVA) Repair - CAM	9,133						
Furnace Repair	224,496						
Furnace Repair - CAM							
Furnace Replacement							
Natural Gas Appliance Testing - NGAT		172,548	323,057	336,997	345,340	353,973	362,902
Water Heater Repair		923	15,705	16,382	16,788	17,208	17,643
Minor Home Repair	503,458	8,308	16,431	16,859	17,550	18,777	11,299
Minor Home Repair - CAM	29,314	13,488	87,420	89,720	93,451	117,106	70,513
Total	802,456	195,267	442,613	459,958	473,130	507,064	462,356

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Savings	annual therms	annual therms	annual therms	annual therms	annual therms	annual therms	annual therms
Comprehensive Home Health and Safety Checkups							
Air Sealing							
Combustion Ventilation Air (CVA) Repair							
Combustion Ventilation Air (CVA) Repair - CAM							
Furnace Repair							
Furnace Repair - CAM							
Furnace Replacement							
Natural Gas Appliance Testing - NGAT							
Water Heater Repair							
Minor Home Repair							
Minor Home Repair - CAM							
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) ESACET Benefits	$	$	$	$	$	$	$
Comprehensive Home Health and Safety Checkups							
Air Sealing							
Combustion Ventilation Air (CVA) Repair	14,610						
Combustion Ventilation Air (CVA) Repair - CAM							
Furnace Repair	37,980						
Furnace Repair - CAM							
Furnace Replacement							
Natural Gas Appliance Testing - NGAT		29,176	56,809	58,067	60,939	63,165	65,545
Water Heater Repair		168	2,950	3,016	3,162	3,276	3,398
Minor Home Repair	369,246	1,787	2,982	3,018	3,175	3,810	2,322
Minor Home Repair - CAM							
Total	421,836	31,130	62,741	64,102	67,276	70,252	71,265

Note: Please add rows for measures that are missing from this table.

Minor Home Repair is the only measure where values follow the annual Ele	2027	2028	2029	2030	2031	2032	2033
	41%	41%	38%	39%	38%	37%	63%
	59%	59%	62%	61%	62%	63%	37%

Electric - Pilot

		2021 actual	2022 actual	2023 actual	2024 actual	2025 actual	2026 authorized
Health, Comfort, and Safety (HCS) Measures	**Offered? (Y/N)**	**#**	**#**	**#**	**#**	**#**	**#**
Cold Storage	N						
Air Purifiers	N						
CO and Smoke Alarms	N						
Air Sealing/Envelope	N						
Home Health and Safety Check-up	Y				1	21	
Minor Home Repair	Y				1	32	
Total		-	-	-	1	62	-

Note: Please add rows for measures that are missing from this table.

Each measure was designated under one fuel type, either Electric or Gas for Actuals in PY 2024 and 2025.

PY 2024 Minor Home Repair is counted here as one for Measure Quantity but Budgets, Savings and Benefits are split based commodity allocation. See table below in footnotes.

Acutal data was sourced from Annual Reports for 2021 - 2025. PY 2026 Authorized is blank since only a total measure budget was authorized for Pilot, not a measure level forecast.

SDG&E did not propose measures in the Pilot Planning Table for PY 2028 - 2033 in the Low Income Application.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 actual	2026 authorized
Health, Comfort, and Safety (HCS) Spending/Budgets	**Offered? (Y/N)**	**$**	**$**	**$**	**$**	**$**	**$**
Cold Storage	N						
Air Purifiers	N						
CO and Smoke Alarms	N						
Air Sealing/Envelope	N						
Home Health and Safety Check-up	Y				75	1,617	
Minor Home Repair	Y				147	1,091	
Total		-	-	-	222	2,708	-

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 actual	2026 authorized
Health, Comfort, and Safety (HCS) Savings	**Offered? (Y/N)**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**
Cold Storage	N						
Air Purifiers	N						
CO and Smoke Alarms	N						
Air Sealing/Envelope	N						
Fan Controller for A/C	Y						
Home Health and Safety Check-up	Y						
Minor Home Repair	Y						
Total		-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 actual	2026 authorized
Health, Comfort, and Safety (HCS) ESACET Benefits	**Offered? (Y/N)**	**$**	**$**	**$**	**$**	**$**	**$**
Cold Storage	N						
Air Purifiers	N						
CO and Smoke Alarms	N						
Air Sealing/Envelope	N						
Fan Controller for A/C	Y						
Home Health and Safety Check-up	Y				-	342	
Minor Home Repair	Y				-	231	
Total		-	-	-	-	945	-

Note: Please add rows for measures that are missing from this table.

Gas

Health, Comfort, and Safety (HCS) Measures	Offered? (Y/N)	2021 actual #	2022 actual #	2023 actual #	2024 actual #	2025 actual #	2026 authorized #
CO and Smoke Alarms	N						
Natural Gas Appliance Testing (NGAT)	N						
Air Sealing	Y				2		
Furnace Clean and Tune	Y					15	
High Efficiency Furnace	Y					29	
Minor Home Repair	Y				1	19	
Total		-	-	-	3	63	-

Note: Please add rows for measures that are missing from this table.

Health, Comfort, and Safety (HCS) Spending/Budgets	Offered? (Y/N)	2021 actual $	2022 actual $	2023 actual $	2024 actual $	2025 actual $	2026 authorized $
CO and Smoke Alarms	N						
Natural Gas Appliance Testing (NGAT)	N						
Air Sealing	Y				275		
Furnace Clean and Tune	Y					1,468	
High Efficiency Furnace	Y					3,807	
Minor Home Repair	Y				75	669	
Total		-	-	-	350	5,944	-

Note: Please add rows for measures that are missing from this table.

Health, Comfort, and Safety (HCS) Savings	Offered? (Y/N)	2021 actual annual therms	2022 actual annual therms	2023 actual annual therms	2024 actual annual therms	2025 actual annual therms	2026 authorized annual therms
CO and Smoke Alarms	N						
Natural Gas Appliance Testing (NGAT)	N						
Air Sealing	Y						
Furnace Clean and Tune	Y						
High Efficiency Furnace	Y						
Minor Home Repair	Y						
Total		-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

Health, Comfort, and Safety (HCS) ESACET Benefits	Offered? (Y/N)	2021 actual $	2022 actual $	2023 actual $	2024 actual $	2025 actual $	2026 authorized $
CO and Smoke Alarms	N						
Natural Gas Appliance Testing (NGAT)	N						
Air Sealing	Y				3		
Furnace Clean and Tune	Y					194	
High Efficiency Furnace	Y					759	
Minor Home Repair	Y				-	141	
Total		-	-	-	3	1,094	-

Note: Please add rows for measures that are missing from this table.

Only the Minor Home Repair measure follows the Electric/Gas spending split from Annual Reports:

	2024	2025
Electric	66%	62%
Gas	34%	38%

Electric - Pilot

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Measures	#	#	#	#	#	#	#
Cold Storage							
Air Purifiers							
CO and Smoke Alarms							
Air Sealing/Envelope							
Home Health and Safety Check-up							
Minor Home Repair							
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.
Each measure was designated under one fuel type, either Electric or Gas t
PY 2024 Minor Home Repair is counted here as one for Measure Quantit
Acutal data was sourced from Annual Reports for 2021 - 2025. PY 2026 /
SDG&E did not propose measures in the Pilot Planning Table for PY 2028

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Spending/Budgets	$	$	$	$	$	$	$
Cold Storage							
Air Purifiers							
CO and Smoke Alarms							
Air Sealing/Envelope							
Home Health and Safety Check-up							
Minor Home Repair							
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Savings	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh
Cold Storage							
Air Purifiers							
CO and Smoke Alarms							
Air Sealing/Envelope							
Fan Controller for A/C							
Home Health and Safety Check-up							
Minor Home Repair							
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) ESACET Benefits	$	$	$	$	$	$	$
Cold Storage							
Air Purifiers							
CO and Smoke Alarms							
Air Sealing/Envelope							
Fan Controller for A/C							
Home Health and Safety Check-up							
Minor Home Repair							
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

Gas

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Measures	#	#	#	#	#	#	#
CO and Smoke Alarms							
Natural Gas Appliance Testing (NGAT)							
Air Sealing							
Furnace Clean and Tune							
High Efficiency Furnace							
Minor Home Repair							
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Spending/Budgets	$	$	$	$	$	$	$
CO and Smoke Alarms							
Natural Gas Appliance Testing (NGAT)							
Air Sealing							
Furnace Clean and Tune							
High Efficiency Furnace							
Minor Home Repair							
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Savings	annual therms	annual therms	annual therms	annual therms	annual therms	annual therms	annual therms
CO and Smoke Alarms							
Natural Gas Appliance Testing (NGAT)							
Air Sealing							
Furnace Clean and Tune							
High Efficiency Furnace							
Minor Home Repair							
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) ESACET Benefits	$	$	$	$	$	$	$
CO and Smoke Alarms							
Natural Gas Appliance Testing (NGAT)							
Air Sealing							
Furnace Clean and Tune							
High Efficiency Furnace							
Minor Home Repair							
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

Only the Minor Home Repair measure follows the Electric/Gas spending s

Electric

Electrification		2021 actual	2022 actual	2023 actual	2024 actual	2025 actual	2026 forecasted	2027 proposed
ESA Main								
Households Treated	#							
Budgets	$							
Electricity Savings or (Increase)	annual kWh							
Electricity Savings or (Increase)	lifetime kWh							
Electricity Savings or (Increase)	kW							
Other Fuel Savings	annual MMBtus							
Other Fuel Savings	lifetime MMBtus							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA MFWB								
Households Treated	#							
Budgets	$						190,232	83,138
Electricity Savings or (Increase)	annual kWh						(40,358)	(17,979)
Electricity Savings or (Increase)	lifetime kWh						(420,711)	(68,923)
Electricity Savings or (Increase)	kW						1	-
Other Fuel Savings	annual MMBtus						(138)	(235)
Other Fuel Savings	lifetime MMBtus						(1,436)	-
Energy Benefits (ESACET)	$						(34,309)	274
Non-Energy Benefits (ESACET)	$						see Gas table	see Gas table
ESA Pilots								
Households Treated	#					1		
Budgets	$					5,739		
Electricity Savings or (Increase)	annual kWh					1,681		
Electricity Savings or (Increase)	lifetime kWh					8,405		
Electricity Savings or (Increase)	kW					-		
Other Fuel Savings	annual MMBtus					5.74		
Other Fuel Savings	lifetime MMBtus					-		
Energy Benefits (ESACET)	$					696		
Non-Energy Benefits (ESACET)	$					1,505		

Gas

Electrification		2021 actual	2022 actual	2023 actual	2024 actual	2025 actual	2026 forecasted	2027 proposed
ESA Main								
Households Treated	#							
Budgets	$							
Electricity (Increase)	annual kWh							
Electricity (Increase)	lifetime kWh							
Electricity (Increase)	kW							
Gas Savings	annual therms							
Gas Savings	lifetime therms							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA MFWB								
Households Treated	#							
Budgets	$						155,645	119,637
Electricity (Increase)	annual kWh						see Electric table	see Electric table
Electricity (Increase)	lifetime kWh						see Electric table	see Electric table
Electricity (Increase)	kW						see Electric table	see Electric table
Gas Savings	annual therms						7,445	2,907
Gas Savings	lifetime therms						77,233	10,632
Energy Benefits (ESACET)	$						131,725	18,817
Non-Energy Benefits (ESACET)	$						37,486	5,490
ESA Pilots								
Households Treated	#					1		
Budgets	$					3,517		
Electricity (Increase)	annual kWh					see Electric table		
Electricity (Increase)	lifetime kWh					see Electric table		
Electricity (Increase)	kW					see Electric table		
Gas Savings	annual therms					41		
Gas Savings	lifetime therms					203		
Energy Benefits (ESACET)	$					351		
Non-Energy Benefits (ESACET)	$					see Electric table		

Electrification is not offered in the ESA Main Program.
Electrification measures are offered in MFWB, which launched in PY 2023 but no installations occurred in PY 2023 - 2025.
For MFWB, a total measures budget was approved for PY 2023 - 2026. There was not a specific authorized electrification budget.
No homes treated numbers were forecasted or proposed for MFWB electrification measures, only the measure installations were forecasted or proposed.
PY 2026 forecasted and 2027 proposed MFWB electrification measures budget and savings are sourced from Low Income Application Attachment G, MFWB Planning Table A-1a.
MFWB budget split between Electric and Gas tables for PY 2026 and 2027 follows the forecasted commodity spending of 55%-E, 45%-G for 2026 and 41%-E, 59%-G for 2027.
PY 2027 MFWB Energy Benefits (ESACET) in Electric Table show positive savings due to inadvertently including two non-fuel substitution measures in the calculation for Supplemental Testimony to the 2027 Bridge Funding Application. This does not impact 2027 ESACET scores.
ESA Pilots (PPPD) launched in PY 2024 with a total measures budget for the program. There was not a specific authorized electrification budget for any program year.
In PY 2025, PPPD installed one electrification measure in one household. The measure has both electric and gas savings per Table 2B in 2025 Annual Report.
The PPPD budget split follows the actual commodity spending from 2025 Annual Report, ESA Table 1A-2 Pilot Expenses, at 62% Gas and 38% Electric.
For PY 2027, PPPD did not forecast budgets, savings or benefits for electrification measure installation.

Electric

Electrification		2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
ESA Main								
Households Treated	#							
Budgets	$							
Electricity Savings or (Increase)	annual kWh							
Electricity Savings or (Increase)	lifetime kWh							
Electricity Savings or (Increase)	kW							
Other Fuel Savings	annual MMBtus							
Other Fuel Savings	lifetime MMBtus							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA MFWB								
Households Treated	#	300	440	440	440	440	440	2,500
Budgets	$	$ 119,514	$ 180,624	$ 191,181	$ 198,474	$ 207,731	$ 218,406	$ 1,115,931
Electricity Savings or (Increase)	annual kWh	(204,581)	(301,102)	(301,102)	(301,102)	(301,102)	(301,102)	(1,710,091)
Electricity Savings or (Increase)	lifetime kWh	(2,197,934)	(3,225,287)	(3,225,287)	(3,225,287)	(3,225,287)	(3,225,287)	(18,324,369)
Electricity Savings or (Increase)	kW	-	-	-	-	-	-	-
Other Fuel Savings	annual MMBtus	(698)	(1,027)	(1,027)	(1,027)	(1,027)	(1,027)	(5,833)
Other Fuel Savings	lifetime MMBtus	(7,499)	(11,005)	(11,005)	(11,005)	(11,005)	(11,005)	(62,524)
Energy Benefits (ESACET)	$	-	-	-	-	-	-	-
Non-Energy Benefits (ESACET)	$	See Gas table	See Gas table	See Gas table	See Gas table	See Gas table	See Gas table	See Gas table
ESA Pilots								
Households Treated	#							
Budgets	$							
Electricity Savings or (Increase)	annual kWh							
Electricity Savings or (Increase)	lifetime kWh							
Electricity Savings or (Increase)	kW							
Other Fuel Savings	annual MMBtus							
Other Fuel Savings	lifetime MMBtus							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							

Gas

Electrification		2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
ESA Main								
Households Treated	#							
Budgets	$							
Electricity (Increase)	annual kWh							
Electricity (Increase)	lifetime kWh							
Electricity (Increase)	kW							
Gas Savings	annual therms							
Gas Savings	lifetime therms							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA MFWB								
Households Treated	#	300	440	440	440	440	440	2,500
Budgets	$	$ 290,530	$ 470,972	$ 490,593	$ 528,197	$ 561,177	$ 592,775	$ 2,934,244
Electricity (Increase)	annual kWh							-
Electricity (Increase)	lifetime kWh							-
Electricity (Increase)	kW							-
Gas Savings	annual therms	25,298	37,408	37,408	37,408	37,408	37,408	212,338
Gas Savings	lifetime therms	262,096	385,951	385,951	385,951	385,951	385,951	2,191,851
Energy Benefits (ESACET)	$	$ 493,567	$ 763,962	$ 803,848	$ 846,139	$ 890,999	$ 938,599	$ 4,737,114
Non-Energy Benefits (ESACET)	$	$ 619,514	$ 936,763	$ 961,659	$ 999,670	$ 1,034,174	$ 1,072,945	$ 5,624,725
ESA Pilots								
Households Treated	#							
Budgets	$							
Electricity (Increase)	annual kWh							
Electricity (Increase)	lifetime kWh							
Electricity (Increase)	kW							
Gas Savings	annual therms							
Gas Savings	lifetime therms							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							

Electrification measures are not proposed in ESA Main Program.

For ESA Pilots (Electrification Pilot), a total measures budget was proposed for PY 2028-2033. There was not a specific electrification measures budget or a planning table with measures submitted in SDG&E's Low Income Application.

MFWB forecasted 10% of homes treated to receive electrification measures, per Prepared Direct Testimony of Roland Mollen et.al. SDG&E-03, Section 7.1.6 at 77.

The proposed list of electrification measures for MFWB includes Remediation, and can be found in Table A-1a, ESA MFWB Planning in Attachment G of SDG&E's Application for Low Income Assistance Programs for PY 2028-2033

MFWB budget for electrification measures is split between electric and gas tables, based on forecasted commodity spending for MFWB for each year:

	2028	2029	2030	2031	2032	2033
Electric	41%	38%	39%	38%	37%	37%
Gas	59%	62%	61%	62%	63%	63%

SOUTHERN CALIFORNIA GAS COMPANY

THE UTILITY REFORM NETWORK (TURN)
Data Request No. TURN-SoCalGas-02
RECEIVED: APRIL 13, 2026
SUBMITTED: APRIL 27, 2026

Question 4:

Please provide a break out of the proposed budgets, savings, households treated, and benefits for each program (ESA Main, ESA MFWB, and ESA Pilots) in each program year (2028-2033) by electric and gas using the template provided in Discovery Tables.xlsx, tab 02. Please note that there are three tables for electric and three tables for gas. Please provide all data that is applicable and available. Please leave any cells blank that cannot be populated because they are not applicable (for example, electric table inputs for a gas utility). If some data is not available, please identify that data in the written response, explain why it is not available, and populate those cells with a "n/a".

SoCalGas Response:

See attached file: "SoCalGas Response_TURN-DR-SoCalGas_Discovery Tables_04.27.2026.xlsx", see worksheet titled '02'.

SOUTHERN CALIFORNIA GAS COMPANY

THE UTILITY REFORM NETWORK (TURN)
Data Request No. TURN-SoCalGas-02
RECEIVED: APRIL 13, 2026
SUBMITTED: APRIL 27, 2026

Question 6:

Please provide a break out of the actual, authorized, and proposed number of health, comfort, and safety (HCS) measures, the spending or budget allocated to HCS measures, and the savings and the benefits attributable to HCS measures for each program year in the previous cycle (2021-2026), 2027 bridge year, and each year in the new cycle (2028-2033) for electric and gas. Please provide the response using the template provided in Discovery Tables.xlsx, tab 03. Please note that there are four tables for electric and four tables for gas--one for measures, one for spending/budgets, one for savings, and one for benefits. Please add rows for any measures that are missing from these tables and use the Offered (Y/N) column to indicate which measures are offered and which are not offered. Please provide all data that is applicable and available. Please leave any cells blank that cannot be populated because they are not applicable (for example, electric table inputs for a gas utility). If some data is not available, please identify that data in the written response, explain why it is not available, and populate those cells with a "n/a".

SoCalGas Response:

See attached file: "SoCalGas Response_TURN-DR-SoCalGas_Discovery Tables_04.27.2026.xlsx", see worksheet titled '03'.

Cells populated with N/A are because measures are not budgeted at the individual measure level. Instead, budgets are established at the total program cost per year, to allow flexibility in selecting and installing measures based on individual household needs, while being mindful that overall expenditure remains within the Commission-authorized Energy Efficiency budget. All dollar amounts shown in Table A-1[1] in SoCalGas's Application are preliminary estimates and are intended solely for illustrative purposes; actual expenditures may differ based on program implementation and realized conditions.

[1] SoCalGas ESA and CARE Programs and Budgets for PYs 2028-2033 Application (A.26-01-011), Attachment E, Table A-1 at Attachment E-9.

SOUTHERN CALIFORNIA GAS COMPANY

THE UTILITY REFORM NETWORK (TURN)
Data Request No. TURN-SoCalGas-02
RECEIVED: APRIL 13, 2026
SUBMITTED: APRIL 27, 2026

Question 9:

How will the plan target customers and conduct outreach for electrification, especially for customers who use multiple fuel sources to heat their home?

a. Which utilities are responsible for targeting? Please describe the roles and responsibilities of each utility and how they will coordinate with one another.
b. Which utilities are responsible for conducting the cost-effectiveness and rate and bill impacts assessment for each customer? Please describe the roles and responsibilities of each utility and how they will coordinate with one another.
c. Which utilities are responsible for outreach to customers? Please describe the roles and responsibilities of each utility and how they will coordinate with one another.
d. Is the responsibility for targeting, cost-effectiveness and rate and bill impact assessment, and outreach shared between electric and gas utilities? If so, how? What is each utility responsible for and how do they carry out these responsibilities in coordination with the other utilities?
e. How are electric and gas utilities coordinating to ensure that multiple utilities are not reaching out to the same customer with different and competing measure offerings?

SoCalGas Response:

SoCalGas did not propose any electrification plans. This question is not applicable to SoCalGas.

SOUTHERN CALIFORNIA GAS COMPANY

THE UTILITY REFORM NETWORK (TURN)
Data Request No. TURN-SoCalGas-02
RECEIVED: APRIL 13, 2026
SUBMITTED: APRIL 27, 2026

Question 14:

Please provide data on the actual, authorized, and proposed electrification efforts to date, for electric and gas from 2021 through 2027 using the template provided in Discovery Tables.xlsx, tab 06. Please note that there is one table for electric and one table for gas. Please provide all data that is applicable and available. Please leave any cells blank that cannot be populated because they are not applicable (for example, electric table inputs for a gas utility). If some data is not available, please identify that data in the written response, explain why it is not available, and populate those cells with a "n/a".

SoCalGas Response:

SoCalGas did not propose any electrification plans for PYs 2021-2027. This question is not applicable to SoCalGas.

SOUTHERN CALIFORNIA GAS COMPANY

THE UTILITY REFORM NETWORK (TURN)
Data Request No. TURN-SoCalGas-02
RECEIVED: APRIL 13, 2026
SUBMITTED: APRIL 27, 2026

Question 15:

Please provide data on electrification efforts as proposed in the new program years (the 2028-2033 plan) for electric and gas using the template provided in Discovery Tables.xlsx, tab 07. Please note that there is one table for electric and one table for gas. Please provide all data that is applicable and available. Please leave any cells blank that cannot be populated because they are not applicable (for example, electric table inputs for a gas utility). If some data is not available, please identify that data in the written response, explain why it is not available, and populate those cells with a "n/a".

SoCalGas Response:

SoCalGas did not propose any electrification plans. This question is not applicable to SoCalGas.

SOUTHERN CALIFORNIA GAS COMPANY

THE UTILITY REFORM NETWORK (TURN)
Data Request No. TURN-SoCalGas-02
RECEIVED: APRIL 13, 2026
SUBMITTED: APRIL 27, 2026

Potential & Goals Study (Questions 26-29)

Question 26:

Did you use the 2025 Potential & Goals Study to develop the proposed 2028-2033 ESA plan goals? Please discuss electrification measures separately from the other measures in the portfolio.

a. If so, how?
b. If not, why not? Is the methodology flawed and if so, how?
c. Are the fuel substitution assumptions and analysis in the study relevant to ESA? If so, how? If not, why not?

SoCalGas Response:

a. Yes, SoCalGas's proposed budget did consider the 2025 Potential & Goals study during its development of the Application. With a clear and sustained focus on customer affordability, SoCalGas used the 2025 Potential & Goals (P&G) Study as an important reference point in developing the proposed 2028–2033 ESA Program goals. The Study provided a comprehensive assessment of achievable therm savings under a range of assumptions, offering valuable insights into theoretical savings potential.
b. SoCalGas did not rely on the 2025 P&G Study's maximum potential estimates alone. Instead, SoCalGas applied a prudent, customer-centric lens to support that its proposed ESA Program goals strike an appropriate balance between energy savings, program effectiveness, and cost impacts. Ultimately, affordability for all SoCalGas customers was the decisive factor in shaping the proposed 2028–2033 ESA Program goals. By prioritizing achievable and cost-effective savings levels, SoCalGas's proposed goals are designed to deliver meaningful benefits to income-qualified customers while minimizing upward pressure on rates and maintaining fairness across the broader customer base.
c. N/A.

Electric

ESA Main		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets	$								
Energy savings	annual kWh								
Energy savings	lifetime kWh								
Demand savings	kW								
Other fuel savings	annual MMBtus								
Other fuel savings	lifetime MMBtus								
Households treated	#								
Energy benefits (ESACET)	$								
Non-energy benefits (ESACET)	$								

ESA MFWB		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets	$								
Energy savings	annual kWh								
Energy savings	lifetime kWh								
Demand savings	kW								
Other fuel savings	annual MMBtus								
Other fuel savings	lifetime MMBtus								
Households treated	#								
Energy benefits (ESACET)	$								
Non-energy benefits (ESACET)	$								

ESA Pilots		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets	$								
Energy savings	annual kWh								
Energy savings	lifetime kWh								
Demand savings	kW								
Other fuel savings	annual MMBtus								
Other fuel savings	lifetime MMBtus								
Households treated	#								
Energy benefits (ESACET)	$								
Non-energy benefits (ESACET)	$								

Gas [1]

ESA Main		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets	$	123,506,958	124,172,251	127,733,769	131,548,296	135,363,828	139,274,896	143,273,452	801,366,491
Gas savings	annual therms	1,435,220	1,620,094	1,620,094	1,620,094	1,620,094	1,620,094	1,620,094	9,720,566
Gas savings	lifetime therms	14,241,951	12,916,792	12,916,792	12,916,792	12,916,792	12,916,792	12,916,792	77,500,753
Households treated	#	92,369	92,369	92,369	92,369	92,369	92,369	92,369	554,214
Energy benefits (ESACET)	$	(31,691,198)	(5,393,186)	(4,985,799)	(4,526,669)	(4,011,044)	(3,434,009)	(2,790,416)	(25,141,124)
Non-energy benefits (ESACET)	$	37,227,168	45,937,975	47,352,703	48,812,101	50,317,645	51,870,864	53,473,339	297,764,627

ESA MFWB		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gas savings	annual therms	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gas savings	lifetime therms	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Households treated	#	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Energy benefits (ESACET)	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non-energy benefits (ESACET)	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

ESA Pilots		2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
Budgets	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gas savings	annual therms	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Gas savings	lifetime therms	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Households treated	#	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Energy benefits (ESACET)	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non-energy benefits (ESACET)	$	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Footnotes:

[1] : Data represents entire ESA Program Portfolio serving single family, multifamily, common area measures

N/A For ESA MFWB Table: Not applicable, SoCalGas proposed an ESA Program Portfolio and Program Cycle level

N/A For ESA Pilots: Not applicable, SoCalGas did not propose any ESA Pilots

Electric tables are not applicable to SoCalGas.

Electric

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS) Measures	**Offered? (Y/N)**	**#**	**#**	**#**	**#**	**#**	**#**
Cold Storage							
Air Purifiers							
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Air Sealing/Envelope							
Total		-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS) Spending/Budgets	**Offered? (Y/N)**	**$**	**$**	**$**	**$**	**$**	**$**
Cold Storage							
Air Purifiers							
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Air Sealing/Envelope							
Total		-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS) Savings	**Offered? (Y/N)**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**	**annual kWh**
Cold Storage							
Air Purifiers							
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Air Sealing/Envelope							
Total		-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS) ESACET Benefits	**Offered? (Y/N)**	**$**	**$**	**$**	**$**	**$**	**$**
Cold Storage							
Air Purifiers							
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Air Sealing/Envelope							
Total		-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

Gas

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS) Measures	**Offered? (Y/N)**	**#**	**#**	**#**	**#**	**#**	**#**
Comprehensive Home Health and Safety Checkups	Y	not offered	6,889	35,429	36,252	N/A	N/A
CO and Smoke Alarms	Y	not offered	5,602	31,580	35,231	N/A	N/A
Natural Gas Appliance Testing (NGAT)	Y	57,158	52,662	35,854	38,746	N/A	N/A
Air Sealing/Envelope	Y	132,537	101,773	32,737	32,138	N/A	N/A
Furnace Clean and Tune	Y	21,688	16,958	2,502	3,731	N/A	N/A
Furnace Repair/Replacement	Y	7,174	9,136	1,287	1,190	N/A	N/A
Total		218,557	193,020	139,389	147,288	-	-

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS) Spending/Budgets	**Offered? (Y/N)**	**$**	**$**	**$**	**$**	**$**	**$**
Comprehensive Home Health and Safety Checkups	Y/N	not offered	$ 440,856	$ 2,263,527	$ 2,250,113	N/A	N/A
CO and Smoke Alarms	Y/N	not offered	$ 1,171,096	$ 7,003,382	$ 7,560,276	N/A	N/A
Natural Gas Appliance Testing (NGAT)	Y	$ 1,064,369	$ 1,648,214	$ 1,156,213	$ 1,555,661	N/A	N/A
Air Sealing/Envelope	Y	$ 20,074,373	$ 18,280,325	$ 4,016,812	$ 5,585,818	N/A	N/A
Furnace Clean and Tune	Y	$ 1,253,396	$ 1,004,300	$ 242,960	$ 343,389	N/A	N/A
Furnace Repair/Replacement	Y	$ 12,531,759	$ 10,669,936	$ 3,903,126	$ 3,926,428	N/A	N/A
Total		$ 34,923,897	$ 33,214,727	$ 18,586,019	$ 21,221,685	$ -	$ -

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS) Savings	**Offered? (Y/N)**	**annual therms**	**annual therms**	**annual therms**	**annual therms**	**annual therms**	**annual therms**
Comprehensive Home Health and Safety Checkups	Y/N	not offered	-	-	-	N/A	N/A
CO and Smoke Alarms	Y/N	not offered	-	-	-	N/A	N/A
Natural Gas Appliance Testing (NGAT)	Y	N/A	N/A	N/A	N/A	N/A	N/A
Air Sealing/Envelope	Y	61,954	44,545	16,171	15,747	N/A	N/A
Furnace Clean and Tune	Y	(26,676)	(20,858)	(3,077)	(4,589)	N/A	N/A
Furnace Repair/Replacement	Y	(248,433)	(241,239)	(4,507)	(4,442)	N/A	N/A
Total		(213,155)	(217,552)	8,587	6,716	-	-

Note: Please add rows for measures that are missing from this table.

		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized
Health, Comfort, and Safety (HCS) ESACET Benefits	**Offered? (Y/N)**	**$**	**$**	**$**	**$**	**$**	**$**
Comprehensive Home Health and Safety Checkups	Y/N	not offered	N/A	N/A	N/A	N/A	N/A
CO and Smoke Alarms	Y/N	not offered	N/A	N/A	N/A	N/A	N/A
Natural Gas Appliance Testing (NGAT)	Y	not offered	N/A	N/A	N/A	N/A	N/A
Air Sealing/Envelope	Y	(19,908,220)	(17,282,160)	(3,749,782)	(4,092,461)	10,099,280	10,922,468
Furnace Clean and Tune	Y	(1,088,577)	(965,755)	(119,595)	(112,454)	(806,872)	(722,423)
Furnace Repair/Replacement	Y	(10,328,666)	(14,979,262)	(1,830,583)	(276,991)	(2,059,678)	(1,941,210)
Total		(31,325,462)	(33,227,177)	(5,699,961)	(4,481,906)	7,232,730	8,258,834

Note: Please add rows for measures that are missing from this table.

Footnotes:

N/A for Health, Comfort, and Safety (HCS) Measures and Spending/Budgets Tables: Not applicable, measures are not budgeted at the individual measure level. Instead, budgets are established at the total program cost per year, to allow flexibility in selecting and installing measures based on individual household needs, while being mindful that overall expenditure remains within the Commission-authorized Energy Efficiency budget. All dollar amounts shown in SoCalGas's Application Table A-1 are preliminary estimates and are intended solely for illustrative purposes; actual expenditures may differ based on program implementation and realized conditions.

N/A for Health, Comfort, and Safety (HCS) Savings: Not applicable, per D.21-06-015, Attachment 1 at Table 5, therms savings goal authorized at the portfolio level per year not at individual measure level

N/A for Health, Comfort, and Safety (HCS) ESACET Benefits Table: Not applicable, Comprehensive Home Health and Safety measures, including CO and smoke alarms, and NGAT are not included in the ESACET calculation because they do not generate energy savings.

Electric tables are not applicable to SoCalGas.

Electric

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Measures	#	#	#	#	#	#	#
Cold Storage							
Air Purifiers							
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Air Sealing/Envelope							
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Spending/Budgets	$	$	$	$	$	$	$
Cold Storage							
Air Purifiers							
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Air Sealing/Envelope							
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Savings	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh	annual kWh
Cold Storage							
Air Purifiers							
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Air Sealing/Envelope							
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) ESACET Benefits	$	$	$	$	$	$	$
Cold Storage							
Air Purifiers							
Comprehensive Home Health and Safety Checkups							
CO and Smoke Alarms							
Air Sealing/Envelope							
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

Gas

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Measures	#	#	#	#	#	#	#
Comprehensive Home Health and Safety Checkups	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CO and Smoke Alarms	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Natural Gas Appliance Testing (NGAT)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Air Sealing/Envelope	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Clean and Tune	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Spending/Budgets	$	$	$	$	$	$	$
Comprehensive Home Health and Safety Checkups	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CO and Smoke Alarms	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Natural Gas Appliance Testing (NGAT)	$ 3,092,352	$ 3,092,352	$ 3,092,352	$ 3,092,352	$ 3,092,352	$ 3,092,352	$ 3,092,352
Air Sealing/Envelope	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Clean and Tune	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	$ 3,092,352	$ 3,092,352	$ 3,092,352	$ 3,092,352	$ 3,092,352	$ 3,092,352	$ 3,092,352

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) Savings	annual therms	annual therms	annual therms	annual therms	annual therms	annual therms	annual therms
Comprehensive Home Health and Safety Checkups	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CO and Smoke Alarms	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Natural Gas Appliance Testing (NGAT)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Air Sealing/Envelope	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Clean and Tune	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Furnace Repair/Replacement	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	-	-	-	-	-	-	-

Note: Please add rows for measures that are missing from this table.

	2027 proposed	2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed
Health, Comfort, and Safety (HCS) ESACET Benefits	$	$	$	$	$	$	$
Comprehensive Home Health and Safety Checkups	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CO and Smoke Alarms	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Natural Gas Appliance Testing (NGAT)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Air Sealing/Envelope	(4,228,524)	$ (1,722,915.86)	(1,764,078)	(1,805,813)	(1,848,087)	(1,890,867)	(1,934,116)
Furnace Clean and Tune	(119,292)	$ (105,989.38)	(110,045)	(114,286)	(118,721)	(123,363)	(128,222)
Furnace Repair/Replacement	$ (271,037.92)	$ (141,317.89)	(145,110)	(148,988)	(152,954)	(157,009)	(161,153)
Total	(4,618,854)	(1,970,223)	(2,019,233)	(2,069,087)	(2,119,762)	(2,171,239)	(2,223,491)

Note: Please add rows for measures that are missing from this table.

Footnotes:
N/A for Health, Comfort, and Safety (HCS) Measures and Spending/Budget
cost per year, to allow flexibility in selecting and installing measures based
budget. All dollar amounts shown in SoCalGas's Application Table A-1 are
and realized conditions.
N/A for Health, Comfort, and Safety (HCS) Savings: Not applicable, per D.
N/A for Health, Comfort, and Safety (HCS) ESACET Benefits Table: Not a
ESACET calculation because they do not generate energy savings.
Electric tables are not applicable to SoCalGas.

Electric

Electrification		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized	2027 proposed
ESA Main								
Households Treated	#							
Budgets	$							
Electricity Savings or (Increase)	annual kWh							
Electricity Savings or (Increase)	lifetime kWh							
Electricity Savings or (Increase)	kW							
Other Fuel Savings	annual MMBtus							
Other Fuel Savings	lifetime MMBtus							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA MFWB								
Households Treated	#							
Budgets	$							
Electricity Savings or (Increase)	annual kWh							
Electricity Savings or (Increase)	lifetime kWh							
Electricity Savings or (Increase)	kW							
Other Fuel Savings	annual MMBtus							
Other Fuel Savings	lifetime MMBtus							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA Pilots								
Households Treated	#							
Budgets	$							
Electricity Savings or (Increase)	annual kWh							
Electricity Savings or (Increase)	lifetime kWh							
Electricity Savings or (Increase)	kW							
Other Fuel Savings	annual MMBtus							
Other Fuel Savings	lifetime MMBtus							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							

Gas

Electrification		2021 actual	2022 actual	2023 actual	2024 actual	2025 authorized	2026 authorized	2027 proposed
ESA Main								
Households Treated	#							
Budgets	$							
Electricity (Increase)	annual kWh							
Electricity (Increase)	lifetime kWh							
Electricity (Increase)	kW							
Gas Savings	annual therms							
Gas Savings	lifetime therms							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA MFWB								
Households Treated	#							
Budgets	$							
Electricity (Increase)	annual kWh							
Electricity (Increase)	lifetime kWh							
Electricity (Increase)	kW							
Gas Savings	annual therms							
Gas Savings	lifetime therms							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA Pilots								
Households Treated	#							
Budgets	$							
Electricity (Increase)	annual kWh							
Electricity (Increase)	lifetime kWh							
Electricity (Increase)	kW							
Gas Savings	annual therms							
Gas Savings	lifetime therms							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							

Footnotes:
Electric tables are not applicable to SoCalGas.

Electric

Electrification		2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
ESA Main								
Households Treated	#							
Budgets	$							
Electricity Savings or (Increase)	annual kWh							
Electricity Savings or (Increase)	lifetime kWh							
Electricity Savings or (Increase)	kW							
Other Fuel Savings	annual MMBtus							
Other Fuel Savings	lifetime MMBtus							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA MFWB								
Households Treated	#							
Budgets	$							
Electricity Savings or (Increase)	annual kWh							
Electricity Savings or (Increase)	lifetime kWh							
Electricity Savings or (Increase)	kW							
Other Fuel Savings	annual MMBtus							
Other Fuel Savings	lifetime MMBtus							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA Pilots								
Households Treated	#							
Budgets	$							
Electricity Savings or (Increase)	annual kWh							
Electricity Savings or (Increase)	lifetime kWh							
Electricity Savings or (Increase)	kW							
Other Fuel Savings	annual MMBtus							
Other Fuel Savings	lifetime MMBtus							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							

Gas

Electrification		2028 proposed	2029 proposed	2030 proposed	2031 proposed	2032 proposed	2033 proposed	2028-2033 proposed
ESA Main								
Households Treated	#							
Budgets	$							
Electricity (Increase)	annual kWh							
Electricity (Increase)	lifetime kWh							
Electricity (Increase)	kW							
Gas Savings	annual therms							
Gas Savings	lifetime therms							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA MFWB								
Households Treated	#							
Budgets	$							
Electricity (Increase)	annual kWh							
Electricity (Increase)	lifetime kWh							
Electricity (Increase)	kW							
Gas Savings	annual therms							
Gas Savings	lifetime therms							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							
ESA Pilots								
Households Treated	#							
Budgets	$							
Electricity (Increase)	annual kWh							
Electricity (Increase)	lifetime kWh							
Electricity (Increase)	kW							
Gas Savings	annual therms							
Gas Savings	lifetime therms							
Energy Benefits (ESACET)	$							
Non-Energy Benefits (ESACET)	$							

Footnotes:
Electric tables are not applicable to SoCalGas.
SoCalGas does not have proposed electrification plans.

SOUTHERN CALIFORNIA GAS COMPANY

THE UTILITY REFORM NETWORK (TURN)
Data Request No. TURN-SoCalGas-04
RECEIVED: APRIL 21, 2026
SUBMITTED: AUGUST 14, 2026

Question 6:

Please refer to SoCalGas' Response to TURN-DR-SoCalGas 002 Q006, Discovery Tables_04.27.2026.xlsx", tab '03'.

a. There are negative benefits for Air Sealing/Envelope, Furnace Clean and Tune, and Furnace Repair/Replacement measures in 2028, 2029, 2030, 2031, 2032, and 2033. Please explain why the benefits for these HCS measures are negative.
b. Does the Air Sealing/Envelope measure have therm savings? If so, how does it meet the definition of an HCS measure (aka a measure without gas savings)?
c. Does the Furnace Clean and Tune measure have therm savings? If so, how does it meet the definition of an HCS measure (aka a measure without gas savings)?
d. Does the Furnace Repair/Replacement measure have therm savings? If so, how does it meet the definition of an HCS measure (aka a measure without gas savings)?

SoCalGas Response:

a. The negative ESACET benefits for Air Sealing/Envelope, Furnace Clean and Tune, and Furnace Repair/Replacement occur because these measures provide minimal energy savings, and in some cases negative therm savings. As a result, the projected energy benefits are low and do not outweigh the costs of installing the measures, resulting in negative ESACET benefits. Furnace Clean and Tune and Furnace Repair/Replacement are considered Health Comfort and Safety (HCS) measures with negative therm savings, while Air Sealing/Envelope is classified as an HCS measure due to its minimal energy savings. Certain ESA measures may provide significant non-energy benefits such as improved occupant comfort, equipment reliability and housing quality even when direct energy benefits or cost-effectiveness metrics are limited.
b. The IOUs define a HCS measure as one with 1 or fewer first year therms saved. For all climate zone and housing types except for Single Family homes in Climate zone 9, which has a first-year savings of 4.12 therms, the savings is zero. On an average basis across the program year, the savings for that measure meets the definition of HCS.
c. Furnace Clean and Tune has negative first year therm savings for all climate zones and housing types. This meets the definition of HCS noted above in response to question 6.b.
d. Furnace Repair/Replacement has individual components that can have positive or negative savings. As a whole, over the course of a program year, this measure has a net negative savings, thus meeting the definition of HCS as defined above in the response to question 6.b.