

FAMILY ELECTRIC RATE ASSISTANCE (FERA) PROGRAM ANNUAL REPORT

2008 Results

INTRODUCTION:

The purpose of this annual report is to provide information on San Diego Gas & Electric Company's (SDG&E) Family Electric Rate Assistance (FERA) program¹ and to report on the administration and subsidy costs incurred by the program in its fifth year of operation. The California Public Utilities Commission (Commission or CPUC) in Decision (D.) 04-02-057, dated February 26, 2004, adopted the FERA program, whereby, qualifying lower-middle income large household participants are charged Tier 2 (101% - 130% of baseline) electric rates for their Tier 3 (131% - 200% of baseline) usage. The FERA program is available to households of three or more persons with annual gross income levels between 200% and 250% of the Federal Poverty Guidelines (FPG) in accordance with D.05-10-044.² These income levels are subject to revision pursuant to the Commission's communication of new levels which shall occur no later than May 1 of each year.

SDG&E's FERA program implementation plan utilizes the existing protocols and procedures already developed and adopted by the Commission for the California Alternate Rates for Energy (CARE) Program. These existing protocols and procedures relate to outreach practices, enrollment, verification, and recertification activities. SDG&E uses one dual application for both the CARE and FERA program.

² See D.05-10-044, Ordering Paragraph 3.

¹ FERA was originally referred to in D.04-02-057 as the Middle Income Large Household Program.

SAN DIEGO GAS & ELECTRIC COMPANY'S FAMILY ELECTRIC RATE ASSISTANCE (FERA) PROGRAM

January 1, 2008 through December 31, 2008

I. Participant Information

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

See Table 1.

| Table 1 | | | | | |
|-----------|-------------------------------|-------------------------------------|--|--|--|
| 2008 | FERA Enrolled ¹ | FERA Receiving Tier 3 Benefit | | | |
| January | 3,905 | 1,882 | | | |
| February | 3,878 | 1,803 | | | |
| March | 3,872 | 1,570 | | | |
| April | 3,996 | 1,450 | | | |
| May | 3,976 | 1,615 | | | |
| June | 3,934 | 1,867 | | | |
| July | 3,966 | 2,156 | | | |
| August | 3,995 | 2,220 | | | |
| September | 4,100 | 2,375 | | | |
| October | 4,101 | 2,209 | | | |
| November | 4,046 | 1,810 | | | |
| December | 4,105 | 1,858 | | | |

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 | | | | | |
| (Estimated) 2008 FERA-Eligible Quarter Ending Households ¹ | | FERA-Participating Households ¹ | FERA Household Penetration Rate ² | | |
| March 31 | 42,879 | 3,872 | 9.0% | | |
| June 30 | 42,924 | 3,934 | 9.2% | | |
| September 30 | 42,983 | 4,100 | 9.5% | | |
| December 31 | 43,197 | 4,105 | 9.5% | | |

Notes:

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

SDG&E used a customer information system count of residential customers within its territory as the basis for estimating FERA eligible customers

Residential Customers Per Quarter 2008

| March: | 1,187,077 |
|------------|-----------|
| June: | 1,188,242 |
| September: | 1,189,890 |
| December: | 1 195 787 |

The estimate of FERA-eligible households was developed as follows: Multiply the residential customers by the factor in the Annual Eligibility Update for CARE/FERA³, which is .036124 for program year (PY) 2008. See Table 2 above for results.

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

Year-end sub-metered activity totaled 17 tenants.

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

SDG&E did not experience any difficulty administering the FERA program for sub-metered tenants or master-metered customers.

¹This category does not include sub-metered tenants.

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

³ This report was provided by SDG&E consultant John Petersen of Athens Research.

II. Program Costs

A. Discount Cost

1. State the average monthly FERA discount received, in dollars per FERA customer.

In 2008, the average monthly FERA discount was \$11.42 per customer.*

* Notes: This discount amount does not include sub-metered tenants; however, it does include all enrolled customers who have received a discount in any month.

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

During 2008, the cumulative annual discount for all FERA customers was \$268,932.*

* Notes: This discount amount does not include sub-metered tenants; however, it does include all enrolled customers who have received a discount in any month.

B. Administrative Cost

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

See Table 4.

| Table 4 FERA Program Administrative Costs by Category and Benefits | | | | |
|--|-----------|--|--|--|
| | | | | |
| Outreach | \$3,640 | | | |
| Processing, Certification, and Verification | \$15,601 | | | |
| General Administration | \$12,907 | | | |
| TOTAL PROGRAM COSTS | \$32,148 | | | |
| CUSTOMER BENEFITS | 268,932 | | | |
| TOTAL PROGRAM COSTS & CUSTOMER BENEFITS | \$301,080 | | | |

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

See table below.

| Category | Description |
|--------------------------------|----------------------------|
| Outreach | Includes: |
| | Capitation Fee Project |
| Processing, Certification, and | Includes: |
| Verification | Processing staff labor |
| General Administration | Includes: |
| | General program management |
| Benefits | Includes: |
| | Rate discounts. |

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

The costs of distinct CARE and FERA activities are charged separately to each program. To the extent possible, the costs of joint CARE/FERA activities are allocated in proportion to the work that should be attributable separately to CARE and FERA.

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

As of December 31, 2008, the balance recorded in SDG&E's FERA Baseline Balancing Account (BBA) year-to-date totaled \$329,824, which includes all costs associated with the program from inception in 2004. In the prior year, as of December 31, 2007, the balance recorded in the BBA year-to-date totaled \$297,674, which did not include \$268,932 in customer benefits.

III. Outreach

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

<u>Annual Notification</u> – SDG&E's annual notification took place from mid-July to mid-August. The insert, in English and Spanish, was included in customer bills and sent to more than one million customers. Approximately 70 enrollments were added to the FERA program from the annual notification.

<u>Customer Contact Employees</u> – SDG&E offers the FERA program through the customer call center, bill payment offices and field services activities. Customer Service Representatives (CSRs) advise customers about the program, during service-related telephone calls, e.g., initiating service, credit and collection telephone calls. Customers requesting information about the program are either sent an application, or directed to the CARE/FERA page on the company website, per the customer's request.

<u>Interactive Voice Response (IVR) Information on Hold</u> – While customers are on hold, waiting for assistance from a CSR, an IVR message (Option to hear in English or Spanish) describing the CARE/FERA programs is rotated with other company messages. The IVR process also allows the customer to request an application. In 2008, approximately 3,863 applications were requested through the IVR system.

<u>Direct Mail</u> – SDG&E's direct mail piece promotes both the CARE and FERA programs. In 2008, the piece was mailed to over 200,000 SDG&E customers utilizing census data information for potentially eligible customers in low-income areas. Approximately 264 enrollments were added to the FERA program through direct mailings.

<u>Collection Call</u> – SDG&E provides an additional outbound telephone call with a follow-up letter to low-income customers faced with collection activity on their account. Information about the availability of payment arrangements and customer assistance programs is given, and customers are urged to call SDG&E for more information.

<u>Website</u> – SDG&E's website contains information about the FERA program, and the CARE/FERA application may be downloaded or submitted electronically. Of the 9,300 applications submitted on-line, 463 qualified for the FERA program.

<u>Capitation Contractors</u> – In PY 2008, 45 agencies at 105 different site locations provided outreach and enrollment services for both CARE and FERA programs. Community based organizations (CBO) that are contracted to offer CARE through the fee per application or Capitation Program with SDG&E also offer FERA using the dual CARE/FERA applications. The terms and conditions of the contracts are the same with contractors receiving compensation from \$5.00 to \$15.00 for each eligible applications received.

Community Outreach Events – Throughout PY 2008, SDG&E participated in over 77 local community outreach events throughout San Diego County to provide information on FERA and other assistance programs. Types of events included presentations to community groups, health and safety fairs, community resource fairs, along with several FERA enrollment days at faith based organizations. Many

of the events were leveraged with the Lighting Turn In program targeted to seniors and other hard–to-reach residential customers.

<u>Sub-metered Apartments and Mobile Home Parks</u> – FERA program informational packets were mailed to all managers/owners of sub-metered facilities during the CARE/FERA annual recertification in September 2008. Packets included bulletin board posters and FERA/CARE applications for tenants.

B. Discuss each of the following:

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

<u>CARE</u> – SDG&E uses a joint CARE/FERA application and no longer tracks FERA program enrollments from the CARE program due to a customer exceeding CARE income limits.

<u>LIEE</u> – SDG&E's LIEE program provides recipients of weatherization measures with in-home energy education, including FERA/CARE information and an opportunity to enroll in FERA/CARE programs.

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

Attempting to reach FERA customers specifically has proven to be a challenge for SDG&E. While SDG&E targets low income areas in an effort to enroll both CARE and FERA customers, customers who would normally qualify for FERA often do not apply because they see themselves as not needing low-income assistance. Also, the annual increase of the income guidelines for both programs has a tendency to increase CARE enrollments with customers who were qualified for the FERA program resulting in a drop in FERA participation.

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 5.

| | Table 5 | | | | | | |
|-------------------|--|----------|------------|--------|----------------------------|------------|--|
| FEI | FERA Self-Certification and Self-Recertification Applications* | | | | | | |
| | Provided | Received | Approved** | Denied | Pending/Never Completed | Duplicates | |
| Utility | 4516 | 2258 | 2157 | 18 | 83 | 0 | |
| Capitation | 125 | 63 | 61 | 0 | 2 | 0 | |
| Other Third-Party | 479 | 239 | 234 | 3 | 2 | 0 | |
| Total | 5120 | 2560 | 2452 | 21 | 87 | 0 | |

^{*} Notes: This includes sub-metered tenants. Self-Certification applications are distributed/mailed through a wide variety of fulfillment and outreach methods, such that it is not possible to determine an actual count. Recertification applications are tracked.

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.

| TABLE 6 | | | | | | |
|---|-----------|----------|-----------|----------|----------------------------|------------|
| FERA Random Post-Enrollment Verification Requests | | | | | | |
| | Requested | Received | Approved* | Denied** | Pending/Never Completed | Duplicates |
| Total | 2 | 52 | 52 | 2 | 0 | 0 |

^{*}Notes: Approved includes CARE ineligible Post Enrollment Verification Requests that are eligible for FERA.

V. Program Management

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

There were no issues or events that significantly affected FERA program management in PY2008.

^{**}Approved includes CARE ineligible applications that are eligible for FERA.

^{**} Denied includes customers who were dropped due to non-response.