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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

Before the

Public Utilities Commission of the State of California

Rosemead, California
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Southern California Edison's Testimony in Support of Energy Savings Assistance (ESA) Program and Budget for Program Years 2028-2033 — SCE 01 – Policy

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I.

EXECUTIVE SUMMARY

Southern California Edison Company (SCE) submits the following testimony to support its Application for Approval of its Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for Program Years 2028-2033 (Application).[1] The purpose of this testimony exhibit, Exhibit SCE-01, is to provide a policy framework to contextualize SCE's overall Income Qualified Programs (IQPs) application. SCE's IQP portfolio improves bill affordability, health, comfort, and safety for customers with limited financial means. SCE's IQP portfolio consists of three (3) programs: a) Energy Savings Assistance (ESA)[2] providing customers with no-cost direct install measures b) California Alternate Rates for Energy[3] (CARE) and c) Family Electric Rate Assistance[4] (FERA); both CARE and FERA provide customers with bill discounts.

Maintaining sufficient income in times of accelerating costs is an affordability challenge for millions of Californians in SCE's service area, challenging the accessibility of basic living needs. Recent government funding cuts and tax credits to SafetyNet and clean energy programs may further compound issues with low-income access to energy security and health, comfort, and safety.[5, 6] Customers face these challenges while at the same time there is a near-term need for climate change remediation; SCE customers may often prioritize immediate medical needs, food, and housing over clean energy upgrades.

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1 This Application addresses application requirements found in the California Public Utilities Commission (Commission or CPUC) Energy Division (ED) Staff Guidance Document (Guidance Document) and the February 21, 2025, Email Update on Income Qualified Programs (CARE/FERA/ESA) Applications, (Updated Application Guidance).

2 Energy Savings Assistance program *available at* https://www.sce.com/save-money/income-qualified-programs/energy-savings-assistance-program.

3 CARE: qualifying households (≤200% federal poverty level or categorical) receive 32.5% off their electric bills.

4 FERA: qualifying households (201-250% federal poverty level or categorical) receive an 18% discount on their electric bills.

5 *See,* Medicaid, SNAP *available at* https://www.congress.gov/bill/119th-congress/house-bill/1. and Medical, *available at* https://www.nytimes.com/2025/06/27/us/newsom-budget-immigrant-health.html.

6 *See,* To provide for reconciliation pursuant to title II of H. Con. Res. 14. H.R,1, *available at* https://www.congress.gov/bill/119th-congress/house-bill/1.

For over two decades, SCE as the administrator of the CARE, FERA, and ESA programs has strongly supported income-qualified customers and job creation as core utility offerings, helping customers both manage energy bills and make clean energy upgrades. SCE's ESA and CARE programs continue to support approximately 1.3 million low-income customer accounts throughout SCE's service territory. Additionally, there are approximately 350,000 customer accounts with slightly higher household incomes than CARE, but who are eligible to receive a discounted rate through FERA. IQPs are energy programs serving SCE's most vulnerable customers and are foundational to making low-income customer bills more affordable while enabling participation in the current clean energy transition, which SCE strongly supports.[7]

In this Application, SCE presents its proposed IQP portfolio for a six-year program cycle, from 2028 to 2033. SCE's proposed programs are a reasonable and balanced approach to competing objectives, including energy savings, bill savings, GHG reductions, and health, comfort, and safety improvements for eligible income-qualified customers. The application is also sensitive to affordability overall, as increasing rates impact the entire customer base. SCE's IQP portfolio continues to champion no-cost home upgrades, including energy efficient appliances and weatherization, and bill discounts to address the basic energy needs of low-income customers that could otherwise be left behind due to real and accelerating financial instability. To continue funding these critical programs, SCE seeks cost recovery approval through the existing balancing account cost recovery mechanisms for ESA, CARE, and FERA programs. This amount includes $674.5 million for delivery of the ESA Program and $107.3 million for CARE/FERA administration. The funding request supports important program enhancements for participating and non-participating customers and general cost escalation rates which reflects observed increases in labor costs due to inflationary pressures, wage growth, and market competition for

[7] The following are examples of SCE's work to support California's clean energy transition. SCE published Pathway 2045, *available at* https://www.edison.com/clean-energy/pathway-2045; Countdown 2045, *available at* https://www.edison.com/clean-energy/countdown-to-2045; and Reaching Net Zero whitepapers, *available at* https://www.edison.com/clean-energy/reaching-net-zero; to develop road maps and identify gaps to close to meet California climate goals. SCE's Clean Energy Optimization Pilot, BE Pilot, SCE distributed energy resource programs, including SCE customer generation programs, and SCE transportation electrification programs all support California's climate goals.

skilled labor and accounts for moderate increases in material, equipment, and other non-labor-related expenses, which have risen due to supply chain disruptions and broader economic factors.

SCE's Application re-affirms the important role that CARE, FERA, and ESA programs play in serving California's low-income communities. These programs support California's long-standing commitment to environmental and low-income policy objectives by improving low-income customer energy bills; increasing health, comfort and safety; and promoting energy education and efficiency practices. During the 2028-2033 program cycle, SCE plans to serve approximately 387,000 customers through the ESA Program cycle with a measure mix that includes many traditional offerings along with an increasing focus on enhanced building electrification (BE)[8] measures. Additionally, SCE anticipates ongoing high CARE participation among eligible customers, at or above the existing levels while proposing new program guardrails to enhance the integrity around eligibility that all customers deserve. For FERA customers, SCE proposes to reach 30 percent participation among eligible customers during the cycle, which remains a reasonable target despite the historical and documented challenges with reaching this comparatively niche customer segment.

[8] According to the California Energy Commission, "Building electrification, also referred to as fuel substitution, is a quickly emerging decarbonization strategy that takes advantage of the evolution of the electric grid", *available at* https://efiling.energy.ca.gov/GetDocument.aspx?tn=239311, p.22.

II.

IQP PORTFOLIO PROPOSAL BASED ON FOUR GUIDING PRINCIPLES

The proposed IQP portfolio aligns with the Energy Division Staff Guidance Document,[9] and the February 21, 2025, email *Update on Income Qualified Program (CARE/FERA/ESA) Applications*.[10] SCE developed its IQP Portfolio based on four guiding principles that align with the Energy Division's Guiding Principles, which are listed below:

1. Advancing ESA – SCE will advance the ESA program, prioritizing equity by expanding integrated ESA offerings, including building electrification and resiliency.
2. Affordability – SCE underscores affordability by updating its upfront eligibility design proposals for CARE and FERA.
3. High Performance – SCE focuses on high performance and delivery efficiency to improve customer experience, program access, and affordability.
4. Aligning Objectives – SCE will implement clear program designs that align IQP objectives and metrics.

Based on the IQP guiding principles above, SCE anticipates the following positive outcomes described below:

A. Principle 1: Advancing ESA - The ESA Program Supports California's Climate Objectives by Significantly Enhancing Building Electrification and Resiliency Measures

In support of SCE's first guiding principle to advance the ESA Program, SCE plans to expand and accelerate building electrification[11] offerings to more ESA customers to support California's

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[9] On October 31, 2024, ED Staff initially served its Guidance Document on service list A.19-11-003 et al.

[10] February 21, 2025, Email served on service lists for A.19-11-003 et al., Update on Income Qualified Program (CARE/FERA/ESA) Applications, with Attachment: ED Staff Guidance to IOUs on ESA-CARE-FERA-CAS_IOU_Revision_1_15_25.

[11] During the last IQP cycle, ESA conducted a BE pilot, which SCE proposes to expand and fully adopt. Many best practices from the pilot will carry over, such as providing customers with individual bill analyses as part of the ESA BE assessment. Another proven best practice SCE will continue is working with partners to co-

(*Continued*)

decarbonized future and to secure low-income customers' important role as valued participants in the clean energy vision. Furthermore, SCE plans to cultivate local partnerships to leverage the ESA Program to deliver safety and resiliency education and measures[12]. The impact of climate change continues to increase,[13,14] and building electrification has an immediate and indispensable role in improving air quality and mitigating the impacts of extreme weather variances impacting customer lives. BE is also necessary to help achieve the state's climate goals that support a greater vision for energy independence, healthier communities, and overall job creation that is necessary to maintain California's lead as the fifth largest economy in the world.

The 2008 California Energy Efficiency Strategic Plan (Strategic Plan) establishes ESA as an energy resource with a goal that the program deliver "increasingly cost-effective and longer-term savings."[15] Since the last update of the 2008 Strategic Plan in 2011, decarbonization has become an even

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fund electrification measures. Additionally, as an equity design element, SCE proposes to use a tailored approach to serving its ESA customers, understanding that one size does not fit all. The clean energy journey for some may start with BE readiness measures, and for others the journey may start with a new heat pump water heater and end years later with full electrification. ESA wants to build a long-term relationship as a trusted advisor and partner to customers on their path to a clean energy future.

12 To support community resilience, SCE proposes to expand air-conditioning as a health, comfort, and safety (and resilience) measure to more climate zones. Additionally, to support health, comfort, safety and resilience, SCE will explore updating ESA energy education to include fire safety and/or thermal comfort and safety. Lastly, SCE continues to seek and identify program partnerships, and in 2028-2033 will explore local safety/resilience partnerships in addition to building and electrification partnerships.

13 "2023 and 2024 were the hottest years on record....The chances of seeing extreme fire weather are roughly double in today's climate compared with the preindustrial period, the researchers found." 7/21/25, *available at* https://www.nytimes.com/2025/07/21/climate/extreme-fire-weather-forests.html?campaign_id=9&emc=edit_nn_20250722&instance_id=158989&nl=the-morning&regi_id=68171067&segment_id=202361&user_id=0fe8278b5618f282b9b727d49033df3c;

14 In August 2025, Los Angeles County adopted new indoor air temperature standards; BL 8-5-25 (#08248) Max Indoor Temperature Threshold Ordinance, an ordinance amending Chapter 11.20 of Title 11Health and Safety of the Los Angeles County Code: https://file.lacounty.gov/SDSInter/bos/supdocs/205510.pdf. High indoor temperatures caused by general warming can be unsafe, and many Southern California residents may not have home cooling.

15 CA 2011 Energy Efficiency Strategic Plan *available at* https://www.cpuc.ca.gov/-/media/cpuc-website/files/legacyfiles/c/5303-caenergyefficiencystrategicplan-jan2011.pdf: California Energy Efficiency Strategic Plan, p. 26.

higher priority for California[16] and the communities that SCE serves.[17] Although SCE's ESA Program delivers energy savings (for example in 2024 the program's cumulative savings were 18.3 million kWh[18]), expanding customer access to BE will require a trade-off with one of our long-standing objectives to maximize cost-effective cumulative energy savings. BE measure installations lead to a greater on average investment per home with relatively deeper energy savings per home and increased GHG reductions. The deeper energy savings and higher GHG reductions are trade-offs between high cumulative energy savings and high volumes of enrollments (homes treated) typically achieved by prioritizing cheaper and highly cost-effective (CE) measures such as select lighting and power strips. However, since the reimagining of ESA post-2020, the Commission and Energy Division have emphasized a) deeper energy savings and b) decarbonization as program design aspects, which SCE's new ESA Program design will deliver alongside energy efficiency, health, comfort, and safety measures.[19] In Exhibit SCE-02, the testimony details proposed metrics to evaluate ESA program performance given the evolution in program objectives and design. In Exhibit SCE-05 Appendix D, SCE provides an explanation of its measure mix and the trade-offs between a high ESACET and high energy saving measures.

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16 Senate Bill (SB) 32 (Pavley, 25 2016) required reducing emissions to 40% below 1990 levels by 2030, available at https://legiscan.com/CA/text/SB32/id/1428776. In 2018, Executive Order 26 B-55-18 established a statewide goal to achieve carbon neutrality by 2045, *available at* https://archive.gov.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf

17 Cities such as Santa Monica are pursuing reach codes that include electric readiness understanding the benefits of electrification and decarbonization, *available at* https://www.santamonica.gov/energy-performance-requirements#:~:text=The%20Energy%20Performance%20Approach%20Reach,buildings%20to%20be%20fully%20electric.

18 SCE Annual Report for CARE and ESA Programs, Section 1.1.1, p. 7.

19 D.19-06-022, p.9. *available at* https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M301/K140/301140548.PDF, Attachment A; and ED guidance for program cycle 2028-2033.

B. Principle 2: Affordability - Redesign of CARE and FERA Enrollment SupportS Equitable Access for Low-Income Customers and Affordability for All Customers

Over the last program cycle, SCE experienced a significant and rapid increase in CARE and FERA subsidies. Specifically, in 2024, SCE's CARE subsidies were $855 million, approximately double what was budgeted, impacting rate affordability.[20] In October 2024, Governor Newsom issued an Executive Order[21] focused on rate affordability, which is a cornerstone to the following proposal. In support of SCE's guiding principle to deliver affordability, SCE proposes to enhance the CARE and FERA application process by moving the verification step to be earlier in the process and more comprehensive, which is further described in Exhibit SCE-03. The objective of this proposal is to ensure that only qualified CARE and FERA customers enroll in SCE's bill discount programs and to reduce the risk of ineligible higher-income customers that were never intended to receive low-income benefits from enrolling in bill discounts. CARE and FERA bill discounts are funded by cost-shifts from non-participating customers to CARE and FERA customers. Upfront eligibility helps confirm that only qualified customers are enrolled, preventing the misallocation of benefits. This proactive approach is more effective than correcting ineligible enrollments after the fact, which can be extremely challenging. Ensuring the right customers are on the right rate is an important responsibility for all parties that have administrative oversight functions – especially when maintaining public accountability and trust.

SCE's CARE and FERA proposals also introduce a single enrollment process and replace both the current state post-enrollment verifications and recertifications to streamline the experience for customers. Additionally, aligning upfront eligibility requirements with other income-based programs should improve the accuracy of cross-coordination between programs.[22]

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[20] *See* SCE (2024), CARE/FERA and ESA Annual Report CARE Table 1.

[21] Executive Order N-5-24, *available at* https://www.gov.ca.gov/wp-content/uploads/2024/10/energy-EO-10-30-24.pdf.

[22] Several other income-based utility programs use upfront verifications to manage program integrity such as ESA, SCE Charge Ready Home Program, *available at* https://evhome.sce.com/residents#qualify and SCE preowned vehicle rebate program, *available at* https://evrebates.sce.com/site/how-to-apply#required-documents.

C. Principle 3: High Performance - ESA's New Flexible Contracting Strategy Will EnablE Scaled Program Delivery and enhance Customer Experience

In this Application, SCE submits several proposals that support SCE's third guiding principle to focus on high performance and delivery efficiency to improve customer experience, program access, and affordability. To enhance ESA Program delivery, SCE proposes a new flexible contracting strategy designed to accelerate the onboarding of service providers, particularly in hard-to-reach areas where geographic barriers have historically limited contractor participation. By streamlining onboarding and reducing administrative hurdles, SCE aims to attract and retain more service providers to equitably serve its diverse service area.

SCE's proposal for a flexible, scalable, and equitable contracting model can be found in Exhibit SCE-02 section VI.A.2. It will allow for real-time adjustments to contractor participation and pricing, expanding access to underserved communities and supporting market responsiveness. This approach replaces rigid, early-cycle solicitations with a dynamic framework that improves competition and enables targeted incentives for local contractors.

To further support contractors and customers, SCE will seek to strengthen local partnerships and advocate for more consistent permitting requirements across local jurisdictions. These efforts to standardize processes (e.g. documentation requirements) and establish service level agreements (e.g. inspection date within defined window) will help increase predictability in permitting and project timelines, benefiting both ESA contractors and customers.[23] Furthermore, SCE plans to leverage partnerships with local governments and agencies to maximize co-funding opportunities and coordinate multiple programs through ESA's single delivery channel, enhancing resource efficiency and customer offerings.[24]

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[23] *See,* Exhibit SCE-02.

[24] *Id.* SCE is exploring ways to use AI for program leveraging and integration and to improve customer experience.

Exhibit SCE-04 details SCE's integrated, customer-focused strategy to better support income-qualified households by aligning its offerings with a broad network of state, federal, and community-based equity programs. This systems-based approach will minimize barriers, streamline enrollment, and prioritize comprehensive customer support that addresses both immediate needs and long-term energy goals. SCE will partner across agencies to boost outreach, connect customers to available financial support and energy upgrades, and streamline income verification through data sharing and auto-enrollment, reducing administrative burdens and improving customer experience.

D. Principle 4: Aligning Objectives - ESA Program Metrics Should Balance Competing Priorities and Trade-Offs. Income Qualified Goals and Targets Should Be Based on Realistic and Achievable Thresholds

In support of SCE's fourth guiding principle to implement program designs that align IQP objectives and metrics, SCE underscores the need to balance, at times, competing objectives. For example, advancing decarbonization is a guiding principle of this application, however providing customers BE and deeper energy savings limits program reach and cost-effectiveness. Overall, for the 2028-2033 program cycle, SCE has designed an inclusive program that offers both energy savings and BE with a realistic and achievable average ESA Cost Effectiveness Test (ESACET) value of 0.5. This cycle, SCE has a plan to achieve a 0.5 ESACET and will continue to strive for a 0.7 ESACET as a target, particularly as more customers adopt clean zero-emission heating.[25] See Exhibit SCE-02 for more details on ESA Program goals and targets. For FERA, SCE recommends adjusting the program target from 60 percent to 30 percent, reflecting a realistic and achievable goal based on a comprehensive analysis of year-to-date enrollment trends. This recommendation is further supported by the FERA

[25] Domestic water measures are highly cost-effective measures tied to water heating sources, once customers adopt heat-pumps for water and space heating, SCE can expand delivery of these low-cost and highly cost-effective measures.

Barriers Study commissioned by PG&E,[26] which provides secondary data validating SCE's projection. See Exhibit SCE-03 for more details on FERA program proposals and goals.

[26] Evergreen Economics. (2025). FERA Enrollment Barriers Study (Draft Report). Commissioned by Pacific Gas and Electric Company as part of A.19-11-003, *available at* https://www.calmac.org/publications/Categorical_Eligibility_Report_-_Final.pdf, p. 36.

III.

KEY POLICY CHANGES AND CONSIDERATIONS

A high-level summary of key policy and program changes that SCE is requesting the Commission approve in this Application is as follows:

1. Approve a six-year program cycle to support contractors and program stability as requested above
2. Adopt SCE's Flexible Contractor Network for contractor onboarding to improve market competition, transparency, and responsiveness and support service delivery in hard-to-reach areas. See SCE-02 Section VI.A.2
3. Incorporate BE into the ESA Main Program to address climate change and an equitable transition to clean energy. See SCE-02 Section IV.C.2
4. Acknowledge SCE's realistic and transparent ESACET of 0.5 based on its balanced approach to delivering EE, customer enablement, and BE. See SCE-02 Section III.C
5. Adopt SCE's proposed ESA program targets, to balance the benefits of decarbonization measures that could support BE readiness, and the trade-offs to enrollment volumes and cumulative energy savings. See SCE-02 Section III
6. Authorize SCE to administer its own local multi-family program delivery. See SCE-02 Section IV.B.4
7. Adopt upfront eligibility verification for CARE and FERA enrollments in support of all ratepayer interests, increased program integrity, and better alignment with other income-qualified programs. See SCE-03 Section III.A.2.b
8. Revise the FERA penetration goal to 30 percent. See SCE-03 Section IV.C
9. Approve May 2031 filing date for the Joint IOU Mid-Cycle Report[27]. See SCE-04 Section IX.C.1

[27] To be filed via Tier 2 Advice Letter.

10. Revise or retire outdated compliance requirements established in previous proceeding dockets. See Exhibit SCE-04 Section XI IQP Compliance Requirement Retirement

IV.

IQP GOALS AND BUDGETS

The following is a summary of the IQP goals and budgets, formulated to balance multiple programmatic objectives. In this Application, SCE forecasts approximately $674.5 million funding need for the ESA Program and approximately $107.3 million funding need for CARE and FERA for administrative costs over the six-year program period. Annualized, this amount is $112.4 million for ESA and $17.9 million for CARE and FERA. SCE plans to continue using the existing balancing account cost recovery mechanisms for ESA, CARE, and FERA. All budgetary requests are to meet IQP goals and objectives to serve eligible customers with beneficial measures and rates.

For the 2028-2033 Program Cycle, SCE proposes to maintain a 92 percent goal for the CARE penetration rate and to ramp up FERA participation to 30 percent in 2033. See SCE-03 for more details on CARE and FERA budgets and goals. For the ESA Program, in the 2028-2033 cycle, SCE proposes to serve over 387,000 homes and save more than 195.4 million kWh and 19,567 kW. Table IV-1 below summarizes the proposed funding for ESA, CARE, and FERA for the 2028-2033 program years. Table IV-2 below provides the annual average budget for those years.

Table IV-1
2028-2033 Proposed ESA, CARE, and FERA Budget
($s in Thousands)

Description	2028	2029	2030	2031	2032	2033
ESA	$104,794	$107,699	$110,868	$113,892	$116,968	$120,311
CARE	$14,792	$18,688	$12,442	$12,744	$13,163	$14,766
FERA	$3,397	$3,785	$3,146	$3,261	$3,429	$3,686
Total	$122,983	$130,172	$126,456	$129,897	$133,560	$138,764

Note: Totals may not sum due to rounding.

Table IV-2
2028-2033 Average Annual Budget for ESA, CARE and FERA
($s in Thousands)

Description	Average Annual Budget 2028-2033
ESA	$112,422
CARE	$14,432
FERA	$3,451
Total	$130,305

Note: Totals may not sum due to rounding.

V.

TESTIMONY STRUCTURE

SCE's testimony is structured as follows. Each exhibit is organized as described below.

- **Exhibit SCE-01 – Policy**

  Exhibit SCE-01 provides policy context and a summary of SCE's IQP application. The exhibit outlines the application testimony structure. Exhibit SCE-01 concludes with a description of SCE's long-term vision and IQP tenets and a summary of policy requests and budgets.

- **Exhibit SCE-02 – Energy Savings Assistance (ESA) Program**

  Exhibit SCE-02 provides details on SCE's ESA Program proposals, including goals and budgets, continued best practices, and innovations. This volume highlights an expansion of BE within the ESA Program, and other climate resiliency and safety initiatives.

- **Exhibit SCE-03 – California Alternative Rates for Energy (CARE) and Family Electric Rate Assistance (FERA) Programs**

  Exhibit SCE-03 provides details on SCE's CARE and FERA Program proposals, including goals and budgets, continued best practices, and innovations. This volume proposes an update to income verification procedures that streamline enrollment and maintenance of eligibility.

- **Exhibit SCE-04 – Cross-Cutting Issues**

  Exhibit SCE-04 provides details on SCE's cross-cutting proposals, including studies, IQP reporting, technology opportunities, partnerships, marketing and outreach, and a list of compliance requirements to retire. This volume highlights benefits and opportunities for future program integration and leveraging data sharing between programs.

- **Exhibit SCE-05– Appendices**

  Exhibit SCE-05 provides several Appendices to the Testimony:

- Appendix A – Informal ED Guidance Topics. Reference to where specific topics from the Informal ED Guidance Document are included in SCE's testimony.
- Appendix B – ESA, CARE, FERA Attachment Tables
- Appendix C – Reconciliation of ESA Authorized Funding
- Appendix D – ESACET Discussion. Outlines SCE's approach to developing its 2028–2033 ESA measure portfolio, emphasizing the balance between cost-effectiveness, electrification objectives, and electric savings goals in alignment with CPUC guidance and state climate priorities.
- Appendix E – Proposed IQP Compliance Requirements for Retirement
- Appendix F – Acronyms and Abbreviations
- Appendix G – Witness Qualifications

VI.

CONCLUSION

SCE has a clear vision for its IQP portfolio. By 2045, most eligible customers will have adopted targeted clean energy measures and behaviors through ESA, which will serve as the main channel for income-qualified programs. In the long-run, CARE/FERA will be integrated with other resource programs and will have stronger program integrity, which will improve customer experience and long-term affordability. SCE believes the ESA Program will help enable California's equitable clean energy transition for low-income customers, and CARE and FERA will provide sustainable bill assistance for vulnerable customers.

Through its PY 2028-2033 IQP Application, SCE has designed a program portfolio that prioritizes California's clean energy transition by advancing building electrification for ESA Program customers and balances customer bill affordability and overall rate affordability by enhancing the CARE and FERA enrollment process through upfront eligibility verification. As outlined in the preceding sections, SCE-02 through SCE-04 include additional proposals for modernization, efficiency, resilience, and customer experience.

SCE respectfully requests that the Commission approve its PY 2028–2033 IQP Application to allow SCE to continue delivering benefits to ESA, CARE, and FERA customers.