BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Applications of Pacific Gas and Electric Company for
Approval of the 2009-2011 Low Income Energy
Efficiency and California Alternate Rates for Energy
Programs and Budget (U39M)

Application 08-05-022 (Filed May 15, 2008)

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Application of Southern California Edison Company (U 338-E) for Approval of Low Income Assistance Programs and Budgets for Program Years 2009, 2010 and 2011.

Application 08-05-026 (Filed May 15, 2008)

ANNUAL REPORT ACTIVITY OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) ON LOW INCOME ASSISTANCE PROGRAMS FOR 2010

Kim F. Hassan

Attorney for San Diego Gas & Electric Company 555 W. Fifth Street Los Angeles, CA 90013

Telephone: (213) 244-3061 Facsimile: (213) 629-9620

E-Mail: KHassan@semprautilities.com

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ANNUAL REPORT ACTIVITY OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) ON LOW INCOME ASSISTANCE PROGRAMS FOR 2010

This report presents the results and expenditures for Southern California Gas Company (SoCalGas') California Alternate Rates for Energy (CARE) program and Energy Savings Assistance Program for program year (PY) 2010. The purpose of this report is to consolidate activity for the CARE program and Energy Savings Assistance Program, and provide the Energy Division with all the necessary information to assist in analyzing the low-income programs.

Respectfully Submitted,

/s/ Kim F. Hassan

Kim F. Hassan

Attorney for Southern California Gas Company 555 W. Fifth Street Los Angeles, CA 90013 Telephone: (213) 244-3061

Telephone: (213) 244-3061 Facsimile: (213) 629-9620

E-Mail: KHassan@semprautilities.com



Energy Savings Assistance Program And California Alternate Rate for Energy (CARE) Program Annual Report

2010 Results

May 2, 2011

ENERGY SAVINGS ASSISTANCE PROGRAM ANNUAL REPORT

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ENERGY SAVINGS ASSISTANCE PROGRAM ANNUAL REPORT

1. Energy Savings Assistance Program Executive Summary

The California Public Utilities Commission (CPUC) authorized Southern California Gas Company's (SoCalGas) Energy Savings Assistance Program¹ for program year 2010 (PY2010) in Decision (D.) 08-11-031. This report provides information on SoCalGas' Energy Savings Assistance Program accomplishments and expenditures for PY2010. SoCalGas' Energy Savings Assistance Program offers low income customers weatherization services, energy efficient appliances, and energy education at no cost to qualified natural gas customers within its service territory.

In D.07-12-051, the CPUC updated its policy objectives for the Energy Savings Assistance Program stating:

"[T]he key policy objective for the LIEE Programs, like that of our non-LIEE Energy Efficiency Programs, is to provide cost-effective energy savings that serve as an energy resource and to promote environmental benefits. We retain our commitment to ensuring the LIEE Programs add to the participant's quality of life, which implicates, equity, energy affordability, bill savings and safety and comfort for those customers who participate in LIEE Programs."²

To achieve these objectives, the CPUC adopted a programmatic Energy Savings Assistance Program initiative (programmatic initiative) "to provide all eligible LIEE customers the

² D.07-12-051 at p. 25.

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¹ Energy Savings Assistance Program was formerly known as Low Income Energy Efficiency (LIEE) Program.

opportunity to participate in LIEE programs and to offer those who wish to participate all cost effective energy efficiency measures in their residences by 2020."³

The California Energy Efficiency Strategic Plan (Strategic Plan) lays out two goals: 1) By 2020, all eligible customers will be given the opportunity to participate in the Energy Savings Assistance Program, and 2) The Energy Savings Assistance Program will be an energy resource by delivering increasingly cost-effective and longer-term savings.

In D.08-11-031, the CPUC reinforced its key policy objective of making the Energy Savings Assistance Program a reliable energy resource by adopting goals to accomplish the programmatic initiative by assigning the treatment of 25% of all SoCalGas' willing and eligible households to the 2009-2011 program cycle. SoCalGas continues to work towards meeting the CPUC-directed Energy Savings Assistance Program goals and objectives.

³ *Id*.

1.1. Alignment of Energy Savings Assistance Program with Strategic Plan Goals and Strategy

1.1.1. Please identify the IOU strategies employed in meeting Goal 1: Improve Customer Outreach

Implementation Plan and Timeline				
Strategies	Near Term 2009 – 2011	IOU strategy employed this program year		
1.1: Strengthen program outreach using segmentation analysis and social marketing tools.	 Identify, implement and evaluate effective marketing, education and outreach methods for targeting low income customer segments. Use social marketing to effectively engage low income customers in program participation. 	 Marketing campaigns such as targeted direct mailings, bill inserts, and automated voice messaging (AVM) were effective, as well as using information resources such as demographics and energy usage for contacting various customer segments and educating them on the Energy Savings Assistance Program. The Whole Neighborhood Approach (WNA) identified and reached out to targeted low income customer segments. To better implement the WNA, a precanvassing letter was developed for contractors to distribute to customers targeted to receive Energy Savings Assistance Program services. The online Energy Savings Assistance Program interest form was enhanced to improve user friendliness and created the basic functionality that would help generate better leads by allowing the customer to specify whether they qualify through income and/or categorical eligibility. 		

	Implementation Plan and Timeline			
Strategies	Near Term 2009 – 2011	IOU strategy employed this program year		
1.2: Develop a recognizable and trustworthy Brand/Tagline for the programs.	 Develop a statewide program name and description for the Energy Savings Assistance Program which is coordinated with the ME&O efforts for energy efficiency, demand response and any other demand-side options. Implement branding. 	 In 2010, the CPUC adopted two statewide energy efficiency brands: Engage 360 (Energy Efficiency) and the Energy Savings Assistance Program (Low Income Energy Efficiency). In 2010, SoCalGas' Energy Savings Assistance Program began preparatory work for the 2011 implementation of the statewide branding initiative. Branding implementation includes the replacement of the former utility program name with the new statewide name "Energy Savings Assistance Program" and logo on all promotional, marketing, education, and outreach documents and materials. 		

⁴ See Assigned Commissioner's Ruling Providing Guidance Concerning the California Alternative Rates for Energy (CARE) Program and Energy Savings Assistance Program (Formerly and Generally Referred to as Low Income Energy Efficiency (LIEE) Program) and Related 2012-2014 Budget Applications, at p. 4 (issued March 30, 2011).

Implementation Plan and Timeline				
Strategies	Near Term	IOU strategy employed this		
	2009 – 2011	program year		
1.3: Improve program delivery	Use information from segmentation analysis to achieve efficiencies in program delivery. Leverage with Local, State, and Federal agencies as well as other organizations to increase seamless coordination, efficiency and enrollment	 SoCalGas continued to utilize segmentation analysis to improve efficiencies in the program. For example, the WNA and targeted marketing efforts described under the bulleted Strategy 1.1 above. SoCalGas continued to develop its relationship with LA County Department of Public Social Services, to leverage promotion of the Energy Savings Assistance Program to categorically eligible FoodStamps/Supplemental Nutritional Assistance Program (SNAP) participants. SoCalGas continued to work with the USC Family of Schools and Kid Watch program. SoCalGas provided Energy Savings Assistance Program information directly to community members at local events. SoCalGas Public Affairs representatives used their contacts to help promote the Energy Savings Assistance Program to local, state and federal agencies. SoCalGas developed an Energy Savings Assistance Program/Low Income Home Energy Assistance Program (LIHEAP) leveraging framework which streamlined the enrollment process for joint Energy Savings Assistance Program /LIHEAP enrollments. Community Based Organizations (CBOs) continue to utilize their intake processes to promote the Energy Savings Assistance Program along with the other services provided. 		

Implementation Plan and Timeline			
Strategies			
	2009 – 2011	program year	
1.4: Promote the growth of a trained Energy Savings Assistance Program workforce.	 Incorporate Energy Savings Assistance Program training needs into the Workforce Training needs assessment. Develop Training Roadmap which includes funding requirements and sources other than IOUs. Implement Energy Savings Assistance Program workforce education and training. 	 SoCalGas participated in a Workforce Education & Training (WE&T) pilot with Los Angeles Trade Technical College (LATTC), The East Los Angeles Community Union (TELACU) and Community Enhancement Services (CES) to recruit students and to provide input on LATTC's training program. The goal was to develop a Statewide Energy Savings Assistance Program WE&T Certificate. To help contractors improve program delivery, SoCalGas held refresher training courses in Outreach and Assessment at its Energy Savings Assistance Program contractors' facilities. SoCalGas also began hosting regional All-Hands refresher training courses for all Outreach Specialists to identify methods to increase enrollments and improve initial assessments. SoCalGas held focused weatherization, heating ventilating and air conditioning (HVAC), and natural gas appliance testing (NGAT) training classes to improve Installers' technical expertise. SoCalGas promoted the CPUC-sponsored Census Worker job fairs, which helped displaced census canvassers, find new opportunities of employment. Several SoCalGas Energy Savings Assistance Program contractors attended the events and were able to hire census workers who already had federal-level background checks and experience in canvassing. 	

1.1.2. Please identify the IOU strategies employed in meeting Goal 2: Energy Savings Assistance Program is an Energy Resource

Implementation Plan and Timeline				
Strategies	Near Term 2009 – 2011	IOU strategy employed this program year		
2.1: Increase collaboration and leveraging of other low income programs and services	 Identify key areas where data sharing would be possible and advantageous. Develop partnerships with community organizations and other agencies to leverage resources available from local governments, federal, state, and private project funding sources. 	 SoCalGas began implementation of its capitation program to gain enrollments using agencies who may serve Limited English Proficient, disabled, and elderly community groups. SoCalGas developed a LIHEAP Leveraging model for use with SoCalGas LIHEAP agencies. 		
2.2: Coordinate and communicate between Energy Savings Assistance Program, energy efficiency and DSM programs to achieve service offerings that are seamless for the customer.	 Ensure Energy Savings Assistance Program participants are aware of energy efficiency and DSM/EE programs. Coordinate with CSI programs to provide Energy Savings Assistance Program services in qualified low income housing for both single family and multi- family CSI programs. Coordinate AMI delivery and Energy Savings Assistance Program. 	 Every customer treated by the Energy Savings Assistance Program receives an Energy Education guide that promotes all of SoCalGas' Energy Efficiency (EE) programs. SoCalGas coordinated with EE programs to ensure that potentially eligible low income customers first receive Energy Savings Assistance Program outreach. In 2010, the CPUC approved SoCalGas' advanced metering infrastructure (AMI) program, and communication between the two programs was initiated to plan for future coordination. 		
2.3: Provide low income customers with measures that result in the most savings in the Energy Savings Assistance Program	 Assess design of programs to ensure increasingly cost effective measures, while reducing low income customers' bills and improving quality of life. Continue to include measures that provide long term energy savings, such as 	 SoCalGas participated in the development of installation standards for new measures such as furnace pilot retrofit kit, high efficiency clothes washers (HE Washers), and the furnace clean and tunes, which will result in energy savings to customers. As a single commodity utility, SoCalGas relied on the installation 		

Implementation Plan and Timeline				
Strategies	Near Term 2009 – 2011	IOU strategy employed this program year		
	refrigerators.	of standalone measures to increase enrollments when the three measure minimum could not be met. • SoCalGas continued to provide all feasible measures to customers' homes, such as attic insulation, furnace pilot retrofit kit, and HE clothes washers, which should lead to long-term energy savings. Also by completing minor home repairs such water heater and gas appliance repairs and replacements, door and building envelope repairs, SoCalGas assisted customers by increasing health, comfort and safety, and reducing air infiltration.		
2.4: Increase delivery of efficiency programs by identifying segmented concentrations of customers.	 Identify and develop segmented approach to deliver services to households Improve use of CBOs in delivering services 	 SoCalGas used PRIZM codes' and Zip-7 codes to define WNA areas to reach geographically concentrated eligible customer segments. SoCalGas used 18 CBOs as Energy Savings Assistance Program contractors, and hosted bimonthly contractor meetings for its entire Energy Savings Assistance Program contractor network to coordinate resources, update program changes and improve Energy Savings Assistance Program delivery. SoCalGas developed a LIHEAP leveraging framework that streamlined the enrollment and installation process by reducing the number of utility-based Energy Savings Assistance Program forms required when completing enrollment and weatherization 		

⁵ PRIZM codes are a set of area-based customer segmentation data widely used for marketing purposes in the United States. The data consist of demographic clusters that categorize every U.S. household into a segment. These segments were developed in part from the analysis of U.S. census data and categorize U.S. consumers into 14 distinct groups and 66 segments. The segments help marketers tailor content to consumers' needs and look at a variety of factors, including income, likes, lifestyles and purchasing behaviors.

Implementation Plan and Timeline			
Strategies	Near Term 2009 – 2011	IOU strategy employed this program year	
		tasks for both programs. In addition, SoCalGas enhanced the (Home Energy Assistance Tracking) HEAT system to make the data entry process for capturing Energy Savings Assistance Program measures installed by LIHEAP more efficient.	
		• LIHEAP agencies that are also Energy Savings Assistance Program contractors are able to leverage services offered to their in-take customers with the Energy Savings Assistance Program. LIHEAP agencies are CBOs who offer services such as: Support for child, youth, and family development, Support for seniors and the disabled community, Utility bill payment assistance, Health services, and Homeless services.	

1.2. Energy Assistance Savings Program Overview

The SoCalGas Energy Savings Assistance Program serves all eligible low income customers, willing to participate in the program, by providing all feasible Energy Savings Assistance Program measures⁶ as determined through its outreach and assessment and installation process. During PY2010, SoCalGas' Energy Savings Assistance Program treated⁷ a total of 121,274 homes, which represents a 42% increase from PY2009 results and 84% of the

⁶ See D. 08-11-031, at Ordering Paragraph (OP) 15.

⁷ Per D.02-12-019, the CPUC defines a "treated" home as an income-qualified home that has received any measure or service under the Energy Savings Assistance Program, including energy education, compact fluorescent lamps, weatherization and appliances. Under the Energy Savings Assistance Program, a treated home must receive all feasible measures for which it qualifies.

PY2010 homes to be treated goal. Also in PY2010, 108,658 homes were weatherized⁸, which is a 52% increase over PY2009 results. In PY2010, SoCalGas saw great growth in the number of homes treated through its Energy Savings Assistance Program.

As part of its comprehensive services to eligible Energy Savings Assistance Program participants, SoCalGas provided: in-home energy education to 117,449 customers, 98,551 envelope and air sealing measures, 101,776 water heater conservation measures, 11,939 furnace clean and tune measures, and 1,966 duct seal weatherization measures. In addition, SoCalGas serviced 11,939 appliances including 1,212 water heater replacements, and 9,948 furnaces, and 79 washers. A total of 22,589 customers were classified as "ineligible" or "unwilling" to participate in PY2010 which represents more than 15% of the number of homes treated in PY2010.

The average per home lifecycle bill savings for the PY2010 Energy Savings Assistance Program was \$162. Weatherization and appliance installations resulted in energy savings of 2,327,287 therms. The energy savings achieved through the 2010 Energy Savings Assistance Program will contribute to the CPUC's energy savings goals adopted for program year 2006 and beyond as set forth in D.04-09-060. Furthermore, SoCalGas' Energy Savings Assistance Program contributes to the CPUC's programmatic initiative. Associated Energy Savings Assistance Program expenditures and therm savings are reflected in the following summary table.

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⁸ Per D.02-12-019, the CPUC defines a "weatherized" home as a subset of treated homes, and are defined as income-qualified homes that have received any weatherization measures (e.g., weatherstripping and caulking) under the Energy Savings Assistance Program.

⁹ Ineligible & Unwilling is defined as leads that do not result in a customer enrollment based on one of the following reasons: customer refused; home does not meet minimum measure requirement; customer is moving; over income; owner refused for renter occupied single family; unable to provide homeownership documentation; or home weatherized under another program.

¹⁰ Findings of Fact 13

1.2.1. Provide a summary of the Energy Savings Assistance Program elements as approved in Decision 08-11-031:

	Program Summary ¹¹		
	Authorized / Planning		
	Assumptions	Actual	%
Budget	\$76,872,816	\$ 73,532,016	96%
Homes Treated	143,540	121,274	84%
Therms Saved	3,292,424	2,327,287	71%

Due to the high number of homes treated in PY2010, as noted in the table above, additional coordination with Energy Savings Assistance Program contractors was needed. During 2010, SoCalGas added six new contractors (two are Diverse Business Enterprises (DBE)) and expanded the services of one existing contractor. SoCalGas coordinated with its contractors and external partners to improve Energy Savings Assistance Program delivery, ultimately working together to serve a greater number of customers with energy efficiency measures.

In August 2010, SoCalGas released a request for proposal (RFP) to potential contractors who met desired qualifications based on their responses to the Request for Qualification issued in May. By October, SoCalGas identified and selected five new Energy Savings Assistance Program contractors that would join its contractor team in 2011. The addition of qualified Energy Savings Assistance Program contractors will increase the number of service providers participating in the SoCalGas Energy Savings Assistance Program contractor network particularly in its outer service territory. SoCalGas continues working towards meeting CPUC goals by increasing its resources and expanding its capacity of existing Energy Savings Assistance Program contractors.

¹¹ In 2010 SoCalGas filed a petition for modification (PFM) to request the inclusion of certain measures that were inadvertently omitted from its Application for its 2009–2011 Energy Savings Assistance Program Cycle. All measure expenditures and energy savings are reflected in Section 1.2.1 summary table, because eligible customers received the benefits of the Energy Savings Assistance Program and the energy savings contributed to the Commission's energy savings goal adopted by D.04-09-060. The CPUC issued D.10-12-002 December 2, 2010 on SoCalGas' PFM.

As SoCalGas' Energy Savings Assistance Program contractors diligently worked towards increasing the number of homes they serviced, close attention to customer satisfaction remained a top priority for SoCalGas. Overall, 87% of customers reported being highly satisfied with the Energy Savings Assistance Program in PY2010. In addition, throughout the program year an average of 92% of the customers treated also reported being highly satisfied with the Energy Savings Assistance Program installation experience. Customer satisfaction, a key goal for SoCalGas, was partially managed through frequent evaluations that provided results specific to Energy Savings Assistance Program contractors servicing customers. The customized evaluations assisted Energy Savings Assistance Program contractors in understanding customer viewpoints and presented additional insight on ways to enhance and improve service delivery. SoCalGas maintains its commitment to work closely with its Energy Savings Assistance Program contractor network and to constantly seeks innovative channels for program improvement to retain these high customer service results.

During PY2010, SoCalGas provided more one-on-one training and increased back office support which helped with providing its contractors with customized feedback to increase productivity. SoCalGas' staff met in person with contractors that were experiencing difficulties with invoicing and data-entry, and trained them on best practices for invoice processing and system data-entry. Additionally, SoCalGas helped stabilize some of its newer contractors' productivity by involving them in AVM Campaigns; through the AVM campaigns, contractors are provided with more direct leads consequently facilitating growth in customer enrollments. SoCalGas continues to make improvements in streamlining its internal work processes.

SoCalGas continues to expand its outreach efforts and to improve program delivery by informing the community of the benefits they can receive from the services offered by the Energy Savings Assistance Program. SoCalGas and Southern California Edison (SCE) collaborated in coordinating "telethon" events at Univision. Univision is one of the top five Spanish television networks in the U.S.

In addition, SoCalGas organized "LIHEAP Action Day" which featured Senator Roderick D. Wright (D-Inglewood) and other local community leaders who urged Congress to maintain or increase funding for the LIHEAP. In December, SoCalGas created a "Glad to be of Service" video for its website which promotes SoCalGas' customer assistance programs including its Energy Savings Assistance Program. SoCalGas continues to strengthen the Energy Savings Assistance Program and has positioned itself to meet 2011 program goals. This report identifies strategies to meet the Energy Savings Assistance Program goals in various sections (including, but not limited to Sections 1.4.3 and 1.5.4).

1.3. Whole Neighborhood Approach Evaluation

1.3.1. Provide a summary of the geographic segmentation strategy employed, (i.e. tools and analysis used to segment "neighborhoods," how neighborhoods are segmented and how this information is communicated to the contractor/CBO).

Throughout PY2010, SoCalGas used Zip-7 codes (the five-digit postal zip code plus the first two digits of the four-digit zip code extension), which provided a greater level of detail on a neighborhood than traditional five-digit zip codes. SoCalGas used 200% of the federal poverty level as a factor to calculate the "estimated eligible" population in each Zip-7 area. SoCalGas extracted Zip-7 codes, identified smaller areas to target, and then used this data to create more refined canvass lists for contractors. Zip-7 codes also represent the highest level of detail included in the demographic information provided to SoCalGas by Athens Research¹².

In addition, SoCalGas provided contractors with canvass lists utilizing PRIZM codes, a data source that allows contractors to better determine the likelihood of a particular household's potential eligibility for participation in the Energy Savings Assistance Program based on their market characteristics. A set of instructions was included with every canvass list

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¹² Athens Research is a contractor that develops large and small area estimates of demographic eligibility on behalf of the Joint Utilities.

provided to contractors. Contractors also received regular information updates at the bimonthly Energy Savings Assistance Program contractor meetings. In 2010, the WNA used a geographic segmentation strategy that compared customer account numbers contained in Zip-7 and other canvass lists against the HEAT system, a database used for all Energy Savings Assistance Program tracking and reporting. This process determined if a particular household had previously been served by the Energy Savings Assistance Program. Only households that had not yet been served would appear on canvass lists. Other useful information, such as a customers' CARE status also appeared for the contractors' information.

1.3.2. Provide a summary of the customer segmentation strategies employed (i.e. tools and analysis used to identify customers based on energy usage, energy burden and energy insecurity) and how these customer segments are targeted in the Whole Neighborhood Approach to program outreach.

Since 2009¹³, SoCalGas revised its strategy for targeting customers based on energy usage, energy burden¹⁴, and energy insecurity¹⁵. In 2010, SoCalGas conducted WNA efforts, reaching high energy burden customers without neglecting low income customers with other energy needs. SoCalGas also conducted WNA efforts to target low income areas using PRIZM code demographic information on households, which can be analyzed according to geographic social groups¹⁶ and sorted on a scale from highest incomes to lowest incomes. The PRIZM code tool allows SoCalGas to analyze energy burden, assuming that the lowest incomes have the highest energy burden.

By using WNA to outreach to eligible customers with varying energy needs along with PRIZM code tools to analyze results, Energy Savings Assistance Program was able to use

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¹³ Although a focus in marketing outreach in 2009, energy insecure and high energy users were not targeted in 2010

¹⁴ High energy burden is the ratio of customer energy bills to income.

¹⁵ High energy insecurity is related to late payments, and/or threatened service shut-off.

¹⁶ Urban, Suburban, Second City, Town and County

remaining program resources to focus on other high priority segments through its general marketing. A key high priority segment was customers with disabilities. Overall, the purpose of employing this strategy was to promote the Energy Savings Assistance Program to a greater number of customers and special segments, and advance D.08-11-031's goal of increasing the enrollment of disabled customers.

1.3.3. Describe how the current program delivery strategy differs from previous years, specifically relating to Identification, Outreach, Enrollment, Assessment, energy Audit/Measure Installation, and Inspections.

SoCalGas began its WNA effort in PY2009 and made adjustments that year to refine processes. In PY2010, SoCalGas maintained program delivery strategies related to Identification, Outreach, Enrollment, Assessment, Energy Audit/Measure Installation, and Inspections.

PY2010 saw a greater increase in the number of WNA efforts and ultimately the number of customers enrolled via WNA. The Zip-7 methodology coupled with PRIZM codes appears to be a worthwhile strategy for identifying smaller, more manageable canvassing lists that contain households more likely to meet Energy Savings Assistance Program eligibility requirements. WNA efforts are also a good way to help new Energy Savings Assistance Program contractors get established and achieve success in their endeavors. SoCalGas still faces the challenge of getting Energy Savings Assistance Program contractors to document the status of every single customer. However, SoCalGas has initiated a process that captures WNA efforts and documents which customers it has attempted to contact via this methodology. Beginning in 2010, SoCalGas started the process of uploading WNA campaign information and data tracking using the HEAT System. Reports are prepared using data from the HEAT System to determine the results of each WNA effort. These reports provide an exhaustive list of customers that were included in every WNA effort.

Beyond the WNA efforts, SoCalGas has expanded outreach to deliver Energy Savings Assistance Program information to customers using AVM campaigns. This methodology helps to streamline the enrollment process by putting customers in direct contact with an Energy Savings Assistance Program contractor in their area and thus eliminating the step requiring SoCalGas to act as an intermediary and assigning a contractor. In PY2010, SoCalGas increased the number of AVM Campaigns to seventeen bi-lingual campaigns which targeted 484,000 customers, compared to PY2009 when SoCalGas launched six bi-lingual AVM campaigns to over 333,000 customers. SoCalGas hopes to expand the number of contractors participating in the AVM campaigns. By utilizing electronic outreach and processing technologies, SoCalGas' AVM campaigns provide considerable cost savings, are environmentally friendly and offer customers an easy method of enrolling in the Energy Savings Assistance Program.

1.4. Energy Savings Assistance Program Customer Enrollment Evaluation

1.4.1. Distinguish between customers treated as "go backs" and brand new customers so that the CPUC has a clear idea of how many new customers the IOUs are adding to the Energy Savings Assistance Program.

SoCalGas continues its focus on offering the Energy Savings Assistance Program to dwellings that have not been served by the program in previous years. SoCalGas enrolled a total of 121,274 customers and 6,677 (5.5%) of the homes treated during 2010 were considered "go backs."

1.4.2. Please summarize new efforts to streamline customer enrollment strategies, including efforts to incorporate categorical eligibility and self-certification.

In 2010, SoCalGas continued to use categorical eligibility¹⁷ and self certification¹⁸ as tools to streamline customer enrollments to the Energy Savings Assistance Program. Categorical eligibility and self certification streamline program enrollment because they decrease required income documentation. With categorical eligibility, customers who can provide documents proving participation in one of several state or federal programs do not need to provide additional income documentation in order to qualify for enrollment in the Energy Savings Assistance Program and CARE.

Key program efforts focused on streamlining enrollments include:

- Continuing to educate contractors and community partners on Energy Savings
 Assistance Program, including categorical eligibility this was particularly important
 for the new Energy Savings Assistance Program capitation program;
- Developing relationships with categorically eligible programs or programs which serve a high percentage of customers enrolled in categorically eligible programs (i.e. SNAP, and National School Lunch Program [NSLP]);
- Updating Energy Savings Assistance Program interest forms, which include a list of categorical programs;
- Further streamlining categorical eligibility enrollments through LIHEAP leveraging;
 and
- Continuing to use WNA to direct outreach to self-certifiable customers that either live in areas where 80% of customers are at or below 200% of the federal poverty line, or that have been CARE post-enrollment verified (PEV).¹⁹

Footnote continued on next page

¹⁷ Categorical programs include:Medicaid/Medi-Cal, Women, Infants, and Children Program (WIC), and LIHEAP, SNAP, Tribal Temporary Assistance to Needy Families (TANF), Bureau of Indian Affairs General Assistance (BIA GA), National School Lunch Program (NSLP), Tribal Head Start, State Supplemental Security Income (SSI), and Healthy Families A & B.

¹⁸ In D.05-10-044 the CPUC allowed SDG&E and SoCalGas to use 2000 census tract data to identify neighborhoods where they could suspend income documentation requirements enroll customers in the Energy Savings Assistance Program through self-certification, if those customers lived in areas where 80% of the households were at or below 200% of the federal poverty line. In D.06-08-025, D.06-12-038, and D. 08-11-031, the CPUC allowed continuation of the self-certification process described above.

¹⁹ Select CARE customers have their incomes verified through the CARE audit process. Following this process, verified eligibility status is identified on contractors' lead lists. Since the same income requirements apply to both

Categorical Eligibility:

SoCalGas educates its contractors and community partners on the Energy Savings Assistance Program, including enrollment through categorical eligibility. Implementation of the Energy Savings Assistance Program capitation program began in 2010, and contractors have been and will continue to be educated on Energy Savings Assistance Program and categorical eligibility requirements. SoCalGas' Public Affairs Department also continued to inform the public at-large on the Energy Savings Assistance Program and enrollment requirements.

In 2010, SoCalGas laid the foundation to leverage marketing and outreach of its Energy Savings Assistance Program with SNAP/FoodStamp²⁰ through its relationship with LA County Department of Public Social Services. In addition, the CARE program cross-promoted the Energy Savings Assistance Program through targeted outreach to students and families utilizing the NSLP. Although data sharing between Energy Savings Assistance Program and SNAP or NSLP is not possible at this time due to customer privacy concerns, SoCalGas has cultivated relationships with these programs to reach customers who categorically qualify for Energy Savings Assistance Program. SoCalGas also coordinated with programs serving a high percentage of customers enrolled in categorical programs, such as the USC Family of Schools program.

SoCalGas updated both online and hard copy program interest forms, which now list categorical programs to simplify the enrollment process for customers who qualify through participation in outside programs. SoCalGas continued to provide lists of categorical programs on SoCalGas.com and on Energy Savings Assistance Program brochures.

SoCalGas further streamlined the enrollment process using categorical eligibility by creating a LIHEAP leveraging model framework that outlined the process for LIHEAP contractors to

CARE and Energy Savings Assistance Program, the Energy Savings Assistance Program enrollment process is streamlined for CARE PEV customers.

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²⁰ California Food Stamp program is also known as CalFresh.

also enroll LIHEAP customers into the Energy Savings Assistance Program. The framework identified the measures common to the Energy Savings Assistance Program and LIHEAP and outlined documentation and enrollment and assessment requirements that were necessary for the Energy Savings Assistance Program. SoCalGas then worked with participating LIHEAP agencies to identify areas where paperwork could be reduced in order to minimize the impact to customers through the dual enrollment process. In addition, enhancements were made to the HEAT system to support the leveraging framework which helped to reduce the amount of paperwork necessary to document leveraging efforts and the contactors' carbon footprints. The leveraging of Energy Savings Assistance Program measures installed by LIHEAP helped SoCalGas to meet the three measure minimum requirement and also resulted in savings to the SoCalGas Energy Savings Assistance Program. Results of this effort are discussed in Section 1.6.3 and savings are identified in Table 14.

Self-certification:

SoCalGas conducted outreach and assessment refresher classes to help increase awareness of all customer and home eligibility requirements of the Energy Savings Assistance Program. These courses addressed topics related to the various avenues to income qualify households such as self-certification, categorical eligibility, CARE PEV, full documentation, as well as structure eligibility such as minimum measure/therm requirements and other measure leveraging opportunities within low income programs. Through these courses SoCalGas intends to provide feedback and clarification to address most common outreach errors, challenges and issues as identified during the internal paperwork process.

SoCalGas enrolled 1,864²¹ customers through the WNA. The WNA generated canvassing lead lists for outreach contractors notate the Zip-7 codes and the CARE Post-Enrollment Verification status. Zip-7 codes and CARE PEV streamlined customer enrollments by highlighting households that meet the self-certification criteria adopted in D. 05-10-044

²¹ This number is based on contractor inputs of enrollment "lead source" into the HEAT system. The WNA total treated number reflected in Energy Savings Assistance Program Table 12 is based on a HEAT query that identifies all customers provided on WNA canvass lists that enrolled in PY2010.

against those that do not. In addition to WNA lead lists, contractors also used PRIZM codes to streamline their enrollment process through non-WNA efforts.

1.4.3. If the IOU has failed to meet its annual goal of number of households served, please provide an explanation of why the goal was not met. Explain the programmatic modifications that will be implemented in order to accomplish future annual goals of number of households served.

SoCalGas and its Energy Savings Assistance Program contractor network worked diligently throughout PY2010 to treat 121,274 homes, achieving 84% of its 2010 goal. The unprecedented number of homes treated by the SoCalGas Energy Savings Assistance Program is a significant accomplishment. The following factors contributed to SoCalGas' challenges in meeting its goals for the number of households treated during 2010:

- The introduction and expansion of competing low income and general EE programs such as American Recovery and Reinvestment Act (ARRA), LIHEAP and Community Development Block Grants (CDBG) contributed to a resource drain. For example, competing programs and contractors who received ARRA funding in SoCalGas' Energy Savings Assistance Program network concentrated first on fulfilling their ARRA commitments.
- The economic downturn continues to limit many contractors' lines of credit, which in turn has prevented these contractors from increasing their resources and workforce to ramp up to meet PY2010 goals.
- Enrollment barriers related to: the transiency of SoCalGas' Energy Savings
 Assistance Program renter customer segment, gaining the trust of potential Energy
 Savings Assistance Program customers particularly if the customers have
 immigration status concerns, overcoming the unwillingness of eligible customers to
 participate in the program due to any low income stigmas they may associate to the

Energy Savings Assistance Program, language barriers, and varying customer schedules, also hampered SoCalGas' enrollment efforts.

- Owners not providing approval to perform work on their rental units which prevents SoCalGas' ability to treat multifamily dwellings.
- As a single commodity utility, it is often times a challenge to meet technical (NGAT
 and combustion and ventilation air) assessment requirements as well as meeting the
 three measure minimum requirements, because of the characteristics of many homes
 served.

In PY2010, SoCalGas and SDG&E jointly filed a PFM of D.08-11-031. The CPUC's D.10-12-002 will have positive future impacts on the Energy Savings Assistance Program because D.10-12-002 approved the inclusion of inadvertently omitted measures in the program. The addition of more measures will allow SoCalGas to offer a more varied array of measures to its customers. The establishment of the NGAT memorandum account will allow SDG&E to track unexpected costs associated with increased NGAT activity for potential future recovery.

SoCalGas continues to strive towards reaching 25% of the programmatic initiative through 2011 and looks forward to meeting its aggressive 2011 goals. SoCalGas added ten new contractors since 2009 and also expanded the services of existing contractors to increase customer enrollment. SoCalGas continued working closely with its Energy Savings Assistance Program Contactor Network to implement program improvements that contribute to building contractor capacity. SoCalGas will continue to expand data mining efforts through targeted marketing campaigns and emphasize customer information collection to increase contractors' success with Energy Savings Assistance Program enrollments.

SoCalGas will continue to increase integration between the SoCalGas EE and Energy Savings Assistance Program to ensure advantages in all possible areas between the programs including collaboration opportunities with other IOUs, workforce education and training,

marketing, and other areas that will increase Energy Savings Assistance Program awareness. Leveraging efforts will continue to be developed with LIHEAP, Municipal Utilities and other non- Energy Savings Assistance Program CBOs and community resources. SoCalGas will continue to make use of the capitation program to reach customers who have limited English proficiency, who are disabled, or are elderly, and to help overcome enrollment barriers (such as language, trust, and fear).

The strategies described above will help to increase overall Energy Savings Assistance Program enrollment totals as well as increase the number of service providers participating in SoCalGas' contractor network.

1.5. **Disability Enrollment Efforts**

Provide a summary of efforts to which the IOU is meeting 1.5.1. the 15% penetration goal.

SoCalGas targeted low income Medical Baseline²² and customers with disabilities²³ through a variety of approaches, such as bill inserts, direct mail campaigns, AVM, and special events. The direct mail letters used large font and were also translated into Spanish.

In March 2010, SoCalGas conducted two personalized direct mailings to over 7,000 existing residential CARE and Medical Baseline customers. The second mailing was deployed to over 4,000 customers who have self-identified as having a disability. The mailings focused on the benefits of no-cost energy efficient home improvements and the letters issued were in large font print to better assist SoCalGas' visually impaired customers.

²² The Medical Baseline program is CPUC mandated and provides additional baseline allowance (gas at the lowest rate) for people with specific medical needs.

²³ Customer Service Representatives categorized customers as having a disability when they either called in on a Telecommunications Device for the Deaf (TDD or TTY), or because they self-identified as, or stated having at least one of nine conditions (Blind, Deaf, Hemiplegic, Paraplegic, Quadriplegic, Scleroderma, Life Threatening Illness, Multiple Sclerosis, and Compromised Immune System) classified as disabilities. Customer Service records of customers with disabilities were used in targeted marketing campaigns.

- In July 2010, SoCalGas conducted a second direct mail campaign to 12,970 existing residential Medical Baseline customers on CARE. In addition, because not all customers on Medical Baseline are on CARE, SoCalGas targeted a mailing to Medical Baseline customers in low income zip codes. Subsequently, another mailing went out to 3,761 customers, who according to SoCalGas' customer service records had a disability.²⁴
- SoCalGas formed a partnership with Braille Institute of America, Inc., in which 2,500
 CARE and Energy Savings Assistance Program information packages were put
 together for sight impaired customers. Additionally, SoCalGas Energy Savings
 Assistance Program representatives participated in four events with the Braille
 Institute.
- SoCalGas participated in the 6th annual Los Angeles DEAFestival,²⁵ where over 3,000 customers attended and over 300 customers were educated on CARE and the Energy Savings Assistance Program. SoCalGas was also present to accept a certificate of appreciation from LA City Council members.
- SoCalGas began attending monthly meeting at the Inland Empire Disability Coalition, ²⁶ and participated in the Inland Empire Disabilities Collaborations on October 23, 2010. This event drew 800 attendees, and SoCalGas promoted all its assistance programs including Energy Savings Assistance Program, CARE, and Medical Baseline.

²⁴ SoCalGas customer service records are captured in the Customer Information System (CIS).

²⁵ The DEAFestival is an annual event in celebration of deaf awareness month.

²⁶ The Coalition's mission is to promote equal opportunity, universal access, and full participation of people with disabilities in all aspects of life

- SoCalGas developed a video regarding its Customer Assistance programs and is scheduled to add sign language which will be distributed among deaf and disabled communities when completed. The video is will also be available at Socalgas.com.
- SoCalGas worked with the Deaf and Disabled Telecommunications Program (DDTP)²⁷ to cross-promote CARE/ Energy Savings Assistance Program in their Southern California Telephone Access Program (CTAP) locations in Burbank, Riverside and Santa Ana. Additionally, the DDTP link (Deaf & Disabled Telecommunications Program)²⁸ is displayed on SoCalGas' website page. To reciprocate, DDTP is displaying SoCalGas' website link Socalgas.com/assistance.
- SoCalGas researched and identified 40 private organizations and CBOs that provide services to the disabled community within the SoCalGas service territory. SoCalGas is continuing contact with this focused group to determine which organizations are interested in promoting the Energy Savings Assistance Program services to customers with disabilities.
- Energy Savings Assistance Program contractors, such as LIHEAP agencies who
 provide services to customers with disabilities also offered Energy Savings
 Assistance Program services to interested customers and followed up with
 enrollments and installations.
- Energy Savings Assistance Program contractors developed relationships with disability community advocacy groups and/or disability customer care groups in order to target eligible customers with disabilities to offer Energy Savings Assistance Program services.

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²⁷ This program is administered by the CPUC and provides assistive telephone devices and the California Relay Service (CRS).

²⁸ http://ddtp.cpuc.ca.gov/HomePage.aspx?id=91&LangType=1033

In PY2010, SoCalGas focused its efforts on engaging with The Braille Institute, DDTP and the Inland Empire Disability Coalition. All efforts were designed to follow the CPUC's directive to increase the number of households with disabilities²⁹ that participate in the Energy Savings Assistance Program. During PY2010, 13,425³⁰ households that had a member identified with a disability enrolled in the Energy Savings Assistance Program. This represents approximately 11% of the total enrollments for the year. The total number of disability enrollments results in a 59% increase from PY2009 when 8,460 households that had a member with a disability were enrolled in the Energy Savings Assistance Program.

Section 1.5.4 describes other future opportunities for SoCalGas to partner with Energy Savings Assistance Program capitation contractors, which will build SoCalGas' capacity to reach customers with special needs, by providing communication options such as American Sign Language.

1.5.2. Describe how the Energy Savings Assistance Program customer segmentation for ME&O and program delivery takes into account the needs of persons with disabilities.

Direct mailing campaigns were sensitive to the visually impaired community, and to improve information accessibility, large font print was used in these campaigns. SoCalGas made Braille booklets available to customers to promote all assistance programs. These booklets are available to customers during events. In addition, SoCalGas plans to make bills available in large font at customer request.

To respond to the needs of customers with disabilities, SoCalGas' updated its website strives to improve users' experience. The SoCalGas website, with particular emphasis in the customer assistance section, is designed to comply with Web Content Accessibility (W3C)

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²⁹ D. 08-11-031 O.P. 30.

³⁰ See table 1.5.3, which shows customers with disabilities enrolled in PY2010 as indentified in the HEAT database and SoCalGas' CIS.

guidelines. This means that vision impaired customers who use screen readers³¹ and similar assistive technologies can navigate the site and read its content. In the customer assistance section, there are informational and explanatory videos on SoCalGas' assistance programs.

For the hearing impaired, in PY2010, subtitles were added to videos. In 2011 SoCalGas' Marketing and Outreach group intends to expand accessibility efforts and develop a video that uses American Sign Language. Transcripts will supplement the videos and further assist customers who are deaf. SoCalGas has also increased accessibility to the deaf community with closed caption videos in the assistance section of SoCalGas' website to promote the Energy Savings Assistance Program, CARE and Medical Baseline programs.

1.5.3. Identify the various resources the IOUs utilize to target the disabled community and the enrollments as a result:

Disability Enrollments			
Source	Total	Disability	% of
	Enrollments	Enrollments	Disability

³¹ A screen reader is a software application that attempts to identify and interpret what is being displayed on the computer screen. This interpretation is then represented to the user with text-to-speech, sound icons, or a Braille output.

			Enrollment	
			S	
CARE Referral	120	6	5%	
Direct Mail	5,244	802	15%	
Energy Efficiency Referral	4,586	614	13%	
LI-HEAP	730	96	13%	
Media/Leveraging Dept Event	708	93	13%	
Neighbor/Friend/Relative Referral	2,154	251	12%	
Newspaper/Radio/Television	296	23	8%	
Other Utility Referral	7,098	669	9%	
Outreacher - Canvassing	87,034	7,339	8%	
SoCalGas - Email	440	26	6%	
SoCalGas - GAF/Medical Baseline	15	4	27%	
SoCalGas - Internet	2,317	255	11%	
SoCalGas Referral	4,353	385	9%	
Telemarketing - Telephone	4,256	488	11%	
Univision - Telethon	59	5	8%	
Whole Neighborhood Approach	1,864	245	13%	
Subtotal	121,274	11,301	9%	
CIS ¹	N/A	2,124	N/A	
Total	121,274	13,425	11%	
Target Enrollment Rate			15%	

¹In order to capture all disability information available, enrollments from 2010 (pulled from the HEAT database) were cross referenced with customer disability information that is captured in CIS. Through this effort SoCalGas was able to count enrollments that were not originally identified by the outreach specialist as being disabled at the time of enrollment, but should be counted towards disability enrollment efforts.

As described in Section 1.5.1, SoCalGas utilized bill inserts, canvassing/outreach referrals, direct mail, AVM campaigns and other similar means to target the disabled community. The Energy Savings Assistance Program contractor network also played a large role in significantly increasing enrollments within the disabled community. In 2010, SoCalGas increased the quality of Energy Savings Assistance Program leads each month by using segmentation to ensure targeted customers and facilities were eligible for Energy Savings Assistance Program.

In addition, SoCalGas' HEAT database was enhanced by making the disability status of the customer a mandatory question to be answered by the contractor during the data entry step. The change was made in the first quarter of 2010 to help minimize data entry errors.

In response to a joint (SoCalGas and SDG&E) Petition for Modification, the CPUC in D.10-12-002 clarified that D. 08-11-031 Ordering Paragraph 31 allows IOUs to include, as part of the required 15% disabled household enrollment, "customers who voluntarily self-identify as disabled." Subsequently, SoCalGas worked to include an optional question on customer interest forms to allow customers the opportunity to indicate whether household members have a disability.

1.5.4. If participation from the disabled community is below the 15% goal, provide an explanation why:

SoCalGas significantly increased its enrollment of persons within the disabled community to 11% of total enrollments. However, SoCalGas fell short of the 15% goal because it continues to hone the best marketing, outreach, and enrollment strategies to reach customers with disabilities. SoCalGas will continue to improve its ability to track and report disability enrollments, as well as increase opportunities to further utilize WNA efforts and leverage with outside programs. SoCalGas has identified various strategies to implement in 2011 to help meet the 15% penetration goal for the disabled community. The identified strategies are as follows:

In 2010, SoCalGas implemented its Energy Savings Assistance Program capitation program which focuses outreach efforts to agencies serving clients with Limited English Proficient, persons with a disability, and the elderly. In PY2010 SoCalGas enlisted two community based organizations to assist in reaching low income Limited English Proficient, elderly, and disabled customers. SoCalGas plans to enroll more CBO's that come in contact with the disabled customers and can share information about the program, determine eligibility and provide assistance in completing applicable forms. Through this approved program, SoCalGas reimburses the CBO's for their incremental cost of performing these services that result in an enrollment of a qualified customer to the Energy Savings Assistance Program. In addition, the

SoCalGas Energy Savings Assistance Program contractor network will continue to build on existing community relationships in order increase disability enrollments.

- SoCalGas will maximize the ability of Energy Savings Assistance Program
 contractors to leverage in-house services to the disabled community with Energy
 Savings Assistance Program services, as well as expand relationships with private
 and non-profit entities that are involved in advocacy and are service providers to the
 disabled community.
- Energy Savings Assistance Program contractors will continue to develop relationships with disability advocacy groups and customers with disabilities in order to increase the enrollments for this customer segment.
- SoCalGas has begun grass roots outreach to customers with disabilities. SoCalGas has begun to work with (and will accelerate its efforts) the Braille Institute and the California Council of the Blind. In addition, by integrating with the Medical Baseline program and leveraging with organizations with a medical focus (such as, Los Angeles Department of Social Services and LA Care, administrator for LA County Medi-Cal), customers with disabilities will be made aware of SoCalGas programs. In addition, SoCalGas will be integrating customer assistance programs with a customer contact initiative. This initiative will strive to ascertain a customer's contact preference (such as TDD/TTY), which will improve data on customers with disabilities.
- Another identified opportunity is to increase disability enrollment efforts by targeting Medical Baseline participants in marketing campaigns, such as AVM campaigns.

SoCalGas' Energy Savings Assistance Program will continue to look towards increasing efforts to enroll and track customers with disabilities to meet the 15% goal.

1.6. Leveraging Success Evaluation, Including LIHEAP

1.6.1. Describe the efforts taken to reach out and coordinate the Energy Savings Assistance Program with other related low income program offered outside the IOU that serve low income customers.

Last year, SoCalGas completed an agreement with the Imperial Irrigation District (IID) to leverage the benefits of their low income programs. A leveraging agreement with Burbank Water and Power (BWP) was signed in 2010. SoCalGas will administer the IID and BWP partnerships, using Energy Savings Assistance Program contractors. IID will install electric measures while SoCalGas will install Energy Savings Assistance Program gas measures. BWP will install electric and water measures while SoCalGas will install Energy Savings Assistance Program gas measures.

In 2010, SoCalGas continued to meet with the Los Angeles Department of Water & Power (LADWP) and finalized an agreement whereby customers residing in the utilities' overlapping service territories would benefit from both SoCalGas' Energy Savings Assistance Program and from LADWP's low income program. Similar to agreements secured by SoCalGas with IID and BW&P, SoCalGas seeks to partner with LADWP, the largest municipal utility in the nation, to install not only the comprehensive mix of measures offered in SoCalGas' Energy Savings Assistance Program, but to also deliver additional water and electric measures from LADWP. SoCalGas also provided LADWP guidance on establishing their ARRA weatherization program and identified additional partnering opportunities. The finalized municipal agreement is pending City Attorney approval for implementation in 2011. SoCalGas will continue working with LADWP as they administer their ARRA program in order to facilitate an easier transition to combined SoCalGas and LADWP measures to qualified low income customers.

SoCalGas continues to pursue opportunities to leverage program funds with water districts for the installation of HE Washers under SoCalGas' Energy Savings Assistance Program. To this end, in 2010, SoCalGas and Eastern Municipal Water District (EMWD) signed an

agreement where EMWD provides a rebate to SoCalGas for every HE Washer installed within the two utilities' joint service territories. This partnership ensures that the Energy Savings Assistance Program achieves maximum benefits, including energy savings, water reduction and customer bill savings. In addition to these benefits, monies rebated to SoCalGas' Energy Savings Assistance Program allow SoCalGas to use these extended funds to further enroll and treat an increased number of customers. Initial installations under the signed agreement began in the fourth quarter of 2010 and will continue throughout 2011.

Furthermore, SoCalGas continues to collaborate with Metropolitan Water District (MWD) to develop a strategic partnership to leverage program funds from water conservation rebates for HE Washers. MWD is the largest supplier of treated water in the U.S. and serves the most populous areas of SoCalGas' service territory.

1.6.2. In addition to tracking and reporting whether each leveraging effort meets the above criteria in order to measure the level of success, please describe the Other Benefits resulting from this particular partnership not captured under the 3 criteria described above.

SoCalGas continued to lay groundwork with IID and BWP in 2010. Issues regarding marketing material (co-branding) are being addressed and the parties are still working through those issues. Additionally, IID embarked upon an internal reorganization that suspended activity on the leveraging agreement. Subsequently, the new organization is in place and has requested a meeting between the two parties in 2011. SoCalGas believes that IID will likely choose to move forward with the agreement at that time.

Similarly, since SoCalGas continues to work on establishing partnerships with LADWP and MWD to leverage program funds, and no leveraging agreements are signed, program delivery has not yet begun and savings and benefits have yet to be realized. With the future implementation of any of these leveraging programs, SoCalGas will track related savings and benefits to the Energy Savings Assistance Program. SoCalGas will give special attention to the

three criteria established by the CPUC: 1) dollar savings, 2) energy savings/benefits, and 3) enrollment increases.

In 2010, SoCalGas and EMWD established a partnership to leverage program funds for the direct installation of HE Washers. As part of this agreement EMWD will provide a rebate to SoCalGas for every HE Washer installed within the two utilities' joint service territories. As water conservation continues to be a growing aspect of the Energy Savings Assistance Program, SoCalGas continues to explore leveraging opportunities with water agencies that fall within its service territories. With this leveraging partnership SoCalGas and EMWD are supporting a less expensive and more reliable energy resource base while continuing to provide energy benefit / savings to low income customers. Furthermore, allowing for the water district to claim the over 10,000 gallons per year savings demonstrates the utilities' statewide conservation efforts needed to address the state's water scarcity issues. Lastly, the rebate monies that EMWD provides to SoCalGas allows for Energy Savings Assistance Program dollars to be extended and fund a greater number of low income customer enrollments.

1.6.3. Please provide a status of the leveraging effort with CSD. What new steps or programs have been implemented for this program year? What was the result in terms of new enrollments?

In 2010, SoCalGas met with several of its LIHEAP agencies³² to discuss leveraging opportunities with the Energy Savings Assistance Program. SoCalGas developed a LIHEAP leveraging framework that helped its participating LIHEAP agencies capture installations of measures common to both Energy Savings Assistance Program and LIHEAP to assist SoCalGas in meeting the three measure minimum requirement. The participating LIHEAP agencies were given the opportunity to contribute to the plan and began capturing the

³² The state Department of Community Services & Development administers the federally funded Low-Income Home Energy Assistance Program (LIHEAP) in California.

workflow in the HEAT database during the fourth quarter of PY2010. The LIHEAP framework has resulted in 730 LIHEAP leveraged enrollments in PY2010. This is a 49% increase, compared with 491 LIHEAP leveraged enrollment in PY2009.

1.7. Integration Success Evaluation

1.7.1. Describe the new efforts in program year to integrate and coordinate the Energy Savings Assistance Program with the CARE program.

In PY2010, SoCalGas continued to integrate efforts and messaging through all of its marketing events by coordinating the Energy Savings Assistance Program with the CARE program to make customers fully aware of both programs. CARE customers who have not received Energy Savings Assistance Program services are targeted, using direct mail, outbound dialing, and email campaigns to ensure they have every opportunity to enroll in Energy Savings Assistance Program.

Other methods used throughout SoCalGas departments that integrate Energy Savings Assistance Program with CARE are:

- <u>Data Sharing</u>: Energy Savings Assistance Program shares data with the CARE Program. Customers who are found in the Energy Savings Assistance Program system are automatically enrolled for the CARE discount and exempt from PEV, if their income eligibility has been verified by the Energy Savings Assistance Program.
- <u>Integrated Voice Recording (IVR)</u>: Multi-lingual Energy Savings Assistance Program and CARE messages are made available on the IVR.
- <u>Branch Payment Offices</u>: Energy Savings Assistance Program and CARE information is displayed or is available in branch payment offices.

- Customer Contact Center: Customer Service Representatives inform customers about the Energy Savings Assistance Program and CARE programs when appropriate. When a customer inquires about CARE, Energy Savings Assistance Program information including a telephone number is provided. Also, SoCalGas integrated the Energy Savings Assistance Program for residential customers by mailing a conservation package to customers during bill inquiries; the package included information on CARE, Energy Savings Assistance Program, Medical Baseline, Energy-efficiency rebates, and energy-saving tips to help customers manage their gas bills, and State Department of Community Services and Development (CSD) programs.³³
- Email Campaigns: SoCalGas Customer Communications department deployed email campaigns in which both CARE and Energy Savings Assistance Program were promoted to new SoCalGas customers.³⁴ Additionally, an e-mail was sent to customers enrolled for the first time in the My Account³⁵ program. Customers enrolled in the My Account program, who are identified as being on the CARE program, receive an e-mail encouraging them to apply for the Energy Savings Assistance Program's no cost home improvements. The e-mail campaign features the Energy Savings Assistance Program services and included links to drive customers to the on-line Energy Savings Assistance Program request (lead) form.
- Credit and Collections: During collection days, SoCalGas Field Representatives deliver pending disconnection notices in person to senior citizens and disabled customers.³⁶ Because collections involve customers who are struggling to pay their

³³ In 2010, there 4,917 English and 1,832 Spanish packages sent.

³⁴ New SoCalGas customers received a welcome e-mail from SoCalGas informing them about available assistance programs.

³⁵ My Account is an online service SoCalGas provides so that customers may: go paperless; pay bills; request payment arrangements; start, stop, or move gas service; and schedule gas appliance service.

36 SoCalGas customer service records on disability and age are captured in CIS. Customers self-identified as having

a disability, and this information is captured in CIS.

bills due to financial issues, customer assistance information is provided to field collectors who can educate customers about Energy Savings Assistance Program and CARE.

- <u>Joint Electronic Newsletter</u>: "Outreach Around the Region", a quarterly e-newsletter was sent to over 1,300 CBOs and CARE/Energy Savings Assistance Program contractors. The e-newsletter served as a news update and included articles about SoCalGas' Energy Savings Assistance Program and CARE programs, and other news about SoCalGas' programs.
- Events and Other Ethnic Media Advertising: SoCalGas and SCE teamed up for four telethons. The telethons were broadcasted on KMEX-TV (Univision, Los Angeles) "A Su Lado" to inform Spanish speaking viewers about Utility programs, including CARE, Energy Savings Assistance Program and other assistance programs. Viewers were invited to call a toll-free telephone number to apply for CARE and Energy Savings Assistance Program as well as receive information on other assistance programs. At each telethon, there were hundreds of calls/leads generated during the segments. Customers expressed gratitude for the utilities offering such valuable assistance programs and for taking the time to conduct a live telethon.
- <u>Winter Media Campaign:</u> Energy Savings Assistance Program and CARE information was coordinated to be promoted as part of the yearly winter media campaign to bring awareness to customers who are eligible to enroll and have not participated in the enrollment of these programs.

1.7.2. Describe the new efforts in program year to integrate and coordinate the Energy Savings Assistance Program with the Energy Efficiency Residential Program.

In 2010, SoCalGas' Energy Savings Assistance Program and the EE Residential Programs continued to work to coordinate their programs so that customers could receive benefits from

both programs without difficulty. The most meaningful step for customers is to lead potentially eligible low income customers toward the Energy Savings Assistance Program. Reaching low income customers prior to the receipt of EE installations prevents potential issues with the three measure minimum standard that is a component of the Energy Savings Assistance Program. For example, if a low income customer receives a measure through one of the EE Residential Programs before Energy Savings Assistance Program enrollment, then subsequently that customer may not qualify for enrollment into the Energy Savings Assistance Program (if after EE installations there are less than three feasible Energy Savings Assistance Program installation measures, or minimum energy savings remaining). Therefore to preempt the noted issue, coordinating leveraging so that Energy Savings Assistance Program eligibility is reviewed first, is essential to maintaining customers' opportunities to achieve additional energy and cost savings found in the comprehensive mix of Energy Savings Assistance Program measures.

In 2010, the Energy Savings Assistance Program continued to work diligently with the EE's Third Party Programs multi-family segment to screen multi-family complexes that house residents with a high probability of being eligible for the Energy Savings Assistance Program. The multi-family segment of EE's Third Party Programs is a program whereby contractors directly install energy and water savings measures into multi-family complexes. This EE Program does not target customers by income; therefore, some low income customers have been treated under the program. Due to the three measure minimum standard set within the Energy Savings Assistance Program, if a low income customer were to receive these measures through this direct EE installation program, then that customer could potentially become ineligible for the Energy Savings Assistance Program because the residence may no longer need at least three Energy Savings Assistance Program measures or meet energy savings requirements.

To manage a potentially missed Energy Savings Assistance Program integration opportunity, both programs followed a process that was devised in 2009 where the program contractors that install EE measures at multi-family complexes first send the sites targeted for installation to the EE Third Party program manager for review. Upon receiving the list of

targeted sites, the EE program manager shares the list with the Energy Savings Assistance Program to screen those complexes that have residents with a high probability of being eligible for the Energy Savings Assistance Program. Those multi-family complexes that are screened and removed from the list of targeted sites are forwarded to Energy Savings Assistance Program contractors to contact and enroll individual residents from those complexes into the Energy Savings Assistance Program. This process was established in order to ensure that all eligible low income customers are given the opportunity to achieve the maximum energy and cost savings offered by the Energy Savings Assistance Program. Throughout 2010, this process was followed and over 700 multi-family complexes, with over 23,000 potentially eligible low income customers were screened for Energy Savings Assistance Program enrollment.

In addition, one SoCalGas Energy Savings Assistance Program contractor does 100% integration between Energy Savings Assistance Program and EE through the servicing of mobile homes. In 2010, SoCalGas enrolled 4,935 enrollments as a result of this integration effort with the Energy Savings Assistance Program /EE mobile home program.

1.7.3. Describe the new efforts in program year to integrate and coordinate the Energy Savings Assistance Program with the Energy Efficiency Government Partnerships Program.

In PY2010, SoCalGas continued to make use of its Public Affairs (PA) Department contacts to broaden public awareness regarding the Energy Savings Assistance Program in order to pursue greater energy and cost savings opportunities and to increase awareness amongst potentially eligible customers for enrollment into the program. SoCalGas PA representatives were instrumental in arranging meetings with various city, county, and state contacts with the goal of expanding Energy Savings Assistance Program visibility and success. The Energy Savings Assistance Program focused on this integration, rather than work with the Energy Efficiency Partnerships Program to accomplish similar objectives. However, in the future the "Energy Efficient Government Partnerships Programs" may be relied upon as vital to the

Energy Savings Assistance Program's continuous efforts to explore and develop external associations that will benefit its low income customers.

1.7.4. Describe the new efforts in program year to integrate and coordinate the Energy Savings Assistance Program with any additional Energy Efficiency programs.

As Energy Savings Assistance Program is a residential program, SoCalGas currently focuses its integration efforts with EE Residential Programs. This is discussed under Section 1.7.2 of this report.

1.7.5. Describe the new efforts in program year to integrate and coordinate the Energy Savings Assistance Program with the Demand Response Programs.

SoCalGas does not have a residential demand response program; therefore, this section is not applicable to SoCalGas.

1.7.6. Describe the new efforts in program year to integrate and coordinate the Energy Savings Assistance Program with the California Solar Initiative Programs.

During 2010 Energy Savings Assistance Program staff remained current with the activities of the CSI-Thermal Program. Integration has not yet happened but will be further explored in 2011.

1.8. Workforce Education & Training

1.8.1. Please summarize efforts to improve and expand Energy Savings Assistance Program workforce education and training. Describe steps taken to hire and train low income workers and how such efforts differ from prior program years.

Throughout 2010 SoCalGas enhanced and expanded Energy Savings Assistance Program workforce education and training by continuously making improvements to the delivery of its enrollment and assessment classes, as well as expanding the technical content of its weatherization, HVAC and NGAT training classes.

Los Angeles Trade Technical College (LATTC) was the winning bidder for the CPUC WE&T Pilot. LATTC collaborated with TELACU and CES as their industry partners and with SoCalGas as their IOU partner. The WE&T pilot efforts included development meetings, industry ride-alongs, and identification of Energy Savings Assistance Program areas to be included in LATTC's training curriculum. The LATTC campus is located within a targeted low income area in the City of Los Angeles and draws their students from the surrounding communities. Although the WE&T pilot ended in January 2011, it provided a great value to students looking for jobs in the field of weatherization and other emerging green-related industries. As a result of this pilot, industry partners were able to increase their workforce by a total of 21 employees and have retained 13. While LATTC did not offer an Outreach Specialist cohort they did offer a skill enhancement cohort to help potential Outreach Specialist candidates prepare for the utility class. Of the 13 employees that attended testing, five passed and four were employed by industry partners. Two employees are currently still performing the job. The goal of the CPUC WE&T Energy Savings Assistance Program Certification.

The Energy Savings Assistance Program contractor network pulls the majority of its labor resources from the local areas it services, including the low income communities within the SoCalGas' service territory. SoCalGas contributed to the CPUC-sponsored effort to encourage attendance at the various Census Worker job fairs that helped displaced census

canvassers find new opportunities for employment. Several SoCalGas Energy Savings Assistance Program contractors attended the census recruitment events throughout the utility service territory and were able to hire census workers. Census workers have already gone through a background check and bring new experience in outreach and canvassing to the SoCalGas contractor network. SoCalGas supports the Energy Savings Assistance Program contractor network recruitment efforts in local jobs fairs by providing marketing material to help promote the program.

In an effort to accommodate contractor growth SoCalGas increased the number of classes it offers from one class per month to two classes per month. This allowed contractors to hire workers needed to help SoCalGas achieve its program goals. SoCalGas also continued to sponsor the NGAT training to weatherization crews, in addition to HVAC crews, in order to increase their technical expertise. This increased the quality of services, and increased level of secondary assessment.

All SoCalGas Energy Savings Assistance Program services are provided by third party contractors and the SoCalGas Energy Savings Assistance Program contractor network includes both private and CBOs who recruit employees from low income communities. SoCalGas works with its contractor network to improve its Outreach and Assessment by continuously asking them to provide their feedback on SoCalGas' training requirements and curriculum. SoCalGas was expedient in making curriculum changes and updates that resulted from any CPUC decision or requirements. To help facilitate and encourage enrollment into training SoCalGas created several custom email inboxes to help streamline communications with contractor network. The Energy Savings Assistance Program training programs supported by SoCalGas are critical in maintaining a high quality of service for Energy Savings Assistance Program customers as well as for program implementation.

1.8.2. Please list the different types of training conducted and the various recruitment efforts employed to train and hired from the low income energy efficiency workforce.

SoCalGas continued its internal training programs which provide two areas of training: 1) Enrollment and Assessment (E&A) and 2) Energy Savings Assistance Program Operations. SoCalGas also required contractors to ensure that their employees are trained in the jobs that they perform. All Energy Savings Assistance Program services were provided by third party contractors. Thus, the students who attended these training classes are hired by the Energy Savings Assistance Program contractor network. Outreach specialists were usually subcontractors to the Energy Savings Assistance Program contractors and may not be direct employees. However, the potential Outreach specialist must still be successful in passing the required training and background check.

SoCalGas staff provided a 5-day enrollment and assessment training class to its Energy Savings Assistance Program contractor representatives. Outreach specialists, who were referred by the Energy Savings Assistance Program contractors, were required to complete training before they could receive an identification badge to work under the SoCalGas Energy Savings Assistance Program. SoCalGas provides initial and refresher training for weatherization, HVAC and NGAT. The contractor representatives are hired employees of the Energy Savings Assistance Program contractors and are expected to arrive with the skill sets required to complete installation services. Installers were also given an aptitude test that they must pass in order to receive an identification badge to work under the SoCalGas Energy Savings Assistance Program. This is in addition to a review of customer service standards and expectations.

Type of training or recruitment conducted	Employees ¹ attended	Employees ¹ eligible ²
Skill Level Test	448	334
Enrollment & Assessment Class	322	291
Weatherization and HVAC Initial	63	257
Weatherization Refresher	31	331
NGAT	15	152

¹SoCalGas does not hire employees to provide outreach and assessment or weatherization services. The students that attend classes are hired by SoCalGas Energy Savings Assistance Program contractors. ²Employees eligible refers to those who are eligible to perform the job function related to the training.

1.9. Legislative Lighting Requirements Status

Because SoCalGas is a gas-only utility, Section 1.9 is not applicable to the SoCalGas Energy Savings Assistance Program.

1.10. Studies

1.10.1. For each Study, provide 1) a summary describing the activities undertaken in the study since its inception; 2) the study progress, problems encountered, ideas on solutions; and 3) the activities anticipated in the next quarter and the next year.

Four statewide studies were planned for the 2009 to 2011 program cycle. These include: (1) an impact evaluation, (2) a process evaluation, (3) a study of non-energy benefits, and (4) a study of refrigerator degradation. The first three studies are described below, and the fourth study was not applicable to SoCalGas.

(1) Joint Utility³⁷ 2009 Energy Savings Assistance Program Impact Evaluation

The prime research contractor for the 2009 impact evaluation was ECONorthwest. Energy Division staff selected the contractor and managed the study. SCE holds the contract with the contractor for the project.

The objective of the impact evaluation was to provide electric and gas savings estimates by measure, utility, household, weather zone, and other relevant dimensions for the 2009 Energy Savings Assistance Program. The results of this evaluation were intended to inform the planning and development of the 2012-14 application.

³⁷ The Joint Utilities are PG&E, Southern California Edison Company (SCE), SoCalGas, and San Diego Gas and Electric Company (SDG&E).

The results provided data to quantify the 2009 program achievements and document the relative value of various measures in producing energy savings. Analyses of the program impacts on energy savings are being used to update savings forecasts, complete other Energy Savings Assistance Program analyses, and meet filing and reporting requirements. The impact evaluation conducted during this program cycle focused additional resources on understanding behavioral and/or housing-related variables relevant to heating and cooling impacts. In particular, more in-depth data were collected and further analyses were conducted on furnaces and evaporative coolers.

The primary analyses of the data were done via utility billing data. Additional primary data collection included phone surveys with participants and non participants; as well as in-home audits and interviews with a smaller sample of participants. Engineering analyses of some small and new measures were also conducted.

The statewide impact evaluation commenced with a kickoff meeting for all interested parties in September of 2009. To date, all data has been collected and most of the analysis is complete. A draft report was delivered in March 2011. A workshop was held on March 28th to discuss the results, after which the report will be finalized.

(2) Joint Utility Energy Savings Assistance Program Process Evaluation

The prime research contractor for the process evaluation was Research Into Action. Energy Division staff selected the contractor and managed the study. PG&E holds the contract with the contractor for the project.

The purpose of the study was to evaluate the effectiveness of program delivery strategies and provide recommendations for improvement. The work scope consisted of a combination of telephone surveys of program participants and nonparticipants, telephone interviews of utility program staff and contractors, focus groups with contractors, and ride-alongs with contractors.

The statewide process evaluation commenced with a kickoff meeting for all interested parties

in August 2010. To date, all the data and analysis has been completed and a draft report was

delivered February 25, 2011. A workshop was held on March 28, 2011 to discuss the results,

after which the report will be finalized.

(3) <u>Joint Utility Non-Energy Benefits (NEBs) Study</u>

The prime research contractor for the process evaluation was Skumatz Economic Research

Associates. A statewide advisory group selected the contractor and SDG&E managed the

study and held the contract with the contractor for the project.

The purpose of the study was to research the available literature on non-energy benefits and

provide a recommended methodology for updating the current non-energy benefit values

used for testing the cost effectiveness of the Energy Savings Assistance Program. The work

scope consisted of an extensive literature review and synopsis of relevant ranges of values

used in other programs.

The statewide study of non-energy benefits commenced with a kickoff meeting for all

interested parties in August 2009. A final report was delivered and vetted in a public

workshop on May 25, 2010. Initially, a phase two study was planned to develop the

recommendations from this report; however, it was decided by the statewide advisory group

that the results of the "phase one" study showed that values had not changed much from what

was currently being used, and minor updates could be done by the IOUs with data on hand.

1.10.2. If applicable, submit Final Study Report describing: 1)

Overview of study; 2) Budget spent vs. authorized budget; 3)

Final results of study; and 4) Recommendations.

See Section 1.10.1(3) for a summary of the Joint Utilities Non-Energy Benefits Study. A

copy of the final report for the Non-Energy Benefits Study is provided as Attachment A. The

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authorized budget was \$300,000 (for a planned two-phase study), and the total expenditures for the completed one-phase study came to \$123,853.

1.11. Pilots

1.11.1. For each Pilot, provide 1) a summary describing the activities undertaken in the study since its inception;2) the study progress, problems encountered, ideas on solutions; 3) the activities anticipated in the next quarter and the next year; and 4) Status of Pilot Evaluation Plan (PEP).

In its 2009 to 2011 Application SoCalGas proposed a pilot that would offer natural gas highefficiency (HE) forced-air unit (FAU) furnaces to customers with high winter season space heating needs. The pilot was originally designed to target approximately 250 low-income homes with space heating usage at or above 300 therms during the winter season of November through March (winter season). The goal of the pilot was to replace an existing, inefficient operational natural gas FAU furnace, (defined as units with an Annual Fuel Utilization Efficiency (AFUE) rating of 65 or lower) with a new high-efficiency FAU furnace (with an AFUE rating \geq 92). The replacement of these high-use inefficient FAU furnaces with the high-efficiency units would produce a lower bill for the customer and also provide long-term energy savings. Expected energy efficiency gains were estimated at 29% per FAU installed, ³⁸ and anticipated energy savings were an average of 88 therms per customer during the 4 month winter season. Three existing SoCalGas Energy Savings Assistance Program contractors, Community Action Partnership (CAP) of San Bernardino, Reliable Energy Management Company (REMCO), and The East Los Angeles Community Union (TELACU) were selected for the pilot based on their ability to provide full HVAC services and who were already SoCalGas Energy Savings Assistance Program contractors. These contractors had the ability to assess for, finance and install the required equipment on

³⁸In Advice Letter No. 3945 filed on January 5, 2009, SoCalGas stated that an energy efficiency gain of 42% was anticipated. However, it was subsequently realized that this was based on an incorrect calculation and the correct efficiency gain was 29.3%.

an accelerated timeline. Customers were selected to participate in the pilot based on the following criteria: 1) customers who already had an existing, working furnace; 2) customers who lived in single-family homes and customers who owned their home; 3) customers with space heating usage of 300 therms or above during the 2008-2009 winter season; and, 4) customers with furnaces that had an AFUE rating of 65 or lower.

Based on the 41 observations, it appears that positive results can be expected for both therm savings and cost effectiveness. However, SoCalGas does not recommend that the HE FAU replacement be added to the Energy Savings Assistance Program furnace repair and replacement measure. This is due primarily to the recent development of newer and more energy efficient (95 AFUE) forced-air units and the phasing-out of the 92 AFUE units used in the pilot. Uncertainties around the cost of new 95 AFUE FAU's and the availability of the units used in the pilot make it difficult if not impossible to determine the feasibility of HE FAU replacement as a full measure. Because high efficiency FAU's continue to increase in efficiency, SoCalGas would also need to continue to conduct cost-effectiveness tests to verify that new models would still be eligible for the Energy Savings Assistance Program. Additionally, SoCalGas faced many unexpected obstacles (as outlined above) even though a diligent effort was made to find and provide customers with this service.

1.11.2. If applicable, submit Final Pilot Report describing: 1)
Overview of pilot; 2) Description of Pilot Evaluation Plan
(PEP); 3) Budget spent vs. authorized budget; 4) Final results
of pilot (including effectiveness of the program, increased
customer enrollments or enhanced program energy savings);
and 5) Recommendations.

A copy of the final report for the HE FAU is provided as Attachment B. The authorized budget was \$625,000 and the total expenditures for the completed pilot were \$109,834.

1.12. "Add Back" Measures

1.12.1. If the "add-backs" compromise the IOUs' ability to meet the 2020 Plan goal that 100% of eligible and willing customers will have received all cost effective Energy Savings Assistance Program measures, how does the IOU propose to address the shortfall in other parts of the Energy Savings Assistance Program?

The inclusion of "add backs" in the current program will not impact the utility's ability to meet the 2020 plan goal that 100% of eligible and willing customers will have received all cost effective Energy Savings Assistance Program measures because through effective program management SoCalGas is able to control program costs and deliver customers all feasible measures. The total count and expenditures related to "add back" measures are provided in Table 18. Because SoCalGas does not currently anticipate any impacts to the program, it will continue to install the "add back" measures, when feasible.

2. CARE Executive Summary

2.1. Participant Information

2.1.1. Provide the total number of residential CARE customers, including sub-metered tenants, by month, by energy source, for the reporting period and explain any variances of 5% or more in the number of participants

Table 1			
CARE Residential Program			
Customers by Month			
		%	
Month/Year	Customers	Change	
Jan-10	1,571,380	0.69%	
Feb-10	1,573,709	0.15%	
Mar-10	1,584,793	0.70%	
Apr-10	1,614,136	1.85%	
May-10	1,633,528	1.20%	
Jun-10	1,656,356	1.40%	
Jul-10	1,676,643	1.22%	
Aug-10	1,689,241	0.75%	
Sep-10	1,685,144	-0.24%	
Oct-10	1,697,404	0.73%	
Nov-10	1,707,036	0.57%	
Dec-10	1,714,044	0.41%	

2.1.2. Describe the methodology, sources of data, and key computations used to estimate the utility's CARE penetration rates by energy source

2.1.2.1 Describe how the estimates of current demographic CAREeligibility rates, by energy source for the pre-June 1st periods, were derived.

CARE eligibility for PY 2010 was developed using the joint utility methodology approved by the California Public Utilities Commission in Decision (D).01-03-028. This method entails annual estimation of CARE eligibility at the small area (block group, census tract, zip) for each utility as well as for the state. Sources for this estimation include the Commission's current CARE guidelines, current year small area vendor distribution on household characteristics, census Public Use Microdata Sample (PUMS) 2005-2009 American Community Survey ("ACS/PUMS") U.S. Census and Integrated Public Use MicroData Series ("IPUMS-CPS") Minnesota Population Center, University of Minnesota; Labor Market Information Data ("EDD/LMID") California Employment Development Department and additional vendor data sources, including projected small area unemployment data from Synergos Technologies, Inc. and Environmental Systems Research Institute, Inc.

Each quarter SoCalGas applies the county and utility level eligibility factors to its current set of residential meter counts, for CARE this includes both the metered and sub-metered housing units. Once the factors are applied, an estimate for income-eligible customers is generated.

In D.06-12-038 the Commission granted the IOUs' request to file the annual CARE eligibility estimates on October 15th of each year.

The updated CARE eligibility estimates for 2010 were submitted to the Commission December 29, 2010 by Southern California Edison on behalf of itself and the other IOUs'.³⁹

2.1.2.2. Describe how the estimates of current CARE-eligible meters were derived. Explain how total residential meters were adjusted to reflect CARE-eligible meters (i.e., master meters that are not sub-metered or other residential meter configurations that do not provide residential service.)

To derive the estimates of current CARE-eligible meters, SoCalGas counts all residential meters and residential sub-metered units and subtracts the residential accounts with billing tariffs that do not qualify for CARE. This equation equals the number of eligible residential meters for the CARE program in the SoCalGas territory.

2.1.2.3. Discuss how the estimates of current CARE-eligible households were developed.

See SoCalGas' response above in Section 2.1.2. Note that the methodology is based on estimating small area (block group) level household size, by income and householder-age tabulations for the current year and connecting these estimates with small area counts of households that are individually metered or sub-metered. Block group/utility-specific estimates are then disaggregated/aggregated to various geographic levels within a given utility area: zip+2, zip, tract, county, territory, etc. Statewide estimates, regardless of utility boundaries, are also provided at small and large area levels.

³⁹ Compliance Filing Of Southern California Edison Company (U 338-E) On Behalf Of Itself, Southern California Gas Company (U 904-G), San Diego Gas & Electric Company (U 902-M), Pacific Gas And Electric Company (U 39-M), Regarding The Annual Estimates Of Care Eligible Customers And Related Information, Filed October 15, 2010.

2.1.2.4. Describe how current CARE customers were counted.

Current CARE customers were counted by tallying the number of individually metered residential customers with active CARE enrollment status, plus the number of sub-metered tenants receiving service through residential master-metered accounts participating in the CARE Program.

2.1.2.5. Discuss how the elements above were used to derive the utility's CARE participation rates by energy source.

The formula for calculating CARE-participation is:

Number of CARE Customers

Number of Estimated CARE-Eligible Households

2.1.3. Provide the estimates of current demographic CARE-eligibility rates by energy source at year-end.

SoCalGas is a single energy-source utility (natural gas). At year-end 2010, 33.9% or 1,796,889 of SoCalGas' 5,298,373 residential meters were estimated to be eligible for the CARE discount.

2.1.4.Provide the estimates of current CARE-eligible sub-metered tenants of master-meter customers by energy source at year-end.

At year end 2010, SoCalGas had 143,753 sub-metered tenants in 1,819 mastermeter facilities. Assuming 53.73% of its sub-metered residential customers are

eligible for CARE, SoCalGas estimates 77,238 of its sub-metered tenants are CARE eligible.

2.1.5. Provide the current CARE sub-metered tenant counts by energy source at year-end.

As of year end 2010, SoCalGas had 44,390 sub-metered tenants participating in the CARE program.

2.1.6. Provide the current CARE sub-metered penetration rates by energy source at year-end.

SoCalGas estimates 57.5% of its CARE eligible sub-metered tenants were enrolled in the CARE program as of year end 2010.

2.1.7. Discuss any problems encountered during the reporting period administering the CARE program for sub-metered tenants and/or master-meter customers.

Pursuant to D.08-11-031, SoCalGas began to allow its sub-metered tenants to recertify their CARE eligibility every two years instead of annually. Further, sub-metered fixed income tenants were allowed to begin recertifying every four years. Prior to this change in policy, all sub-metered tenants were accustomed to completing their recertification process at the same time each year. The shift from the annual cycle to the two or four year recertification cycles conflicted with customers' expectations that re- certifications would occur annually. As such, this change created confusion for both tenants and property managers. In an effort to address this issue, SoCalGas' CARE staff created and generated letters notifying individuals of the changes in recertification due dates.

During 2010, SoCalGas did not encounter problems administering the CARE program for sub-metered and/or master-metered customers; however, when necessary, reminder letters are still issued to customers who have not yet embraced the positive change that they are no longer required to recertify their CARE eligibility annually.

2.2. CARE Program Summary

2.2.1. Please provide CARE program summary costs

CARE Budget Categories	Authorized Budget	Actual Expenses	% of Budget Spent
Outreach	\$3,755,053	\$3,231,355	86%
Proc., Certification and Verification	\$1,235,832	\$1,230,667	100%
Information Tech./Programming (1)	\$506,003	\$489,218	97%
Pilots (2)	\$0	\$0	0%
Measurement and Evaluation	\$16,707	\$0	0%
Regulatory Compliance	\$229,513	\$175,131	76%
General Administration	\$585,518	\$619,881	106%
CPUC Energy Division Staff	\$171,500	\$46,571	27%
Cooling Centers (3)	N/A	N/A	N/A
Total Expenses	\$6,500,126	\$5,792,823	89%
Subsidies and Benefits (4)	\$134,237,154	\$119,090,538	89%
Total Program Costs and Discounts	\$140,737,280	\$124,883,361	89%

2.2.2. Please provide the CARE program penetration rate to date.

CARE Penetration Year-end 2010				
Participants Enrolled	Eligible Participants	Penetration rate	Target Met?	
1,720,017	1,842,984	93.3%	Yes	

2.2.3. Report the number of customer complaints received (formal or informal, however and wherever received) about their CARE recertification efforts, and the nature of the complaints.

CARE Recertification

	Complaints		Cases
Month	Received	Nature of Complaint	Resolved
		Customers called the IVR and were transferred	
		to the Spanish message when they selected	
		English.	
January	2	Customers were recertified over the phone.	Yes
		Customer called the IVR and was transferred to	
		the Spanish message when customer selected	
		English.	
		Customer stated the automated recertification	
		call was too late.	
February	2	Customers were recertified over the phone.	Yes
		Customer was confused by the IVR system and	
		entered incorrect information.	
		Customer entered incorrect information into the	
		IVR.	
		Customer believes she was incorrectly denied	
		by the IVR.	
June	3	Customers were recertified over the phone.	Yes

2.3. CARE Program Costs

2.3.1. Discount Cost

2.3.1.1. State the average monthly CARE discount received, in dollars, per CARE customer by energy source.

The average monthly discount received per SoCalGas CARE customer in 2010 was \$5.85⁴⁰ per month.⁴¹

 $^{^{40}}$ The average monthly rate discount was computed by dividing the CARE rate discount recorded to the CARE balancing account in 2010 by the monthly residential CARE customers: the total of the 12 months was then divided by 12 for the average monthly CARE discount per customer.

⁴¹ This number does not reflect the CARE customers who received a discount on their Service Establishment Charge (SEC).

2.3.1.2. State the annual subsidy (discount) for all CARE customers by energy source

SoCalGas' CARE customers and expanded CARE customers (i.e. farm and migrant workers, and those living in non-profit group living facilities or agricultural housing) received \$115,209,918 in natural gas rate discounts and \$3,880,620 in SEC discounts in 2010. The 2010 annual subsidy for all SoCalGas CARE customers exceeded \$119 million.

2.3.2. Administrative Cost

2.3.2.1. Show the CARE Residential Program's administrative cost by category.

See section 2.2.1 or CARE - Table 1 in the attachments.

2.3.2.2. Explain what is included in each administrative cost category.

Outreach: Included within this category are costs for the printing and mailing of CARE applications and correspondence, the printing and mailing of Senate Bill (SB) 920⁴² annual notification, postage, bill inserts, brochures, flyers, advertising, direct mailing campaigns, telephone campaigns, web campaigns, third party outreach, community event sponsorships and support, distribution of collateral materials, outreach

⁴² SB 920 requires that homeowners and residents of a master-metered park shall receive notification in their utility billing statement of the assistance available to them under the CARE program. This notification must be received on or before February 1st of each year.

staff labor, and other outreach and enrollment efforts. Capitation payments and any agency-related outreach support efforts are also included in this category. Capitation payments are compensation fees paid to CBOs that assist SoCalGas in enrolling hard-to-reach CARE-eligible customers in the program.

Processing, Certification and Verification: These costs include the CARE Processing Group labor and data scanning costs. The function of the CARE group includes: 1) opening and sorting CARE application forms; 2) processing all CARE applications; 3) initiating and responding to customers' inquiries regarding CARE applications and or the program; and 4) tracking CARE enrollment and operating statistics in support of operations, management, and regulatory reporting.

Information Technology (IT) Programming: Included in this category are IT staff costs to maintain the SoCalGas CARE application billing system, CARE documents, CARE database, system reports, data exchanges with other utilities: to conduct system enhancements to comply with Commission mandates; and improve operational efficiency.

Measurement and Evaluation: This category includes costs for the annual CARE eligibility rate updates and the Needs Assessment.

Regulatory Compliance: These costs include labor and non-labor costs for the preparation and filing of various regulatory filings including: program applications, advice letter filings, comments and tariff revisions, preparation of reports and studies; attendance at working group meetings, and public input meetings and other Commission hearings or meetings.

General Administration: General administration costs include program management labor, office supplies, market research, and general business expenses.

<u>Commission Energy Division Staff Funding:</u> This category includes costs incurred by Energy Division staff in support of the Commission's authorized low-income programs.

2.3.3. Provide the year-end December 31 balance for the CARE balancing account.

At year-end 2010, the CARE balancing account was over-collected by \$4,694,589.86.

2.3.4. Describe which cost categories are recorded to the CARE balancing account and which are included in base rates.

The recorded costs in the CARE balancing account include the Service Establishment Charge (SEC) discounts, all rate discounts, surcharge revenues, amortization, interest, and Administrative costs described in Section 2.3.2.2.

2.3.5. Provide a table showing, by customer class, the CARE surcharge paid, the average bill paid, the percentage of CARE surcharge paid relative to the average bill, the total CARE surcharge collected, and the percentage of total CARE revenues paid.

See CARE - Table 10 in the attachments.

2.4 Outreach

2.4.1 Discuss utility outreach activities and those undertaken by third parties on the utility's behalf.

Utility Outreach

SoCalGas focused on increasing CARE Program awareness and customer participation through the use of mass media, direct mail, automated messaging,

bill inserts (and other bill-related communications), door-to-door promotion and community outreach.

Mass Media: SoCalGas used various forms of mass media including radio, TV, print, and others to inform customers of the CARE Program. Media messages were usually in English, but SoCalGas also launched campaigns that were bilingual (English and Spanish), as well as one in Chinese.

January "Hardship Campaign": During January, SoCalGas continued its "hardship" multi-channel mass media campaign, targeting low-income customers throughout its service area. Print-based media was the primary channel and also included traffic radio, TV billboards and public service announcements to promote its low-income programs. The campaign included messages promoting SoCalGas' CARE and Energy Savings Assistance Programs.

April Joint Utility, Spanish Language Radio: SoCalGas worked with Southern California Edison counterparts to develop a CARE/ Energy Savings Assistance Programs dialogue session on the popular Spanish-language radio talk show "Mujeres Ahora." The sixty minute segments were aired throughout the month.

May multi-channel: SoCalGas conducted a large scale, multi-channel, mass media campaign to promote the CARE program to select, low-income customer groups. The campaign was advertised in eight community publications to reach African-American customers. A combination of print ads, traffic radio spots, and TV sponsorships were used to reach customers who speak Chinese, Filipino, Korean & Vietnamese, as well as customers who are Hispanic and seniors. Public Service Announcements augmented this campaign.

<u>June Univision "A Su Lado" CARE/ Energy Savings Assistance Programs</u>
<u>Telethon:</u> SoCalGas and Southern California Edison collaborated on a telethon broadcasted on KMEX-TV (Univision, Los Angeles). "A Su Lado," (*on your*

side) informed Spanish speaking viewers about the utilities' low-income programs. Viewers were invited to call a toll-free telephone number to apply for CARE and Energy Savings Assistance Programs. Each utility provided Spanish speaking representatives to answer calls.

August San Luis Obispo: SoCalGas conducted a localized CARE print and media campaign in San Luis Obispo County. The campaign included a half-page color advertisement in the Sunday editions of the San Luis Obispo *Tribune*, Public Service Announcements, and a television interview with SLO County Supervisor Adam Rich, who issued a formal resolution declaring the month of August as "low-income energy efficiency and CARE month" in San Luis Obispo County.

<u>August/September Radio Campesina</u>: SoCalGas secured free traffic spots for the CARE and Energy Savings Assistance Programs on Radio Campesina, a Spanish-language station that serves Fresno, Kings, and Tulare counties.

<u>December multi-channel</u>: SoCalGas launched a campaign to promote CARE, Energy Savings Assistance Programs, and Medical Baseline Allowance programs: traffic spots, online banners, and Transit TV (the on-bus televisions on Los Angeles MTA buses). The campaign was bilingual and referenced the SoCalGas web site in both English and Spanish.

December Univision "A Su Lado" CARE/ Energy Savings Assistance

Programs Telethon: SoCalGas and Southern California Edison collaborated on a telethon broadcasted on KMEX-TV (Univision, Los Angeles). "A Su Lado," (*on your side*) informed Spanish speaking viewers about the utilities' low-income programs. Viewers were invited to call a toll-free telephone number to apply for CARE and Energy Savings Assistance Programs. Each utility provided Spanish speaking representatives to answer calls.

Direct Mail: Direct mail continued to be a versatile and effective method for enrolling CARE customers. SoCalGas launched three direct mail campaigns throughout the year: January, June (to announce new eligibility guidelines), and September. The campaigns were strategic and targeted zip codes and PRIZM codes to communicate to customers who are potentially eligible for the CARE Program. Throughout 2010, SoCalGas sent approximately 1.3 million pieces. In general, there was a 10% return rate for these direct mail campaigns.

Bill Message: CARE bill messages were printed in both English and Spanish on non-participating customers' bills, quarterly during 2010. Additionally, if applicable, CARE bill messages were sent out 45 days after a PEV letter is mailed to remind customers that SoCalGas has not received their verification application and proof of income. If after 120 days, SoCalGas had not received customer responses, SoCalGas sent customers a bill message, informing them that they had been removed from the program.

Bill Inserts: Bill inserts were a low-cost method to create program awareness and encourage enrollment. The insert/applications were bilingual (English/Spanish) and contained basic information. The June bill insert highlighted the new eligibility qualifications (published during June). During 2010, approximately 6 million bill inserts were sent to customers.

Automated Voice Messaging: In order to encourage eligible customers to remain on the CARE program, SoCalGas sent an email (when email address is on file) and initiated an automated phone call to customers whose CARE eligibility is set to expire. The email prompted the customer to go to a web site where the customer can re-enroll online. The automated phone call allowed the customer to re-enroll when receiving the call. If the customer did not answer and the customer had an answering machine, the customer was directed to call a toll-free number.

Direct Mailing to Sub-metered Apartments and Mobile-Home Parks:

SoCalGas continued to conduct its annual SB920 targeted mailing in its service territory to the 1,819 master-meter facilities with sub-metered customers in PY2010. SoCalGas also continued to work with master-metered facilities with sub-metered tenants to maintain compliance with both AB 2140and AB 2857. There are currently 143,753 units represented by these customers and PY2010 sub-metered CARE Program participation was 44,390 at year end.

Cross Program Promotion: SoCalGas coordinated the communications for the CARE Program, as well as its other programs and services in a manner that provided clear, comprehensive and consistent messages to its customers. Communication and outreach opportunities were sought out to cross promote the CARE Program with other customer assistance programs and general market (rebate and or incentive) programs to maximize customer value and reduce costs. Mass media cross advertising campaigns incorporating both SoCalGas' CARE and Energy Savings Assistance Program customer assistance programs are conducted annually. The ability to apply for CARE through SoCalGas' Energy Savings Assistance Program applications made it easier for customers to obtain services and other SoCalGas program information simultaneously. Customer information obtained from SoCalGas' Energy Savings Assistance Program and Gas Assistance Fund (GAF) Programs, along with LIHEAP is used for CARE enrollment, recertification, and verification purposes. Certain collateral materials used by SoCalGas' outreach department and field operations personnel have been specifically designed to provide customers with information on all available lowincome and special needs customer programs and services.

Temporary Energy Assistance for Families (TEAF)

Temporary Energy Assistance for Families was a program designed to assist families with minors, less than 18 years old, in the household with overdue utility bills and facing possible utility disconnections. The program was sponsored by California's four investor-owned utilities and administered by the Salvation

Army. It leveraged the federal stimulus emergency funds from the Temporary Assistance for Needy Families (TANF) to provide 80% of the matching funds while utility ratepayers provided the other 20% for utility bill assistance. The program was effective from August to September 21.

<u>SoCalGas.Com Web site</u>: The SoCalGas web site (www.socalgas.com) was a component of virtually all communications. Web site content was monitored to provide customers with up-to-date information. Program brochures had a special section promoting customer e-mail use for correspondence. CARE web site information is available in English, and Spanish and downloadable PDFs in Arabic, Armenian, Chinese, Hmoob, Farsi, Khmer, Korean, Russian, Tagalog, Thai and Vietnamese. CARE applications were downloaded by SoCalGas customers from the CARE web site, resulting in enrollments and re-certifications. SoCalGas' web based outreach efforts included monthly e-mail blasts consisting of targeted electronic newsletters and e-mails promoting the CARE Program, and a customer assistance newsletter "Outreach Around the Region."

Customer Contact Personnel:

Customer Contact Center (CCC): Customers were informed by the IVR system about the CARE Program when they call to request new service or payment arrangements. Customers could request a CARE application from a Customer Service Representative (CSR), the IVR or from SoCalGas' website.

Bilingual Employees: The CCC, CARE Customer Support Center and most company business offices continued to be staffed with bi-lingual (English and Spanish) CSRs. Vietnamese, Korean, Mandarin and Cantonese telephone lines are staffed from 8:00 am to 5:00 pm Monday through Friday in the CCC. Additionally, SoCalGas CCCs provided service in 170 languages through *Language Line Service*, a third-party translation service which is available to customers 24 hours a day, seven days a week. For hearing impaired customers, a

toll-free number is provided in English or Spanish. Deaf and hearing impaired customers may contact the CCC through its TTY/TDD equipment 24 hours a day, seven days a week.

Branch Payment Offices (BPO): Both English and Spanish CARE applications and program information brochures are located in BPOs. Personnel located in BPOs promote CARE with every transaction. English and Spanish CARE posters (complete with program guidelines and helpful information) are on display in each BPO. These posters are revised as program information changes.

<u>Community Events:</u> During PY2010, SoCalGas personnel participated in general and low-income specific community events. The goal of each event was to promote awareness of and participation in customer assistance programs. The events included:

- Los Angeles Neighborhood Housing Services
- The Braille Institute
- Maria Shriver, WeConnect Event at the Los Angeles Forum
- YWCA/JOB Corps Community Fair
- Coachella Valley Association of Government Cities
- Annual Grants Workshop Congresswoman Lucille Roybal-Allard
- San Luis Obispo Community Action Partnership
- FCC Asian and Pacific Islander Broadband Event
- Inland Empire Disability Coalition

Third-Party Outreach

In order improve its efforts to communicate with hard-to-reach customers, SoCalGas has contracted with a vendor to perform door-to-door outreach. During 2010, approximately 55,000 customers were enrolled through this method.

Community-Based Organizations (CBOs)

SoCalGas worked with CBOs and outreach agencies to enroll eligible non-participating customers in the CARE program. These "CARE Capitation Contractors" are located throughout the SoCalGas service area and employ various types of outreach strategies, such as, local community event participation, walk-in enrollment and program material distribution to enroll customers.

By fourth quarter over 1,000 customers had enrolled in the CARE program as a result of the combined outreach efforts of SoCalGas' CARE capitation contractors.

Customer assistance program and service information continue to be added to the growing California 211 information and referral network. The 211 county-based agencies who have been provided with SoCalGas' customer assistance and general utility information include Fresno, Imperial (Sure Helpline) Kern, Kings, Los Angeles, Orange Riverside, San Bernardino, Santa Barbara, San Luis Obispo, Ventura and Tulare, bringing the total now to thirteen including Los Angeles City's' 311s Program. The 211 and 311 information was made available to SoCalGas customers on the individual county internet sites. This information was also provided to customers who called in and spoke with 211/311 call center operators.

2.4.2 Discuss the most effective outreach method, including a discussion of how success is measured.

Direct mail and bill inserts are still the foundation of awareness and enrollment. Even when such channels do not lead to an immediate enrollment, they create awareness and stimulate word-of-mouth knowledge of the program. Technology will obviously play an increasingly significant role in outreach efforts; however, the pace of transition from more traditional methods will be governed by the preferences and behaviors of SoCalGas customers. SoCalGas continually cross

promotes all of its assistance programs and tailors outreach methods to meet individual customer needs, therefore, it would be difficult to single out one outreach method as being the most effective or successful. For example, home page placement of assistance programs information and direct links on SoCalGas' web-site) appeal to customers utilizing the internet. Also, information concerning SoCalGas' assistance programs is frequently mentioned in radio spots and media events, further building program awareness in completely different mediums. SoCalGas believes tailored, multiple channeled outreach is the most effective and successful way to promote its assistance programs and plans to continue this strategy in PY2011.

Some of the primary outreach strategies used during 2010 are listed below:

Automated Voice Messaging: For PY2010, SoCalGas' use of AVM for CARE enrollment and recertification outreach proved to be both efficient and effective. AVM is a low-cost outreach method using an automated telephone script to quickly contact large numbers of SoCalGas customers, allowing them to check their program eligibility and enroll or re-enroll in CARE right over the telephone via the AVM system. Over 9,000 CARE enrollments and 7,000 re-certifications were received using this method.

<u>Bill Inserts:</u> SoCalGas sent out over 6 million CARE (self-mailer type) bill inserts. This resulted in SoCalGas receiving more than 22,000 enrollments. Bill inserts continue to be a moderate cost, non-intrusive, high distribution (all CARE-eligible non-enrolled SoCalGas customers) outreach method for contacting potential CARE customers.

Capitation Program: SoCalGas contracted with 42 CBOs for the CARE Capitation Program in PY2010. These non-profit agencies were part of SoCalGas' overall commitment of contacting hard-to-reach customers at community events and through walk-in traffic; they generated approximately 1,000 CARE enrollments.

Direct Mail: SoCalGas' efforts to target and reach relatively large numbers of highly eligible customers not currently enrolled in the CARE Program are often accomplished through the direct mailing of CARE applications. These customers are selected based on an adjustable eligibility profile that shows them to live in high gap (high eligibility and low penetration) areas. SoCalGas has been experiencing a return rate of nearly 10% (typical comparable response rates are 2% - 3%). During 2010 there were 3 campaigns (1.3 million pieces and 91,000 enrollments).

Third Party Door-to-Door Outreach: Developed to outreach to SoCalGas' hardest-to-reach low-income customers, this proactive door-to-door enrollment tactic continues to be a key component of SoCalGas' marketing strategy. These outreach contractors produce high volume enrollments from a hands-on customer approach. For 2010, SoCalGas CARE enrollments from door-to-door contractors totaled approximately 55,000 enrollments.

Web Based Outreach: Web based outreach consists of program promotion through e-newsletters, web links, e-mail blast campaigns, social media networks and direct internet access. For 2010, SoCalGas received over 53,000 enrollments from web based outreach.

2.4.3 Discuss barriers to participation encountered during the reporting period and steps taken to mitigate them.

SoCalGas' CARE enrollment of the eligible population was more than 94% in 2010. Although SoCalGas has been able to generate great customer awareness about the program throughout its service territory, additional enrollments will be, by definition, in the hard-to-reach category. This category is mostly comprised of customers who may have language barriers, developmental or physical disabilities, or other factors, and as such, are less likely to be reached by conventional advertising efforts. Because of this challenge, SoCalGas has

initiated a strategy that will continue into the next several program years to use grass roots efforts to reach out the hard-to-reach customers.

2.4.4 Discuss how CARE customer data and other relevant program information is shared by the utility with other utilities sharing its service territory

Customers who do not participate in SoCalGas' CARE program, but are enrolled in other utility CARE Programs or LADWP's Low Income Discount Program (LIDP), are automatically eligible for SoCalGas' CARE Program. To ensure that eligible customers in overlapping territories receive all discounts they are entitled to, SoCalGas exchanges its CARE customer data with SCE, SDG&E, PG&E and LADWP. SoCalGas customers enrolled through data-sharing are mailed a letter notifying them of the enrollment and provided the opportunity to opt-out of SoCalGas' program if they choose.

SoCalGas continued to electronically exchange new CARE customer enrollment data on a weekly basis with SCE, a process established in 2001. In 2010, SoCalGas received 421,289 customer records from SCE and enrolled almost 112,000 SCE CARE customers into SoCalGas' CARE Program. Customers who were not enrolled were either already participating in SoCalGas' CARE Program or were not SoCalGas customers.

SoCalGas conducted four CARE data exchanges with PG&E in 2010. These data exchanges resulted in 8,607 PG&E CARE customers being added to the SoCalGas CARE Program.

During 2010, SoCalGas conducted two data exchanges with SDG&E. The exchanges resulted in 3,319 SDG&E CARE participants being added to SoCalGas' CARE Program.

Also during 2010, SoCalGas conducted two data exchanges with LADWP to exchange the names of SoCalGas CARE participants with the names of customers participating in LADWP's Low Income Discount Program. The exchanges resulted in 6,243 customers being added to SoCalGas' CARE program.

Joint Utility Program Manager's Meeting:

In 2010, SoCalGas, SCE, PG&E, SDG&E, South West Gas and Sacramento Municipal Utility District (SMUD) conducted quarterly joint utility meetings to discuss CARE outreach efforts and program issues. Agenda items in the 2010 meetings included: phone enrollment, phone recertification, internet enrollment, successful outreach activities, telethons, PY2012-14 Application, CARE categorical eligibility issues, SB1154, PEV practices, process improvements, and quarterly CARE public meeting agenda information.

2.4.5 Discuss how CARE customer data and other relevant program information is shared within the utility, for example, between its Energy Savings Assistance Program and other appropriate lowincome programs

Leveraging with other assistance programs is one of the most cost effective ways for SoCalGas to increase customer participation in the CARE program.

Therefore, customer information obtained from SoCalGas' Energy Savings

Assistance Program and Gas Assistance Fund (GAF) Programs, along with

LIHEAP, is used for CARE enrollment, recertification, and verification purposes.

In 2010, SoCalGas continued cross-referencing customers who receive Energy Savings Assistance Program benefits. Customers who are found in the Energy Savings Assistance Program system are automatically enrolled for the CARE

discount and exempt from PEV if their eligibility has been verified by the Energy Savings Assistance Program. In 2010, SoCalGas automatically enrolled 18,342 Energy Savings Assistance Program customers in CARE.

SoCalGas' GAF Program provides a one-time bill assistance amount of up to \$100 on a qualified customer's winter natural gas bill. The annual, one-time bill payment assistance is available to eligible customers on a first-come, first-served basis. The program typically begins in February and continues through the end of March, or until funds are depleted.

Because GAF customers are eligible for CARE, SoCalGas' GAF customer data and CARE customer data are interfaced. Customers participating in the GAF Program, but not in CARE, are automatically enrolled in CARE. Additionally, because GAF customers provide proof of income when applying, customers approved for GAF are not subject to CARE's PEV process. Finally, CARE customers who are scheduled for recertification and who are approved for GAF assistance are not asked to recertify their CARE eligibility again until the next two year recertification cycle has lapsed. This process helps reduce barriers to participation and assists in retaining qualified customers.

During 2010, SoCalGas added 1,093 GAF participants to the CARE Program and verified the eligibility of 6,791 CARE customers without requiring proof of income from the customers.

2.4.6 Describe the efforts taken to reach and coordinate the CARE program with other related low income programs to reach eligible customers.

SoCalGas has begun working with LA County organizations that serve customers with similar needs. Schools that have a high concentration of students who receive free school lunches is one example. SoCalGas has also begun working

with the Los Angeles County Cal Fresh program (formerly known as food stamps); child advocacy groups; and Medi-Cal groups to create joint communication efforts. These initiatives were in the planning phases during late 2010 and will ramp up in 2011.

2.4.7 Describe the process for cross-referral of low-income customers between the utility and CSD. Describe how the utility's CARE customer discount information is provided to CSD for inclusion in its federal funds leveraging application. (Note: These agreements are limited to sharing 1-800 phone numbers with customers and providing CARE benefit information for the federal fiscal year, October 1 of the current year through September 30 of the subsequent year. There are no tracking mechanisms in place to determine how many customers contact the other programs or actually become enrolled in other program(s) as a result of these agreements.)

In May 2000, CSD and SoCalGas entered into an agreement that solidified the coordination of resources and program benefits between CSD's LIHEAP and SoCalGas' CARE and GAF Programs. In June 2000, SoCalGas added the toll-free telephone numbers for LIHEAP (and Energy Savings Assistance Program) on the CARE applications. At the same time, SoCalGas began providing CSD's toll free number to customers who call SoCalGas to request information on low-income assistance programs.

2.4.8 Discuss any recommendations to improve cost-effectiveness, processing of applications, or program delivery. Discuss methods investigated or implemented by the utility or third parties under contract to the utility to improve outreach and enrollment services to non-participating households in the prior year. Provide cost-effectiveness assessments, if available.

During 2010, several changes were implemented or scheduled for future implementation by the SoCalGas CARE Program. These changes were designed

to improve the cost-effectiveness of the program, processing of applications, and program delivery. SoCalGas continued to utilize technological advances to improve processing of applications and telephone and web enrollment options to encourage CARE enrollment and increase program participation.

SoCalGas made changes to its CARE Recertification IVR system in 2010. Revisions included offering more detailed instructions at the beginning of the process. These changes were implemented to notify customers of the need to have their account number handy before proceeding with the automated recertification process. Additionally, SoCalGas reduced the amount of "pause time" between the announcements of each of the categorically eligible public assistance programs to lessen the total amount of time a customer would be engaged in completing the automated process.

In 2010, SoCalGas CARE revised their mailing process for their CARE Opt-out letter. Customers who were automatically enrolled for CARE through inter-utility data exchange, automated outbound dialing, or system interface with another low income program, such as LIHEAP, GAF, and Energy Savings Assistance Program, received a letter upon CARE enrollment informing the customer of their new rate, and the option to not participate in CARE.

During September 2010, SoCalGas' customers began receiving newly designed bills. To assist customers in navigating their new bills, SoCalGas included a "How to Read Your Bill" guide in the mailings as well as posting the guide on the Company website. The new bill format included: larger paper size for ease of reading, easier to locate account information and more detailed and clearer breakdowns of charges. For CARE customers, the bills now display a prominent message and CARE icon at the top of the bill indicating a customer's participation in SoCalGas' CARE program. Additionally, the CARE discount is now reflected as a separate line item to further educate customers on how much the discount lowers their bills every month.

In 2010, SoCalGas continued to promote the use of the internet and the company website to educate customers about available customer assistance programs and services. Web-based CARE applications improve cost-effectiveness by saving postage, paper, and printing costs and assist a wide range of customers since the applications are available in thirteen languages as well as large print font. Through on-line activities in 2010, 53,800 customers were successfully enrolled and/or recertified, compared to 38,243 in 2009. The comparison between 2009 and 2010 program years undeniably proves web based services are becoming the preferred communication channel for many customers. As such, SoCalGas will continue to promote and support on-line CARE enrollment and recertification.

SoCalGas continued to electronically exchange new CARE customer enrollment data on a weekly basis with SCE, a process established in 2001. In 2010, SoCalGas received 421,289 customer records from SCE and enrolled almost 112,000 SCE CARE customers into SoCalGas' CARE Program. SoCalGas also recertified nearly 65,000 customers on CARE, a process implemented in March 2009. Customers who were not enrolled were either already income verified in SoCalGas' CARE Program, enrolled on a different account, or were not SoCalGas customers.

In 2010, the CARE form was updated with new income guidelines and public assistance program name changes as well as internal requirements for mailing purposes (e.g. ensuring automated folding of forms matched exact window envelope dimensions). Additional post enrollment verification forms were created for sub-metered customers in mobile home parks. SoCalGas performed adjustments and updates to their data scanning system for a more streamlined document validation operation process.

SoCalGas processed more than 755,000 applications in 2010. Of these, only 6% required manual data entry. Approximately 66,000 applications were processed

monthly compared to a monthly average of 60,000 in 2009. Increases in productivity are a direct result of experience garnered through managing and improving various data scanning capabilities. Throughout 2010, experience derived from past years helped the CARE staff streamline the process of scanning and validating applications and lessened the number of applications requiring manual data entry.

2.5 Processing Care Applications

2.5.1 Describe the utility's process for recertifying sub-metered tenants of master-meter customers.

SoCalGas received authorization to permit sub-metered tenants to recertify their CARE eligibility every two years in D.08-11-031, Ordering Paragraph 100. Fixed income tenants or those who pass the Probability Model (i.e. customers found 85% or more likely to be CARE eligible), now recertify every four years. In 2010, an automated process was implemented for sub-metered CARE customers. This process replicates the automated process developed for regular residential customers which includes random selection of tenants for PEV.

SoCalGas pre-populates each application with the name of the facility, the account number, the tenant's name, address and space number; this was designed for ease of recertifying one's eligibility, thereby reducing attrition. The recertification application requires the number of household occupants, annual income or participation in a public assistance program, signature, and date. The application is mailed back to SoCalGas in the postage paid envelope provided.

Tenants are allowed 90 days to respond to the recertification request. If the recertification is received after the 90 day timeframe, the tenant is re-enrolled in CARE. Annually, each sub-metered facility is mailed a complete listing of its CARE tenants.

2.5.2 Describe any contracts the utility has with third parties to conduct certification, recertification and/or verification on the utility's behalf. Describe how these third-party efforts compare to the utility's efforts in comparable customer segments, such as hard-to-reach or under-served. Include comparisons of effectiveness and cost-effectiveness of comparable customer segments, if available.

SoCalGas does not contract with third parties to conduct certification, recertification and/or verification on its behalf. SoCalGas processes and approves all CARE enrollment applications, recertification forms, and verification requests internally. Additionally, SoCalGas utilizes LIHEAP, Energy Savings Assistance Program, and GAF participant information to enroll, recertify, and verify CARE eligibility. SoCalGas also utilizes PG&E, SDG&E, and SCE CARE participant information and information from LADWP's LIDP to enroll customers.

In 2010, SoCalGas contracted with 42 CBOs and one third party outreach contractor to help eligible non-participating customers sign up for the CARE Program. The non-profit CARE Capitation CBOs employed a one-stop-shopping approach by helping their clients complete a CARE application while also assisting the customers in enrolling in other programs they might be eligible for.

SoCalGas' third party CARE outreach contractor employed a variety of outreach strategies, such as door-to-door solicitation, local community event participation, and program material distribution to help customers apply for CARE. Many of the customers targeted by the third party CARE contractor do not respond to traditional forms of outreach, nor visit CBO facilities, and are much more receptive to door-to-door canvassing efforts.

During PY2010, the number of customers enrolled in CARE by SoCalGas' CARE Capitation CBOs was approximately 1,000. Over 50,000 new enrollments were derived from CARE's third party contractor's efforts.

2.6 Program Management

2.6.1 Discuss issues and/or events that significantly affected program management in the reporting period and how these were addressed.

SoCalGas' CARE Program did not experience any issues or events that significantly affected program management during PY2010.

3. CARE Expansion Program

- 3.1 Participant Information
 - 3.1.1 Provide the total number of residential and/or commercial facilities by month, by energy source for the reporting period.

See CARE Table 12 in the attachments

3.1.1.1 State the total number of residents (excluding caregivers) for residential facilities, and for commercial facilities, by energy source, at year-end.

As of December 31, 2010, there were 24,009 residents in the non-residential CARE Expansion Program facilities. There were 452 primary facilities with 705 associated satellites participating in the CARE Expansion Program at year-end 2010.

3.2 Usage Information

3.2.1 Provide the average monthly usage by energy source per residential facility and per commercial facility.

See CARE Table 12 in the attachments

3.3 Program Costs

3.3.1 Administrative Cost (Show the CARE Expansion Program's administrative cost by category).

For PY2010, SoCalGas incurred \$8,100 in Outreach expenses for the CARE Expansion Program bill insert. SoCalGas did not track administrative labor cost due to the small volume of new applications received during 2010 and because recertification of the CARE expansion program accounts were not required. This was due to Commission approval changing CARE Expansion Program recertification requirements from one year to a two-year requirement.

3.3.1.1 Discount Information

3.3.1.2 State the average annual CARE discount received per residential facility by energy source.

The annual discount received per participating CARE residential facility in 2010 was \$60.66.

3.3.1.3 State the average annual CARE discount received per commercial facility by energy source.

The annual discount received per participating CARE Expansion Program facility in 2010 was \$445.18.

3.4 Outreach

3.4.1 Discuss utility outreach activities and those undertaken by third parties on the utility's behalf.

Annually, SoCalGas sends a bill insert to commercial customers informing them of the Non-Profit Group Living Rate. In addition, SoCalGas worked with its Public Affairs personnel in rural counties to set up awareness for low-income farm workers.

3.4.2 Discuss each of the following:

3.4.2.1 Discuss the most effective outreach method, including a discussion of how success is measured.

For 2010, the CCC continued to be the most effective outreach method for the SoCalGas CARE Expansion Program's non-residential facilities. Customers that call in to make payment arrangements, have their service established or request service activation talk with CSRs who present the CARE Program to them and respond to any questions the customers may have. Social service networks continue to be another valuable communication medium to promote CARE Program information to CARE expansion customers. The use of one-on-one or in-person dialogue sessions continues to make these two outreach methods very effective.

3.4.2.2 Discuss how the CARE facility data and relevant program information is shared by the utility with other utilities sharing service territory.

There was no facility data shared during PY2010.

3.4.2.3 Discuss barriers to participation encountered in the prior year and steps taken to mitigate these, if feasible, or not, if infeasible.

SoCalGas did not experience any barriers to participation in the prior year. SoCalGas received Commission approval to change the CARE Expansion Program's recertification requirement for customers living in non-profit group living facilities, agricultural housing, and non-profit migrant farm worker housing, from a one year requirement to a two-year requirement, therefore, no recertification of these facilities took place in 2010. SoCalGas was able to retain these eligible CARE customers.

3.4.3 Discuss any recommendations to improve the cost-effectiveness, processing of applications, or program delivery. Discuss methods investigated or implemented by the utility or third parties on the utility's behalf to improve outreach and enrollment services to non-participating facilities in the prior year. Provide cost-effectiveness assessments, if available.

2010 was the initial roll-out year for the new two year recertification requirement. Accounts that were enrolled or last recertified in 2008 were required to recertify in 2010. In prior years, CARE Expansion Program customers were required to recertify their CARE eligibility annually. The newly implemented two-year recertification requirement has reduced processing costs.

SoCalGas also considers the processing of CARE expansion applications to be cost-effective, provided all necessary documentation is received and no additional follow-up with customers is required. Receiving all necessary documentation back from these customers was accomplished through explicit instructions that accompanied the Recertification application. In order to maintain as many CARE expansion accounts as possible, when an expansion account closes and there is a new turn-on at the same facility, SoCalGas proactively mails an application to the new customer.

3.5 Program Management

3.5.1 Discuss issues and/or events that significantly affected program management in the reporting period and how these were addressed.

SoCalGas' CARE Program did not experience any issues or events that significantly affected program management during PY2010.

4 Fund Shifting

4.1.1 Report Energy Savings Assistance Program fund shifting activity that falls within rules laid out in Section 20.1 of D. 08-11-031

Fund shifting activities in PY2010 are documented in Energy Savings Assistance Program - Table 19 in the attachments. The overall PY2010 SoCalGas Energy Savings Assistance Program budget was not fully expended. However, SoCalGas Energy Savings Assistance Program had over-expenditures in four budget categories:

- Weatherization (154%)
- Training Center (127%)
- Inspections (121%)
- M&E Studies (139%)

Pursuant to D. 08-11-031⁴³ and D. 10-10-008, SoCalGas used carry forward funds to cover the budget shortfalls in these categories. Additionally, SoCalGas reported the Weatherization and Training Center over expenditures and fund shifting plans in its October Monthly Report.⁴⁴

During October, SoCalGas reached the authorized funding levels for the Weatherization subcategory and Training Center budget categories. The contributing factors to the overage

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⁴³ Section 20 and O.P. 85, as modified by D. 10-10-008

in the Weatherization budget include the unprecedented number of homes SoCalGas treated through October 2010 and includes measures such as weather-stripping and outlet gasket covers that were not funded in the Energy Savings Assistance Program budget authorized by D.08-11-031.

The Training Center budget exceeded funding level due to the addition of 5-day NGAT training classes. In late 2009, SoCalGas added the 5-day NGAT training to increase the technical expertise of weatherization installation crews in the areas of gas appliance services and NGAT. The NGAT training of weatherization crews also contributed to a higher quality of home assessments which increased enrollments.

SoCalGas surpassed the authorized funding levels for Inspections in 2010. One of the contributing factors to the overage in the Inspections budget includes the increase in the number of homes that SoCalGas treated. The increase in the amount of treated homes is correlated to an increase in the inspection rate which contributed to a backlog of inspections. Additionally, inspections were conducted at a higher rate than required by the Table 8-1 of the Energy Savings Assistance Program Policy and Procedures Manual due to health and safety concerns related to the installation of certain weatherization measures beginning in 2009 and spanning through a portion of 2010. SoCalGas used carry forward funds to cover Inspection budget shortfalls.

In addition, Energy Savings Assistance Program Table 1 reflects that SoCalGas spent 139% of its M&E budget. However, to cover the costs of the Impact Evaluation under the M&E budget category, SoCalGas used funds already authorized for the study. D. 08-11-031⁴⁵ authorized the IOUs to use the \$600,000 authorized in D.06-12-038 to conduct an Impact Evaluation Study.

⁴⁴ October 2010, Section 1.1.1

⁴⁵ Section 18.4.5.2

4.1.2 Report CARE fund shifting activity that falls within rules laid out in Section 20.1 of D. 08-11-031

The CARE program fund shifting that occurred in PY2010 followed the rules articulated in D. 08-11-031. SoCalGas' CARE program overspent in the General Administration budget category (106%), and the over expenditure was reported in its December Monthly Report⁴⁶. The over expenditure was due to the transfer of one FTE previously budgeted under the outreach cost category to the general administration category. The transfer occurred for two reasons, 1) high penetration in outreach and 2) the FTE was needed in CARE to implement and manage new service avenues. Overall the program used less than its authorized budget for PY2010 (89%), and will use under spent funds⁴⁷ from the Outreach category to cover costs in excess of the authorized budget allocation for General Administration. See CARE table 13.

4.1.3 Was there any Energy Savings Assistance Programs or CARE fund shifting activity that occurred that falls OUTSIDE the rules laid out in Section 20.1 of D. 08-11-031?

There was no Energy Savings Assistance Program or CARE fund shifting activity that occurred that falls outside the rules in Section 20.1 of D. 08-11-031.

84

Ψ33,000

⁴⁶ December 2010, Section 2.1.1

⁴⁷ \$35,000.

5. Commonly Used Acronyms

CARE California Alternate Rates for Energy
CBO Community Based Organization
CFL Compact Fluorescent Lamp

CPUC California Public Utility Commission

CSI California Solar Initiative

D. Decision

DCSD California Department of Community Services and Development

DDTP Deaf and Disabled Telecommunications Program

DRP Demand Response Program
DSM Demand Side Management

EE Energy Efficiency

FERA Family Electric Rate Assistance
HEAT Home Energy Assistance Tracking

IOU Investor Owned Utilities

kW Kilowatt kWh Kilowatt hour

LIEE Low Income Energy Efficiency (program)

LIHEAP Low Income Home Energy Assistance Program

MOU Memorandum of Understanding

mW Megawatt mWh Megawatt hour

NGAT Natural Gas Appliance Testing

OP Ordering Paragraph

PEV Post Enrollment Verification PFM Petition for Modification

PG&E Pacific Gas and Electric Company

PPP Public Purpose Program

PY Program Year

SCE Southern California Edison Company
SDG&E San Diego Gas & Electric Company
SoCalGas Southern California Gas Company
TDD Telecommunication Device for the Deaf

TRC Total Resource Cost

UC Utility Cost

SSI Social Security Income
SSD Social Security Disability
SSP Social Security Pension

6. Appendix:

6.1. Energy Savings Assistance Program Tables

Energy Savings Assistance Program- Table 1- Overall Program Expenses

Energy Savings Assistance Program- Table 2- Expenses & Energy Savings by Measures Installed

Energy Savings Assistance Program- Table 3- Cost Effectiveness

Energy Savings Assistance Program- Table 4- Penetration

Energy Savings Assistance Program- Table 5- Direct Purchases & Installation Contractors

Energy Savings Assistance Program- Table 6- Installation Cost of Program Installation Contractors

Energy Savings Assistance Program- Table 7- Expenditures by Cost Elements

Energy Savings Assistance Program- Table 8- Detail by Housing Type and Source

Energy Savings Assistance Program- Table 9- Life Cycle Bill Savings by Measure

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