

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

Application 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 (U 39 M)	Application 08-05-022 (Filed May 15, 2008)
Application of San Diego Gas & Electric Company (U 902 M) for Approval of Low Income Assistance Programs and Budgets for Program Years 2009 – 2011	Application 08-05-024 (Filed May 15, 2008)
Application of Southern California Gas Company (U 904 G) for Approval of Low Income Assistance Programs and Budgets for Program Years 2009 – 2011	Application 08-05-025 (Filed May 15, 2008)
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)

**FIFTH ANNUAL REPORT OF PACIFIC GAS AND ELECTRIC COMPANY
(U 39 E) ON THE RESULTS OF ITS 2008 FAMILY ELECTRIC RATE ASSISTANCE PROGRAM
EFFORTS IN COMPLIANCE WITH ADVICE LETTER 2498-E-A**

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May 26, 2009

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**FIFTH ANNUAL REPORT OF PACIFIC GAS AND ELECTRIC COMPANY
(U 39 E) ON THE RESULTS OF ITS 2008 FAMILY ELECTRIC RATE ASSISTANCE PROGRAM
EFFORTS IN COMPLIANCE WITH ADVICE LETTER 2498-E-A**

Pacific Gas and Electric Company (PG&E) files its Fifth Annual Progress Report on its 2008 Family Electric Rate Assistance (FERA) Program efforts in compliance with the FERA reporting requirements developed jointly by the utilities, DRA, Energy Division, Latino Issues Forum, and TURN as set forth in PG&E's Advice Letter 2498-E-A, which became effective June 17, 2004. This advice letter was a requirement of Decision 04-02-057 at page 58, and Ordering Paragraph 5. The 2008 FERA report was originally submitted to the Commission only by hard copy on April 30, 2009, but is now being filed and served, and tables in excel spreadsheet format are separately provided, as directed by Administrative Law Judge Kimberly H. Kim on May 21, 2009.

Respectfully submitted,

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/s/

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May 26, 2009

**FIFTH ANNUAL PROGRESS REPORT TO THE
CALIFORNIA PUBLIC UTILITIES COMMISSION**

**FAMILY ELECTRIC RATE ASSISTANCE
(FERA)**

JANUARY 1, 2008 - DECEMBER 31, 2008

May 1, 2009

**PACIFIC GAS AND ELECTRIC COMPANY
FERA PROGRAM
MAIL CODE B5K
PO Box 770000
SAN FRANCISCO, CA 94177**

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FAMILY ELECTRIC RATE ASSISTANCE (FERA)

I. PARTICIPANT INFORMATION

A. Provide the total number of FERA customers by month, for the reporting period.

See Table 1.

Table 1		
2008	FERA Enrolled¹	FERA Receiving Tier 3 Benefit¹
January	11,514	7,072
February	12,290	6,496
March	12,816	6,218
April	13,379	6,136
May	13,823	7,536
June	14,541	7,219
July	15,102	9,269
August	15,527	9,770
September	15,933	9,983
October	16,530	8,565
November	16,176	8,030
December	15,932	9,516

Notes:

¹ Does not include sub-metered tenants.

B. Provide the total number of FERA-eligible households, FERA-participating households, and FERA household penetration rates by quarter.

See Table 2.

Table 2			
FERA Penetration Rate			
2008 Quarter Ending	FERA-Eligible Households ¹	FERA-Participating Households ¹	FERA Household Penetration Rate ²
March 31	164,459	12,816	8%
June 30	164,459	14,541	9%
September 30	164,459	15,933	10%
December 31	164,459	15,932	10%

Notes:

¹Does not include sub-metered tenants.

²FERA Household Penetration Rate is calculated by dividing FERA Participating Households by FERA-Eligible Households.

C. Discuss how the estimates of current FERA-eligible households were developed.

For the 2008 program year reporting period, PG&E used the same Joint Utilities' methodology for calculating demographic FERA-eligibility rates that was adopted for California Alternate Rates for Energy (CARE) in 2001 in Decision (D.) 01-03-028. The particulars of the calculations may be found in Attachment A, "Technical Addendum: Joint-Utility Methodology for Calculating CARE Penetration" excerpted from the Joint Utilities' "Reporting Requirements Manual (RRM) Working Group Report for Low Income Assistance Programs" (R.98-07-037) and Attachment B, the Joint Utility CARE eligibility update (filed on October 15, 2004 and updated December 28, 2004 in compliance with the directives of D.02-07-033, Ordering Paragraph 4(b), as modified by the Assigned Commissioner's Ruling (ACR) of December 27, 2002 and the Scoping Memorandum of June 24, 2004).¹ In summary, PG&E applies county-based commodity-specific demographic eligibility multipliers to the technically eligible meter count within that county. The product of this calculation is then added together to obtain an overall eligibility for each commodity served.

The estimates of FERA-demographically eligible households were calculated for each utility by applying the demographic eligibility rate to technically eligible households by county and utility service area. The methodology is described in

¹ The Joint Utilities are PG&E, Southern California Edison Company, San Diego Gas and Electric Company and Southern California Gas Company. Energy Division and the Division of Ratepayer Advocates also participate in the RRM Working Group.

the Low Income Reporting Requirements Manual. These rates were developed by Athens Research and utilize current year income and household size data. The 2008 penetration rates reported in low income monthly reports used demographic eligibility rates that were submitted to the Commission on October 15, 2007.

PG&E applied the demographically eligible meter count supplied by the Joint Utility demographer to internally derive the technically eligible meter count by county and commodity. To derive the demographic information, the Joint Utilities hired a demographic consultant, Athens Research, which culled information starting with the current census tract data available for PG&E's service area. Additionally, commercially available demographic updates were utilized to update the population information for the current year. The Joint Utility demographer then developed matrices, applying appropriate statistical methods in order to properly represent the information by county and commodity. The raw percentage of estimated eligible population, by county and fuel type, was then provided to PG&E for combining with the technically eligible meter counts. The product of these statistics results in PG&E's estimated eligible population.

D. Provide the current FERA sub-metered tenant counts at year-end.

154 sub-metered tenants were enrolled in FERA at year-end.

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

Since FERA was created in June 2004, the main problems encountered by sub-metered tenants and/or master-metered customers include understanding the FERA discount on their bills, understanding the difference between the FERA discount and the CARE discount, and understanding whether or not they can apply for both discounts.

II. PROGRAM COSTS

A. Discount Cost

1. State the average monthly FERA discount received, in dollars per FERA customer.^{1,2}

The average monthly FERA discount in 2008, per FERA customer, was \$21.37.

Notes:

¹Does not include sub-metered tenants.

² Enrolled customers are excluded from the monthly average during any months they did not reach Tier 3 usage.

2. State the cumulative annual discount for all FERA customers.¹

The cumulative annual FERA discount through 2008 was \$5,914,480.79.

Notes:

¹Does not include sub-metered tenants.

B. Administrative Cost

1. Show the FERA Program's administrative cost by category.

See Table 3.

Table 3	
FERA Program Administrative Costs by Category and Benefits	
Category	Cost
Outreach	\$136,923.64
Processing, Certification, and Verification	\$24,259.32
General Administration	\$48,378.92
Billing System / Programming	\$0.00
Regulatory Compliance	\$153.58
Energy Division Staff Funding	\$0.00
TOTAL PROGRAM COSTS	\$209,715.46
CUSTOMER BENEFITS	\$2,100,026.49
TOTAL PROGRAM COSTS & CUSTOMER BENEFITS	\$2,309,741.95

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

See table below.

Category	Description
Outreach	Includes: Bill inserts, applications (printing and mailing), postage, sub-metered outreach, information technology (technical support and software licensing), staff labor, event staffing, out-bound dialing and website design.
Processing, Certification, and Verification	Includes: Staff labor for application processing and training.
General Administration	Includes: Office supplies, program management labor and information technology (technical support and software licensing).
Billing System / Programming	Includes: Manual rebilling, programming and billing labor.
Regulatory Compliance	Includes: Program applications and advice filings, comments and reply comments, hearings, reports and studies, working group meetings, public input meetings and tariff revisions.
Energy Division Staff Funding	Includes: Both past and present funding for the Energy Division staff.
Customer Benefits	Includes: Rate discounts.

3. Explain how costs of joint CARE/FERA activities are charged to each program.

For joint CARE/FERA activities, PG&E charged the expenses to appropriate CARE/FERA order numbers depending on the nature of the activities and the number of hours spent on each program.

C. Provide the year-end December 31 balances for the FERA balancing account for both the current and prior reporting periods.

The year-end December 31, 2008 balance for the FERA balancing account was a debit of \$2,566,392

The year-end December 31, 2007 balance for the FERA balancing account was a debit of \$1,603,094.

The year-end December 31, 2006 balance for the FERA balancing account was a debit of \$1,658,767.

The year-end December 31, 2005 balance for the FERA balancing account was a debit of \$1,340,372¹.

The year-end December 31, 2004 balance for the FERA balancing account was a debit of \$340,948.

Notes:

¹ The figures were adjusted and different from the 2005 Annual Report.

III. OUTREACH

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

Consistent with the provisions of D.04-02-057 that, "[A]dditional outreach should be undertaken when it can be done at little cost" (mimeo, p. 56), outreach for FERA is coordinated with PG&E's CARE and Low Income Energy Efficiency ("LIEE," also known as "Energy Partners") outreach efforts. These are described below.

Bill Inserts

A bill insert consisting of a mini FERA application was mailed in the February, June and October billing cycles. It included postage-paid return mailing and was in multiple languages. The bill insert presented FERA information in a concise way and allowed the customer to fill out a condensed version of the application. This initiative was an efficient outreach tool because of its ability to reach every residential PG&E customer who was not already on FERA.

Direct Mails

Since implementing a single application for the CARE and FERA Programs, PG&E has expanded FERA outreach through its direct mail initiatives at no additional cost to the program.

Those direct mail initiatives included:

- Customer Care and Billing (CC&B) direct mail – PG&E utilized data from its customer information system to generate a list of prospective customers. The list included those customers who were on medical baseline or life support, and customers who had received a 48-hour notice or had been required to submit a credit deposit.
- Hispanic direct mail – An English/Spanish direct mail piece was created to increase enrollment within the Hispanic community. A list of Hispanic customers was purchased and an informative letter with an application was mailed directly to customers' homes.
- Chinese direct mail – An English/Chinese direct mail piece was created to increase enrollment within the Chinese community. A list of Chinese customers was purchased and an informative letter with an application was mailed directly to customers' homes.
- Vietnamese direct mail – An English/Vietnamese direct mail piece was created to increase enrollment within the Vietnamese community. A list of

Vietnamese customers was purchased and an informative letter with an application was mailed directly to customers' homes.

- African American direct mail – A direct mail piece was created to increase enrollment within the African American community. A list of African American customers was purchased and an informative letter with an application was mailed directly to customers' homes.
- Native American direct mail – A direct mail piece was created to increase enrollment within the Native American community. A list of Native American customers was purchased and an informative letter with an application was mailed directly to customers' homes.
- Recertification direct mail - A letter and an application were sent on a monthly basis to lists of previous CARE customers who had failed to recertify.
- Name Finders direct mail – A list (of target customers) containing specific criteria was purchased. These criteria included income levels, household size and geographic location. An informative letter with an application was mailed directly to customers' homes.
- Welcome Packets – There was coordination with the Customer Service Department to insert a mini application into the welcome packets which are distributed to all new PG&E customers.
- Previously Over Income (POI) direct mail - An informative letter with an application was mailed directly to a list of customers who were previously above the income guidelines or on the FERA program.
- Post-Enrollment Verification (PEV) direct mail – An informative letter with an application was mailed directly to a list of customers who had not submitted proof of income in the past 12 months.
- Customer No Response (CNR) direct mail – An informative letter with an application was mailed directly to a list of customers who had previously requested an application but did not mail it in.
- Zip code direct mail – An informative letter with an application was mailed directly to a list of customers in zip codes where 25% or more un-enrolled PG&E customers were estimated to be CARE-eligible.

Integration

FERA coordinated with CARE, Cooling Centers and Energy Partners (PG&E's LIEE Program), in order to generate FERA enrollment. FERA applications were on display and available to participants at Cooling Centers that partnered with PG&E. FERA information and applications were distributed at various CARE and Energy Partners outreach events. Also, CARE Community Outreach Contractors

(COCs) assisted in enrolling FERA customers at no additional cost. In addition, CARE customers who notified PG&E of a change in income status which no longer qualified them for CARE were then informed about FERA and provided with an opportunity to apply if qualified. More importantly, customers that applied for CARE, but were income qualified for FERA, were automatically enrolled in the FERA Program.

Web

PG&E continued to use its website to promote the FERA Program. Each application was posted in-language and in a format that allowed easy download and printing. Detailed information about the program was provided and links to other assistance programs were made available.

PG&E initiated online enrollment for the FERA program in March. Customers were able to access the residential FERA application on the PG&E website using one of two options: completion of a simple form which requires no registration, or via "My Account", which requires registration. With the online application, customers were able to complete the necessary household and income eligibility information, accept the declaration that the information they provided is true, and submit the application electronically.

A *Frequently Asked Questions* section accompanies each program area. Feedback from users of the website helped to improve the site in 2009.

B. Discuss each of the following:

- 1. How FERA customer data and other relevant program information is shared within the utility, for example, between LIEE and other appropriate low-income programs.**

The FERA discount is recorded directly into PG&E's Customer Information System. This allows customer service representatives to see the FERA status of any customer that phones PG&E's call center for assistance and to discuss appropriate benefits and services.

FERA includes a brief description of other financial assistance programs and their contact numbers on its application. Also, completed FERA applications that qualified for CARE were forwarded to the CARE Processing Center and vice versa.

- 2. Discuss barriers to participation encountered during the reporting period and steps taken to mitigate them.**

With the increasing awareness of energy efficiency, many FERA income qualified households with electric usage below Tier 3 (131 – 200 percent of baseline) were not interested in applying for the FERA discount since they would not benefit from it. The FERA Program commended customers on their energy conservation efforts but encouraged them to apply for FERA anyway, in preparation for any unforeseen future energy usage increase.

IV. PROCESSING FERA APPLICATIONS

A. Processing Self-Certification and Self-Recertification Applications (individual and sub-metered customers)

1. Provide the number of utility and third-party FERA self-certification and self-recertification applications provided, received, approved, denied, pending/never completed, or duplicates for the reporting period.

See Table 4.

TABLE 4						
FERA Self-Certification and Self-Recertification Applications ¹						
	Provided ²	Received	Approved	Denied	Pending/Never Completed	Duplicates
Utility	11,610	11,562	11,450	54	58	955
Capitation	0	0	0	0	0	0
Other Third-Party	0	0	0	0	0	0
Total	11,610	11,562	11,450	54	58	955

Notes:

¹Includes sub-metered tenants.

²Excludes outreach applications and multiple bill inserts.

B. Processing Random Post-Enrollment Verification Requests

1. Provide the total number of verifications requested, received, approved, denied, pending/never completed, or duplicates, for the reporting period.

See Table 5.

TABLE 5						
FERA Random Post-Enrollment Verification Requests ¹						
	Requested	Received	Approved ²	Denied	Pending/Never Completed	Duplicates
Total			771			

Notes:

¹Random Post-Enrollment Verification was not conducted for FERA in 2008, due to the small number of enrollments and discounts.

²771 CARE Post-Enrollment Verification requests were approved for FERA in 2008.

V. PROGRAM MANAGEMENT

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

Assembly Bill 2576 required the utilities to utilize a single application for CARE and FERA Programs. PG&E implemented this change on June 1, 2007.

This change allowed FERA to expand its outreach to include additional bill inserts and direct mails at no additional cost to the program. As a result, FERA enrollment increased from 7 percent to 10 percent.

Table 1		
	FERA	FERA Receiving Tier 3 Benefit¹
2008	Enrolled¹	
January	11,514	7,072
February	12,290	6,496
March	12,816	6,218
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November	16,176	8,030
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¹ Does not include sub-metered tenants.

Table 2			
FERA Penetration Rate			
2008 Quarter Ending	FERA-Eligible Households¹	FERA-Participating Households¹	FERA Household Penetration Rate²
31-Mar	164,459	12,816	8%
30-Jun	164,459	14,541	9%
30-Sep	164,459	15,933	10%
31-Dec	164,459	15,932	10%

¹Does not include sub-metered tenants.

²FERA Household Penetration Rate is calculated by dividing FERA Participating Households by FERA-Eligible Households.

Table 3	
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TOTAL PROGRAM COSTS	\$209,715.46
CUSTOMER BENEFITS	\$2,100,026.49
TOTAL PROGRAM COSTS & CUSTOMER BENEFITS	\$2,309,741.95

TABLE 4						
FERA Self-Certification and Self-Recertification Applications¹						
	Provided²	Received	Approved	Denied	Pending/Never Completed	Duplicates
Utility	11,610	11,562	11,450	54	58	955
Capitation	0	0	0	0	0	0
Other Third-Party	0	0	0	0	0	0
Total	11,610	11,562	11,450	54	58	955

1 Includes sub-metered tenants.

2 Excludes outreach applications and multiple bill inserts.

TABLE 5						
FERA Random Post-Enrollment Verification Requests ¹						
	Requested	Received	Approved ²	Denied	Pending/Never Completed	Duplicates
Total			771			

¹Random Post-Enrollment Verification was not conducted for FERA in 2008, due to the small number of enrollments and discounts.

² 771 CARE Post-Enrollment Verification requests were approved for FERA in 2008.

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is 77 Beale Street, San Francisco, California 94105

On May 26, 2009, I served a true copy of:

**FIFTH ANNUAL REPORT OF PACIFIC GAS AND ELECTRIC COMPANY
(U 39 E) ON THE RESULTS OF ITS 2008 FAMILY ELECTRIC RATE ASSISTANCE
PROGRAM EFFORTS IN COMPLIANCE WITH ADVICE LETTER 2498-E-A**

- [XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service lists for R.08-07-011, A.08-05-022, et al., and A.08-06-031 with an e-mail address.
- [XX] By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed on the official service lists for R.08-07-011, A.08-05-022, et al., and A.08-06-031 without an e-mail address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 26st day of May 2009, at San Francisco, California.

/S/

PAMELA J. DAWSON

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA EMAIL SERVICE LIST

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ALJ Assigned: Kimberly Kim on December 19, 2008

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Application 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 (U 39 M)

Application of San Diego Gas & Electric Company (U
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A.08-05-022 (Filed May 15, 2008)

A.08-05-024 (Filed May 15, 2008)

A.08-05-025 (Filed May 15, 2008)

A.08-05-026 (Filed May 15, 2008)

Application of Southern California Gas Company (U 904
G) for Approval of Low-Income Assistance Program and
Budgets for Program Years 2009-2011

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

Order Instituting Rulemaking to Develop the
Commission's Energy Efficiency Strategic Plan.

Rulemaking 08-07-011
(Filed July 10, 2008)

In the Matter of the Application of Southwest Gas
Corporation (U905G) for Approval of Low-Income
Programs and Budgets for Program Years 2009-2011.

A.08-06-031

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