

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF
CALIFORNIA**

Pacific Gas and Electric Company's
(U 39 M) Application for Approval of its
2028-2033 Income-Qualified Programs.

And Related Matters.

Application 26-01-003
(Filed on January 9, 2026)

Application 26-01-005
Application 26-01-010
Application 26-01-011

**REBUTTAL TESTIMONY OF THE COUNTY OF LOS ANGELES IN THE
CONSOLIDATED 2028–2033 INCOME-QUALIFIED PROGRAMS PROCEEDING**

Lujuana S. Medina
Division Manager, Environmental Initiatives
County of Los Angeles
1100 North Eastern Avenue
Los Angeles, CA 90063-3200
(323) 267-2006
LMedina@isd.lacounty.gov

For the County of Los Angeles

October 16, 2026

TABLE OF CONTENTS

I.	INTRODUCTION	3
A.	Purpose of Testimony	3
II.	CUSTOMER ACCESS AND PARTICIPATION	4
A.	Hard-to-Reach Customers Continue to Face Unique Barriers to Participation in ESA Programs	4
B.	Verification Requirements Should Not Create Unnecessary Barriers for Eligible Households	6
C.	Simplified Enrollment Pathways Can Improve Access to ESA Services	7
D.	Effective Customer Navigation Can Help Households Access Available ESA Benefits	9
E.	Accessibility and Inclusive Program Design Help Ensure ESA Services Reach All Eligible Customers	10
III.	ELECTRIFICATION AND CUSTOMER BENEFITS.....	11
A.	Affordability Protections Should Remain a Central Consideration in Electrification Efforts	11
B.	Electrification Opportunities Can Deliver Meaningful Benefits to Income-Qualified Households	12
IV.	LOCAL DELIVERY MODEL.....	14
A.	Multiple Program Offerings Can Enhance Customer Participation and Experience, Specifically for Those Most Underserved	14
B.	Partnerships and Innovative Delivery Approaches Can Improve Customer Outcomes	15
V.	PROGRAM ACCOUNTABILITY AND OVERSIGHT	15
A.	Ongoing Evaluation Can Help Identify Opportunities to Improve Program Delivery..	15
B.	Performance Metrics Should Reflect Meaningful Customer and Program Outcomes..	17
VI.	RECOMMENDATIONS	18
VII.	CONCLUSION	19

1 **I. INTRODUCTION**

2 Pursuant to Rule 2.6 of the California Public Utilities Commission’s (Commission or CPUC)
3 Rules of Practice and Procedure, the County of Los Angeles (the County) submits the following
4 Rebuttal Testimony in the consolidated proceeding addressing the consolidated 2028–2033
5 Income-Qualified Program Applications¹ of Pacific Gas and Electric Company (PG&E), Southern
6 California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Southern
7 California Gas Company (SoCalGas) filed on January 9, 2026. The County submits this rebuttal
8 testimony in response to testimony filed by the Center for Accessible Technology (CforAT), the
9 National Consumer Law Center (NCLC), the Public Advocates Office (Cal Advocates), Sierra
10 Club, and The Utility Reform Network (TURN) on September 14, 2026.²

11 **A. Purpose of Testimony**

12 The County’s rebuttal testimony addresses several issues raised in stakeholder testimony,
13 including customer access and participation, electrification, local delivery approaches, and
14 program accountability and oversight. The County is particularly interested in how these policies
15 and program design decisions affect income-qualified households, especially customers who
16 experience high energy burdens, face barriers to participation, or reside in historically underserved
17 communities.

¹ Pacific Gas and Electric Company’s Application for Approval of its 2028-2033 Income-Qualified Programs, Application (A.) 26-01-003 (filed Jan. 9, 2026); Southern California Edison Company’s Application for Approval of its 2028-2033 Income Qualified Programs and Budgets, A.26-01-005; San Diego Gas & Electric Company’s Application for Approval of Low-Income Assistance Programs and Budgets for Program Years 2028-2033, A.26-01-010; and Southern California Gas Company’s Application for Approval of Low-Income Assistance Programs and Budgets for Program Years 2028-2033, A.26-01-011.

² Prepared Testimony of the Center for Accessible Technology, filed Sept. 14, 2026; Prepared Testimony of Leigh Ferrin Presenting Survey Information from California Legal Services and Community-Based Organizations that Serve Low-Income Clients, Exhibit NCLC-01, filed Sept. 14, 2026; Public Advocates Office Opening Testimony on 2028–2033 Income-Qualified Assistance Programs, Exhibit CA-01, filed Sept. 14, 2026; Direct Testimony of Rebecca Barker and Chinyere Osuala on Behalf of Sierra Club, Exhibit SC-01, filed Sept. 14, 2026; Prepared Testimony of The Utility Reform Network, Exhibits TURN-01 through TURN-04, filed Sept. 14, 2026.

18 The County supports efforts to improve customer access, strengthen customer protections,
19 enhance program transparency and accountability, and ensure that Energy Savings Assistance
20 (ESA) investments provide meaningful benefits to participating households. This rebuttal
21 testimony responds to positions advanced by stakeholders and, where relevant, discusses those
22 positions in the context of proposals contained in the investor-owned utilities' 2028–2033 Income-
23 Qualified Program (IQP) applications.

24 II. CUSTOMER ACCESS AND PARTICIPATION

25 A. Hard-to-Reach Customers Continue to Face Unique Barriers to Participation in 26 ESA Programs

27 The stakeholder testimony demonstrates that many eligible households continue to encounter
28 significant barriers when attempting to access IQPs. These barriers may include limited English
29 proficiency, lack of required documentation, limited time to complete the application process,
30 concerns about submitting personal information, lack of internet access, and limited awareness of
31 available programs. NCLC's survey of California legal services organizations and community-
32 based organizations (CBOs) found that customers experienced each of these issues while
33 attempting to navigate application and income-verification processes.³

34 The examples provided by survey respondents help demonstrate how these barriers affect
35 customers in practice. One respondent explained that “[a]pplying online is challenging for most of
36 our clients,” while another stated that documentation requirements can themselves serve as a
37 barrier when a customer is unable to return with the required materials.⁴ Other respondents
38 described customers who needed assistance navigating the process while simultaneously
39 experiencing insecure housing, a new disabling condition, or a sudden loss of income. These

³ Prepared Testimony of Leigh Ferrin Presenting Survey Information from California Legal Services and Community-Based Organizations that Serve Low-Income Clients, Exhibit NCLC-01 (NCLC Testimony), p. 3.

⁴ NCLC Testimony, pp. 3–4.

40 examples underscore that eligible households may be navigating multiple challenges at once, and
41 that even seemingly routine administrative requirements can prevent customers from completing
42 the process.

43 CforAT’s testimony further demonstrates that participation barriers may have particularly
44 serious consequences for customers with disabilities, medical needs, or chronic health conditions.
45 CforAT explains that this population is “disproportionately low income and relies on the various
46 income-qualified programs to assist them in their ability to pay their energy bills.”⁵ CforAT
47 therefore identifies program eligibility, verification, application processes, and accessible outreach
48 and communications as significant issues in this proceeding.⁶

49 The County agrees that the success of ESA and other IQPs should be evaluated not only by
50 whether services are available, but also by whether eligible households can realistically access and
51 complete the processes necessary to receive them. NCLC explains that households may face
52 challenges learning about available programs, navigating the digital divide, addressing accessibility
53 needs, and managing multiple benefit applications with different requirements, definitions, and
54 deadlines.⁷ CforAT similarly cautions against program requirements that may prevent otherwise
55 eligible customers from successfully navigating enrollment processes.⁸

56 Although much of this testimony discusses CARE and FERA enrollment, the customer
57 experiences described by NCLC and CforAT also provide important guidance for ESA program
58 design and delivery. ESA participation may require customers to navigate outreach, eligibility
59 determination, enrollment, property assessment, installation, and follow-up. Each additional

⁵ Prepared Testimony of the Center for Accessible Technology (CforAT Testimony), p. 1.

⁶ CforAT Testimony, p. 1.

⁷ NCLC Testimony, p. 7.

⁸ CforAT Testimony, pp. 13–14.

requirement may create another point at which an otherwise eligible customer is unable or unwilling to continue. The Commission should therefore remain attentive to how administrative requirements, communication practices, digital access, and the availability of individualized assistance affect participation by hard-to-reach and underserved customers.

The County supports continued efforts to identify and reduce these barriers. Program processes should reflect the circumstances of the households the programs are intended to serve, including customers with limited English proficiency, limited digital access or literacy, disabilities, unstable housing, or other circumstances that make participation more difficult. Improving access for these customers will require clear and accessible information, flexible participation methods, and sufficient support throughout the customer journey.

B. Verification Requirements Should Not Create Unnecessary Barriers for Eligible Households

Multiple parties raise concerns regarding proposals that would increase verification requirements or otherwise make enrollment more difficult for eligible customers. The County agrees that program integrity is important and that eligibility requirements should be administered responsibly. However, verification policies should be evaluated not only on their ability to identify ineligible applicants, but also on their potential impact on participation by eligible households.

TURN specifically recommends that the Commission reject SCE's proposal to require upfront income verification as part of the enrollment process. According to TURN, customers currently enroll through self-certification and are subsequently subject to post-enrollment verification, a process that has supported high enrollment levels while maintaining program oversight. TURN argues that replacing this approach with mandatory upfront documentation

requirements would create additional barriers for customers seeking assistance and could reduce program participation among eligible households.⁹

The concerns raised by TURN are consistent with evidence provided by NCLC and California legal services organizations. Survey respondents reported that customers frequently encounter difficulty obtaining documentation, navigating online systems, responding to requests for information, and completing verification processes while managing other significant life challenges. NCLC concluded that requiring additional documentation as part of the initial application process would likely result in fewer completed applications because of these existing barriers.¹⁰

The County shares these concerns. Customers seeking assistance may face limited internet access, language barriers, disabilities, housing instability, competing family obligations, or other circumstances that make documentation and verification requirements more difficult to satisfy. While verification requirements serve an important administrative purpose, they should be implemented in a manner that minimizes burden on eligible households and preserves access to program benefits. The Commission should therefore carefully evaluate whether proposed verification changes advance program integrity objectives without creating disproportionate barriers for the customers these programs are intended to serve.

C. Simplified Enrollment Pathways Can Improve Access to ESA Services

In addition to avoiding unnecessary verification burdens, the Commission should consider whether enrollment processes make it as straightforward as possible for eligible households to access available assistance. Enrollment procedures should help customers identify the programs for

⁹ Prepared Testimony of Sylvie Ashford Addressing CARE and FERA, Exhibit TURN-02 (TURN Ashford Testimony), pp. 4–17.

¹⁰ NCLC Testimony, p. 7.

103 which they may qualify without requiring them to navigate separate, duplicative, or unnecessarily
104 complicated application pathways.

105 TURN raises this concern in response to SCE’s and SDG&E’s proposals to establish
106 standalone FERA applications instead of retaining the combined CARE and FERA application.
107 Although SCE asserts that a separate form would “reduce confusion,” “improve enrollment
108 accuracy,” and “streamline the customer experience,” TURN recommends retaining the combined
109 application.¹¹ TURN explains that a combined application allows customers who do not qualify for
110 CARE to be evaluated for FERA without navigating an additional application process.¹²

111 CforAT’s testimony on categorical eligibility provides another example of how enrollment
112 can be simplified without abandoning eligibility requirements. Categorical eligibility allows a
113 customer’s participation in another qualifying public-assistance program to establish eligibility for
114 an IQP. CforAT explains that categorical eligibility can reduce administrative burdens for
115 customers and utilities because applicants do not need to separately produce and review income
116 documentation when their eligibility has already been established through another qualifying
117 program.¹³ CforAT also emphasizes the importance of maintaining a clear and dependable list of
118 qualifying programs so that customers understand how they may establish eligibility.¹⁴

119 These issues have implications beyond CARE and FERA. Customers seeking ESA services
120 may already participate in other income-qualified assistance programs or have previously provided
121 information establishing their eligibility. When permissible under applicable program
122 requirements, enrollment pathways should recognize existing eligibility determinations and reduce

¹¹ Prepared Testimony of Sylvie Ashford Addressing CARE and FERA, Exhibit TURN-02 (TURN Ashford Testimony), p. 18.

¹² TURN Ashford Testimony, pp. 18–21.

¹³ Prepared Testimony of the Center for Accessible Technology (CforAT Testimony), pp. 3–8.

¹⁴ CforAT Testimony, pp. 8–11.

the need for customers to repeat substantially similar processes. Likewise, customers should receive clear information about related programs for which they may qualify rather than being required to independently identify and navigate each offering.

The County supports enrollment approaches that make it easier for eligible households to access assistance while preserving appropriate program safeguards. Simplified enrollment does not mean eliminating eligibility requirements. Rather, it means administering those requirements in a coordinated and customer-focused manner that avoids unnecessary duplication, provides clear pathways among related programs, and reduces the likelihood that eligible households will abandon the process before receiving available benefits.

The Commission should therefore preserve and expand enrollment practices that provide customers with a clear path to available assistance, including combined application processes and appropriate use of categorical eligibility. These approaches can reduce customer burden, support participation, and help connect eligible households with ESA and other services intended to improve household affordability and well-being.

D. Effective Customer Navigation Can Help Households Access Available ESA Benefits

Customer eligibility alone does not guarantee successful participation in ESA programs. Customers must first become aware of available services, understand program requirements, complete enrollment processes, respond to requests for information, and ultimately navigate the steps necessary to receive program benefits. As a result, customer navigation and support services can play an important role in helping eligible households successfully access assistance.

Several parties note that customers may face challenges throughout the enrollment process, particularly when interacting with multiple programs, eligibility requirements, and verification

procedures. These challenges may be especially significant for customers with limited English proficiency, limited digital literacy, disabilities, or other barriers to participation. As discussed previously, stakeholder testimony demonstrates that many eligible households require additional assistance navigating available program offerings and completing enrollment requirements.¹⁵

The County supports approaches that help customers successfully navigate available services rather than placing the burden entirely on households to identify, understand, and access program benefits on their own. Clear communications, coordinated outreach, and individualized customer support can help reduce confusion, increase participation, and improve customer experience. These efforts may be particularly valuable for customers who are participating in multiple assistance programs or who have historically been underserved by traditional delivery approaches.

E. Accessibility and Inclusive Program Design Help Ensure ESA Services Reach All Eligible Customers

CforAT's testimony highlights the importance of ensuring that IQPs remain accessible to customers with disabilities, medical needs, and chronic health conditions. CforAT explains that these customers are disproportionately low-income and often rely on affordability programs to help meet essential energy needs.¹⁶

The County agrees that accessibility should be considered throughout program design, outreach, enrollment, and implementation. Customers may encounter barriers related to language access, digital literacy, internet availability, accessibility of online platforms, or the ability to provide and receive information through traditional communication channels. Program requirements that are manageable for some customers may present significant challenges for others.

¹⁵ NCLC Testimony, pp. 3–7; CforAT Testimony, pp. 1, 13–14.

¹⁶ CforAT Testimony, p. 1.

As discussed by both CforAT and NCLC, customers may already face a variety of circumstances that make participation more difficult, including disability-related needs, limited English proficiency, lack of internet access, and other barriers.¹⁷ Accessible and inclusive program design can help ensure that these customers are not unintentionally excluded from assistance for which they are otherwise eligible.

The County supports continued efforts to incorporate accessibility considerations into program delivery, customer communications, enrollment processes, and customer support services. Accessible program design helps ensure that ESA benefits are available to all eligible households and supports equitable access to the services these programs are intended to provide.

III. ELECTRIFICATION AND CUSTOMER BENEFITS

A. Affordability Protections Should Remain a Central Consideration in Electrification Efforts

Several parties discuss the role of electrification within future IQP portfolios. While parties offer differing perspectives regarding program design, the County agrees that affordability should remain a central consideration as electrification efforts continue to expand.

The County recognizes the potential benefits that electrification measures may provide to income-qualified households. At the same time, many customers served through income-qualified programs already experience significant energy burdens and face competing financial pressures. As a result, electrification investments should be evaluated not only based on technology adoption goals, but also on their ability to improve customer outcomes and maintain or enhance household affordability.

¹⁷ CforAT Testimony, pp. 1, 13–14; NCLC Testimony, pp. 3–7.

TURN supports electrification while emphasizing the need to protect participating households from adverse bill impacts.¹⁸ Similarly, Cal Advocates argues that electrification measures should not increase participating households' utility bills and recommends post-electrification bill protections where electrification proposals are approved.¹⁹

The County believes that electrification efforts should be implemented in a manner that recognizes the diverse circumstances of income-qualified households. Customers may face varying housing conditions, equipment needs, energy-use patterns, and financial constraints. For some households, electrification opportunities may offer meaningful benefits. For others, additional support, customer education, remediation work, or complementary program services may be necessary to ensure successful adoption and positive outcomes.

The County therefore supports approaches that balance electrification objectives with customer affordability considerations. Program offerings should continue to focus on delivering tangible benefits to participating households while minimizing the risk of creating new barriers or unintended financial burdens. Maintaining this focus on customer outcomes will help ensure that electrification efforts remain consistent with the underlying purpose of IQPs.

B. Electrification Opportunities Can Deliver Meaningful Benefits to Income-Qualified Households

While affordability protections remain essential, the County also recognizes the potential benefits that electrification opportunities can provide to income-qualified households. Sierra Club's testimony supports expanded access to electrification measures and recommends increased investment in electrification technologies and related enabling measures within ESA programs. Sierra Club argues that electrification should be expressly prioritized within ESA and that income-

¹⁸ Prepared Testimony of Jennifer Kallay on the Energy Savings Assistance Programs, Exhibit TURN-01 (TURN Kallay Testimony), pp. 31–34.

¹⁹ Cal Advocates Testimony, pp. 2–8–2–13.

qualified households should have access to electrification measures that can provide energy savings, bill savings, and health, comfort, and safety benefits.²⁰

The County agrees that income-qualified customers should have meaningful access to electrification opportunities when those measures are appropriate for the property, customer, and household circumstances. Low-income households may face barriers to accessing newer technologies and energy upgrades, including appliance affordability, property-owner approval, language and digital-literacy challenges, and limited awareness of available programs.²¹ As electrification technologies become increasingly common throughout the broader marketplace, it is important that income-qualified households are not left behind.

At the same time, the County recognizes that successful electrification often requires more than simply offering a replacement technology. In many cases, customers may benefit from complementary services, education, or technical assistance that help ensure electrification measures can be effectively installed and operated. Sierra Club similarly highlights the importance of maintaining support for enabling measures that help facilitate successful electrification projects.²²

The County therefore supports continued exploration of electrification opportunities within ESA and other income-qualified programs. When implemented thoughtfully and paired with appropriate customer protections and support services, electrification measures may help participating households improve energy efficiency, increase comfort, and access additional program benefits. These opportunities should remain available to eligible customers while

²⁰ Direct Testimony of Rebecca Barker and Chinyere Osuala on Behalf of Sierra Club, Exhibit SC-01 (Sierra Club Testimony), pp. 2, 7.

²¹ Evergreen Economics, 2025 Low Income Needs Assessment Final Report (2025 LINA), pp. 47–48, 60–61, 67, 84–86.

²² Sierra Club Testimony, p. 2.

recognizing the importance of affordability, customer choice, and individual household circumstances.

IV. LOCAL DELIVERY MODEL

A. Multiple Program Offerings Can Enhance Customer Participation and Experience, Specifically for Those Most Underserved

Testimony submitted by multiple parties demonstrates that income-qualified customers have different circumstances, barriers, and service needs. Factors such as housing type, language access, disability-related needs, and access to technology may affect a customer's ability to participate in available programs. These differences support maintaining multiple program offerings and service pathways rather than relying on a single approach for all eligible households.

The County supports a diverse portfolio of program offerings that can accommodate the varied circumstances of income-qualified households. A single delivery model or customer pathway has historically been proven to not be equally effective for all participants. Customers living in multifamily properties may face different challenges than those living in single-family homes. Likewise, customers with limited English proficiency, seniors, customers with disabilities, and other underserved populations may benefit from different forms of outreach, engagement, and program support.

Providing multiple program offerings and service pathways can help improve customer participation and overall program experience. Flexible program offerings and service pathways can help customers participate in ways that reflect their individual circumstances and community needs. Providing these options can also reduce customer burden and improve the overall customer experience.

The County therefore supports maintaining a range of program offerings and delivery pathways that help expand participation among eligible customers. This flexibility may be

particularly important for historically underserved households, which often face the greatest barriers to participation but may also benefit most from successful program engagement.

B. Partnerships and Innovative Delivery Approaches Can Improve Customer Outcomes

The County supports partnerships and delivery approaches that use the strengths of local governments, CBOs, housing organizations, social-service providers, and other entities with community-based experience. These entities may have existing relationships, local knowledge, and service-delivery experience that can complement traditional program administration and help connect customers with available resources.

Partnerships may also help improve customer awareness, provide support throughout the customer journey, and identify barriers that may not be apparent through traditional program administration alone. The 2025 LINA, for example, recommends stronger coordination with local in-language CBOs to provide support throughout the program process, including outreach, assessment, installation, and follow-up.²³

Innovative delivery approaches should be evaluated based on their ability to increase access, improve participation, reduce customer burden, and enhance customer experience. Approaches that connect customers with multiple services, improve coordination across programs, or provide additional support to underserved populations may warrant particular consideration.

V. PROGRAM ACCOUNTABILITY AND OVERSIGHT

A. Ongoing Evaluation Can Help Identify Opportunities to Improve Program Delivery

The County agrees with stakeholder testimony emphasizing the importance of evaluating program performance and using lessons learned to improve future program delivery. Cal

²³ 2025 LINA, pp. 84–86.

278 Advocates argues that “reasonable spending should correlate with the actual energy, demand, and
279 therms savings.”²⁴ Cal Advocates also recommends a mid-cycle process for adjusting budgets
280 based on actual spending during the first two years of the next program cycle.²⁵

281 The County agrees that ongoing evaluation plays an important role in ensuring IQPs continue
282 to effectively serve eligible households. Customer needs, housing conditions, technologies, and
283 market circumstances evolve over time, and evaluation can help determine whether programs
284 remain aligned with those changing conditions. Evaluation can also help identify barriers that limit
285 participation, highlight successful practices, and provide information regarding how programs can
286 better serve income-qualified customers.

287 The County believes that evaluation efforts should consider not only energy savings and
288 expenditures, but also customer participation and experience. As discussed previously, NCLC and
289 CforAT identify barriers related to enrollment, verification, accessibility, and customer
290 navigation.²⁶ Ongoing evaluation can help determine whether these barriers persist, whether
291 particular customer populations continue to face challenges accessing services, and whether
292 program modifications are improving outcomes for participating households.

293 The County further supports the use of evaluation as a tool for continuous improvement
294 rather than solely as a retrospective review of program performance. Findings regarding
295 participation levels, service delivery, accessibility, and customer outcomes can help administrators
296 refine program offerings, improve customer-engagement strategies, and better align services with

²⁴ Cal Advocates Testimony, p. 1-2.

²⁵ Cal Advocates Testimony, pp. 2-3 to 2-4.

²⁶ Prepared Testimony of Leigh Ferrin Presenting Survey Information from California Legal Services and Community-Based Organizations that Serve Low-Income Clients, Exhibit NCLC-01, pp. 3–7; Prepared Testimony of the Center for Accessible Technology, pp. 1, 13–14.

customer needs. This type of iterative evaluation can be particularly valuable for identifying approaches that successfully serve hard-to-reach and historically underserved populations.

B. Performance Metrics Should Reflect Meaningful Customer and Program Outcomes

Cal Advocates emphasizes that ESA programs should be evaluated based on both prudent spending and program outcomes, noting that program expenditures should correspond to achieved savings and customer benefits.²⁷ Cal Advocates further argues that the Commission should ensure program investments deliver measurable value and that budgets should be aligned with what program administrators can reasonably achieve.²⁸

The County agrees that performance measurement should include traditional indicators such as participation levels, energy savings, spending, and cost-effectiveness. However, these measures alone may not fully capture whether eligible households are successfully accessing and benefiting from program services. As discussed elsewhere in this testimony, stakeholders identified a variety of barriers related to enrollment, verification, accessibility, and customer navigation that can affect participation and completion of services.²⁹ Performance metrics should therefore help illuminate whether customers are progressing successfully through the program experience and receiving intended benefits.

The County believes that a more comprehensive set of performance measures can provide a clearer picture of program effectiveness. In addition to energy and participation metrics, the Commission may wish to consider measures related to customer access, enrollment success, service completion, customer experience, participation among underserved populations, and

²⁷ Cal Advocates Testimony, pp. 1-2 to 1-3; 3-1 to 3-4.

²⁸ Cal Advocates Testimony, pp. 2-52 to 2-53.

²⁹ Prepared Testimony of Leigh Ferrin Presenting Survey Information from California Legal Services and Community-Based Organizations that Serve Low-Income Clients, Exhibit NCLC-01, pp. 3–7; Prepared Testimony of the Center for Accessible Technology, pp. 1, 13–14.

customer retention. These types of metrics can help identify whether programs are effectively reaching the households they are intended to serve and whether particular populations continue to face barriers to participation.

The County also agrees with Cal Advocates that customer outcomes should remain central when evaluating electrification and other program investments. Cal Advocates notes that electrification efforts should be implemented in a manner that avoids increasing hardships for participating households and recommends safeguards to ensure positive customer outcomes.³⁰ Similarly, the County believes that performance measures should help assess whether program investments are improving affordability, reducing barriers, and delivering meaningful benefits to participating households.

VI. RECOMMENDATIONS

Based on the discussion in this rebuttal testimony, the County recommends that the Commission:

1. Reduce unnecessary barriers to participation for eligible households, including barriers related to verification, enrollment, customer navigation, and accessibility.
2. Preserve accessibility measures, customer protections, and inclusive program design to help ensure that all eligible customers can successfully access available services and benefits.
3. Advance electrification opportunities in a manner that protects affordability, supports customer choice, and delivers meaningful benefits to participating households.
4. Support ongoing evaluation and performance measurement that promotes continuous program improvement and focuses on meaningful customer and program outcomes.
5. Maintain flexible program offerings and encourage partnerships and innovative delivery approaches that improve participation, customer experience, and outcomes, particularly for historically underserved populations.

³⁰ Cal Advocates Testimony, pp. 2-8 through 2-13, 2-53.

VII. CONCLUSION

The County appreciates the opportunity to provide this Rebuttal Testimony in the consolidated 2028–2033 Income-Qualified Programs proceeding. As discussed throughout this testimony, the County supports policies and program design approaches that improve customer access, strengthen customer protections, promote accountability and continuous program improvement, and enhance outcomes for income-qualified households. The County respectfully requests that the Commission consider the positions and recommendations presented herein as it evaluates the record and the investor-owned utilities' 2028–2033 Income-Qualified Program applications.

Respectfully submitted,

/s/ Lujana S. Medina

Lujana S. Medina
Division Manager, Environmental
Initiatives
County of Los Angeles
1100 North Eastern Avenue
Los Angeles, CA 90063-3200
(323) 267-2006
LMedina@isd.lacounty.gov

For the County of Los Angeles

October 16, 2026