

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

Application of San Diego Gas & Electric)
Company (U 902 M) for Approval of Low-)
Income Assistance Programs and Budgets for) A.08-05 ____
Program Years 2009-2011)
_____)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY
FOR APPROVAL OF LOW-INCOME ASSISTANCE PROGRAMS
AND BUDGETS FOR PROGRAM YEARS 2009-2011**

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TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	LIEE PROGRAM PLAN AND BUDGETS APPLICATION FOR PY 2009-2011.....	2
A.	OVERVIEW.....	2
B.	BACKGROUND.....	5
C.	PROGRAM GOALS	6
1.	Program Achieves ¼ of Programmatic Initiative	6
2.	Program Meets Policy Objectives.....	6
3.	Goals by Population/Segments	7
4.	Program Meets Savings Goal.....	7
D.	COST EFFECTIVENESS & ENERGY SAVINGS	7
E.	PROGRAM DESIGN.....	11
1.	Section Overview.....	11
2.	Program Delivery.....	12
3.	Portfolio Composition.....	16
4.	ME&O.....	22
5.	Integration with Energy Efficiency.....	26
6.	Leverage Available Resources.....	26
7.	Pilots	29
8.	Studies.....	30
F.	BUDGET	31
G.	REVENUE REQUIREMENTS AND RATE IMPACTS	33
H.	COMPETITIVE BID	34
I.	CONCLUSION	36
III.	CARE PROGRAM PLAN AND BUDGETS APPLICATION FOR PY 2009-2011 ...	36
A.	OVERVIEW.....	36
B.	BACKGROUND.....	36
C.	CARE PROGRAM GOALS AND BUDGET FOR PY 2009, PY 2010, AND PY 201138	
1.	Program Goals	38
2.	Program Budget	39
D.	PROGRAM ADMINISTRATION.....	39
1.	Processing/Certification/Verification	39
2.	Information Technology/Programming	41
3.	Pilots	42
4.	Measurement and Evaluation.....	42
5.	Regulatory Compliance	42
6.	General Administration.....	42
7.	CPUC Energy Division Staff.....	43
E.	OUTREACH	43
1.	Marketing Education and Outreach	44
2.	Section 8 Housing.....	50
3.	Outreach Plans	50

F.	REVENUE REQUIREMENTS AND RATE IMPACTS	51
G.	REQUEST TO CONTINUE FUNDING AND ALLOW FOR FUND SHIFTING	53
H.	CONCLUSION	54
IV.	STATUTORY AND PROCEDURAL REQUIREMENTS	54
A.	Proposed Category, Issues to Be Considered, Need for Hearings and Proposed Schedule.....	54
B.	Statutory Authority - Rule 2.1	55
C.	Legal Name, Place of Business/Incorporation - Rule 2.1(a)	55
D.	Correspondence - Rule 2.1(b).....	55
E.	Articles of Incorporation - Rule 2.2	56
F.	Financial Statement, Balance Sheet and Income Statement – Rule 3.2(a)(4)	56
G.	Rates – Rules 3.2(a)(2) and 3.2(a)(3)	56
H.	Property and Equipment – Rule 3.2 (a)(4)	56
I.	Summary of Earnings – Rules 3.2(a)(5).....	56
J.	Depreciation – Rule 3.2(7)	56
K.	Proxy Statement – Rule 3.2(a)(8).....	57
L.	Pass Through of Costs – Rule 3.2(a)(10)	57
M.	Service and Notice – Rule 3.2(b)	57
V.	RELIEF REQUESTED.....	57

APPENDICES

Appendix A	Financial Statement, Balance Sheet and Statement of Income and Retained Earnings
Appendix B	Plant Investment and Accumulated Depreciation
Appendix C	Summary of Earnings
Appendix D	List of Government Agencies
Appendix E	Certificate of Service

ATTACHMENTS

Attachment A-1:	LIEE Electric and Gas Budget
Attachment A-1:	LIEE Electric Budget
Attachment A-1:	LIEE Gas Budget
Attachment A-2:	LIEE Planning Assumptions
Attachment A-3:	LIEE Penetration
Attachment A-4:	LIEE Detail by Housing Type
Attachment A-5:	LIEE Cost Effectiveness
Attachment A-6:	LIEE Cost Effectiveness – Weather Sensitive Measures
Attachment A-7:	LIEE Cost Effectiveness – Non Weather Sensitive Measures
Attachment A-8:	LIEE Measurement and Evaluation Studies
Attachment A-9:	LIEE Program Summary of 2009-2011
Attachment A-10:1	LIEE Pilot –In Home Displays

Attachment A-10.2: LIEE Pilot – Programmable Communicating Thermostat
Attachment A-10.3: LIEE Process Evaluation
Attachment A-10.4: LIEE Impact Evaluation
Attachment A-10.5: LIEE Refrigerator Degradation Study
Attachment A-10.6: LIEE Non Energy Benefits Study
Attachment A-11: LIEE Methodology to Determine Basis for Total Number of Eligible Customers to be Served between 2009-2011

Attachment B-1: CARE Budget
Attachment B-2: CARE Estimated Participation
Attachment B-3: CARE Outreach and Penetration Information
Attachment B-4: CARE Program Summary of 2009-2011
Attachment B-5: CARE Pilot and Study Implementation Plan
Attachment B-6: CARE Internet Enrollment Report

Attachment C-1: CARE and LIEE Rate Impacts – Electric
Attachment C-1: CARE and LIEE Rate Impacts – Gas
Attachment C-2: Customer Usage
Attachment C-2A: Customer Bill Savings
Attachment C-3: Projected Customer Usage and Eligibility

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**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY
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I. INTRODUCTION

In accordance with the California Public Utilities Commission’s (“Commission” or “CPUC”) Decision (“D.”) 07-12-051,¹ Ordering Paragraph (“OP”) 3,² San Diego Gas & Electric Company (“SDG&E”) hereby submits its Application for Approval of Low Income Assistance Programs and Budgets for Program Years (“PY”) 2009-2011 (“Application”). In this Application, SDG&E seeks: (i) approval of its proposed Low Income Energy Efficiency (“LIEE”) and California Alternate Rates for Energy (“CARE”) program plans, measures, and budgets for PY 2009-2011, (ii) approval to adjust rates to recover CARE and LIEE program costs, and (iii) approval to continue the LIEE and CARE programs and funding into PY 2009 if a final decision has not been made prior to January 1, 2009.

¹ D.07-12-051 was a companion case to D.07-10-032, in which the Commission instituted a comprehensive, long-term energy efficiency strategy to make energy efficiency an integral part of “business as usual” in California. D.07-10-032 directed SDG&E, Southern California Gas Company (“SoCalGas”), Pacific Gas & Electric Company (“PG&E”), and Southern California Edison Company (“SCE”) (collectively, the investor-owned utilities (“IOU”)) to develop a single, statewide IOU strategic plan for energy efficiency through 2020 and beyond. In accordance, the IOUs developed the *California Energy Efficiency Strategic Plan* (“Strategic Plan”), which defines innovative new paths to aggressively deliver energy efficiency to the state, and to significantly contribute to the state’s goal of having a reasonably priced, stable, reliable and clean portfolio of energy resources. The IOUs will file the strategic plan on June 2, 2008.

² In addition, an April 1, 2008 Assigned Commissioner’s Ruling (“ACR”) provided a guidance document to the IOUs for their PY 2009-2011 LIEE program and budget applications. The guidance document outlined the format of the applications and discussed the specific elements that must be included in each section of the applications.

II. LIEE PROGRAM PLAN AND BUDGETS APPLICATION FOR PY 2009-2011³

A. OVERVIEW

1. D.07-12-051 expanded and updated the LIEE program policy objectives

In recognition of the changes in energy markets and the environment, as well as the needs of low income individuals and the larger community, the Commission, in D.07-12-051, updated the policy objectives for the LIEE programs, stating:

[T]he key policy objective for 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.⁴

To achieve these objectives, the Commission adopted a programmatic LIEE initiative (“programmatic initiative”): “to provide all eligible LIEE customers the 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.”⁵ The Commission also emphasized the need to implement the programmatic initiative in conjunction with the Strategic Plan. In furtherance of its commitment to change the approach of the LIEE programs, the Commission instructed the IOUs to incorporate these guidelines into their LIEE program and budget applications for PY 2009-2011:

- Propose a portfolio that identifies the benefit-cost ratio for each program and a justification for each program that is not cost-effective, as required in D.02- 08-034 and according to the most recently-adopted cost-effectiveness methodology;
- Be designed to achieve over the three-year budget period approximately 25% of the programmatic initiative;
- Demonstrate that all program elements included toward the achievement of the initiative articulated here is cost-effective using the total resource cost test adopted in D.02-08-034;

³ See direct testimony of Witness Lawless for a more detailed presentation of SDG&E's LIEE program plans, measures and budgets for PY 2009-2011.

⁴ D.07-12-051, at p. 25.

⁵ *Id.*

- Propose program elements that may not be cost-effective but that serve other important policy objectives and provide justifications for each consistent with by D.02-08-034;
- Present specific strategies and programs for the budget years 2009-2011 toward accomplishing the LIEE programmatic initiative adopted here that emphasizes long term and enduring energy savings, ways to leverage the resources of other entities, and ways to integrate LIEE programs with other demand-side programs, especially energy efficiency programs;
- Propose Marketing, Education and Outreach (“ME&O”) programs to promote LIEE programs and the LIEE programmatic initiative, including a program element that targets renters;
- Eliminate or modify the 10 year “go back” rule⁶ to permit installations of new measures and technologies in all households while avoiding duplicative installations;
- Propose a process for automatically qualifying all tenants of public housing and improving information to public housing authorities;
- Propose ways to promote program continuity and long term LIEE investments with more flexible budgeting and funding rules, consistent with the practices and rules adopted in D.07-10-032;
- Propose specific program participation goals in specific population sectors or segments and budgets designed to meet those goals, consistent with D.06-12-038;
- Analysis of how AB 1109 may affect their programs and the deployment of CFLs in California.
- Propose methods of tracking costs for each program element and participation in each that will permit cost-benefit analysis for each program element and that are consistent for all utilities.⁷

⁶ Currently, the IOUs apply a rule that a customer who is otherwise eligible for LIEE programs may not participate if the residence of that customer received LIEE measures within the previous ten years. *See* D.01-03-028, OP 1 and Attachment 3, and D.01-12-020 at OP 5. *See also* Section 2.8 of the 2006 LIEE Program and Policy Manual (“P&P Manual”).

⁷ D.07-12-051, at pp. 74-75.

2. SDG&E's proposed PY 2009-2011 LIEE program is designed to achieve the Commission's newly adopted LIEE program policy objectives

In this Application, SDG&E presents proposed modifications to its LIEE program, which are designed to meet the Commission's key policy objective of making LIEE a reliable energy resource and accomplishing the programmatic initiative of reaching 25% of all willing and eligible households in PY 2009-2011. In order to comply with the directives outlined in D.07-12-051, SDG&E designed a comprehensive LIEE program, which:

- Proposes a process to automatically qualify all tenants of public housing and Section 8 housing and improve dissemination of information to public housing authorities;
- Establishes an audit-based, customized approach for program delivery;
- Integrates the LIEE program with general energy efficiency and other demand-side programs;
- Leverages SDG&E's available resources with other IOU LIEE programs, other non-IOU low income programs, local and federal agencies, community-based organizations ("CBOs"), schools, and businesses;
- Coordinates efforts with the California Solar Initiative ("CSI");
- Proposes new, technology-based energy efficient pilots;
- Plans new cost-efficient program measures that provide long term, enduring energy savings;
- Develops a program participation goal in specific population segments to target those customers with the highest potential to be eligible for LIEE;
- Eliminates the 10-year "Go Back" rule;
- Tailors ME&O efforts to target specific customer segments, based on such factors as customer energy consumption, climate zone, language, income, age, owner vs. renter, etc;
- Develops and integrates LIEE workforce training requirements into the Workforce Education & Training ("WE&T") strategy by working in concert with existing job training programs that cater to disadvantaged customers in the local community; and
- Proposes measurement and evaluation ("M&E") studies designed to collect program information and data, which will allow SDG&E to assess program achievements and inform current and future program designs.

Consistent with the newly revised LIEE objectives articulated in D.07-12-051, SDG&E’s redesigned LIEE program reflects the Strategic Plan and supports the programmatic initiative, as it promotes the program as a reliable energy resource, makes the program available to more customers, offers more cost-efficient program measures, increases leveraging opportunities, and improves the benefit-to-cost ratio of the program.

3. Proposed PY 2009-2011 LIEE Budget

To fund the proposed PY 2009-2011 LIEE program plans and measures, SDG&E requests a budget of \$21.00 million for PY 2009, \$21.00 million for PY 2010, and \$20.25 million for PY 2011. SDG&E’s proposed PY 2009 – 2011 LIEE budget amounts and projected energy savings are shown in Table 1 below.

Table 1 – SDG&E Proposed LIEE Program Budget and Energy Savings*

Proposed PY2009-11			
Budget	2,009	2,010	2,011
Projected Total Budget**	\$21,000,000	\$21,000,000	\$20,250,000
Energy Savings			
Projected kWh	8,887,914	8,887,914	8,575,260
Projected Therms	478,745	478,745	452,749
Projected kW	2,010	2,010	1,965
Projected C02 Reduction (Tons)	7,661	7,661	7,365
Projected Vehicle Reduction	1,548	1,548	1,489

* Achieved energy savings will contribute to the energy savings goals adopted in D.04-09-060.

** Projected total budget includes the proposed PY 2009-2011 measurement and evaluation budget. See direct testimony of Witness McKinley, regarding the itemization of the proposed studies.

B. BACKGROUND

Historically, the LIEE programs have been primarily designed to promote participant equity, cost savings and comfort.⁸ However, in response to the lessons learned from the state’s energy crisis and the state’s need for adequate and reliable energy resources, the LIEE policy objectives shifted to also focus on the achievement of greater energy savings, as demonstrated by the Commission’s “Rapid Deployment”⁹ decision and “Winter Initiative” decisions.¹⁰ In these

⁸ See, e.g., D.89-12-057, D.95-05-045, D.99-03-056 and D.05-12-026.

⁹ D.01-05-033.

¹⁰ D.01-05-033 and D.05-10-044.

decisions, the Commission expanded the available LIEE program measures, streamlined the enrollment process, and increased income eligibility guidelines.

In D.07-12-051, the Commission revised the LIEE policy objectives to further emphasize the importance of making the LIEE programs an energy resource for the state. The Commission clarified that “the complementary objectives of LIEE programs are to provide an energy resource for California, consistent with our ‘loading order’ that establishes energy efficiency as our first priority, while reducing low-income customers’ bills and improving their quality of life.”¹¹

C. PROGRAM GOALS

1. Program Achieves ¼ of Programmatic Initiative

SDG&E’s proposed program is designed to achieve approximately 25% of the Commission’s programmatic initiative to provide all eligible customers the opportunity to participate in the LIEE programs and to offer those who wish to participate all cost effective energy efficiency measures in their residences by 2020. To identify the estimated total number of customers eligible to be served, the joint utilities¹² worked together to develop a methodology to determine the estimated total number of customers.¹³ Based on this methodology, the estimated number of customers SDG&E plans to serve is 60,000 low income households during PY 2009 - 2011.¹⁴

2. Program Meets Policy Objectives

SDG&E’s proposed LIEE program is primarily designed with a focus on the achievement of energy savings and the reduction of low-income customers’ bills. In order to obtain maximum savings that will both be a resource to the State of California and will provide customers direct benefits, SDG&E developed a comprehensive LIEE program designed to better identify, target, and serve customers. The program’s proposed customer education and customer rewards elements will also help to ensure that customers understand how they can contribute to sustained energy savings. To further promote and market the LIEE program, SDG&E also suggests proposals to integrate the LIEE program with the general energy efficiency programs and other utilities, as well as coordinate with other businesses and organizations.

¹¹ D.07-12-051, at p. 2.

¹² The joint utilities consist of SDG&E and SoCalGas.

¹³ See Attachment A-11 for a detailed description of the methodology used.

¹⁴ Although the actual number of customers calculated under the proposed methodology is 50,711, SDG&E established a goal to serve more customers, i.e., 60,000 customers, during 2009-2011 because SDG&E’s anticipates that it will become increasingly more difficult to meet the programmatic initiative in the later years.

3. Goals by Population/Segments

SDG&E proposes to identify those neighborhoods in its service territory that have a high density of customers who have a high likelihood of meeting the LIEE eligibility requirements. Concomitantly, SDG&E will identify those customers within these neighborhoods who are participating in the CARE program, but have not enrolled in LIEE.¹⁵ From these two strategies, SDG&E will generate a segment of highly eligible LIEE customers. SDG&E will then group the identified, highly eligible customers into tiers, based on their household energy usage—high users, medium users, and low users.¹⁶

SDG&E proposes the following program participation goals for PY 2009-2011: 20,000 high users, 21,000 medium users and 19,000 low users (these numbers include those customers whose natural gas usage will be evaluated on their consumption relative to baseline). SDG&E's PY 2009-2011 goal is to serve a total of 60,000 households.¹⁷ SDG&E's budget to meet its program participation goal is approximately \$62 million.

4. Program Meets Savings Goal

SDG&E's proposed LIEE program is aimed at achieving long term and enduring energy savings, serving as a resource to the State of California, as well as providing increased bill savings to SDG&E's low income customers. The energy savings resulting from this new LIEE program approach will contribute to the annual and cumulative energy savings goals adopted by the Commission in D.04-09-060.¹⁸

D. COST EFFECTIVENESS & ENERGY SAVINGS

1. Benefit/Cost Ratio of Program

For PY 2009-2011, the Commission instructed the IOUs to provide program level and measure level benefit cost ratios using the Utility Cost Test ("UCT"), the Modified Participant Test ("MPT"), and the Total Resource Cost ("TRC") tests.¹⁹ Because the measure level benefit/cost ratios produced for this Application assess the cost effectiveness of the program as a

¹⁵ Because SDG&E is a dual fuel utility, SDG&E will aggressively market the program to high consumers of electricity and above baseline natural gas consumers.

¹⁶ These levels represent the actual electric and natural gas consumption tiers under which customers are billed.

¹⁷ These numbers are based on SDG&E's attempts to enroll the highest energy users during PY 2009-2011, in order to achieve the programmatic initiative.

¹⁸ D. 04-09-060 states that, "savings achieved from energy efficiency measures installed under the IOUs LIEE program should be counted toward today's adopted savings goals."

¹⁹ *Assigned Commissioner's Ruling Providing Guidance for Low-Income Energy Efficiency 2009-2011 Budget Applications*; Rulemaking 07-01-042, April 1, 2008.

whole, indirect costs were included in the analysis, unlike the analysis completed on previous programs. In addition, because significant changes have been made since 2003, in the way avoided costs are included in energy efficiency analyses, the E3 Calculator for PY 2009-2011 planning²⁰ (“E3 Calculator”) was used in this analysis to measure avoided cost benefits. The steps involved in conducting the cost effectiveness tests for the PY 2009-2011 LIEE program are summarized as follows.

The MPT was conducted using the methodology approved by the Commission for the PY 2003 evaluation. The model used in that evaluation was updated with the proposed values for PY 2009-2011 as detailed below:

- The estimated number of participant households was entered by measure type, housing type, fuel type and climate zone where applicable.
- The estimated program costs were entered as measure-specific installation costs and overall program indirect costs.
- Estimated energy saving impacts were entered as therms, kWh related to non-cooling measures, kWh related to cooling measures, and kW impacts where they were available.²¹

The benefit/cost ratio for the MPT test consists of the net present value (“NPV”) of energy savings and non-energy benefits (“NEBs”) for the participant in the numerator, and the cost of the program (both measure installation and indirect costs) in the denominator. For measure level benefit/cost ratios, the indirect costs were allocated based on the energy savings of the measure.

The UCT was conducted in two stages. First, the NEBs model used in the PY 2003 evaluation was used to calculate program level NEBs, similar to the analysis for the MPT but with utility-specific NEBs specified rather than participant-specific NEBs.²² Second, the E3 Calculator was used to derive the avoided cost benefits. The E3 Calculator was populated with the proposed measure installation quantities, proposed program costs, and the energy savings impacts described above for the MPT. The benefit/cost ratio for the UCT test consists of the

²⁰ SDG&E Tool 5c (800) downloaded from http://www.ethree.com/cpuc_cee_tools.html on 04/21/08.

²¹ Most of the impacts used in the analysis were taken from the 2005 Impact Evaluation conducted by West Hill Energy & Computing described in the direct testimony of Witness McKinley. Where impacts were not provided in this study, they were taken from the Database for Energy Efficiency Resources (“DEER”), workpapers, or the impacts used in the “Preliminary Report on the Assessment of Proposed New LIEE Measures,” Itron, March 2005.

²² Examples of utility-specific NEBs include reduced carrying costs on arrearages, fewer shutoffs, fewer reconnects, fewer customer calls; examples of participant-specific NEBs include water/sewer savings, fewer fires, property value benefits, fewer illnesses, comfort, and reduced hardship.

NPV of avoided cost savings for the utility plus the utility NEBs in the numerator, and the cost of the program (both measure installation and indirect costs) in the denominator. For measure level benefit/cost ratios, the indirect costs were allocated based on the energy savings of the measure.

The TRC test was conducted using the E3 Calculator. As with the UCT, the E3 Calculator was populated with the proposed measure installation quantities, proposed program costs, and the energy savings impacts described above for the MPT. The E3 Calculator provides program level results and measure-specific results with indirect costs allocated based on the energy savings of the measure. The TRC test²³ does not include NEBs, so in this respect it is not comparable to the results of the MPT and the UCT.

In general for this analysis, it is important to note that allocating indirect costs across measures according to energy savings in many cases skews the cost effectiveness results for some measures, making them appear to be less cost effective or more cost effective than they really are. The reason for this is that indirect costs are not directly related to the amount of energy a measure might save. The result of allocating indirect costs by energy savings is that measures that contribute more energy savings to the portfolio bear a greater portion of these costs than measures that contribute less energy savings. For example, according to the most recent impact study discussed below, 78% of the statewide electric LIEE energy savings is attributable to refrigerators. Thus, although the number of units installed is relatively low compared to other measures, they bear a large portion of the allocated indirect costs and this drives the benefit cost ratio for this measure down.

2. Impact Evaluations

D.02-12-019 directed the IOUs to conduct a bi-annual load impact evaluation for the LIEE programs in accordance with the M&E protocols and the provisions²⁴ described in D.03-10-041. Following this direction, the 2005 Program was evaluated by West Hill Energy & Computing, Inc.²⁵ The primary purpose of the 2005 evaluation was to estimate the first year

²³ The TRC test is used for determining the cost-effectiveness of program portfolios offered under the Energy Efficiency programs. The portfolio of programs must result in a TRC of 1 or greater to be deemed cost-effective. Historically, the Commission has not required LIEE programs to meet the TRC threshold because the programs served other Commission equity objectives.

²⁴ *Protocols and Procedures for the Verification of Costs, Benefits, and Shareholder Earning from Demand-Side Management Programs, as adopted by the Commission*, Revised June 1999.

²⁵ West Hill Energy & Computing, Inc. *Impact Evaluation of the 2005 California Low Income Energy Efficiency Program Final Report*, December 19, 2007.

energy savings for the measures offered under the LIEE program at the program and measure level. In addition, the 2005 evaluation was designed to provide additional information for certain key measures, i.e., lighting, cooling, and low-flow showerheads. The study also assessed the effectiveness of the energy education component of the LIEE Program on a qualitative basis and provided recommendations for improving the LIEE Program.

The study incorporated a regression analysis to estimate impacts. The results of the regression analysis were then compared to estimates from previous evaluations, external studies, and other data collected through the showerhead and the on-site surveys in an effort to triangulate and improve the estimates of the energy impacts.²⁶

The study included the following recommendations for improving the program and future evaluations:

- Focus energy education on actions with higher savings and lower acceptance, such as drawing shades to reduce cooling;
- Improve the quality of the CFL lamps and ensure their installation to raise retention rates from the 65% found in the on-site survey;
- Provide additional instruction on the appropriate use of evaporative coolers and air conditioning systems;
- Consider changes to the refrigerator replacement protocols;
- Focus on NEBs (e.g., improvements in health and safety) in the next evaluation; and
- Consider adding efficient clothes washers to the program and information regarding how customers can claim savings for reduced water pumping from low flow devices and other water-savings measures.

This study provided valuable information for program planning and reporting. Primarily, the estimated savings will be used for regulatory reporting and for cost effectiveness testing. In addition, a number of findings informed LIEE program design planning for PY 2009-2011. For example, according to the results reported from this study, energy savings for key measures are significantly higher in high consumption households. Consistent with the study's finding, SDG&E's proposed program design focuses special marketing attention on those customers/homes who are the highest energy consumers, without excluding those potentially

²⁶ See direct testimony of Witness McKinley for a summary of these results for the LIEE program's electric and natural gas measures.

eligible customers who have lower energy consumption. SDG&E is also proposing to add high efficiency clothes washers to its PY 2009-2011 portfolio of measures. In addition, potential changes to refrigerator replacement protocols (i.e., age of refrigerator) will be evaluated as part of the proposed Refrigerator Degradation Study described in Attachment A-10.5.

E. PROGRAM DESIGN

1. Section Overview

SDG&E proposes a new LIEE program design that harmonizes the Commission’s revised LIEE policy objectives—to emphasize participating customer benefits and produce energy savings. In order to achieve long term, enduring energy savings *and* bill savings, SDG&E proposes to move away from a “one-size-fits-all” approach to a more comprehensive LIEE program design that coordinates with a wider range of low income service programs,²⁷ CBOs, and other local and federal agencies to target and better address the unique needs and characteristics of individual customers. As a long term strategic approach to achieve long-term behavioral changes and sustained energy savings, SDG&E proposes to augment its program delivery to include a customized energy education element and a customer rewards element. In order to maximize savings, SDG&E also proposes to integrate general energy efficiency programs and other demand response programs with the LIEE program.

This new program design also addresses the health and safety needs of low-income customers, by ensuring that customers’ households are matched with the appropriate mix of energy efficient and cost effective measures.²⁸ Additionally, SDG&E’s proposal maximizes the use of program funds to reach the greatest number of eligible customers by coordinating with other utility low income assistance programs, and redirecting program funds that in the past had been used to install measures that achieved limited energy savings or were not cost effective to the program.

SDG&E’s proposed LIEE program design will help minimize lost opportunities by: 1) increasing aggressive marketing efforts, 2) enhancing the collection of data that will help facilitate needed modifications to program design elements, 3) providing the appropriate mix of program measures based on customer energy consumption patterns, and 4) monitoring changes

²⁷ E.g., WIC, TANF, and LIHEAP.

²⁸ For example, SDG&E proposes additional measures to address safety concerns, such as a furnace clean and tune, which ensures a properly operating furnace, and a standing pilot light retrofit which replaces pilot lights that burn constantly in central forced air furnaces.

in household consumption and modifying measures where appropriate. Consistent with the Strategic Plan and the programmatic initiative, SDG&E's new LIEE program design supports the Commission's objective of providing energy resources for California, while providing optimal benefits to low-income customers through reduced energy usage and costs.

2. Program Delivery

a. Program Delivery by Segments/Density

To meet its program participation goal of enrolling 60,000 customers into the program for PY 2009-2011, and achieve maximum savings as soon as possible, SDG&E proposes to prioritize the focus of its marketing efforts, based on customer energy usage levels. For example, SDG&E will focus aggressive marketing efforts on customers identified as high and medium users, since these customers have the greatest potential for energy savings and customer benefits. Aggressive marketing efforts may include canvassing, direct customer contact by customer service representatives or other customer contact personnel, and telemarketing. SDG&E will also focus its marketing efforts on low users, but less frequently and less aggressively. For example, low users may receive direct mailings and email blasts. Although some customers will be contacted less frequently, no customer will be excluded from participation in the program at any time as a result of this new approach. SDG&E fully intends that willing and eligible customers will have the ability to participate in the program at all times.

In order to generate higher responses to the marketing efforts, SDG&E also plans to develop multiple marketing materials aimed at reaching these customers based on various socioeconomic characteristics, such as income, age, owner/renter, language, etc. For example, in focus groups, SDG&E found that renters do not consider their rental unit as "home," but rather it is simply the place they live. For this reason, when marketing to renters, SDG&E plans to refer to the rental unit as a "residence." SDG&E will also expand the type of media used to market customers and the number of languages used to communicate to customers.

Reaching out to customers in this fashion will enable SDG&E to customize its marketing efforts to reach all highly eligible customers, while better meeting customer needs, providing maximum benefits to customers, allowing SDG&E to reach those customers who have been the "hardest-to-reach" in the past, and improving customer participation. This method will also help SDG&E achieve the Commission-adopted programmatic initiative goal.

b. Increased Coordination Between Utilities

Currently, SDG&E and SoCalGas refer customers to each other. For PY 2009-2011, SDG&E and SoCalGas plan to implement a joint LIEE enrollment process to ensure that customers receive all recommended program measures. This process will maximize customer benefits, while simplifying the enrollment process. Implementing a joint utility enrollment process will also provide cost savings (e.g., duplicative costs, outreach, time, assessment, enrollment, and inspection) for both utilities, and reduce any inconveniences that may be experienced by the customer, e.g. multiple in-home assessments and program enrollments.

SDG&E also will work with SoCalGas to develop co-branded direct mailers and other marketing collateral. This will increase customers' awareness about the LIEE program and will also ensure that customers who reside in overlapping service territories are fully aware of all LIEE program services and benefits.

c. Program Delivery Process

SDG&E's proposed LIEE program delivery process is comprised of the following six elements: 1) enrollment; 2) customized energy audit; 3) customized energy education; 4) installation of measures; 5) inspections; and 6) customer rewards. The following briefly describes the six program elements.²⁹

1. Enrollment

SDG&E proposes to maintain its current form of streamlined enrollment options, as adopted by the Commission, which include: targeted self certification,³⁰ categorical eligibility³¹ and eligibility verified through CARE's post enrollment verification process.³² These options simplify the enrollment process for customers and the outreach specialists who enroll customers. Customers will also continue to be able to enroll by providing proof of income documentation.

2. Customized LIEE Energy Audit

The current LIEE program includes an in-home energy assessment, which is a basic audit, that identifies "all feasible measures"³³ to be installed, and develops a standard energy

²⁹ See direct testimony of Witness Lawless for a more detailed discussion on SDG&E's proposed program delivery process.

³⁰ See D.06-08-025.

³¹ See D.06-12-038, which defines the method under which customers can qualify for CARE or LIEE based on their participation in identified state and federally-funded means tested programs all in an effort to keep qualified customers enrolled in the program

³² See Assigned Commissioner's Ruling, dated March 29, 2008 in R.04-01-006.

³³ "All feasible measures" has been defined as being all measures that can be installed in conformance with the Statewide LIEE Installation Standards.

education package, designed to highlight and discuss conservation practices. SDG&E's proposed program design provides a customized and detailed energy audit that creates a personalized energy-use profile for each customer. This customized audit, which focuses on the needs of the household, will better align the assessment process with the goal of achieving energy savings, reducing greenhouse gas emissions, and lowering customer bills.

Following the audit, the auditor will thoroughly discuss with the customers their individual results, and identify recommended LIEE measures that will best meet the needs of the customers' households and have the potential to yield the greatest energy savings. As part of the post-audit results package provided to the customer, SDG&E intends to include a graphic that compares the customers' household consumption with like homes in the neighborhood. This visual depiction will allow customers to gauge their energy consumption in comparison with their neighbors, and potentially encourage more energy efficient behavior. The post-audit results package will also include a disaggregated breakdown of customers' household consumption by end-use, e.g. refrigeration, lighting, air-conditioning, etc, which will help customers understand where they have the greatest opportunities to achieve energy savings and cost savings.

SDG&E's comprehensive energy audit will ensure that homes receive the correct and appropriate mix of measures to make the home as energy efficient as practical, given the age and type of the building, and the customer's energy consumption patterns. For these reasons, SDG&E proposes to eliminate the three-measure minimum currently required for participation in the LIEE program, which will enable SDG&E to serve more customers.³⁴

3. Customized Energy Education

SDG&E is proposing to implement a new and innovative approach to customer energy education. This new educational approach differs from SDG&E's current process because will be more personalized to the needs and characteristics of the individual home and is aimed at engaging the customer's participation and commitment to becoming energy smart by using energy wisely. The success of the energy education program will largely depend on customer understanding and appreciation of the importance of energy efficiency, developing skilled program personnel to promote and encourage changes in customer behavior, and providing

³⁴ As articulated in the P&P Manual, the three-measure rule provides that a home must require a minimum number (3) of program measures in order to be eligible for participation in the program.

performance feedback to customers. Based on the results of the comprehensive audit previously discussed, energy education tailored to the individual customer will consist of the following:

- Basic energy efficiency information and tips;
- Measures to be installed and associated energy savings;
- Customer-generated goals related to energy use;
- Potential benefits to the customer and the environment and economy;
- Usage of Smart Meter feedback information;
- Potential improvements to health, comfort, safety, and quality of life; and
- Comparison of energy usage patterns of households with similar characteristics.

4. Installation of Measures

Measures recommended in the audit will be installed by licensed CBOs and contractors participating in the LIEE program. These entities and individuals will be responsible for contacting the customer to schedule installations and completing the services according to program procedures and requirements. SDG&E or its contractor will perform a post- installation inspection on a sampling of homes.

5. Inspections

D.06-12-038, as modified by D.07-06-044, requires SDG&E to competitively bid its LIEE program. SDG&E is in the process of developing its request for proposals (“RFP”) and anticipates releasing the RFP by mid-2008. D.00-07-020 concluded that if a utility utilizes a prime contractor as administrator of the LIEE program, inspections can be performed by utility personnel. If the SDG&E performs the administrative functions, inspections are to be conducted by a third party. SDG&E’s current LIEE program utilizes a prime contractor. However, SDG&E envisions that the future LIEE program will not have a prime contractor, and SDG&E will contract directly with numerous contractors and CBOs for the enrollment of customers and the installation of program measures and services.

Currently, SDG&E has a trained staff of in-house experts who provide inspection services for the LIEE and general energy efficiency programs. Using this staff for both programs results in more efficient use of time and resources, and produces cost savings for the utility. Inspections performed by in-house personnel allows SDG&E to closely monitor the quality of work being performed in the program. Ultimately, SDG&E is responsible for the success of the

LIEE program, and therefore has a vested interest in ensuring that work performed by its contractors is of the highest quality. To make certain that no conflict of interest exists between program management and inspections staff, the inspection function is organizationally separate from SDG&E's LIEE program management. For these reasons, SDG&E plans to continue its in-house program inspections.

6. Customer Rewards

To reinforce energy education, achieve long-term behavioral changes, and create sustained energy savings, SDG&E proposes a new LIEE program element—customer rewards. This element is designed to reward customers who are able to consistently maintain a reduction in their overall energy consumption. Additionally, it may potentially mitigate the rebound effect, whereby customers use more energy because they have more discretionary dollars, as a result of reduced energy bills.

The following describes the methodology that will be used to determine the target percentage reduction and the levels of potential rewards. The comprehensive energy audit will analyze customer energy usage for the previous 12 months to establish a base level of energy consumption. A monthly projection of reduced energy savings will be calculated, based on the energy audit's recommended measures to be installed. From this calculation, a percentage reduction over the 12-month average consumption will be determined and will form the basis for the reward category for which the customer qualifies. If, for a consecutive six month period after LIEE measures are installed, customers achieve and maintain the projected energy savings, they will be eligible to receive a customer reward.³⁵ And, if they continue to maintain the energy savings, then they will be eligible for a second reward at the end of 12 months. To encourage maximum energy savings, two levels of incentive rewards will be available. The Platinum Level Incentive of \$37.50 will be awarded to customers who reduce their energy consumption by 20% or more. Customers who reduce their energy consumption by 15% to 19% will receive the Gold Level reward of \$25. Customers may receive up to two rewards in one year during the first year of program participation.

3. Portfolio Composition

The current LIEE program provides installation of all feasible measures, whether or not a measure provides any substantive savings or is needed by the household. SDG&E's new LIEE

³⁵ SDG&E has not yet determined the form of the reward.

program will offer three mixes of measures, depending on the household’s usage category (High, Medium, and Low) and the customer’s audit profile. Each measure mix will include measures identified as producing the highest energy savings and most benefits for each customer. SDG&E will offer a customized mix of measures to customers, which will result in long term energy savings, lower customer bills, reduced program costs, and improved quality of life. SDG&E intends that the mix of measures may be modified to meet unique customer needs where necessary.

SDG&E’s proposed portfolio of measures includes a combination of measures, both old and new, that have a benefit/cost ratio of less than one. However, SDG&E has included them in this portfolio because these measures still provide energy savings to the customer. As such, they directly address the Commission’s objectives to provide participant bill savings, improve quality of life, and in combination with SDG&E’s proposed plan for PY 2009 – 2011, improve the program’s benefit/cost ratio. The mix of measures for each usage level is detailed in the following two tables:

Table – 7

ELECTRIC MEASURE MIX		
HIGH	MEDIUM	LOW
Air Conditioner Replacement	Air Conditioner Replacement	Air Conditioner Replacement
Air Conditioner Tune-up	Air Conditioner Tune-up	Air Conditioner Tune-up
Compact Fluorescent Lights	Compact Fluorescent Lights	Compact Fluorescent Lights
Evaporative Cooler	Evaporative Cooler	Evaporative Cooler
HE Clothes Washer	HE Clothes Washer	HE Clothes Washer
Interior Hardwired Lighting	Interior Hardwired Lighting	Interior Hardwired Lighting
LED Night Light	LED Night Light	LED Night Light
Microwave	Microwave	Microwave
Porch Light	Porch Light	Porch Light
Refrigerator Replacement	Refrigerator Replacement	Refrigerator Replacement
Torchiere Lamp	Torchiere Lamp	Torchiere Lamp

Table – 8

NATURAL GAS MEASURE MIX	
AT OR BELOW BASELINE	ABOVE BASELINE
Ceiling Insulation	Caulking
Faucet Aerator	Ceiling Insulation
Furnace Clean & Tune	Duct Testing & Sealing
Furnace Filter	Evaporative Cooler Cover
Furnace Repair/Replacement	Faucet Aerator
High Efficiency Clothes Washer	Furnace Clean & Tune/Filter
Low Flow Showerhead	Furnace Filter
Minor Home Repair*	Furnace Repair/Replacement**
Shower Start	High Efficiency Clothes Washer
Standing Pilot Change Out***	Low Flow Showerhead
Water Heater Blanket	Minor Home Repair
Water Heater Pipe Wrap	Shower Start
Water Heater Replacement (Tank & Tankless)	Standing Pilot Change Out***
Caulking	Water Heater Replacement (Tank/Tankless)
Duct Testing/Sealing	Water Heater Blanket
Evaporative Cooler Cover	Water Heater Pipe Wrap
Weather-stripping	Weather-Stripping
Notes: * Minor home repairs are limited to “repairs required to mitigate catastrophic envelope leaks” as defined in Table 6-2 of the P&P Manual ** Only available for owner-occupied units *** Only available for operational furnaces Measures shown in gray shading are not available for this customer segment.	

Of the measures listed in above tables, the following are new measures that SDG&E proposes to add in PY 2009-2011:

- High-Efficiency Clothes Washer** – SDG&E and the Metropolitan Water District (“MWD”) are in negotiations to develop a partnership to leverage available program funds for the direct installation of high-efficiency clothes washers. MWD proposes to contribute \$110 towards the purchase cost of each high efficiency clothes washer that SDG&E’s LIEE program installs. The balance of the purchase cost will be borne by the program. To ensure this proposed measure achieves maximum benefits for LIEE program energy savings, water reduction and customer bill savings high efficiency clothes washers will only be made available to large households consisting of four or more household members, and when the clothes washer *and* clothes dryer in the household are operational. As the Commission acknowledged in D.07-12-050, “to use less water means using less energy.”

High efficiency clothes washers, heat less water and extract more water from the clothes than traditional clothes washers. With the extraction of more water from the clothes, the required drying time is reduced, which also results in reduced energy savings. The annual energy savings is expected to be approximately 37 therms and 49 kWh for natural gas dryers, and 27 therms and 303 kWh if the dryer is electric, and water savings of 10,000 gallons.

- **Forced Air Unit Furnace Standing Pilot Light Retrofit** - Natural gas forced air unit (“FAU”) furnaces manufactured prior to January 1, 1992³⁶ have a standing pilot light that remains on 24 hours a day, seven days a week. Some customers may choose to keep their standing pilot light on all year, while some may choose to turn it off during the non-heating season. Significant savings can be achieved by retrofitting a standing pilot light with an electronic ignition module which will eliminate the natural gas used to keep the pilot light constantly burning. The estimated energy savings for this measure is 44 therms per year.
- **Microwave** - SDG&E is proposing to provide LIEE customers with counter top microwaves because microwaves reduce cooking time and energy usage, compared to conventional cooking methods. For example, in an all electric home, the range top and oven are two of the largest energy consumers on a per hour basis. A microwave will save the customer time and energy. The estimated energy savings for this measure is 98 kWh per year.
- **Shower Start** – Due to the way in which homes are plumbed, many customers turn on the shower and perform other tasks, while waiting for the water to reach the desired temperature. This practice results in a waste of both energy and water. The Shower Start allows customers to start the flow of hot water, and when the water reaches a certain temperature reduces the flow of water to a trickle. When customers enter the shower, they release the valve, and adjust the water temperature. This measure will save customers both energy and water. The estimated energy savings for this measure is 13.6 therms when the water heater is natural gas, and 399 kWh when water the water heater is electric, and 2,500 gallons of water per year per home.

³⁶ The 1992 California Energy Commission Appliance Efficiency Regulations addressed the sale of fan type central furnaces with standing pilots and states that fan type central furnaces manufactured before January 1, 1992 (for non-mobile home) shall not be sold or offered for sale if they are equipped with constant burning pilots.

- **LED Night Lights** – Light Emitting Diode (“LED”) technology has been used in the commercial sector for many years. An LED night light with a photo sensor is an excellent application for most households. When these lights are properly placed in the home, they provide enough light to eliminate the need to turn on overhead lights in various rooms. They can light a stairway at night, provide enough light in a kitchen to get a drink of water, and provide a nightlight for a child’s room. The cost to operate LED nightlights is pennies per year. This is another cost saving measure for customers. The estimated energy savings for this measure is 10 kWh per year.
- **Furnace Clean and Tune** – The temperate climate of SDG&E’s service territory contributes to relatively low customer heating bills. Because heating systems in SDG&E’s service territory are not used often, many customers neglect to service their heating systems, as frequently as needed. A well-tuned and cleaned furnace will operate more efficiently and minimize the risk of any health dangers due to incomplete combustion. For safety and operational efficiency, it is important that heating systems are inspected and maintained by qualified personnel. For these reasons, SDG&E proposes to add this new measure.
- **Second Refrigerators** – On December 12, 2007 SDG&E filed Advice Letter 1951-E seeking permission to expand the existing refrigerator component of the LIEE program as a pilot to include the replacement of a secondary refrigerator. SDG&E’s request was approved, effective January 11, 2008. SDG&E believes this is a valuable measure to those larger low income households that require the use of a second refrigerator. SDG&E proposes to make second refrigerators a standard offering of the LIEE program with the same installation criteria as applied to primary refrigerators.³⁷

SDG&E selected these new measures by examining the measures that would best complement the current list of program measures, provide increased energy savings to customers, improve customers’ quality of life, and increase the cost effectiveness of SDG&E’s LIEE program.

³⁷ The refrigerators have to be manufactured before 1993, be a minimum size of 10 cubic feet, be of equal size, and the refrigerator must fit in the available space. See 2006 LIEE Program Statewide Policies and Procedure Manual, at Section 7.3.19.

a. Assembly Bill 1109 (“AB1109”)

AB 1109³⁸ requires that general purpose lights meet specific standards for hazardous materials (particularly mercury) and that the California Integrate Waste Management Board consider methods for the safe disposal of general purpose lights. Additionally, the bill requires that the California Energy Commission (“CEC”) adopt regulations (in combination with other programs and activities affecting lighting use) that will reduce the average indoor residential lighting consumption by 50% and average indoor commercial and outdoor lighting levels by 25% relative to 2007 levels.

The federal standards³⁹ may lead to the replacement of standard incandescent 100-watt light bulbs on January 1, 2012, 75-watt light bulbs on January 1, 2013, and 40-watt and 60 watt light bulbs on January 1, 2014 with more efficient lighting sources. However, since incandescent lights will be available through 2011, AB 1109 will not adversely affect SDG&E’s PY 2009 – 2011 LIEE program. As such, it is premature at this time to try and develop a strategy to inform and educate customers regarding proposed changes.

b. 10-Year Rule

In order to provide services to the widest range of low-income households possible, the current P&P Manual generally restricts the utilities from returning to customer households that have previously been treated under the LIEE Program during the past ten years. D.07-12-051 directed the IOUs to “[e]liminate or modify the ten year ‘go back’ rule to permit installations of new measures and technologies in all households while avoiding duplicative installations.” In accordance, the IOUs have agreed upon the following modifications/exceptions to be added to "Section 2.8 Previous Participation" of the P&P Manual:

New cost effective measures or technologies that were not previously available in the LIEE program at the time the utility treated a home shall be made available for those qualifying customers. In the event a key program eligibility requirement now makes a customer eligible for measures previously not offered at the time the utility treated the home, the utility shall make available those cost effective measures for qualified customers.

This modification gives SDG&E full flexibility to return to homes that have been treated in the past and to provide the homes with cost effective measures that were either not available at

³⁸ AB 1109 - The California Lighting Efficiency and Toxics Reduction Act, Chapter 534 was approved by Governor Schwarzenegger on October 12, 2007, and filed with the Secretary of State on October 12, 2007.

³⁹ Federal Energy Independence and Security Act of 2007 (“EISA 2007”).

the time the home was treated, or were not offered due to a condition that has now changed. SDG&E currently utilizes a state-of-the-art, workflow automation tool to avoid duplicative installations, and SDG&E intends to continue its use in the future.

4. ME&O

SDG&E's current LIEE program is marketed in a variety of ways, with a range of marketing approaches that have been developed based on experience and effectiveness. SDG&E has found that the best way to reach potential LIEE-eligible customers is through a focused approach, utilizing methods designed to encourage customers to respond positively, with materials that address customer's unique needs and characteristics. In order to ensure that all customers are aware of the LIEE program and provided the opportunity to participate, SDG&E will continue to use and expand outreach methods that have proven effective and successful. The following describes SDG&E's proposed ME&O activities for PY 2009 – 2011:

1. Targeted Direct Mail – This method has been successful in reaching low-income customers with high potential for eligibility and will be used in conjunction with the energy consumption segmentation strategies.
2. Cross-Promotion – The LIEE program is promoted along with CARE and other SDG&E assistance programs, such as Medical Baseline and the Family Electric Rate Assistance program (“FERA”).⁴⁰ SDG&E also provides customers enrolled in other assistance programs with information on LIEE. The LIEE program will also be cross promoted with the general energy efficiency programs.
3. Telemarketing – SDG&E has been successful in using telemarketing services to contact potentially eligible customers and encouraging them to enroll in the LIEE program. During PY 2009-2011, SDG&E will expand this approach to include calls to customers using automated outbound dialing.
4. Email Blasts – Email blasts are emails that are sent to mass distribution lists. As more low-income customers utilize email, and SDG&E receives their email addresses, this method will be expanded as it has been effective at a very low cost.
5. Canvassing – SDG&E intends to continue the use of door-to-door canvassing campaigns to enroll potential LIEE customers through face-to-face contact.

⁴⁰ The Medical Baseline program provides customers with doctor verified medical conditions requiring heat, air conditioning or life-support equipment additional energy at the lowest (or baseline) rate. The FERA program offers rate assistance to families of three or more and with total household income between 200% and 250% of the Federal Poverty Guidelines.

6. Advertising – SDG&E plans to expand its use of print and radio promotions, focusing on in-language media for various customer segments.
7. Community Events – SDG&E will continue to participate in community events where there is the potential to reach eligible low-income customers, and seeks opportunities to participate in new community events.
8. Coordination with Local Agencies – SDG&E works with a variety of local agencies that serve low-income customers to ensure that the agencies are familiar with the LIEE program and other assistance programs and to encourage them to enroll their clients into the LIEE program. Presentations and program materials are provided to the agencies, with ongoing SDG&E follow-up and contact with the agencies. 211 San Diego⁴¹ provides LIEE program information to callers and provides referrals to SDG&E regarding customers who are interested in participating in the program. SDG&E plans to continue this coordination effort in PY 2009 - 2011.
9. SDG&E Customer Contact – SDG&E’s customer service representatives and other customer contact personnel inform customers about SDG&E’s assistance programs, including LIEE. SDG&E will continue to utilize this resource in PY 2009 - 2011.
10. Brochures – SDG&E has several program informational materials that are distributed through the various outreach methods. Brochures are provided in multiple languages, including English, Spanish, and Vietnamese (online only).

SDG&E will continue to evaluate outreach and marketing opportunities to determine the best ways to overcome barriers to customer participation in LIEE and other assistance programs.⁴² In addition, SDG&E has recently implemented a process to capture information on the reasons why customers choose not to participate in the LIEE program, which will provide insight into ways to overcome the reasons customers may choose not to participate in the program.

a. Single statewide marketing campaign

The Commission in D.07-10-032 directed that the Strategic Plan “provide details about how education, marketing and outreach activities will be used to promote energy efficiency

⁴¹ 211 San Diego San Diego is a human service referral program that provides a free, 24-hour referral service for information on community, health, and disaster services.

⁴² For example, SDG&E plans to evaluate additional activities with faith-based organizations, increased leveraging with energy efficiency communications, potential opportunities with water agencies, and additional opportunities for use of the web/internet.

programs in an integrated and coordinated fashion, as set forth herein.”⁴³ The Commission expanded on this direction in D.07-12-051 for the LIEE program, and directed the utilities to develop a tagline that can be used with the program names currently used by the utilities.⁴⁴ The decision required the assigned ALJ, in consultation with the Assigned Commissioner, to schedule workshops to consider the development of a common branding strategy for California low income energy efficiency products and services. The tagline was discussed and suggestions were offered at two LIEE Strategic Planning Workshops held January 8, 2008, and April 3, 2008. However, no consensus was reached on a tagline for the program.

Despite this lack of a consensus, and in an effort to maximize the exposure that the LIEE program would receive through an integrated statewide marketing campaign for demand-side programs, SDG&E prefers to develop a new, statewide program name in lieu of a tagline that would replace the names currently used by each of the IOUs for their respective LIEE programs. A consistent and recognizable name used throughout the State will also help customers to re-enroll in the program if they move to another utility’s service territory. Even so, SDG&E is willing to coordinate with the other IOUs to develop a statewide program name, tagline, or program description.

b. ME&O by population/segments

SDG&E will continue to target its marketing and outreach strategies to customer segments, taking into special consideration their level of energy usage and certain characteristics as described in SDG&E’s segmentation strategies. SDG&E recognizes that it is important for ME&O efforts to address the specific needs of customer groups, in order to encourage greater program awareness and participation. For example, SDG&E provides program materials in several languages, for customers whose primary language is not English.

SDG&E coordinates its LIEE program promotions with its Medical Baseline program to leverage with agencies that serve persons with disabilities. SDG&E will continue make program materials available in large print for visually-impaired customers. SDG&E also intends to maintain its working relationship with agencies that serve senior customers to extend ME&O strategies.

⁴³ D.07-10-032, dated October 18, 2007, Conclusions of Law 13, 14, OP 8.

⁴⁴ D.07-12-051, dated December 18, 2007, pages 46-47, “[t]he workshop(s) should develop a brand name for the LIEE program that all utilities will use as a tag line that each utility would add to its own LIEE program name.”

SDG&E will expand its categorical eligibility process to include Section 8 and public housing, so that customers in these programs can be automatically qualified for LIEE program services. To improve the delivery of program information to public housing authorities, SDG&E plans to contact and collaborate with public housing authorities to ensure they have an understanding of the program services and program collateral.

A large segment of SDG&E's LIEE customers are renters, and SDG&E has found that its outreach methods have successfully reached them. On May 10, 2007, the Commission convened a workshop to address the issue of renter access to the LIEE program. SDG&E reported at that workshop that 28% of those households treated between 2004 and 2006 were owner occupied, while 72% were occupied by renters. SDG&E expects this ratio to continue through 2009 through 2011. Additionally, in Finding of Fact 23 in D. 07-12-051, the Commission found that "Statewide, renters appear to be receiving more than a proportional share of LIEE programs. Customers with the greatest need are more likely to be renters than homeowners." For these reasons, SDG&E does not believe that more efforts are needed to increase its marketing efforts specifically to renters.

c. Workforce Education and Training ("WE&T")

SDG&E currently utilizes two approaches to training those working in SDG&E's LIEE program. The first approach utilizes the training personnel at SDG&E to assist in the training of outreach personnel employed directly by SDG&E. The second approach requires SDG&E's prime contractor—Richard Heath and Associates—to train its employees in all aspects of the LIEE program as well as to ensure that personnel of its sub-contractors are properly trained on the program's policies and procedures, proper installation of LIEE measures and how to determine the feasibility of measures, and customer contact skills.

One of the areas of particular interest discussed in various venues has been the desire to build and expand on the current workforce that is drawn from the low income communities. SDG&E has found that many of the LIEE contractors and subcontractors already hire their crews from the low income community. For example, CBOs hire from the training programs they currently administer through their agencies. Additionally, there have been LIEE program participants who have become employed by LIEE contractors. During PY 2009-2011, SDG&E will continue to encourage contractors and CBOs to hire and train from the local low income communities.

To expand its WE&T efforts, SDG&E will also explore the feasibility of coordinating with other existing job training programs for minority and disadvantaged groups, such as the Employment Development Department (“EDD”). The EDD focuses on the needs of low-income and displaced workers in general, and also provides grants to governmental units, nonprofits and private companies that engage in job training.

EDD’s “One-Stop Career Centers” provide employment, education, and training services, and identifies job ready workers with the right skills. There are 13 “One-Stop Career Centers” located San Diego County, which are open to all members of the community, including persons with disabilities and persons with limited English speaking ability. In addition to the One-Stop Career Centers, SDG&E plans to initiate discussions with the California Employment Training Panel (“ETP”) regarding job training opportunities in the energy industry.

5. Integration with Energy Efficiency

Because it is important for LIEE customers to be aware of all energy savings opportunities, SDG&E will look for opportunities to integrate its LIEE program with its general energy efficiency programs. For example, LIEE plans to coordinate with other energy efficiency programs, such as Lighting Turn-in Events, where customers will be provided the opportunity to enroll in LIEE and other customer assistance programs. Information and communications for LIEE and energy efficiency will be integrated to provide consistent and complete energy savings information. LIEE education will include information on other related programs that provide energy savings opportunities, and energy efficiency program materials, where appropriate, will include information on LIEE services and eligibility requirements. SDG&E’s goal is to ensure that customers are aware of the portfolio of energy savings programs and services that are available to them and the benefits that can be achieved from program participation, i.e., energy savings, greenhouse gas reduction and other benefits.

6. Leverage Available Resources

a. Coordination with other utility LIEE programs.

SDG&E will coordinate its LIEE program with SoCalGas' LIEE program in Southern Orange County, where the utilities share customers. As mentioned above, SDG&E and SoCalGas plan to co-brand activities, in order to increase customer awareness of the LIEE programs and services available, and reduce costs.

SDG&E proposes to expand its internal leveraging efforts, to better align the LIEE program with other Company-wide efforts to help reinforce messages, increase awareness, and reduce costs. The LIEE program will be coordinated with energy efficiency programs and other Company efforts, including field operations (gas servicemen and collectors), Smart Meters,⁴⁵ CARE, and other assistance programs.⁴⁶ SDG&E will also coordinate promotional efforts for Smart Metering in conjunction with the LIEE in-home display (“IHD”) pilot proposed for 2010, and demand response programs, through the proposed programmable communicating thermostats (“PCT”) pilot that is discussed later herein. As discussed in earlier in this Application, SDG&E will also continue to leverage all areas where feasible in the promotion of CARE and LIEE and in identifying eligible customers for enrollment in both programs.⁴⁷

b. Coordination with other programs and entities

SDG&E plans to increase leveraging opportunities to reduce cost, increase awareness and program participation through coordination and collaboration with other agencies, CBOs, and businesses:

- **LIHEAP⁴⁸** - There are several potential opportunities SDG&E plans to explore in order to work with local LIHEAP agencies for better coordination with the LIEE program, which include:
 - Implementing a structured referral system to allow for flexibility between program participation where customers can be referred to the other party should a service or measure not be provided in one program.
 - Tracking customer referrals in the program database and measures installed by LIEE or LIHEAP.
 - Providing LIHEAP contractors serving the San Diego area access to SDG&E’s LIEE database to enable them to pre-screen their clients to see if they have received LIEE services from SDG&E along with a list of the measures installed.

⁴⁵ Smart Meters are digital meters that have two-way communication between SDG&E and the meter at a home or business. SDG&E plans to replace all electric meters and upgrade all gas meters with Smart Meters in its service territory over the next three years.

⁴⁶ For example, SDG&E’s field operations personnel will refer a potentially eligible customer to the LIEE program staff, or will inform LIEE program staff of a potentially eligible customer for follow up purposes.

⁴⁷ Other programs may include Medical Baseline, Family Energy Rate Assistance (“FERA”), and Neighbor-to-Neighbor.

⁴⁸ The large IOUs and DCSD have initiated discussions on how they and their respective contractors can work together to maximize the leveraging opportunities between the two programs.

- **Cities and local communities** - SDG&E plans ongoing coordination with local agencies, city governments and businesses to promote and deliver information about the LIEE program. Such coordination will include working with city and county officials, agencies, and local businesses to provide program information and collateral for distribution.⁴⁹ SDG&E plans to conduct several events in conjunction with city officials to promote the LIEE and other programs. Media involvement in the events will assist in the promotion of the events, as well as help provide program information through LIEE customer interviews.
 - SDG&E will continue to partner with the City of Chula Vista, City National City, City of San Marcos, and the San Ysidro community to reach the many families who are eligible for LIEE services, but for some reason have not participated in the program. SDG&E plans to organize a training session for the managers of the community programs and provide collaterals to distribute to families. This strategy will allow the LIEE program to reach potentially eligible customers who have not participate in the program. SDG&E will also partner with the local agencies to contact property owners to identify properties where potential LIEE customers reside.
- **Water agencies** - SDG&E proposes to work with local water authorities to promote and leverage energy efficiency and water conservation efforts through a referral system between the water and energy programs.
- **CBOs**- SDG&E plans to expand its efforts to work with various CBOs to broaden LIEE participation and involve the CBOs in the LIEE referral process.
- **Schools** - SDG&E and San Diego Unified School District (“SDUSD”) are evaluating a number of creative ways to deliver information on the LIEE and other assistance programs to the hands of parents. Many children from low income households attend schools in the SDUSD. Moreover, there are many schools which qualify for Title 1⁵⁰ meal assistance for students, and based on income requirements, these students’ families will likely also qualify for the LIEE program

⁴⁹ Examples of entities for this effort include the City of Escondido, City of San Marcos, City of Chula Vista, South Bay Community Services, Junior Achievement, and Cox Communications.

⁵⁰ A program designed to improve academic achievement for the disadvantaged. *See* 20 U.S.C. 6301 (1965).

- **211** - SDG&E will continue to coordinate its leveraging efforts with 211 San Diego, and provide 211 with the information needed to promote the LIEE program to all clients calling 211 for assistance.

c. Coordination with California Solar Initiative (“CSI”) – Low Income Program

SDG&E proposes to work with the CSI’s single-family and multi-family program administrators to coordinate efforts between the CSI and LIEE programs to ensure that homes that receive CSI program measures have first received appropriate LIEE measures. D. 07-11-045 requires the installation of LIEE program measures for homes qualified for solar photovoltaic systems prior to those systems being installed to ensure the achievement of maximum load reduction.⁵¹ SDG&E supports the requirement that homes receive energy efficient measures prior to receipt of solar incentives, as this requirement maximizes potential energy savings and load reduction.⁵²

7. Pilots

SDG&E proposes to implement the following two pilots in PY 2009 – 2011:

a. In-Home Display (“IHD”) Pilot

SDG&E proposes to offer an in-home display (“IHD”) pilot, as part of the energy education process to help customers know and appreciate their actual energy usage.⁵³ The IHD digitally displays the amount of energy consumed and the amount of the energy bill in real time. Customers will be educated on how to read the IHD and utilize it as a tool to monitor their energy consumption. In addition, a tariff is planned to work in conjunction with the IHD technology to further enable customers to see the financial impact of conservation and load shifting, and potentially partner with the utility to manage peak usage and control energy costs. The proposed IHD pilot contributes to the programmatic initiative and the Strategic Plan by promoting energy savings and bill savings.

⁵¹ The recently issued Commission RFP for the administrator of the single family program directs the administrator to 1) collaborate with the LIEE and CARE program administrators on delivery strategy, and 2) work with PG&E, SCE, and SDG&E to direct incentive payments to eligible recipients.

⁵² See also SDG&E’s Reply Comments in R. 08-03-008, dated April 4, 2008.

⁵³ Currently available IHD devices provide information on both the kilowatt hours being consumed and the corresponding energy costs, based on the customer’s rate.

b. Programmable Controllable Thermostat (“PCT”) Pilot

SDG&E proposes to offer a PCT pilot. PCTs are thermostats that can receive price or electric system reliability signals, and can be programmed by a customer to automatically reduce energy consumption through thermostat set-point adjustments. PCTs are interoperable and have expansion ports that will allow SDG&E and other service providers to add communication modules and establish links to other ZigBee®⁵⁴-enabled energy devices. The proposed PCT pilot contributes to the programmatic initiative and the Strategic Plan by promoting energy savings and bill savings.

8. Studies

SDG&E proposes that its LIEE program be evaluated through the following four statewide studies to be conducted during PY 2009-2011:

- A process evaluation,
- An impact evaluation,
- A refrigerator degradation study, and
- A non-energy benefits study.

Each of these is discussed below.

a. LIEE Process Evaluation

A Statewide Process Evaluation is planned for 2009. The objectives of this study are to assess the effectiveness of the program components, including outreach, delivery, data tracking, customer satisfaction, etc. and to provide recommendations for improving the program. In addition, the study will evaluate the low-income customers’ attitudes toward energy efficiency opportunities, in particular their willingness to participate in low-income programs and to engage in energy saving behaviors. The study will assist SDG&E in meeting the programmatic initiative as it will provide SDG&E with valuable information to improve enrollment, marketing and program delivery approaches and strategies.

b. LIEE Impact Evaluation

A Statewide Impact Evaluation is planned for the PY 2010 LIEE program. The primary objective of this study is to estimate the first year energy savings for the LIEE program by utility and at the measure level. In addition, the study will provide information on participant

⁵⁴ Zigbee is a communication protocol that is currently being adopted by the utility and appliance industries, which allows Zigbee-enabled appliances to communicate with the Smart Meter.

consumption and characteristics. The study will focus on new measures in this Program cycle, although impacts for all program measures will be estimated. It is anticipated that the analysis will consist of a statistical regression analysis of consumption records, although some data may also be collected from customer onsite surveys. This study contributes to meeting the programmatic initiative because it will provide SDG&E with information to assess, improve, and propose new energy savings measures.

c. Refrigerator Degradation Study

Because refrigerator replacements provide a significant portion of the energy savings for the LIEE Program, SDG&E proposes to conduct a statewide study, planned for 2009, which will examine the efficiency degradation over the useful life of refrigerators. This study contributes to the achievement of the programmatic initiative because the results of this study will provide valuable information in determining potential energy savings for replacing newer refrigerator models.

d. NEBs Study

The large IOUs are proposing a NEBs study that could be used to update the use of NEBs in cost effectiveness analysis. This study, among other things, would examine and report on studies that have been completed nationwide on NEBs including studies that have attempted to measure NEBs. Once this information is gathered and summarized a more informed decision could be made on the appropriateness of including NEBs in the LIEE cost-effectiveness tests. This study contributes to the achievement of the programmatic initiative as it will help assure that all appropriate benefits are accrued to the LIEE program.

F. BUDGET

1. Budget Discussion

SDG&E's proposed PY 2009-2011 LIEE program budgets, on an annual basis, are \$21 million for PY 2009, \$21 million for \$21 for PY 2010, and \$20.25 for PY 2011. As compared to the authorized 2008 funding level of \$13.3 million, the proposed budgets represent an increase in excess of 50% annually.⁵⁵ Attachment A-1 disaggregates the proposed budgets by major expense categories.

⁵⁵ Attachment A-1 disaggregates the proposed budgets by major expense categories.

2. Tracking Program Costs

SDG&E proposes to track program costs consistent with the program budget categories defined in Attachment A-1. The program budget categories are used for monthly and annual LIEE reporting and were recently approved by the Commission in a November 2007 letter from the Energy Division Director to the utilities. To permit comparable cost/benefit analysis of each program element across the utilities, SDG&E proposes to maintain monthly and annual reporting according to the approved LIEE reporting categories in PY 2009, PY 2010, and PY 2011.

3. Budget Flexibility

Fund shifting flexibility between program categories and program years is critical to the achievement and success of the program's continuity and long term investments, as it is necessary to avoid program service disruptions, and provide a seamless and transparent program to customers. As such, SDG&E requests authorization: 1) to carry forward or carry back funding into PY 2009, PY 2010, or PY 2011 during the three-year funding cycle, and 2) authority to shift funds among program categories in PY 2009, PY 2010, and PY 2011.

Prior to 2007, the Commission allowed the IOUs full flexibility to shift funds among program categories as needed to achieve program objectives. However, in D.06-12-038, the Commission restricted movement of funds among measurement and evaluation, general administration, and the regulatory compliance categories. In this Application, SDG&E has proposed a new customized program design, new measures, innovative pilot programs, modifications to program policies, enhanced marketing and outreach efforts, a new energy education design, coordination with other programs and entities, and new initiatives such as the Workforce, Education and Training, all to meet the Commission's programmatic initiative and Strategic Plan. Therefore, SDG&E requests that the fund shifting restrictions adopted for the 2007 – 2008 program cycle be removed to allow SDG&E more flexibility to make program adjustments and modifications expeditiously and eliminate potential delays.

If the Commission should be delayed in issuing a decision on SDG&E's 2009-2011 low income programs budget application, SDG&E requests interim authorization from the Commission to continue LIEE activities into 2009 using 2009 program funds. Accomplishments achieved during this interim period will be counted toward 2009 program results.

G. REVENUE REQUIREMENTS AND RATE IMPACTS

1. Revenue Requirements

i. SDG&E - Electric

LIEE program costs are currently allocated to the major customer classes using an equal-cent-per-kWh approach. Sales are adjusted to exclude the usage of Street Lighting customers which are exempt from paying the LIEE surcharge. SDG&E proposes no change to this revenue allocation method in this proceeding.

Consistent with the revenue allocation approach, the electric LIEE surcharge is determined by dividing the LIEE program costs by total non-exempt sales. In developing the proposed LIEE rates, SDG&E used the LIEE revenue requirement provided in the direct testimony of Witness. SDG&E also used Commission-approved billing determinants for non-exempt customers based on its 2008 General Rate Case Phase 2 to formulate the LIEE rate.⁵⁶ SDG&E further adjusted the billing determinants to exclude the exempt usage of Street Lighting customers consistent with SDG&E's allocation and rate design methodology filed in A.02-11-031. SDG&E's currently effective equal-cent-per-kWh methodology applicable to non-exempt usage was adopted by the CPUC in D.97-08-056. SDG&E proposes no change to this CARE surcharge rate design method in this proceeding.

ii. SDG&E-Natural Gas

SDG&E's LIEE program costs are currently recovered using equal percent of marginal cost ("EPMC") to allocate the costs between the customer classes. SDG&E has not proposed to change its current allocation methodology in this proceeding⁵⁷. The LIEE program rates are calculated by multiplying the program cost by the allocation factor and dividing by the applicable billing determinants.⁵⁸ SDG&E used the LIEE program costs provided by witness Greg Lawless to develop the proposed rates. The applicable billing determinants are the three-year average gas billed volumes, adjusted to exclude constitutionally exempt customer throughput and to include interstate pipeline volumes, if appropriate.

⁵⁶ A new SDG&E 2008 electric sales forecast was approved in D.08-02-034.

⁵⁷ SDG&E has filed a joint application (A. 07-12-006) with PG&E and SoCalGas to address the allocation of all programs that are part of the PPP surcharge. This proceeding is still pending before the Commission. Therefore, for purposes of developing rates for this application, the existing methodology was employed.

⁵⁸ In D04-08-010, the Commission established the methodology for developing the billing determinants for calculating the PPP surcharge. The billing determinants reflect the average of the actual throughput over 3-years, if the most recent cost allocation proceeding is more than 3-years old.

2. Rate Impacts

i. SDG&E - Electric

SDG&E currently recovers its electric LIEE program costs through the LIEE surcharge. The LIEE surcharge is calculated from the revenue requirement which is based on the combination of both the administration costs and the LIEE subsidy.

SDG&E also proposes to maintain its current method of billing customers. Currently, SDG&E identifies PPP charges as a line-item on customer bills and SDG&E includes a separate CARE program line-item credit (i.e., discount) on the bills of CARE customers. SDG&E requests that the Commission authorize recovery of the program plans and budgets proposed in this Application by means of the proposed LIEE surcharges for PY 2009-2011. The present and proposed rates submitted by SDG&E are shown in Attachment C-1.

ii. SDG&E-Natural Gas

SDG&E recovers its LIEE program costs through the PPP surcharge. The LIEE program cost is calculated from the revenue requirement which is based on the combination of both the administration costs and the LIEE subsidy.

SDG&E requests that the Commission authorize recovery of the program plans and budgets proposed in this Application by means of the proposed LIEE program cost for PY 2009, PY 2010, and PY 2011. The LIEE present and proposed rates submitted by SDG&E are shown in Attachment C-1.

H. COMPETITIVE BID

In D.06-12-038, the Commission directed SDG&E to conduct a competitive solicitation for a third-party administrator, i.e. prime contractor, for its PY 2008 LIEE program. In accordance with this directive, on May 30, 2007, SDG&E submitted its plan for conducting a competitive bid process to the Commission's Energy Division. Subsequently, SDG&E and PG&E jointly filed a Petition to Modify D.06-12-038, requesting authorization to defer for one year the competitive bid process ordered in D.06-12-038. In D.07-06-004, the Commission granted the request and directed SDG&E to obtain written approval from the Director of the Energy Division, or a designee, prior to issuing the RFP and prior to signing contract(s). On March 21, 2008, SDG&E submitted a RFP Plan to Energy Division for which the utility is awaiting feedback.

Since the issuance of D.06-12-038 and D.07-06-004, the Commission has issued an additional decision which impacts LIEE programs—D.07-12-051. D.07-12-051 established the statewide programmatic initiative and expanded the Strategic Plan to include a LIEE component.

SDG&E is preparing the RFP for release in mid-2008. To the extent that the Commission makes significant changes in the program design proposed by SDG&E in its application, the current RFP could be nullified. SDG&E would then need to revise and re-issue its RFP, which would delay implementation of SDG&E's LIEE program well into 2009.

SDG&E recommends and prefers that the Commission delay the RFP and authorize SDG&E to release its RFP three months after the Commission has rendered a final decision on the IOUs PY 2009-2011 LIEE program plans and budgets. This delay is warranted because:

- SDGE is currently required to bid a program that has yet to be defined or approved by the Commission;
- Contractors will incur significant costs to prepare their bids, which may need to be reworked to be consistent with the Commission's approved program for SDG&E, resulting in additional and unnecessary costs borne by the contractors;
- Depending on the extent of the changes required by the final Commission decision, the entire RFP may need to be revised and re-issued, resulting in additional and unnecessary costs borne by the program and delays in implementing the program; and,
- If no decision is rendered by October 2008, there may be insufficient time to make program modifications and renegotiate contract terms that are consistent with the Commission approved program design.

In addition, D. 07-06-004 granted SDG&E's request to defer for one year its LIEE competitive bid process into 2008 and ordered SDG&E to not renew its contract with RHA past December 31, 2008. If the final decision significantly alters the program design, SDG&E will not have sufficient time to obtain a new contractor, which will result in further program delays. With the uncertainty surrounding the timing of the issuance of a final decision, and the fact that SDG&E will not have a program contractor after December 31, 2008, SDG&E could be forced to shut down its LIEE program and cease delivery of program services. For the aforementioned

reasons, SDG&E requests that the Commission delay the issuance of the RFP, and authorize SDG&E to continue its contract with RHA for up to 12 months after the final decision.⁵⁹

I. CONCLUSION

SDG&E requests that the Commission authorize the program plans, measures and budgets proposed in this Application for SDG&E's LIEE program for PY 2009 - 2011.

III. CARE PROGRAM PLAN AND BUDGETS APPLICATION FOR PY 2009-2011⁶⁰

A. OVERVIEW

D. 07-12-051 did not alter the Commission's CARE policy objectives. Rather, D.07-12-051 reiterated the Commission's policy goal to enroll all CARE-eligible customers who wish to participate in the program. To that end, SDG&E proposes modifications to its CARE program plans, enrollment efforts, and recertification processes.

SDG&E's proposed modifications to the CARE program are designed to: 1) offer customers a simple and convenient enrollment process, in order to promote increased program enrollment; 2) facilitate a smooth and seamless recertification process, in order to encourage program retention 3) improve outreach activities, in order to communicate the benefits of the CARE program to a broader array of potential CARE customers; 4) continue and expand coordination efforts with CBOs, local governments, school districts, and other organizations, in order to reach the hardest-to-reach customers and further build community awareness about the CARE program. SDG&E's proposed methods for program enrollment and processing efficiencies, combined with its coordination with local organizations, and expanded outreach strategies will allow SDG&E to reach its enrollment goals of 8,700 in PY 2009, 7,600 in PY 2010 and, PY 7,500 in 2011, with minimal impact to SDG&E's budget.

B. BACKGROUND

CARE is a low-income ratepayer assistance program, providing qualified residential customers and qualifying group living facilities a 20% discount on their monthly energy bill.⁶¹ The CARE program since its inception in 1989 has evolved and expanded through the years.

⁵⁹ Concurrent with the filing of the Application, SDG&E will file a Petition for Modification of D.07-06-004, seeking Commission authority to delay the RFP and extend RHA's contract 12 months after the final decision.

⁶⁰ See direct testimony of Witness Lawless for a more detailed presentation of SDG&E's CARE program plans and budgets for PY 2009-2011.

⁶¹ The CARE program was established through a legislative mandate and was implemented by the Commission in 1989. The CARE program was formerly known as the Low Income Rate Assistance ("LIRA") program; but, the Commission, in D. 94-12-049, changed the name from LIRA to CARE, pursuant to Senate Bill ("SB") 491.

The Commission has issued numerous decisions and directives which continue to be applicable to the CARE program administered today and the 2009 – 2011 proposed program. The following provides a brief synopsis of the many decisions in which the CARE program has expanded and changed over the years:

- D.92-12-039 expanded the program to include eligibility for qualified customers living in non-profit group living facilities.
- D.92-04-024 further expanded the program to include eligibility for customers living in non-profit group living facilities, such as women’s shelters and homeless shelters.
- D.95-10-047 extended the program to qualified CARE customers living in agricultural employee housing facilities.
- D.05-04-052 authorized residents living in agricultural housing facilities managed by the Office of Migrant Services and other non-profit migrant farm worker housing centers to qualify for the CARE discount.
- D.05-10-044 approved various new initiatives for low-income programs during the winter of 2005 – 2006 (“Winter Initiative”). One of the major changes adopted by the Commission was the revision of the CARE income eligibility guidelines from at or below 175% of the Federal Poverty Guidelines (“FPG”) to at or below 200% of the FPG
- D.05-10-044 authorized SDG&E to implement a temporary process to enroll certain prospective CARE-qualified households by telephone from November 1, 2005 through April 30, 2006.⁶²
- D.06-12-038 adopted the IOUs’ CARE program plans and budgets for PY 2007 – 2008. The decision also authorized the following for SDG&E: 1) categorical eligibility, which allowed customers to qualify for CARE based on their participation in certain state or federal assistance programs, 2) four-year recertification for low-income customers on a fixed income, 3) a process to enroll certain prospective CARE-qualified households by telephone, 4) a process to

⁶² SDG&E’s CARE Winter Initiative telephone enrollment process focused on customers who failed to return applications obtained upon request from the call center. The enrollment process also focused on customers who had not responded to SDG&E’s direct mail campaign that was directed towards households located in geographic areas where a high percentage of income-qualified customers reside.

allow customers to recertify their CARE eligibility by its IVR system, and 5) internet- based CARE enrollment and recertification.

- D.06-12-038 directed SDG&E to provide a cost benefit report on the implementation of Internet enrollment, which was to be included with the next CARE Program Application. SDG&E implemented CARE Internet enrollment in April 2007.

C. CARE PROGRAM GOALS AND BUDGET FOR PY 2009, PY 2010, AND PY 2011

1. Program Goals

As of March 2008, 226,593 customers were enrolled in SDG&E's CARE program. SDG&E projects that participation will continue to increase to 238,659 customers by year-end 2008, which will bring its CARE penetration rate to 72%. Consistent with the Commission's goal to enroll all CARE-eligible customers who wish to participate in the program, SDG&E proposes several initiatives in PY 2009 - PY 2011 to not only encourage CARE enrollment, but also retain eligible customers in the program.

Specifically, SDG&E's proposed modifications to the CARE program are designed to: 1) offer customers a simple and convenient enrollment process, in order to promote increased program enrollment; 2) facilitate a smooth and seamless recertification process, in order to encourage program retention 3) improve outreach activities, in order to communicate the benefits of the CARE program to a broader array of potential CARE customers; 4) continue and expand coordination efforts with CBOs, local governments, school districts, and other organizations, in order to reach the hardest-to-reach customers and further build community awareness about the CARE program.

The implementation of these methods for program enrollment and processing efficiencies will allow SDG&E to reach its enrollment goals with minimal impact to SDG&E's budget. SDG&E's enrollment goal is to increase net CARE program participation by 8,700 in PY 2009, 7,600 in PY 2010 and, 7,500 in PY 2011. With the projected net enrollment increases, the forecasted CARE penetration rates are 75% in PY 2009, 77% in PY 2010, and 80% in PY 2011, based on the estimated total CARE eligible customers in 2008.⁶³ SDG&E has established these

⁶³ Estimated PY 2009, PY 2010 and PY 2011 penetration rate will likely fluctuate based on updated CARE eligibility information to be filed October 2008, October 2009 and October 2010. The annual meter growth rate may also negatively impact penetration rate.

goals for the CARE program in an effort to contribute to the Commission's goal of enrolling 100% of the CARE qualified customers who wish to participate in the program.

2. Program Budget

To fund its PY 2009-2011 CARE program plans, SDG&E proposes an annual administrative budget of \$2.9 million for PY 2009, \$3.0 million for PY 2010, and \$3.1 million for PY 2011.⁶⁴ The proposed PY 2009 budget reflects an increase of approximately 7% over the PY 2008 budget of \$ 2.76 million authorized in D. 07-06-004.⁶⁵ The CARE program is funded through a monthly PPP surcharge paid through non-participating customers' energy bills.

D. PROGRAM ADMINISTRATION

CARE program administrative costs are categorized in accordance with the Regulatory Reporting Manual Working Group ("RRMWG") Report.⁶⁶ The following describes the administration of the program, other than outreach, and any changes or improvements proposed to be implemented in this application based on the categories identified in the CARE guidance document.⁶⁷

1. Processing/Certification/Verification

SDG&E's Processing Verification and Certification cost category includes the CARE Administration Group labor and data entry costs. The function of the CARE Administration Group includes: 1) opening and sorting CARE application forms; 2) processing all CARE applications; 3) initiating and responding to customers' inquiries regarding CARE applications/program; and 4) tracking CARE enrollment and operating statistics in support of operations, management, and regulatory reporting.

For this cost category, SDG&E proposes funding of \$216,219, \$222,967 and \$230,015 for PY 2009, PY 2010, and PY 2011, respectively. This request represents a slight decrease from the 2008 authorized budget of \$255,360. The reduction in budget is due to increased efficiencies anticipated as system enhancements are made to improve SDG&E's database used to collect and track CARE customer specific data.

⁶⁴ See Attachment B-1.

⁶⁵ In D. 07-06-044, issued June 7, 2007, the Commission corrected the authorized budget tables of D. 06-12-038 to reflect the SDG&E's correct CARE authorized budget.

⁶⁶ Consistent with the D. 05-04-052, SDG&E worked with the other IOUs to ensure uniformity of how costs are categorized.

⁶⁷ On April 4, 2008, Energy Division issued the Guidance Document for California Alternate Rates for Energy ("CARE") Budget Applications for Program Years 2009, 2010, and 2011.

In order to further the Commission's goal to enroll 100 % of the CARE qualified customers who wish to participate in the program, SDG&E also proposes modifications to its Processing/Certification/Verification procedures, to further encourage customer enrollment and customer retention. The proposed modifications are described in detail below.

a. Continuation of Recertification Probability Model

In D-06-12-038, SDG&E received authorization to continue a pilot for the use of a probability model for CARE Recertification. This model was established as a means to automatically recertify those CARE customers with the highest likelihood of being qualified, based on various criteria. Customers "passing" the model are considered to be very likely eligible, and they are automatically recertified for two years. Customers "failing" the model are sent a notification that they must complete the recertification application process.

In 2007, SDG&E ran its model on a total of 69,036 CARE customers and determined that a majority of those customers (47,986 customers) were able to be automatically recertify, and the remainder (21,050) were asked to recertify. SDG&E believes that the model is accurately targeting customers and is a useful tool for reducing attrition of potentially eligible CARE customers. For these reasons, SDG&E requests authorization to continue using of the probability model for recertification on an ongoing basis.

b. Continuation of Recertification Telephone Enrollments

In D.06-12-038, SDG&E received authorization to continue a pilot to contact CARE customers who are in jeopardy of being dropped from the program due to their failure to respond to recertification requests, and to recertify them over the telephone. Participants deemed eligible would be enrolled and mailed an information letter reminding them of the program guidelines and providing them with an opportunity to "opt-out".

In 2007, SDG&E attempted to contact approximately 4,700 customers to offer telephone recertification. Of the 1,555 customers who were contacted and chose to provide eligibility information over the telephone, over 93% reenrolled, 3% qualified for the Family Electric Rate Assistance ("FERA") program, and 3% were determined no longer eligible to for the program. In order to continue to minimize the impact of attrition from non-response to recertification, recertification enrollment calls SDG&E proposes to continue Outbound Recertification by Phone on an ongoing basis.

c. Recertification for Sub-metered Customers

Currently, sub-metered CARE tenants are required to recertify their eligibility annually. SDG&E requests Commission authorization to make the CARE program requirements for sub-metered tenants in master-metered facilities consistent with the requirements for individually-metered residential customers, i.e., two years or four years. SDG&E’s proposal will permit sub-metered tenants to recertify their CARE eligibility every two years, except those CARE tenants who are on a fixed income,⁶⁸ will be required to recertify every four years.

d. Recertification for CARE customers living in non-profit group living facilities, agricultural housings, and non-profit migrant farm worker housings

SDG&E also seeks Commission authorization to change the CARE Expansion Program’s⁶⁹ 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, because most of these housing facilities are well-established organizations in the community, and it is uncommon for them to change their services within a year.

e. CARE Telephone Enrollment

In 2008, SDG&E plans to implement an IVR enrollment process for CARE customers who are recertifying their program eligibility. SDG&E proposes to expand the IVR process to also allow customers to apply for the CARE program. SDG&E proposes to offer customers the option of transferring to SDG&E’s CARE IVR system when the customers indicate they may qualify for the program. This option will serve as an immediate “call to action” and decrease the lag time between customer calls to SDG&E and SDG&E’s receipt of the CARE applications in the mail.

2. Information Technology/Programming

SDG&E’s Billing System/Programming cost category includes IT costs to maintain CARE functions in SDG&E’s billing system, enrollment and reporting system, telephone IVR system, to fund data exchanges with other assistance programs, and to implement system

⁶⁸ In D.06-12-038, the Commission authorized the utilities to recertify fixed income CARE customers every four years (from every two years). The reasoning behind this is that the total income received by households living on fixed incomes (such as those on Social Security, Supplemental Security Income, or Pensions) are unlikely to change significantly over time.

⁶⁹ CARE Expansion Program provides a 20% discount for eligible Non-Profit Group Living Facilities, Agricultural Housing and Non-Profit Migrant Farm Worker Housing as define in SoCalGas tariffs.

enhancements to comply with regulatory mandates and improve operational efficiencies. Total projected IT/Programming costs are \$508,795 for PY2009, \$481,841 for PY2010, and \$452,687 for PY2011, which reflects a \$137,328 increase in this cost category, compared to the 2008 authorized budget of \$ 371,467. The increases in this cost category are needed to fund the new program requirements for sub-metered CARE tenants,⁷⁰ CARE IVR Enrollment, streamlined enrollment processes and enhancements to improve processing efficiencies.

3. Pilots

SDG&E does not propose any pilots for its CARE program for PY 2009-2011.

4. Measurement and Evaluation

SDG&E is not proposing any new M&E studies for the CARE program during PY2009–2011. The only M&E study budgeted for PY2009-2011, in the M&E budget category, is the annual IOUs' CARE program eligibility update.⁷¹ SDG&E developed the cost for the CARE eligibility rate update for PY 2009 – PY 2011, based on the actual study cost of \$3,623 in 2007. Planned costs for PY 2009-2011 are \$4,000, \$4,160 and \$4,326, respectively.

5. Regulatory Compliance

SDG&E's regulatory compliance costs for PY 2009-2011 are estimated to \$184,015 for PY 2009, \$190,205 for PY 2010, and \$196,401 for PY 2011. The funding is needed to facilitate SDG&E's compliance with Commission reporting requirements, support CARE regulatory filings, and respond to data requests from the Commission and other outside agencies and organizations.

6. General Administration

SDG&E estimates that general administration costs will be \$399,065, \$410,096 and \$423,927 for PY 2009, PY 2010, and PY 2011, respectively. These proposed costs compare to the 2008 authorized budget of \$317,407. Within this cost category, SDG&E includes CARE program management personnel, non-labor costs associated with the day-to-day operations of management staff, and additional expenses such market research, training and development expenses. The day-to-day non-labor costs include office supplies, office equipment and

⁷⁰ As required by AB 2104.

⁷¹ SDG&E, and the other IOUs, used the joint utility methodology adopted by the Commission in D.01-03-028 for developing quarterly and monthly penetration estimates in 2007. This method entails annual estimation of eligibility for CARE, LIEE, and other income-by-household size parameters at the small area (block group, census tract, zip+2, etc.) for each IOU territory and for the state as a whole. D.06-12-038 ordered the IOUs to file annual eligibility updates no later than October 15.

maintenance, and business reimbursements. SDG&E program management personnel are responsible for all aspects of the CARE program, including ensuring that SDG&E is in full compliance with Commission directives. CARE program management personnel will also manage the implementation of CARE policy changes, as they relate to sub-metered tenants, CARE customer services, and information technology improvements.

7. CPUC Energy Division Staff

The IOUs asked the Energy Division to provide projected PY 2009 -2011 costs on April 10, 2008. The estimated dollar amounts were provided by the Energy Division on May 5, 2008, as a placeholder; however, no details or support were provided to explain the requested budget amounts. SDG&E has budgeted \$102,900 for PY 2009, \$102,900 for PY 2010 and \$102,900 for PY 2011.

E. OUTREACH

SDG&E's outreach plan for PY 2009 - 2011 builds on the success of its currently effective outreach strategies, as it modifies SDG&E's strategy to further access the hard-to-reach, special needs CARE-eligible customers. Because of their unique needs, continued emphasis will be placed on reaching highly eligible customers who can be differentiated as seniors, shut-ins, non-English speakers and disabled. SDG&E will also investigate more convenient methods to help these customers apply for the CARE program. SDG&E's proposed outreach plan is based on the use of multiple communication channels, designed to effectively segment SDG&E's low-income customers and communicate the program to those identified as most likely to be eligible for program participation.

SDG&E's proposed outreach efforts for PY 2009-2011 will include the continued use of bill inserts, direct mailing, CARE telephone enrollment using automated voice messaging ("AVM"), web enrollment, third party door-to-door outreach, the capitation program, grassroots outreach,⁷² and mass media. SDG&E will continue to market the CARE program to Spanish speakers, Chinese, Korean, Vietnamese, disabled persons, and seniors, and SDG&E will also

⁷² A technique used to raise overall public awareness of the CARE program and to identify low-income customers who traditionally have not responded to other traditional forms of program outreach. By leveraging relationships with local politicians, CBOs and internal personnel, events are held throughout the service territory to both enroll CARE customers and inform the community of the multiple energy-related assistance programs available to them. Local politicians, along with print, radio and television media, are invited to these outreach events to further expand their effectiveness. Press releases describing the events are also developed and distributed to mass media contacts.

continue to focus additional emphasis on outreaching the CARE program to low income young adults and the shut-in.

As CARE penetration levels continue to increase, SDG&E must conduct outreach beyond its traditional low-income customer segments in order to reach the remaining non-participating but eligible customers. The traditional methods used to reach hard-to-reach customers may no longer be as successful in reaching these customers, and SDG&E intends to employ new methods to encourage customer enrollment. SDG&E program experience indicates that enrolling only new CARE participants will not be sufficient to reach enrollment goals, and retaining current customers in the program will continue to be challenging. During PY 2009-2011, SDG&E will continue to employ existing enrollment strategies (e.g., use of H&R Block, internet, canvassing, and new capitation contractors), to explore the reasons for attrition, and devise new approaches for enrolling and retaining eligible customers.

SDG&E is estimating outreach expenditures of \$1,520,638, \$1,611,634, and \$1,734,261 for PY 2009, PY 2010, and PY 2011, respectively, compared to the previously authorized PY 2008 CARE outreach budget of \$1,581,628. Implementation of successful outreach strategies will help SDG&E reach program enrollment goals without significantly impacting the program budget.

1. Marketing Education and Outreach

a. Bill Inserts and CARE bill messages

Over the past several years, SDG&E has experienced a steady decline in response to the annual notification that occurs two months prior to the peak summer month. In 2007, SDG&E mailed applications to over one million customers and only received a response of 1,500 returned CARE applications. Even so, SDG&E will continue to include both English-only and English/Spanish bill inserts as part of its overall outreach campaign but plans to further evaluate the success of this effort as compared to more cost effective outreach strategies, such as direct mailing, email blasts, and automated voice messages.

b. Direct Mailing

During 2005-2007, SDG&E achieved greater than a 4% response rate from its direct mailing campaigns, approximately 2% higher than the industry average. In 2007, SDG&E targeted over 250,000 highly eligible non-participating customers through its direct mail

campaigns. SDG&E received more than 13,000 returned applications from low-income customers, resulting in approximately 8,800 new CARE enrollments.

SDG&E plans to conduct similar levels of direct mailing campaigns for PY 2009-2011 because of the consistently high response rate, and moderate cost compared to other outreach efforts. Ten direct mail campaigns are planned to be conducted per year, with approximately 225,000 pieces of direct mail being sent customer segments, such as non-participating sub-metered tenants, Medical Baseline participants, Neighbor-to-Neighbor participants, and customer with disabilities. SDG&E will also continue to match its direct mail efforts with market segmentation analysis to identify customers who demonstrate a high likelihood of being eligible for CARE enrollment. Direct mailing campaigns will focus on both new CARE enrollments and recent attrition based re-enrollments.

c. AVM

SDG&E's use of AVM⁷³ has proven to be a very cost-effective and efficient method to communicate to CARE-eligible customers. In 2007, over 4,900 customers were enrolled through AVM telephone calls, at a cost of less than \$3 per enrollment. SDG&E plans to expand its use of this outreach strategy during PY 2009-2011 to include customer awareness messaging, recertification and re-enrollment, along with self-certification enrollment. During PY 2009-2011, SDG&E plans to contact approximately 250,000 SDG&E customers annually regarding the CARE program, using AVM.

d. Multi-Language Mass Media

SDG&E proposes to conduct creative mass media campaigns in multiple languages during each of the CARE program years, and will employ communication media shown to be effective at reaching the CARE eligible customers in low-income areas, which include radio, print and mass transit campaigns. The purpose for these campaigns will continue to focus on achieving both enrollment and program awareness across SDG&E's service territory. Campaigns will focus on the general low income market, seniors, Hispanics, Asians and other ethnic customer segments, and will incorporate multiple communication media. Mass media messages will contain specific customer "calls to action" directing customers to check their CARE program eligibility through one or more of SDG&E's enrollment options.

⁷³ AVM is an automated voice messaging system used by 3rd party vendors on behalf of SDG&E who call customers and inform them about the CARE program.

e. Capitation Contracts

In 2007, forty-seven CBOs enrolled over 2,600 customers in SDG&E's CARE program. Because CBOs continue to play an important role in helping SDG&E reach out to some of its most needy and hard-to-reach low-income communities, SDG&E plans to continue using capitation contracts in PY 2009-2011. CBOs, such as Catholic Charities, Women Infants and Children offices, and the Salvation Army continue to provide vital services to low-income children and families. Many CBOs serve special community needs for racial and ethnic minorities, seniors, veterans, disabled groups, along with non-English speakers. To increase CARE penetration amongst some less recognized community groups, SDG&E plans to proactively search for new CBOs with established relationships with their clients and encourage the CBOs to participate in SDG&E's Capitation program.

f. Community Outreach

In 2007, SDG&E modified its community outreach efforts, in order to improve its CARE program cost-per-enrollment ratio in the SDG&E service territory. By focusing on various community-based outreach events that target ethnic groups, seniors, disabled low-income customers, the SDG&E CARE program enrolled over 1,000 customers in 2007. SDG&E plans to continue to employ this approach in future program years, and enhance this outreach effort by further leveraging opportunities with CBOs and related organizations that are dedicated to serving SDG&E's low-income customers.

g. CARE Outreach Application and Community Outreach Collateral Material

SDG&E updates CARE applications annually to reflect current income guidelines. In addition, SDG&E distributes customer assistance brochures to promote special needs assistance programs, such as FERA, Medical Baseline, and other energy assistance programs at all public and private outreach events. SDG&E plans to print CARE applications annually and replenish the stock and make changes to the brochure design and copy as needed. Brochures will include: information on water conservation and greenhouse gas reductions, as well as changes to better address the needs of visually impaired customers, and more information promoting new or enhanced program enrollment opportunities, e.g. internet, interactive voice messaging system, etc.

h. Internet Enrollment & Recertification

Based on the favorable internet enrollment results received since the implementation of the internet CARE application in April 2007—approximately 4,000 applications were received, and 74% or 2,946 customers were enrolled in the CARE program. SDG&E intends to expand its web-based outreach strategy in the areas of CARE enrollment, recertification, and customer notification. SDG&E’s web-based outreach plan will emphasize: creating a customer friendly website and enrollment /recertification portal, determining which customer segments are receptive to web-based communication and interaction, developing a CARE eligible customer e-mail distribution database, and designing e-mail campaigns and implementation strategies.

i. Special Markets

SDG&E is committed to serving its special needs customers and ensuring that its programs and service offerings are accessible to them.⁷⁴ For example, SDG&E has program brochures and applications available in large font, and in addition multiple languages—currently SDG&E has brochures in four languages and plans to expand to thirteen languages in 2008. SDG&E has also designed a brochure, *Extra Help for Those Who Need It Most*, with special needs customers in mind. The brochure describes all SDG&E assistance programs and service offerings such as: CARE, FERA, LIEE, Medical Baseline, LIHEAP, Neighbor-to-Neighbor, free appliance checks, and Braille markings for oven knobs to name a few. It is printed in 16 point Arial font, as suggested by The Braille Institute, and is available in English, Spanish, and Braille. In addition, SDG&E provides TTY/TTD telephone service 24 hours a day, seven days a week. SDG&E also notates accounts when there is a special needs customer in the household, in order to identify them for future marketing efforts and determine the appropriate means of communication.

SDG&E’s outreach activities for CARE and special needs customers will be expanded in PY 2009-2011, and future efforts will include direct mailings to Senior Centers in SDG&E’s service territory, as well as agencies dedicated to serving customers with special medical needs. SDG&E will continue to advertise the CARE and Medical Baseline⁷⁵ programs in local senior directories, and participate in local events focusing on persons with disabilities.

⁷⁴ Examples of “special markets” customers include: 1) non-English speakers, 2) senior shut-ins 3) the disabled, and 4) sub-metered tenants.

⁷⁵ The Medical Baseline program is not funded with CARE funds.

SDG&E plans to re-design its website to ensure that visually impaired customers have full access to information on SDG&E's website. The website, which will conform to the Web Content Accessibility Guidelines of the World Wide Web Consortium, will be compatible with assistive technology such as screen readers, and the webpages will contain text alternative tags for webpage descriptions.

j. Program Leveraging

Currently, SDG&E works with SoCalGas to share CARE enrollment data in their shared Southern Orange County service territory. At a minimal cost, SDG&E enrolled 270 customers in 2007. Additionally, SDG&E leverages information internally with the LIEE program, and in 2007, enrolled over 1,800 new customers through this leveraging effort.

k. Local Government Partnerships

Currently, SDG&E works directly and indirectly with several local government entities and officials, including 1) San Diego County Health and Human Services; 2) city council members and staff; and 3) city governmental departments. While working with these groups, SDG&E plans to integrate CARE program promotions with the general residential energy efficiency program promotions. SDG&E plans to continue developing additional relationships with local government organizations, to increase customer awareness and enrollment in the CARE, LIEE, and general energy efficiency programs.

SDG&E plans to educate the staffs of its local government partners about CARE, LIEE, and general energy efficiency programs to enable them to determine the program(s) that best fits the needs of their clients and constituents.

l. Coordination with other Utilities

In order to increase SDG&E's CARE penetration rate for PY 2009-2011, SDG&E plans to develop effective and mutually beneficial leveraging opportunities with California American Water Company ("Cal-Am"), which provides water service to Coronado, Imperial Beach, and portions of the City of San Diego.

m. School Districts

Because many children from low income households in the SDUSD, SDG&E and SDUSD are evaluating a number of creative ways to deliver information about the CARE, LIEE and other assistance programs to parents. By educating these students on the benefits of energy conservation and environmental preservation, they can, in turn, share that information with their

parents and other family members. Along with the knowledge the children will receive, they will also be given collateral materials such as a CARE application, brochures and other helpful tools to take home and share with their families.

n. Other Collaborative Efforts

In order to promote SDG&E's assistance programs and enroll customers, SDG&E will continue to collaborate with *2-1-1 San Diego* ("211").⁷⁶ Since SDG&E began working with *2-1-1* in 2006, *2-1-1*'s role in the community has grown significantly, providing an even greater opportunity to distribute information for energy assistance programs. In 2007, *2-1-1* began enrolling SDG&E customers on CARE by telephone, which significantly increased the success of CARE enrollment. Prior to the use of telephone enrollment, *2-1-1* intake operators mailed CARE applications to those customers that the operators determined were qualified over the telephone.

o. San Diego County Cool Zones

Since 2001, SDG&E has partnered with Aging and Independence Services ("AIS") of San Diego County to administer the Cool Zone program in SDG&E's service territory. The program's purpose is to encourage seniors and disabled persons to visit local designated air-conditioned public sites to stay cool during summer months. It also was implemented as one way residential customers could conserve electricity and help lower the risk of rolling blackouts. In addition, the program provides health benefits to low-income residents, especially seniors, who may be unwilling to use their air conditioners due to energy costs, and therefore put themselves at risk for heat-related health problems. The program provides seniors, disabled and low-income residents with travel vouchers and bus passes that enable customers to reach Cool Zone sites. Also provided are portable fans distributed by AIS to home-bound seniors and disabled adults to allow them to use fans for cooling instead of air conditioning if they choose. CARE applications are provided with each transportation voucher and each fan distributed and are available at the Cool Zone sites.⁷⁷

⁷⁶ 211 San Diego is a human service referral program that provides a free, 24-hour referral service for information on community, health, and disaster services.

⁷⁷ D.06-12-038 approved SDG&E's 2007-2008 Cool Zone program plan and budget.

For PY 2009-2011, SDG&E plans to continue to support the County of San Diego's Cool Zone program as one of its CARE outreach efforts and will provide funds for the same services as those approved by the Commission for PY2007 and PY2008.

2. Section 8 Housing

OP 4 of Commission D. 07-12-051 directed the IOUs to propose a process to automatically qualify all tenants of public housing and Section 8 housing, and improve information provided to public housing authorities. In compliance with this Commission directive, SDG&E proposes to categorically enroll all tenants of public housing and Section 8 housing programs in the CARE program. Categorical enrollment of public housing and Section 8 customers in the CARE program is feasible, given the fact that these customers already receive public assistance housing based on their low income, and thus have met income requirements.

SDG&E views categorical enrollment of public housing and Section 8 customers as an interim step to automatic enrollment of these customers. SDG&E will work with the local housing agencies within its service territory to determine the feasibility of implementing a data exchange process, whereby any new participant in public housing and Section 8 could be automatically enrolled in CARE.

3. Outreach Plans

a. Automatic Enrollment of California Lifeline Participants

The CARE and California Lifeline ("Lifeline")⁷⁸ rate assistance programs are both designed to provide rate assistance to qualifying low-income customers on their respective energy and telephone bills. Both programs also employ advertising and outreach to inform and enroll qualified customers, and both utilize categorical eligibility to identify customers who may qualify based on participation in other low-income programs.⁷⁹

Based on these shared commonalities, there is a potential opportunity for sharing customer information between the Lifeline and CARE programs, which would enable SDG&E to automatically enroll customers into the CARE program. However, there are differences between

⁷⁸ Also known as the Universal Lifeline Telephone Service.

⁷⁹ Differences between the two programs include the fact that CARE income eligibility limits are based on 200% of FPG, and Lifeline's is based on 150% of FPG. In addition, the Lifeline program allows for more than one household within a residence to enroll in the program, and CARE's limit is one household.

the programs, such as the fact that the Lifeline program allows for more than one household⁸⁰ within a dwelling unit to enroll in its program, whereas the CARE program only permits one household⁸¹ to enroll in the program. Coordination with the Lifeline program has the potential to further increase SDG&E's CARE penetration rate; however, the Commission must thoroughly examine the two programs in order to align the requirements for each program, so that automatic enrollment is viable.

F. REVENUE REQUIREMENTS AND RATE IMPACTS

1. Subsidy and Benefit Costs

i. SDG&E - Electric

CARE program costs are currently allocated to the major customer classes using an equal-cent-per-kWh approach. Sales are adjusted to exclude the usage of CARE customers and Street Lighting customers which are exempt from paying the CARE surcharge. SDG&E proposes no change to this revenue allocation method in this proceeding.

Consistent with the revenue allocation approach, the electric CARE surcharge is determined by dividing the CARE program costs by total non-exempt sales. In developing the proposed CARE rates, SDG&E used the CARE revenue requirement provided by Witness Rudshagen. SDG&E also used Commission -approved billing determinants for non-exempt customers based on its 2008 General Rate Case Phase 2 to formulate the CARE rate.⁸² SDG&E further adjusted the billing determinants to exclude the exempt usage of CARE customers and Street Lighting customers. These exemptions are consistent with the method adopted by the Commission in D.89-09-044, which states: "... Low-income sales will also be exempt because the LIRA program will discount such usage. Street lighting will also be exempt because such service is ultimately paid for by taxpayers, who will already contribute to the LIRA program as ratepayers." SDG&E's currently effective equal-cent-per- kWh methodology applicable to non-exempt usage was adopted by the CPUC in D.97-08-056. SDG&E proposes no change to this CARE surcharge rate design method in this proceeding.

⁸⁰ Under the Lifeline program, there can be more than one household within a residence because "a room or portion of a dwelling unit occupied exclusively by an individual not sharing equally as a member of the domestic establishment may be considered a separate residence" for the Lifeline program. General Order 153.

⁸¹ Under the CARE program, because there is only one meter to a dwelling unit, there cannot be multiple households in the program.

⁸² A new SDG&E 2008 electric sales forecast was approved in D.08-02-034.

SDG&E currently recovers its electric CARE program costs through the CARE surcharge. The CARE surcharge is calculated from the revenue requirement which is based on the combination of both the administration costs and the CARE subsidy.

SDG&E also proposes to maintain its current method of billing customers. Currently, SDG&E identifies PPP charges as a line-item on customer bills and SDG&E includes a separate CARE program line-item credit (i.e., discount) on the bills of CARE customers. The CARE program line-item reflects a 20% discount, and an exemption from the current CARE rate of \$0.00165 per kWh.

ii. SDG&E – Natural Gas

SDG&E's CARE program costs are currently allocated to customer classes using an equal-cent-per-therm ("ECPT") approach. SDG&E proposes no change to this revenue allocation method in this proceeding. The CARE program rates are calculated by multiplying the program cost by the allocation factor and dividing by the total three-year average gas billed volumes for the customer classes. SDG&E used the CARE program costs provided by witness Greg Lawless to develop rates for this application.⁸³ The applicable billing determinants are the three-year average gas billed volumes for each class, adjusted to exclude CARE and constitutionally-exempt customer throughput and to include interstate pipeline volumes, if appropriate.

SDG&E recovers its CARE program costs through the PPP surcharge. The CARE program cost is calculated from the revenue requirement which is based on the combination of both the administration costs and the CARE subsidy.

SDG&E requests that the Commission authorize recovery of the program plans and budgets proposed in this Application by means of the proposed CARE program cost for 2009, 2010, and 2011. The CARE present and proposed rates submitted by SDG&E are shown in Attachment C-1.

2. Balancing Account

SDG&E maintains natural gas and electric balancing accounts called the California Alternate Rates for Energy ("CARE") Balancing Accounts. The purpose of the CARE Balancing

⁸³ The actual CARE program subsidy will be updated in the October 31st Advice filing, pursuant to Commission established policy in D.04-08-010

Accounts, as currently authorized, are to provide a record of CARE program costs which consist of the sum of:

(1) CARE benefits, which are equal to the amount of discount granted under the discount reflected in the authorized CARE Program discounted rates; and

(2) allocated incremental administrative and general expenses associated with the CARE Program, which include outreach, certification, verification, billing, communications and general expenses.

Since the CARE Balancing Account is applicable to electric and natural gas CARE programs, the electric CARE Balancing Account records revenues based on the percentage of authorized PPP revenues pertaining to the electric CARE program. Revenues recorded to the gas CARE Balancing Account are based on gas PPP surcharge rates authorized by AB 1002. Pursuant to AB 1002, natural gas PPP surcharges are established annually to fund natural gas-related Public Purpose Programs.

This Application does not propose any changes to the current CARE Balancing Account mechanism.

G. REQUEST TO CONTINUE FUNDING AND ALLOW FOR FUND SHIFTING

Fund shifting flexibility between program categories and program years is critical to the achievement and success of the programmatic initiative and necessary to avoid disruption of program services, and provide a seamless and transparent program to customers. As such, SDG&E requests authorization: 1) to carry forward or carry back funding into PY 2009, PY 2010, or PY 2011 during the three-year funding cycle, and 2) authority to shift funds among program categories in PY 2009, PY 2010, and PY 2011.

Prior to 2007, the Commission allowed the utilities full flexibility to shift funds among program categories as needed to achieve program objectives. However, in D.06-12-038, the Commission restricted movement of funds among measurement and evaluation, general administration, and the regulatory compliance categories. In its Application, SDG&E has proposed a modification and expansion of its program plans, enrollment efforts, and certification process. Therefore, SDG&E requests that the fund shifting restrictions adopted for the 2007 – 2008 program cycle be removed to allow SDG&E flexibility to make program adjustments and modifications expeditiously and eliminate potential delays.

If the Commission should be delayed in issuing a decision on SDG&E's 2009-2011 low income programs budget application, SDG&E requests interim authorization from the Commission to continue CARE activities into 2009 using 2009 program funds. Accomplishments achieved during this interim period will be counted toward 2009 program results.

H. CONCLUSION

For the foregoing reasons, the Commission should approve the CARE program plans and budgets for PY 2009-2011, as described in this Application.

IV. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Proposed Category, Issues to Be Considered, Need for Hearings and Proposed Schedule

SDG&E proposes to categorize this Application as a "ratesetting" proceeding within the meaning of Rules 1.3(e) and 7.1. Because of the limited factual issues to be addressed in this proceeding, SDG&E does not anticipate a need for hearings. In the event hearings do become necessary, SDG&E proposes two procedural schedules:

Schedule 1 (Assumes No Hearings)

Filing of Application	May 15, 2008
Prehearing Conference	May 29, 2008
Protests/Testimony of Interested Parties	June 16, 2008
Utilities' Replies to Comments	June 30, 2008
Prehearing Conference	July 10, 2008
Opening Briefs	July 23, 2008
Reply Briefs	August 8, 2008
Proposed Decision	September 3, 2008
Comments to Proposed Decision	September 24, 2008
Reply Comments to Proposed Decision	September 29, 2008
Final Decision	October 2, 2008

Schedule 2 (Assumes Abbreviated Hearing)

Filing of Application	May 15, 2008
Prehearing Conference	May 29, 2008

Protests/Testimony of Interested Parties	June 16, 2008
Rebuttal Testimony	June 30, 2008
Prehearing Conference	July 10, 2008
Hearings	July 21-23, 2008
Opening Briefs	August 20, 2008
Reply Briefs	September 3, 2008
Proposed Decision	September 24, 2008
Comments to Proposed Decision	October 14, 2008
Reply Comments to Proposed Decision	October 20, 2008
Final Decision	November 16, 2008

SDG&E recommends that the Commission adopt the first of these two proposed schedules for the reason explained above.

B. Statutory Authority - Rule 2.1

This Application is made pursuant to Section 451, 701, 702, 728, and 729 of the Public Utilities Code of the State of California; the Commission’s Rules of Practice and Procedure; and the other relevant prior decisions, orders, and resolutions of the Commission.

C. Legal Name, Place of Business/Incorporation - Rule 2.1(a)

Applicant’s legal name is San Diego Gas & Electric Company. SDG&E is a public utility corporation organized and existing under the laws of the State of California, with its principal place of business at 8330 Century Park Court, San Diego, California 92123.

D. Correspondence - Rule 2.1(b)

Correspondence or communication regarding this Application should be addressed to:

Joy Yamagata
Regulatory Manager
San Diego Gas & Electric Company
8330 Century Park Court
San Diego, California 92123-1550
Telephone: (858) 654-1755
Facsimile: (858) 654-1788
E-Mail: jyamagata@semprautilities.com

With a copy to:

Kim F. Hassan
Attorney
San Diego Gas & Electric Company
101 Ash Street, HQ12
San Diego, California 92101-3017
Telephone: (619) 699-5006
Facsimile: (619) 699-5027
E-Mail: khassan@sempra.com

E. Articles of Incorporation - Rule 2.2

SDG&E is incorporated under the laws of the State of California. A certified copy of the restated Articles of Incorporation, as last amended, currently in effect and certified by the California Secretary of State, was filed with the Commission on October 1, 1998 in connection with SDG&E' Application No. 98-10-012, and is incorporated herein by reference.

F. Financial Statement, Balance Sheet and Income Statement – Rule 3.2(a)(4)

Appendix A to this Application is SDG&E' Balance Sheet as of December 31, 2007.

G. Rates – Rules 3.2(a)(2) and 3.2(a)(3)

The current and proposed rates that will result from this Application are described in Attachment C-1.

H. Property and Equipment – Rule 3.2 (a)(4)

A general description of SoCalGas and SDG&E's respective properties was filed with the Commission on October 5, 2001, in connection with Application 01-10-005, and is incorporated herein by reference. Appendix B to this Application is a statement of SDG&E' Cost of Property and Depreciation Reserve Applicable Thereto as of December 31, 2007.

I. Summary of Earnings – Rules 3.2(a)(5)

Appendix C to this Application is a Summary of Earnings for SDG&E for the 3 months ended December 31, 2007.

J. Depreciation – Rule 3.2(7)

For financial statement purposes, depreciation of utility plant has been computed on a straight-line remaining life basis at rates based on the estimated useful lives of plant properties. For federal income tax accrual purposes, SDG&E generally computes depreciation using the straight-line method for tax property additions prior to 1954, and liberalized depreciation, which includes Class Life and Asset Depreciation Range Systems, on tax property additions after 1954

and prior to 1981. For financial reporting and rate-fixing purposes, “flow through accounting” has been adopted for such properties. For tax property additions in years 1981 through 1986, SDG&E has computed its tax depreciation using the Accelerated Cost Recovery System. For years after 1986, SDG&E has computed its tax depreciation using the Modified Accelerated Cost Recovery Systems and, since 1982, has normalized the effects of the depreciation differences in accordance with the Economic Recovery Tax Act of 1981 and the Tax Reform Act of 1986.

K. Proxy Statement – Rule 3.2(a)(8)

SDG&E' latest proxy statement was filed with the Commission on May 2, 2005 in connection with SDG&E' Application No. 05-05-004, and is incorporated herein by reference.

L. Pass Through of Costs – Rule 3.2(a)(10)

A copy of SDG&E's most recent proxy statement, dated April 4, 2008, was mailed to the California Public Utilities Commission on April 29, 2008.

M. Service and Notice – Rule 3.2(b)

SDG&E is serving this Application on all parties to R.06-04-010 and R.07-01-042. Within ten days of filing this application, SDG&E will mail notice of this Application to the State of California and to cities and counties that SDG&E serves and SDG&E will post the notice in its offices and publish the notice in newspapers of general circulation in each county in its service territory. In addition, SDG&E will include notices with the regular bills mailed to all customers affected by the proposed rate changes. The service list of state and government agencies is attached hereto as Appendix D.

V. RELIEF REQUESTED

For the reasons set forth in this Application and accompanying testimony, SDG&E respectfully asks the Commission to:

- 1) Consider this Application and grant all the relief requested herein.
- 2) Find that SDG&E' proposals are in conformance with Commission directives and policies.
- 3) Approve SDG&E' low-income assistance program plans, measures, pilots, and budgets for PY 2009-2011.
- 4) Approve SDG&E's request to be fund shift between CARE administrative categories.

- 5) Approve SDG&E's request to be fund shift between LIEE administrative categories.
- 6) Authorize SDG&E to record all PY 2009-2011 program costs in appropriate balancing accounts.
- 7) Grant such other and further relief which the Commission finds to be just and reasonable.
- 8) Approve SDG&E's requested changes to the P&P Manual, and direct that changes ordered by the final decision be reflected in the P&P Manual.
- 9) Approve SDG&E's rate increase.
- 10) Approve SDG&E's request to delay the issuance of the RFP and authorize SDG&E to release its RFP 3 months after the Commission has rendered a final decision.
- 11) SDG&E requests that the LIEE fund shifting restrictions adopted for the 2007 – 2008 program cycle be removed to allow SDG&E more flexibility to make program adjustments and modifications expeditiously and eliminate potential delays.
- 12) If the Commission should be delayed in issuing a decision on SDG&E's 2009-2011 low income programs budget application, SDG&E requests:
 - a. Interim authorization from the Commission to continue LIEE and CARE program activities in their current forms into 2009, using 2009 program funds.
 - b. Count program accomplishments achieved during this period toward adopted PY 2009 goals.
- 13) Approve the Impact Evaluation proposal.

Respectfully submitted this 15th day of May 2008

By: /s/ Hal Snyder

Hal Snyder

Vice President - Customer Programs
San Diego Gas & Electric Company

 /s/ Kim F. Hassan

Kim F. Hassan

Attorney for:

SAN DIEGO GAS & ELECTRIC COMPANY

May 15, 2008

VERIFICATION

I am an officer of San Diego Gas & Electric Company, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing Application are true to my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters I believe them to be true.

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

Executed this 15th day of May, 2008 at San Diego, California.

/s/ Hal Snyder
Hal Snyder
Vice President - Customer Programs

Appendix A

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
DECEMBER 31, 2007

(a) Amounts and Kinds of Stock Authorized:

Preferred Stock	1,375,000	shares	Par Value \$27,500,000
Preferred Stock	10,000,000	shares	Without Par Value
Preferred Stock	Amount of shares not specified		\$80,000,000
Common Stock	255,000,000	shares	Without Par Value

Amounts and Kinds of Stock Outstanding:

PREFERRED STOCK

5.0%	375,000	shares	\$7,500,000.00
4.50%	300,000	shares	\$6,000,000.00
4.40%	325,000	shares	\$6,500,000.00
4.60%	373,770	shares	\$7,475,400.00
\$1.7625	550,000	shares	\$13,750,000.00
\$1.70	1,400,000	shares	\$35,000,000.00
\$1.82	640,000	shares	\$16,000,000.00

COMMON STOCK

116,583,358	shares	\$291,458,395.00
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(b) Terms of Preferred Stock:

Full information as to this item is given in connection with Application Nos. 93-09-069, 04-01-009 AND 06-05-01 to which references are hereby made.

(c) Brief Description of Mortgage:

Full information as to this item is given in Application No. 06-05-015 to which reference is hereby made.

(d) Number and Amount of Bonds Authorized and Issued

	Nominal Date of Issue	Par Value Authorized and Issued	Outstanding	Interest Paid in 2006
<u>First Mortgage Bonds:</u>				
6.8% Series KK, due 2015	12-01-91	14,400,000	14,400,000	979,200
Var% Series OO, due 2027	12-01-92	250,000,000	150,000,000	7,612,500
5.9% Series PP, due 2018	04-29-93	70,795,000	0	3,413,801
5.85% Series RR, due 2021	06-29-93	60,000,000	60,000,000	3,510,000
5.9% Series SS, due 2018	07-29-93	92,945,000	0	4,645,959
2.539% Series VV, due 2034	06-17-04	43,615,000	43,615,000	913,556
2.539% Series WW, due 2034	06-17-04	40,000,000	40,000,000	837,548
2.516% Series XX, due 2034	06-17-04	35,000,000	35,000,000	724,406
2.832% Series YY, due 2034	06-17-04	24,000,000	24,000,000	584,727
2.832% Series ZZ, due 2034	06-17-04	33,650,000	33,650,000	780,278
2.8275% Series AAA, due 2039	06-17-04	75,000,000	75,000,000	2,057,658
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
5.30% Series CCC, due 2015	11-17-05	250,000,000	250,000,000	13,250,000
6.00% Series DDD, due 2026	06-08-06	250,000,000	250,000,000	8,750,000
Var Series EEE, due 2018	09-21-06	161,240,000	161,240,000	1,521,702
6.125% Series FFF, due 2037	09-20-07	250,000,000	250,000,000	0
<u>Unsecured Bonds:</u>				
5.9% CPCFA96A, due 2014	06-01-96	129,820,000	129,820,000	7,659,380
5.3% CV96A, due 2021	08-02-96	38,900,000	38,900,000	2,061,700
5.5% CV96B, due 2021	11-21-96	60,000,000	60,000,000	3,300,000
4.9% CV97A, due 2023	10-31-97	25,000,000	25,000,000	1,225,000

SAN DIEGO GAS & ELECTRIC COMPANY
FINANCIAL STATEMENT
DECEMBER 31, 2007

<u>Other Indebtedness:</u>	<u>Date of Issue</u>	<u>Date of Maturity</u>	<u>Interest Rate</u>	<u>Outstanding</u>	<u>Interest Paid 2006</u>
Commercial Paper & ST Bank Loans	Various	Various	Various	0	\$998,278

Amounts and Rates of Dividends Declared:

The amounts and rates of dividends during the past five fiscal years are as follows:

<u>Preferred Stock</u>	<u>Shares Outstanding</u>	<u>Dividends Declared</u>				
	<u>12-31-06</u>	<u>2002</u>	<u>2003</u>	<u>2004</u>	<u>2005</u>	<u>2006</u>
5.0%	375,000	\$375,000	\$375,000	\$375,000	\$375,000	\$375,000
4.50%	300,000	270,000	270,000	270,000	270,000	270,000
4.40%	325,000	286,000	286,000	286,000	286,000	286,000
4.60%	373,770	343,868	343,868	343,868	343,868	343,868
\$ 1.7625	650,000	1,762,500	1,674,375	1,498,125	1,321,875	1,145,625
\$ 1.70	1,400,000	2,380,000	2,380,000	2,380,000	2,380,000	2,380,000
\$ 1.82	640,000	1,164,800	1,164,800	1,164,800	1,164,800	1,164,800
	<u>4,063,770</u>	<u>\$6,582,168</u>	<u>\$6,494,043</u>	<u>\$6,317,793</u>	<u>\$6,141,543</u>	<u>\$5,965,293</u> [2]

Common Stock

Amount	\$150,000,000	\$200,000,000	\$200,000,000	\$75,000,000	\$0 [1]
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A balance sheet and a statement of income and retained earnings of Applicant for the twelve months ended December 31, 2007, are attached hereto.

[1] San Diego Gas & Electric Company dividend to parent.

[2] Includes \$1,145,625 of interest expense related to redeemable preferred stock.

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
DECEMBER 31, 2007

1. UTILITY PLANT		<u>2007</u>
101	UTILITY PLANT IN SERVICE	\$8,398,180,798
102	UTILITY PLANT PURCHASED OR SOLD	-
105	PLANT HELD FOR FUTURE USE	4,420,116
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	209,515,345
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(3,868,497,580)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(209,138,759)
118	OTHER UTILITY PLANT	536,417,026
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(139,587,600)
120	NUCLEAR FUEL - NET	<u>36,680,097</u>
TOTAL NET UTILITY PLANT		<u>4,967,989,443</u>
 2. OTHER PROPERTY AND INVESTMENTS		
121	NONUTILITY PROPERTY	3,678,303
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(442,999)
123	INVESTMENTS IN SUBSIDIARY COMPANIES	3,290,000
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	<u>740,241,709</u>
TOTAL OTHER PROPERTY AND INVESTMENTS		<u>746,767,013</u>

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
ASSETS AND OTHER DEBITS
DECEMBER 31, 2007

3. CURRENT AND ACCRUED ASSETS		2007
131	CASH	23,099,930
132	INTEREST SPECIAL DEPOSITS	-
134	OTHER SPECIAL DEPOSITS	-
135	WORKING FUNDS	50,866
136	TEMPORARY CASH INVESTMENTS	120,196,911
141	NOTES RECEIVABLE	156,935
142	CUSTOMER ACCOUNTS RECEIVABLE	162,017,417
143	OTHER ACCOUNTS RECEIVABLE	49,164,851
144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(2,355,836)
145	NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	4,950,475
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	23,174,292
151	FUEL STOCK	-
152	FUEL STOCK EXPENSE UNDISTRIBUTED	-
154	PLANT MATERIALS AND OPERATING SUPPLIES	63,618,289
156	OTHER MATERIALS AND SUPPLIES	-
163	STORES EXPENSE UNDISTRIBUTED	-
164	GAS STORED	48,899,078
165	PREPAYMENTS	69,166,536
171	INTEREST AND DIVIDENDS RECEIVABLE	11,160,695
173	ACCRUED UTILITY REVENUES	47,394,000
174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	16,977,983
175	DERIVATIVE INSTRUMENT ASSETS	28,383,908
TOTAL CURRENT AND ACCRUED ASSETS		666,056,330
4. DEFERRED DEBITS		
181	UNAMORTIZED DEBT EXPENSE	21,023,623
182	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	1,107,975,385
183	PRELIMINARY SURVEY & INVESTIGATION CHARGES	67,513,475
184	CLEARING ACCOUNTS	30,814
185	TEMPORARY FACILITIES	-
186	MISCELLANEOUS DEFERRED DEBITS	18,732,930
188	RESEARCH AND DEVELOPMENT	-
189	UNAMORTIZED LOSS ON REACQUIRED DEBT	34,287,949
190	ACCUMULATED DEFERRED INCOME TAXES	207,058,974
TOTAL DEFERRED DEBITS		1,456,623,150
TOTAL ASSETS AND OTHER DEBITS		\$7,837,435,936

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
DECEMBER 31, 2007

5. PROPRIETARY CAPITAL

	<u>2007</u>
201 COMMON STOCK ISSUED	\$291,458,395
204 PREFERRED STOCK ISSUED	78,475,400
207 PREMIUM ON CAPITAL STOCK	592,222,753
210 GAIN ON RETIRED CAPITAL STOCK	-
211 MISCELLANEOUS PAID-IN CAPITAL	279,618,042
214 CAPITAL STOCK EXPENSE	(25,688,571)
216 UNAPPROPRIATED RETAINED EARNINGS	1,078,672,830
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	<u>(15,469,094)</u>
TOTAL PROPRIETARY CAPITAL	<u>2,279,289,755</u>

6. LONG-TERM DEBT

221 BONDS	1,636,905,000
223 ADVANCES FROM ASSOCIATED COMPANIES	-
224 OTHER LONG-TERM DEBT	267,470,000
225 UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226 UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	<u>(2,860,270)</u>
TOTAL LONG-TERM DEBT	<u>1,901,514,730</u>

7. OTHER NONCURRENT LIABILITIES

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	-
228.2 ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	31,402,167
228.3 ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	194,167,078
228.4 ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
230 ASSET RETIREMENT OBLIGATIONS	<u>568,424,467</u>
TOTAL OTHER NONCURRENT LIABILITIES	<u>793,993,712</u>

SAN DIEGO GAS & ELECTRIC COMPANY
BALANCE SHEET
LIABILITIES AND OTHER CREDITS
DECEMBER 31, 2007

8. CURRENT AND ACCRUED LIABILITES

	<u>2007</u>
231 NOTES PAYABLE	-
232 ACCOUNTS PAYABLE	303,169,075
233 NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234 ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	836,765
235 CUSTOMER DEPOSITS	51,723,308
236 TAXES ACCRUED	1,781,842
237 INTEREST ACCRUED	15,576,335
238 DIVIDENDS DECLARED	1,204,917
241 TAX COLLECTIONS PAYABLE	2,893,269
242 MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	187,059,145
243 OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	-
244 DERIVATIVE INSTRUMENT LIABILITIES	369,487,812
245 DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	<u>1,853,839</u>
TOTAL CURRENT AND ACCRUED LIABILITIES	<u>935,586,307</u>

9. DEFERRED CREDITS

252 CUSTOMER ADVANCES FOR CONSTRUCTION	23,926,275
253 OTHER DEFERRED CREDITS	155,443,594
254 OTHER REGULATORY LIABILITIES	1,068,596,976
255 ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	28,482,509
257 UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281 ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	5,201,256
282 ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	521,157,360
283 ACCUMULATED DEFERRED INCOME TAXES - OTHER	<u>124,243,462</u>

TOTAL DEFERRED CREDITS 1,927,051,432

TOTAL LIABILITIES AND OTHER CREDITS \$7,837,435,936

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
TWELVE MONTHS ENDED DECEMBER 31, 2007

1. UTILITY OPERATING INCOME

400	OPERATING REVENUES		\$2,914,453,325
401	OPERATING EXPENSES	\$1,906,205,153	
402	MAINTENANCE EXPENSES	146,381,639	
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	300,972,852	
408.1	TAXES OTHER THAN INCOME TAXES	62,963,269	
409.1	INCOME TAXES	178,631,455	
410.1	PROVISION FOR DEFERRED INCOME TAXES	58,858,191	
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(87,727,718)	
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(2,800,000)	
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	<u>(1,875,781)</u>	
	TOTAL OPERATING REVENUE DEDUCTIONS		<u>2,561,609,060</u>
	NET OPERATING INCOME		352,844,265

2. OTHER INCOME AND DEDUCTIONS

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-	
417.1	EXPENSES OF NONUTILITY OPERATIONS	(463,459)	
418	NONOPERATING RENTAL INCOME	411,774	
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-	
419	INTEREST AND DIVIDEND INCOME	28,946,576	
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	16,773,673	
421	MISCELLANEOUS NONOPERATING INCOME	2,791,079	
421.1	GAIN ON DISPOSITION OF PROPERTY	<u>-</u>	
	TOTAL OTHER INCOME	<u>48,459,643</u>	
421.2	LOSS ON DISPOSITION OF PROPERTY	-	
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	<u>932,651</u>	
	TOTAL OTHER INCOME DEDUCTIONS	<u>932,651</u>	
408.2	TAXES OTHER THAN INCOME TAXES	318,039	
409.2	INCOME TAXES	(4,039,894)	
410.2	PROVISION FOR DEFERRED INCOME TAXES	2,458,264	
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	<u>(222,554)</u>	
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	<u>(1,486,145)</u>	
	TOTAL OTHER INCOME AND DEDUCTIONS		<u>50,878,439</u>
	INCOME BEFORE INTEREST CHARGES		403,722,704
	NET INTEREST CHARGES*		<u>115,997,643</u>
	NET INCOME		<u>\$287,725,061</u>

*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (6,642,159)

SAN DIEGO GAS & ELECTRIC COMPANY
STATEMENT OF INCOME AND RETAINED EARNINGS
TWELVE MONTHS ENDED DECEMBER 31, 2007

3. RETAINED EARNINGS

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$797,169,413
NET INCOME (FROM PRECEDING PAGE)	287,725,061
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	(4,819,669)
OTHER RETAINED EARNINGS ADJUSTMENTS	<u>(1,401,975)</u>
RETAINED EARNINGS AT END OF PERIOD	<u><u>\$1,078,672,830</u></u>

Appendix B

SAN DIEGO GAS & ELECTRIC COMPANY
COST OF PROPERTY AND
DEPRECIATION RESERVE APPLICABLE THERETC
AS OF DECEMBER 31, 2007

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
ELECTRIC DEPARTMENT			
302	Franchises and Consents	\$ 222,841	\$ 202,900
303	Misc. Intangible Plant	26,878,263	21,540,738
	TOTAL INTANGIBLE PLANT	27,101,104	21,743,638
310.1	Land	14,526,518	46,518
310.2	Land Rights	0	0
311	Structures and Improvements	40,899,464	9,764,455
312	Boiler Plant Equipment	115,839,127	12,331,787
314	Turbogenerator Units	97,698,061	12,832,710
315	Accessory Electric Equipment	33,364,110	4,005,025
316	Miscellaneous Power Plant Equipment	18,950,591	1,321,367
	Steam Production Decommissioning	0	0
	TOTAL STEAM PRODUCTION	321,277,871	40,301,862
320.1	Land	0	0
320.2	Land Rights	283,677	283,677
321	Structures and Improvements	268,718,936	265,450,449
322	Boiler Plant Equipment	393,511,631	393,511,631
323	Turbogenerator Units	137,756,920	135,498,300
324	Accessory Electric Equipment	166,938,296	166,732,806
325	Miscellaneous Power Plant Equipment	258,022,543	208,016,121
107	ICIP CWIP	0	5,748,505
	TOTAL NUCLEAR PRODUCTION	1,225,232,003	1,175,241,488
340.1	Land	143,476	0
340.2	Land Rights	2,428	2,428
341	Structures and Improvements	4,421,921	342,528
342	Fuel Holders, Producers & Accessories	15,295,980	932,131
343	Prime Movers	20,824,413	2,051,771
344	Generators	163,319,936	9,426,861
345	Accessory Electric Equipment	9,103,734	730,861
346	Miscellaneous Power Plant Equipment	359,058	35,376
	TOTAL OTHER PRODUCTION	213,470,946	13,521,958
	TOTAL ELECTRIC PRODUCTION	1,759,980,820	1,229,065,308

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	\$ 35,194,970	\$ 0
350.2	Land Rights	61,121,952	9,478,972
352	Structures and Improvements	80,918,914	27,008,543
353	Station Equipment	528,563,033	124,382,733
354	Towers and Fixtures	104,682,106	76,783,639
355	Poles and Fixtures	126,723,541	40,358,519
356	Overhead Conductors and Devices	215,753,429	146,936,733
357	Underground Conduit	105,508,143	9,321,337
358	Underground Conductors and Devices	91,483,794	12,396,130
359	Roads and Trails	21,628,728	5,032,573
	TOTAL TRANSMISSION	1,371,578,610	451,699,177
360.1	Land	16,850,971	0
360.2	Land Rights	66,736,155	26,317,813
361	Structures and Improvements	3,271,362	1,824,736
362	Station Equipment	305,374,354	69,108,477
364	Poles, Towers and Fixtures	395,120,520	183,993,354
365	Overhead Conductors and Devices	308,662,885	100,390,553
366	Underground Conduit	770,992,532	296,701,324
367	Underground Conductors and Devices	1,038,237,800	553,909,018
368.1	Line Transformers	381,708,393	62,476,139
368.2	Protective Devices and Capacitors	21,060,282	59,628
369.1	Services Overhead	97,595,120	118,019,819
369.2	Services Underground	265,622,785	158,675,212
370.1	Meters	86,461,721	31,969,452
370.2	Meter Installations	41,738,532	9,830,043
371	Installations on Customers' Premises	6,074,857	9,194,585
373.1	St. Lighting & Signal Sys.-Transformers	0	0
373.2	Street Lighting & Signal Systems	23,518,825	16,890,372
	TOTAL DISTRIBUTION PLANT	3,829,027,094	1,639,360,525
389.1	Land	7,511,040	0
389.2	Land Rights	0	0
390	Structures and Improvements	29,317,937	11,427,532
392.1	Transportation Equipment - Autos	0	49,884
392.2	Transportation Equipment - Trailers	175,979	133,052
393	Stores Equipment	54,331	47,304
394.1	Portable Tools	13,005,844	4,061,549
394.2	Shop Equipment	572,160	340,714
395	Laboratory Equipment	300,344	(39,773)
396	Power Operated Equipment	92,162	149,134
397	Communication Equipment	100,620,725	45,500,154
398	Miscellaneous Equipment	431,093	(36,142)
	TOTAL GENERAL PLANT	152,081,614	61,633,409
101	TOTAL ELECTRIC PLANT	7,139,769,242	3,403,502,057

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
GAS PLANT			
302	Franchises and Consents	\$ 86,104	\$ 86,104
303	Miscellaneous Intangible Plant	713,559	574,758
	TOTAL INTANGIBLE PLANT	799,663	660,862
360.1	Land	0	0
361	Structures and Improvements	43,992	43,992
362.1	Gas Holders	0	0
362.2	Liquefied Natural Gas Holders	0	0
363	Purification Equipment	0	0
363.1	Liquefaction Equipment	0	0
363.2	Vaporizing Equipment	0	0
363.3	Compressor Equipment	0	0
363.4	Measuring and Regulating Equipment	0	0
363.5	Other Equipment	0	0
363.6	LNG Distribution Storage Equipment	407,546	358,228
	TOTAL STORAGE PLANT	451,538	402,220
365.1	Land	4,649,144	0
365.2	Land Rights	2,217,185	1,017,259
366	Structures and Improvements	10,874,587	7,557,626
367	Mains	122,184,181	47,618,722
368	Compressor Station Equipment	60,648,818	38,811,290
369	Measuring and Regulating Equipment	16,806,292	10,309,574
371	Other Equipment	0	0
	TOTAL TRANSMISSION PLANT	217,380,208	105,314,472
374.1	Land	102,187	0
374.2	Land Rights	7,928,330	4,981,739
375	Structures and Improvements	43,447	61,253
376	Mains	494,105,437	269,020,089
378	Measuring & Regulating Station Equipment	8,514,938	5,606,064
380	Distribution Services	228,479,160	253,763,680
381	Meters and Regulators	73,022,204	30,516,369
382	Meter and Regulator Installations	58,721,151	22,019,311
385	Ind. Measuring & Regulating Station Equipm	1,531,457	775,340
386	Other Property On Customers' Premises	0	0
387	Other Equipment	4,545,427	4,091,619
	TOTAL DISTRIBUTION PLANT	876,993,739	590,835,464

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
392.1	Transportation Equipment - Autos	\$ 0	\$ 25,503
392.2	Transportation Equipment - Trailers	74,501	74,501
394.1	Portable Tools	6,804,395	2,196,097
394.2	Shop Equipment	84,597	4,342
395	Laboratory Equipment	312,157	(117,388)
396	Power Operated Equipment	162,284	(3,443)
397	Communication Equipment	2,958,618	1,651,648
398	Miscellaneous Equipment	294,233	58,326
	TOTAL GENERAL PLANT	<u>10,690,785</u>	<u>3,889,587</u>
101	TOTAL GAS PLANT	<u>1,106,315,933</u>	<u>701,102,606</u>
COMMON PLANT			
303	Miscellaneous Intangible Plant	172,285,048	144,578,577
350.1	Land	0	0
360.1	Land	0	0
389.1	Land	5,654,409	0
389.2	Land Rights	1,397,590	27,275
390	Structures and Improvements	140,127,168	53,547,088
391.1	Office Furniture and Equipment - Other	23,694,454	11,462,853
391.2	Office Furniture and Equipment - Computer E	42,451,211	28,375,442
392.1	Transportation Equipment - Autos	33,942	(338,930)
392.2	Transportation Equipment - Trailers	33,369	(89,079)
393	Stores Equipment	140,123	(168,430)
394.1	Portable Tools	168,535	3,368
394.2	Shop Equipment	312,954	135,271
394.3	Garage Equipment	2,651,973	718,101
395	Laboratory Equipment	2,460,188	823,055
396	Power Operated Equipment	0	(192,979)
397	Communication Equipment	72,563,444	44,318,089
398	Miscellaneous Equipment	2,924,131	935,024
118.1	TOTAL COMMON PLANT	<u>466,898,540</u>	<u>284,134,725</u>
	TOTAL ELECTRIC PLANT	7,139,769,242	3,403,502,057
	TOTAL GAS PLANT	1,106,315,933	701,102,606
	TOTAL COMMON PLANT	<u>466,898,540</u>	<u>284,134,725</u>
101 & 118.1	TOTAL	<u>8,712,983,714</u>	<u>4,388,739,389</u>
101	PLANT IN SERV-SONGS FULLY RECOVER	\$ <u>(1,167,020,770)</u>	\$ <u>(1,167,020,770)</u>
101	PLANT IN SERV-ELECTRIC NON-RECON Electric	\$ <u>0</u>	\$ <u>0</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	Accrual for Retirements		
	Electric	\$ (3,394,214)	\$ (3,394,214)
	Gas	(65,424)	(65,424)
	TOTAL PLANT IN SERV-NON RECON ACC	<u>(3,459,638)</u>	<u>(3,459,638)</u>
	Electric	0	0
	Gas	0	0
	TOTAL PLANT PURCHASED OR SOLD	<u>0</u>	<u>0</u>
105	Plant Held for Future Use		
	Electric	4,420,116	0
	Gas	0	0
	TOTAL PLANT HELD FOR FUTURE USE	<u>4,420,116</u>	<u>0</u>
107	Construction Work in Progress		
	Electric	220,305,156	
	Gas	7,834,114	
	Common	68,738,035	
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>296,877,305</u>	<u>0</u>
108	Accum. Depr SONGS Mitigation/Spent Fuel Disallowance		
	Electric	0	4,600,000
108	Accum. Depr SONGS SGRP Removal		
	Electric	0	1,130,000
108.5	Accumulated Nuclear Decommissioning		
	Electric	0	645,751,481
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	<u>0</u>	<u>645,751,481</u>
120	NUCLEAR FUEL FABRICATION	<u>68,199,160</u>	<u>50,142,988</u>
143	FAS 143 ASSETS - Legal Obligation	112,254,030	(576,412,883)
	FIN 47 ASSETS - Legal Obligation	40,622,045	18,720,244
143	FAS 143 ASSETS - Non-legal Obligation	0	(1,073,581,165)
	TOTAL FAS 143	152,876,075	(1,631,273,805)
	UTILITY PLANT TOTAL	<u>\$ 8,064,875,962</u>	<u>\$ 2,288,609,645</u>

Appendix C

**SAN DIEGO GAS & ELECTRIC COMPANY
SUMMARY OF EARNINGS
TWELVE MONTHS ENDED DECEMBER 31, 2007
(DOLLARS IN MILLIONS)**

<u>Line No.</u>	<u>Item</u>	<u>Amount</u>
1	Operating Revenue	\$2,915
2	Operating Expenses	<u>2,562</u>
3	Net Operating Income	<u><u>\$353</u></u>
4	Weighted Average Rate Base	\$3,999
5	Rate of Return*	8.23%

*Authorized Cost of Capital

Appendix D

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Appendix E

CERTIFICATE OF SERVICE

I hereby certify that a copy of **NOTICE OF AVAILABILITY OF THE APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY FOR APPROVAL OF PROGRAM YEARS 2009-2011 LOW-INCOME ASSISTANCE PROGRAMS AND FUNDING** has been electronically mailed to each party of record of the service list in R.07-01-042 and R.06-04-010. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and by depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to Administrative Law Judge Sarah R. Thomas and Commissioner Dian Grueneich.

Executed this 15th day of May, 2008 at San Diego, California.

 /s/ Jenny Tjokro
Jenny Tjokro



California Public
Utilities Commission

CPUC Home

CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

**PROCEEDING: R0701042 - CPUC - PG&E, EDISON,
FILER: CPUC - PG&E, EDISON, SOCALGAS, SDG&E
LIST NAME: LIST
LAST CHANGED: MAY 9, 2008**

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[TOP OF PAGE](#)

[BACK TO INDEX OF SERVICE LISTS](#)



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[TOP OF PAGE](#)

[BACK TO INDEX OF SERVICE LISTS](#)



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May 15, 2008

To Those Parties Appearing on Service List R.07-01-042 and 06-04-010

Re: R.07-01-042 and 06-04-010: Application of San Diego Gas & Electric Company for Approval of Low Income Assistance Programs and Budgets for Program Years 2009-2011

Dear Parties,

Pursuant to Rule 1.9(c) of the Rules of Practice and Procedure of the California Public Utilities Commission (the "Commission"), San Diego Gas & Electric Company hereby provides this Notice of Availability of: **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY FOR APPROVAL OF LOW-INCOME ASSISTANCE PROGRAMS AND BUDGETS FOR PROGRAM YEARS 2009-2011**, filed with the Commission and served via email to the official service lists on May 15, 2008 in the above-captioned dockets. The referenced reports can be found at <http://sdge.com/regulatory/>.

Should you have any questions or wish to receive a copy of the above, please do not hesitate to contact me directly at (619) 699-5006 or Khassan@sempra.com.

Best regards,

/s/ Kim F. Hassan
Kim F. Hassan

Attachment A

Attachment A-1

A	B	C	D	E	F
PY 2009-2011 LIEE Proposed Electric & Gas Budget					
San Diego Gas & Electric Company					
1					
2					
3					
4	Authorized PY 2008	PY 2009	Planned PY 2010	PY 2011	3-Year Request PY 2009 - 2011
5					
6	LIEE Program:				
7	Energy Efficiency				
8	- Gas Appliances	\$2,449,373	\$2,496,857	\$2,174,649	\$ 7,120,880
9	- Electric Appliances	\$7,801,688	\$8,035,739	\$7,524,469	\$ 23,361,896
10	- Weatherization	\$4,004,233	\$4,119,047	\$4,106,442	\$ 12,229,722
11	- Outreach & Assessment	\$1,200,117	\$2,152,500	\$1,900,000	\$ 5,965,000
12	- In Home Education	\$155,902	\$1,164,700	\$1,152,200	\$ 3,721,600
13	- Education Workshops	\$0	\$0	\$0	\$ -
14	- Pilot	\$0	\$145,000	\$230,000	\$ 375,000
15	Energy Efficiency Total	\$11,633,997	\$17,812,495	\$17,087,759	\$ 52,774,098
16					
17	Training Center	\$0	\$0	\$0	\$ -
18	Inspections	\$44,144	\$57,838	\$61,513	\$ 179,027
19	Marketing	\$320,992	\$743,200	\$799,000	\$ 2,346,200
20	M&E Studies	\$0	\$111,660	\$45,000	\$ 239,160
21	Regulatory Compliance	\$309,306	\$266,326	\$280,619	\$ 820,417
22	General Administration	\$973,311	\$1,964,381	\$1,932,009	\$ 5,758,799
23	CPUC Energy Division	\$21,000	\$44,100	\$44,100	\$ 132,300
24					
25	TOTAL PROGRAM COSTS	\$13,302,750	\$21,000,000	\$20,250,000	\$ 62,250,000
26	Funded Outside of LIEE Program Budget				
27	NGAT Costs	\$300,000	\$427,500	\$440,325	\$453,150

Attachment A-1 LIEE Electric Budget

A	B	C	D	E	F
PY 2009-2011 LIEE Proposed Electric Budget Category Comparison					
San Diego Gas & Electric Company					
1					
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26					
27					

Attachment A-1 LIEE Gas Budget

A	B	C	D	E	F
PY 2009-2011 LIEE Proposed Gas Budget Category Comparison					
San Diego Gas & Electric Company					
1					
2					
3					
4					
5	Authorized PY 2008	PY 2009	Planned PY 2010	PY 2011	3-Year Request PY 2009 - 2011
6	LIEE Program:				
7	Energy Efficiency				
8	- Gas Appliances	\$1,597,843	\$2,449,373	\$2,496,857	\$ 7,120,880
9	- Electric Appliances	\$0	\$0	\$0	\$ -
10	- Weatherization	\$3,904,358	\$4,004,233	\$4,119,047	\$12,229,722
11	- Outreach & Assessment	\$600,058	\$1,076,250	\$956,250	\$2,982,500
12	- In Home Education	\$77,951	\$702,350	\$582,350	\$1,860,800
13	- Education Workshops	\$0	\$0	\$0	\$ -
14	- Pilot	\$0	\$0	\$72,500	\$187,500
15	Energy Efficiency Total	\$6,180,210	\$8,232,207	\$8,227,004	\$24,381,402
16					
17	Training Center	\$0	\$0	\$0	\$ -
18	Inspections	\$22,072	\$28,919	\$29,838	\$89,513
19	Marketing	\$160,496	\$371,600	\$402,000	\$1,173,100
20	M&E Studies	\$0	\$55,830	\$41,250	\$119,580
21	Regulatory Compliance	\$154,653	\$133,163	\$136,736	\$410,208
22	General Administration	\$486,656	\$982,190	\$931,205	\$2,879,399
23	CPUC Energy Division	\$10,500	\$22,050	\$22,050	\$66,150
24					
25	TOTAL PROGRAM COSTS	\$7,014,586	\$9,825,959	\$9,790,083	\$29,119,353
26	Funded Outside of LIEE Program Budget				
27	NGAT Costs	\$300,000	\$427,500	\$440,325	\$453,150

Attachment A-2

San Diego Gas & Electric Company
 PY 2009 - 2011 LIEE Planning Assumptions

Measures	Units	Quantity Installed	KWh (Annual)	Therms (Annual)	Projected Expenses*	Quantity Installed	KWh (Annual)	Therms (Annual)	Proposed Expenses*	Quantity Installed	KWh (Annual)	Therms (Annual)	Proposed Expenses*	PV 2010 Planned kW (Annual)	PV 2010 Planned kWh (Annual)	Therms (Annual)	Proposed Expenses*	PV 2011 Planned kW (Annual)	PV 2011 Planned kWh (Annual)	Therms (Annual)	Proposed Expenses*	
1 Heating Systems	Each	942			\$ 891,179	1,525			\$ 1,142	1,525			\$ 703,373		1,180		\$ 884				\$ 560,883	
2 Cooling Measures	Each	50	6,435		\$ 42,631	430	14,620		\$ 403,039	430	14,620		\$ 415,130		350	11,900					\$ 348,034	
3 A/C Replacement - Central	Each	74	95,007		\$ 260,276	230	16,994		\$ 781,998	230	16,994		\$ 805,458		132	9,720					\$ 474,122	
4 A/C Tune-up - Central	Each	492	62,379		\$ 78,166	200	26,999		\$ 30,900	200	26,999		\$ 31,827		200	26,999					\$ 32,782	
5 A/C Services - Central	Each																					
6 Heat Pump	Each																					
7 Evaporative Coolers	Each	8	1,238		\$ 7,710	9	295		\$ 8,468	9	295		\$ 8,720		9	255					\$ 8,981	
8 Evaporative Cooler Maintenance	Each																					
9 Ventilation & Space Conditioning	Each																					
10 R-19 Attic Insulation	Home	8,143	98,726		\$ 2,314,154	8,241	99,333		\$ 1,830,420	8,241	99,333		\$ 1,881,786		8,834	82,375					\$ 1,825,933	
11 R-22 Attic Insulation	Home	673	13,108		\$ 4,344	80	5,556		\$ 57,263	400	5,668		\$ 58,081		350	4,862					\$ 51,792	
12 R-30 Attic Insulation	Home	308	17,304		\$ 272,246	479	6,668		\$ 470,817	479	6,668		\$ 485,082		431	6,000					\$ 454,243	
13 Water Heating Measures	Home	8,551	365,368		\$ 80,011	20,000	798,720	1,170	193,868	20,000	798,720	1,170	193,868		20,000	798,720					\$ 696,377	
14 Water Heater Conservation Measures	Each	31			\$ 981	62			\$ 50,887	62			\$ 52,413								\$ 753	\$ 53,886
15 Water Heater Replacement - Gas	Each																					
16 Tankless Water Heater - Gas	Each	100			\$ 2,900				\$ 295,888				\$ 295,888									
17 Tankless Water Heater - Electric	Each																					
18 Lighting Measures	Each	68,699	1,431,829		\$ 726,104	140,029	2,240,469	280	1,193,842	140,029	2,240,469	280	1,193,842		140,022	2,240,344					\$ 1,224,042	
19 CFL	Each	8,364	533,594		\$ 658,361	12,000	768,000	1	\$ 971,263	12,000	768,000	1	\$ 1,000,690		12,000	768,000					\$ 1,040,870	
20 Exterior Hard wired CFL fixtures	Each	2,011	51,703		\$ 122,504	2,150	34,400	4	\$ 128,048	2,150	34,400	4	\$ 131,927		2,110	33,760					\$ 134,871	
21 Forchiare	Each	492	83,972		\$ 48,530	4,750	907,250		\$ 494,397	4,750	907,250		\$ 509,376		4,550	869,050					\$ 507,520	
22 Refrigerators (Primary)	Each	4,538	3,399,346		\$ 3,591,631	3,830	2,762,962	469	\$ 3,175,181	3,830	2,762,962	469	\$ 3,270,437		3,590	2,589,826					\$ 3,196,719	
23 Refrigerators (Secondary)	Each					405	292,167	50	\$ 324,000	405	292,167	50	\$ 333,720		305	220,027					\$ 288,860	
24 Pool Pumps	Each																					
25 Pool Pumps	Each																					
26 Furnace Standby Pilot Change Out	Each					2,103			\$ 92,547				\$ 92,547								\$ 71,650	
27 Furnace Clean & Tune	Each					15,000			\$ 695,260	15,000			\$ 716,108		15,000						\$ 737,591	
28 High Efficiency Washing Machine	Each					1,202	104,717		\$ 42,680	1,202	104,717		\$ 42,680		2,000	104,618					\$ 42,641	
29 LED Night Light	Each					20,000	204,400		\$ 53,902	20,000	204,400		\$ 55,223		20,000	204,400					\$ 57,336	
30 Microwave	Each					400	5,904		\$ 40,127	400	5,904		\$ 41,342		400	5,904					\$ 43,002	
31 Shower Start	Each					10,000	598,500		\$ 488,143	10,000	598,500		\$ 492,327		10,000	598,500					\$ 501,693	
32 Pools	Each																					
33 In-Home Display (IHD)	Each									300			\$ 145,000								\$ 230,000	
34 Programmable Controllable Thermostat (PCT)	Each																					
35 Outreach & Assessment	Home	10,440			\$ 1,200,117	20,000			\$ 2,152,500	20,000			\$ 1,912,500		20,000						\$ 1,900,000	
36 In-Home Education	Home	10,263			\$ 155,901	20,000			\$ 1,404,700	20,000			\$ 1,164,700		20,000						\$ 1,152,200	
37 Education Workshops	Participant																					
38 Total		6,170,007			\$ 179,453	8,897,914		2,010	\$ 478,745	8,897,914		2,010	\$ 178,823,843		8,515,760		1,964				\$ 17,087,759	

* Measure level expenses are projections only. Actual costs will be negotiated with contractors. Utilities are not requesting approval of costs at the measure level.

Attachment A-3

Attachment A-3 Penetration

	A	B	C	D	E	F	G
1	LIEE Program Penetration						
2	San Diego Gas & Electric Company						
3							
4		Number of Residential Customers in Utility Service Area	Number of Eligible and Willing LIEE Customers	Number of Treated LIEE Customers Since 2002	Number of Eligible and Willing Customers Remaining to be Treated*	Customers Reached by LIEE in Program Year	Percent of LIEE Programmatic Initiative Achieved
5							
6							
7							
8							
9							
10	PY 2007	1,208,000	297,785	69,717	N/A	13,074	N/A
11	PY 2008	1,208,000	297,785	82,791	N/A	15,000	N/A
12	PY 2009	1,208,000	297,785	97,791	199,994	20,000	10%
13	PY 2010	1,208,000	297,785	117,791	199,994	20,000	20%
14	PY 2011	1,208,000	297,785	137,791	199,994	20,000	30%
15							
16	* Number of eligible and willing LIEE customers based on utility's proposed "standard means of deriving the number of						
17	LIEE customers on which to base 1/4 of the Commission's programmatic initiative," as discussed in Section III of utility						
18	budget application.						

Attachment A-4

A	B	C	D	E	F	G	H
1	LIEE Program Detail by Housing Type						
2	San Diego Gas & Electric Company						
3							
4		PY 2007	PY 2007	PY 2008	PY 2009	PY 2010	PY 2011
5		Customers	Customers				
6		Estimated	Treated				
7		Eligible for					
		LIEE					
							Customers Treated (Projected)
8	Gas and Electric Customers						
9	Owners - Total	105,436	2,170	3,327	6,373	6,373	6,373
10	Single Family	76,604	1,753	2,417	4,630	4,630	4,630
11	Multi Family	10,357	139	327	626	626	626
12	Mobile Homes	18,475	278	583	1,117	1,117	1,117
13	Renters - Total	205,586	10,118	6,487	12,426	12,426	12,426
14	Single Family	51,723	3,399	1,632	3,126	3,126	3,126
15	Multi Family	148,949	6,681	4,700	9,003	9,003	9,003
16	Mobile Homes	4,914	38	155	297	297	297
17	Electric Customers (only)						
18	Owners - Total	6,729	165	212	407	407	407
19	Single Family	4,889	111	154	296	296	296
20	Multi Family	661	43	21	40	40	40
21	Mobile Homes	1,179	11	37	71	71	71
22	Renters - Total	13,120	621	414	794	794	794
23	Single Family	3,301	184	104	200	200	200
24	Multi Family	9,505	432	300	575	575	575
25	Mobile Homes	314	5	10	19	19	19
26	Gas Customers (only)						
27	Owners - Total	-	-	-	-	-	-
28	Single Family	-	-	-	-	-	-
29	Multi Family	-	-	-	-	-	-
30	Mobile Homes	-	-	-	-	-	-
31	Renters - Total	-	-	-	-	-	-
32	Single Family	-	-	-	-	-	-
33	Multi Family	-	-	-	-	-	-
34	Mobile Homes	-	-	-	-	-	-

Attachment A-5

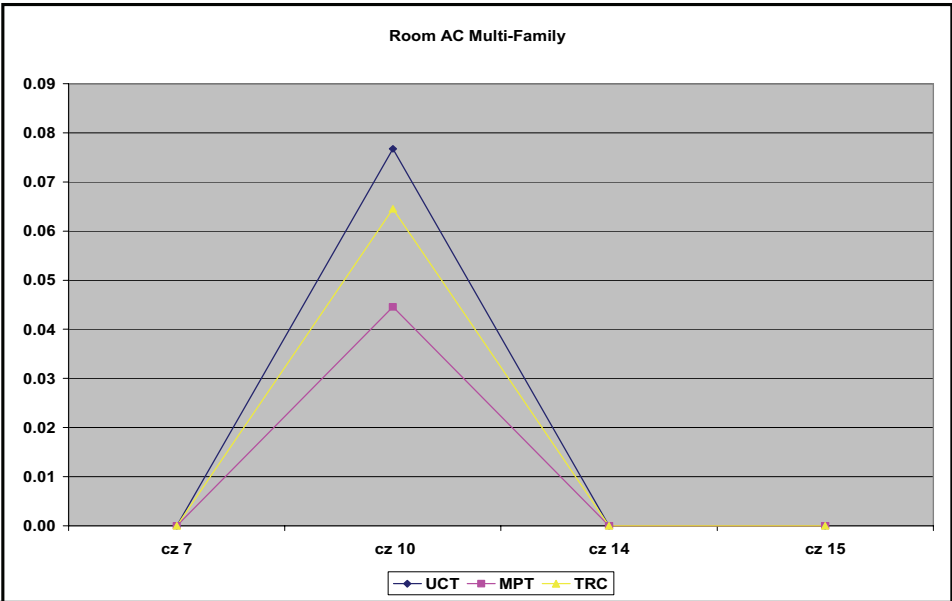
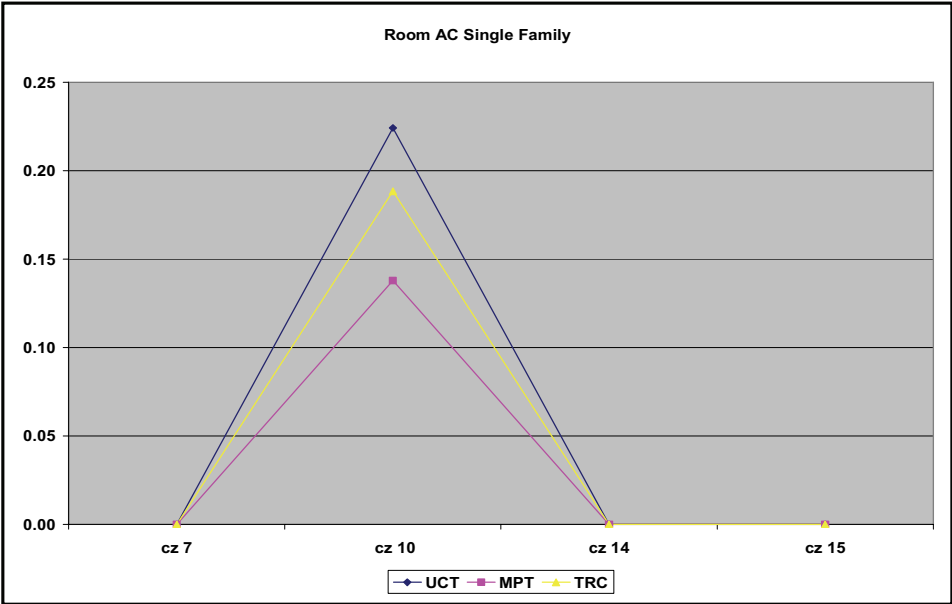
Attachment A-5 Cost Effectiveness

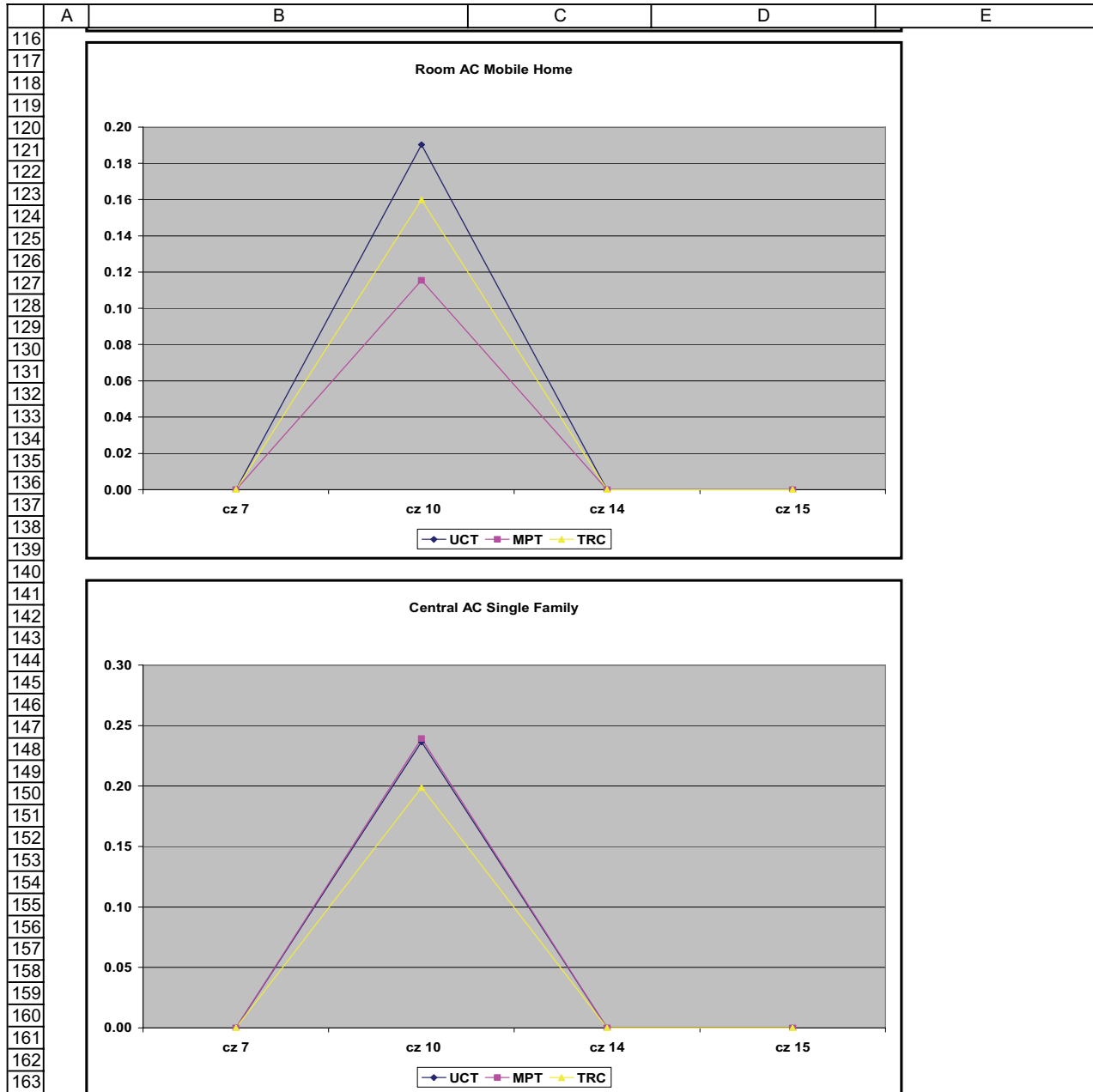
	A	B	C	D
1	Summary of LIEE Program Cost Effectiveness San Diego Gas & Electric Company			
2				
3				
4	Ratio of Program Benefits over Program Costs			
5		Utility Cost Test	Modified Participant Test	Total Resource Cost Test
6	PY 2008	0.40	0.58	0.31
7	PY 2009	0.60	0.86	0.51
8	PY 2010	0.60	0.86	0.51
9	PY 2011	0.60	0.86	0.51
10	NOTE: The benefit cost ratio for PY 2009 - 2011 was calculated using energy impacts primarily from the 2005 LIEE Impact Evaluation. The benefit cost ratio for PY 2008 was calculated using energy impacts from previous studies.			
11				
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Attachment A-6

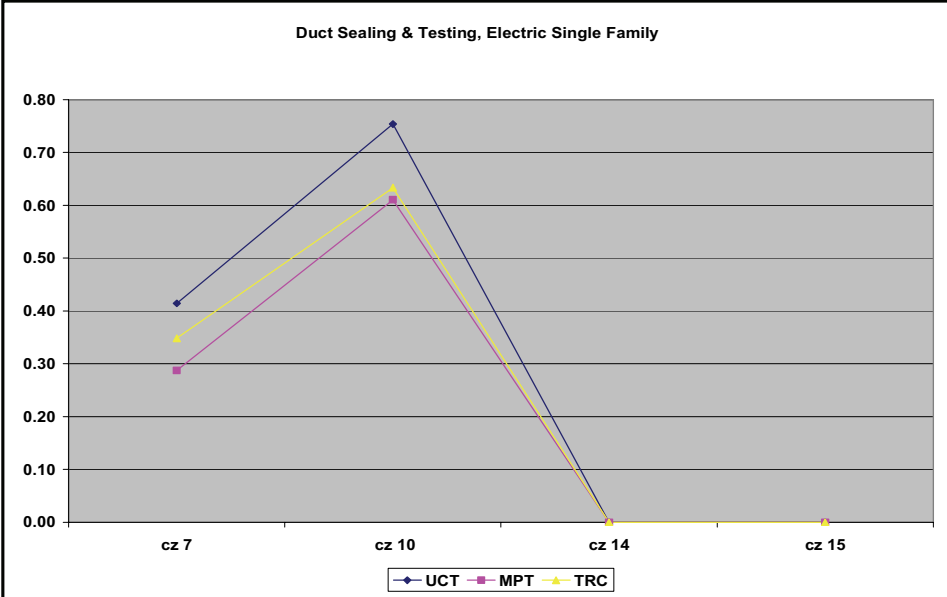
	A	B	C	D	E
1	LIEE Cost-Effectiveness - Weather Sensitive Measures				
2	San Diego Gas & Electric Company				
3					
4					Ratio of Benefits Over Costs
5	Measure*		Utility Cost Test	Modified Participant Test	Total Resource Cost Test
6					
7	Single Family Electric				
8		Room AC, SF, cz10	0.22	0.14	0.19
9		Central AC, SF, cz10	0.24	0.24	0.20
10		Duct sealing & testing, elec, SF, cz7	0.41	0.29	0.35
11		Duct sealing & testing, elec, SF, cz10	0.75	0.61	0.63
12		Air sealing, SF, elec, cz7	0.20	1.58	0.16
13		Air sealing, SF, elec, cz10	0.33	2.64	0.28
14		Air sealing, SF, elec, cz14	0.35	2.74	0.29
15		Air sealing, SF, elec, cz15	0.18	1.49	0.16
16		AC Tuneup,SF,elec, cz7	0.60	0.43	0.51
17		AC Tuneup,SF,elec, cz10	1.01	0.89	0.85
18		Attic insulation, SF, elec, cz7	0.18	0.27	0.15
19		Attic insulation, SF, elec, cz10	0.08	0.06	0.07
20		Evap cooler,SF,elec, cz10	0.31	0.20	0.26
21	Multi-Family Electric				
22		Room AC, MF, cz10	0.08	0.04	0.06
23		Air sealing, MF, elec, cz7	0.08	0.63	0.06
24		Air sealing, MF, elec, cz10	0.14	1.17	0.12
25		AC Tuneup,MF,elec, cz7	0.48	0.32	0.40
26		AC Tuneup,MF,elec, cz10	0.93	0.79	0.78
27	Mobile Home Electric				
28		Room AC, MH, cz10	0.19	0.12	0.16
29		Central AC, MH, cz10	0.20	0.21	0.17
30		Duct sealing & testing, elec, MH, cz7	0.42	0.29	0.35
31		Duct sealing & testing, elec, MH, cz10	0.73	0.59	0.62
32		Air sealing, MH, elec, cz7	0.20	1.58	0.16
33		Air sealing, MH, elec, cz10	0.40	3.19	0.34
34		AC Tuneup,MH,elec, cz7	0.63	0.45	0.53
35		AC Tuneup,MH,elec, cz10	0.95	0.82	0.80
36		Evap cooler,MH,elec, cz10	0.30	0.19	0.25
37	Single Family Gas				
38		Duct sealing & testing, gas, SF, cz7	0.31	0.36	0.26
39		Duct sealing & testing, gas, SF, cz10	0.65	0.68	0.55
40		Air sealing, SF, gas, cz7	0.26	1.52	0.22
41		Air sealing, SF, gas, cz10	0.34	1.96	0.28
42		Air sealing, SF, gas, cz14	0.32	1.84	0.27
43		Air sealing, SF, gas, cz15	0.22	1.27	0.19
44		Attic insulation, SF, gas, cz7	0.43	0.53	0.36
45		Attic insulation, SF, gas, cz10	0.46	0.56	0.38
46		Gas furnace repair/replace,gas,SF, cz7	0.35	0.32	0.29
47		Gas furnace repair/replace,gas,SF, cz10	0.39	0.36	0.32
48		Gas furnace repair/replace,gas,SF, cz15	0.40	0.37	0.33
49	Multi-Family Gas				
50		Air sealing, MF, gas, cz7	0.10	0.59	0.09
51		Air sealing, MF, gas, cz10	0.15	0.82	0.12
52		Attic insulation, MF, gas, cz7	0.20	0.25	0.17
53	Mobile Home Gas				
54		Duct sealing & testing, gas, MH, cz7	0.34	0.39	0.29
55		Duct sealing & testing, gas, MH, cz10	0.62	0.65	0.52
56		Air sealing, MH, gas, cz7	0.33	1.91	0.28
57		Air sealing, MH, gas, cz10	0.42	2.45	0.35
58		Air sealing, MH, gas, cz15	0.28	1.62	0.24
59		Gas furnace repair/replace,gas,MH, cz7	0.53	0.51	0.45
60		Gas furnace repair/replace,gas,MH, cz10	0.59	0.58	0.50
61					
62	* Include chart pertaining to each proposed measure, with information included on type of home (ie. Single Family, Multi Family,				
63	Mobile Home) and electric or gas (if applicable).				
64	** Charts to include information on each climate zone in utility service area.				

	A	B	C	D	E
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66		The figures below illustrate the benefit cost ratios for the SDG&E proposed weather sensitive measures. Note that the Utility Cost Test (UCT) and the Modified Participant Test (MPT) include non-energy benefits while the Total Resource Cost (TRC) test does not.			
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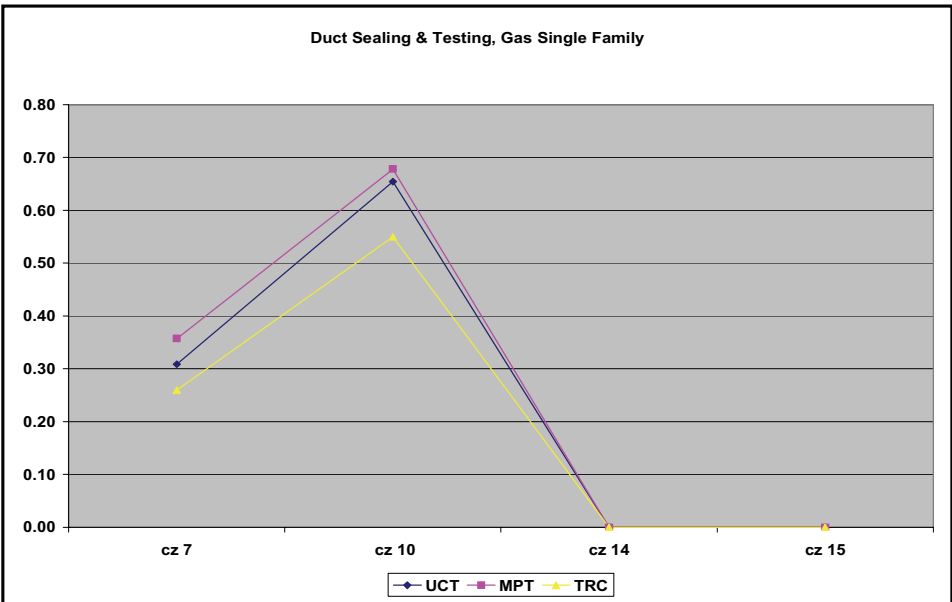
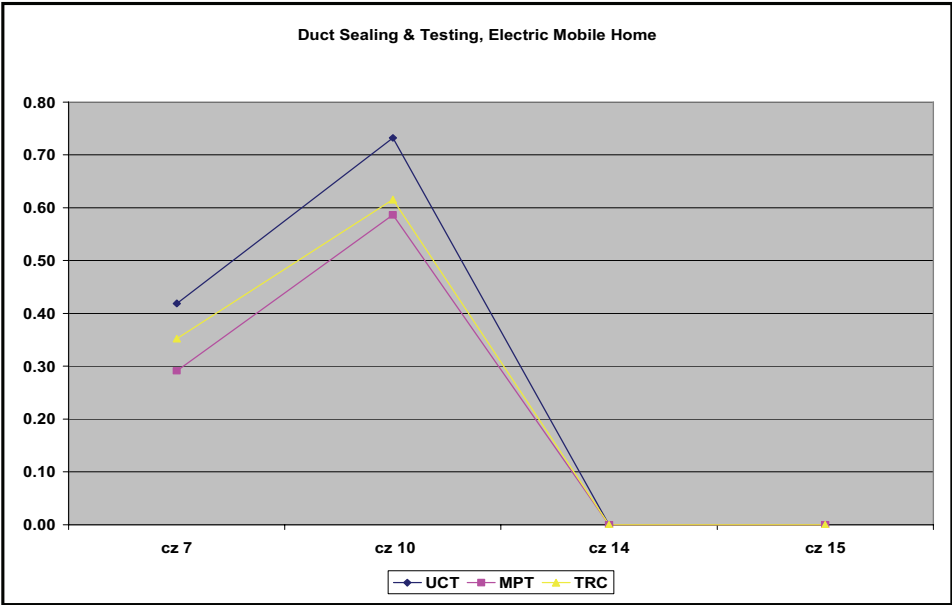




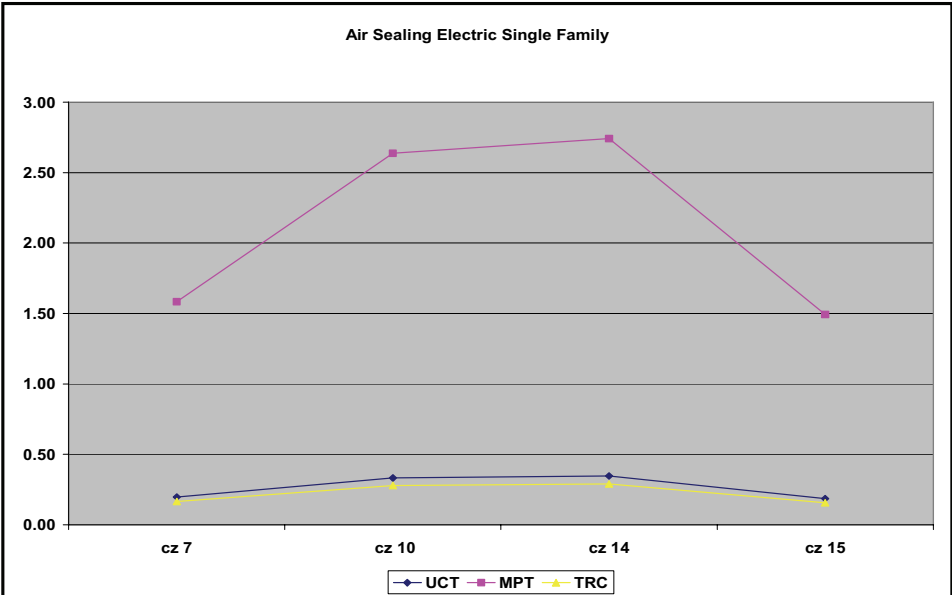
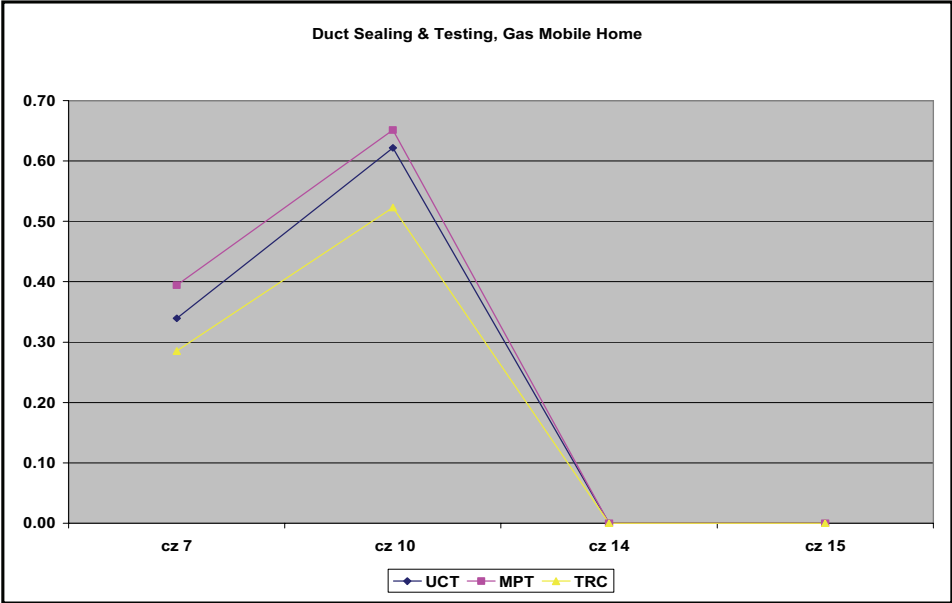
	A	B	C	D	E																				
164		<div data-bbox="235 241 1177 840"> <p style="text-align: center;">Central AC Mobile Home</p> <table border="1"> <caption>Central AC Mobile Home Data</caption> <thead> <tr> <th>Location</th> <th>UCT</th> <th>MPT</th> <th>TRC</th> </tr> </thead> <tbody> <tr> <td>cz 7</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>cz 10</td> <td>0.20</td> <td>0.20</td> <td>0.17</td> </tr> <tr> <td>cz 14</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> <tr> <td>cz 15</td> <td>0.00</td> <td>0.00</td> <td>0.00</td> </tr> </tbody> </table> </div>				Location	UCT	MPT	TRC	cz 7	0.00	0.00	0.00	cz 10	0.20	0.20	0.17	cz 14	0.00	0.00	0.00	cz 15	0.00	0.00	0.00
Location	UCT					MPT	TRC																		
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cz 10	0.20					0.20	0.17																		
cz 14	0.00					0.00	0.00																		
cz 15	0.00					0.00	0.00																		
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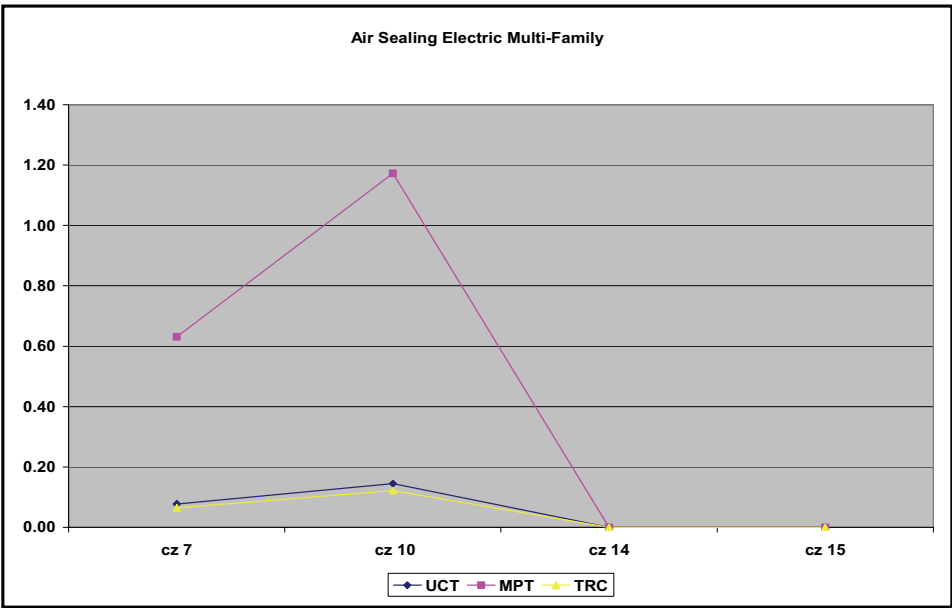
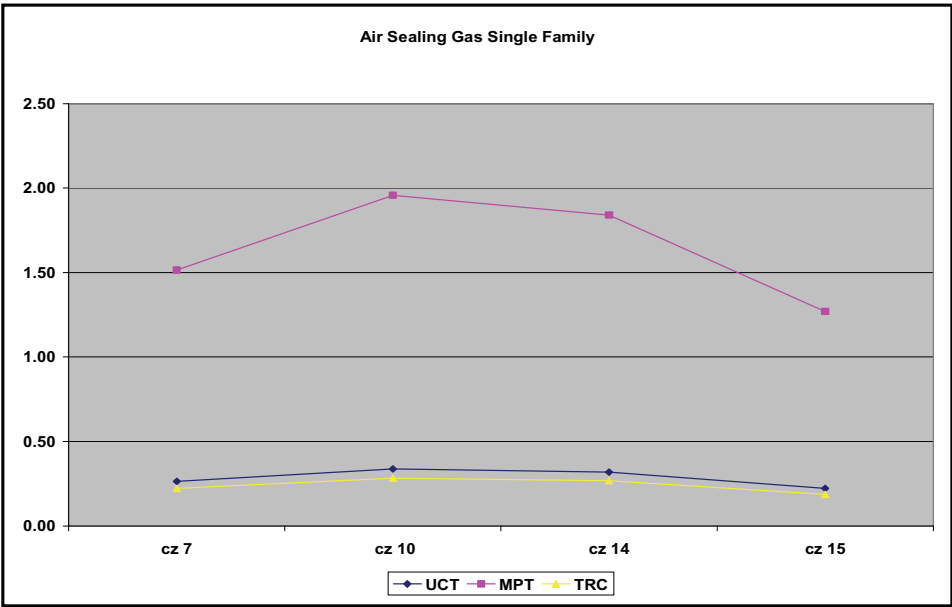
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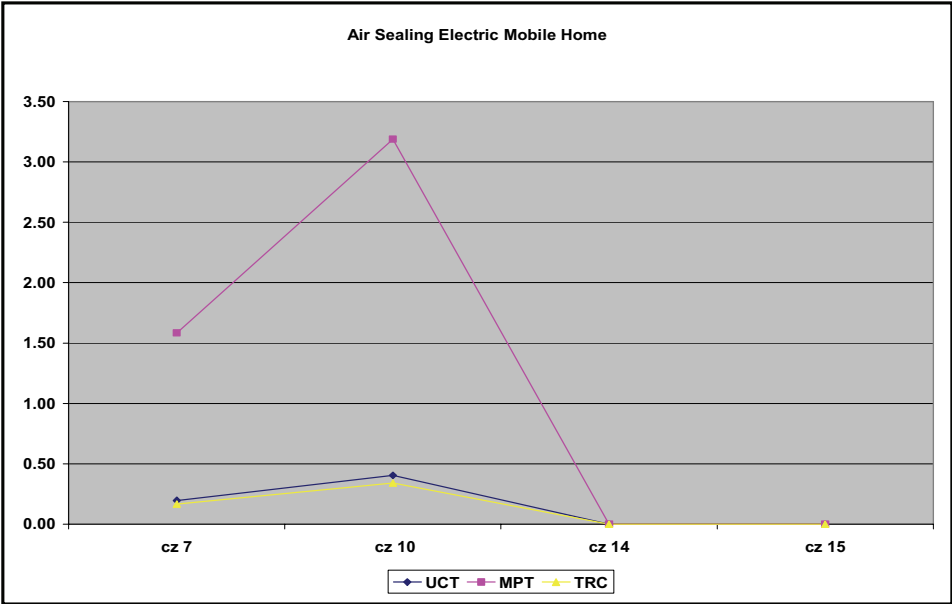
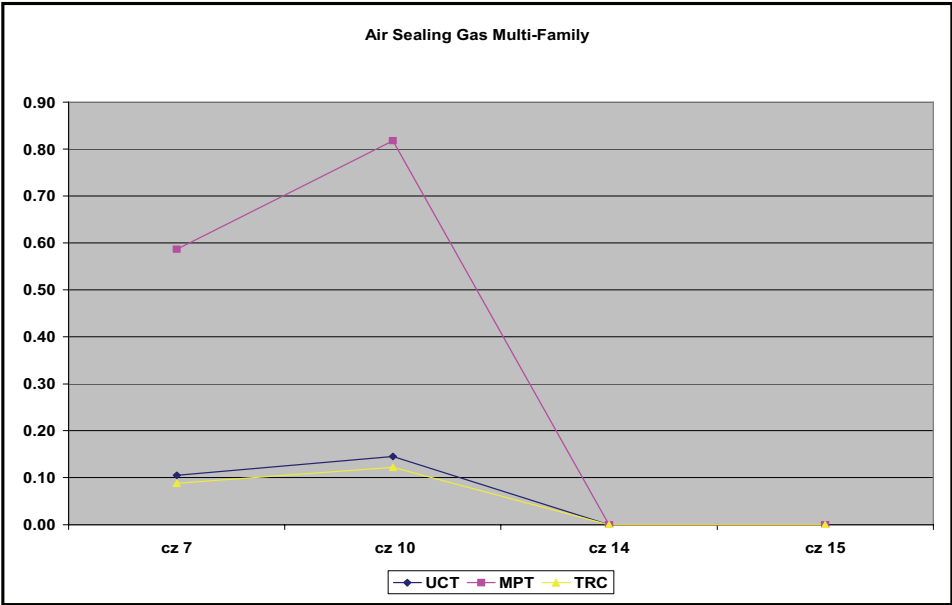
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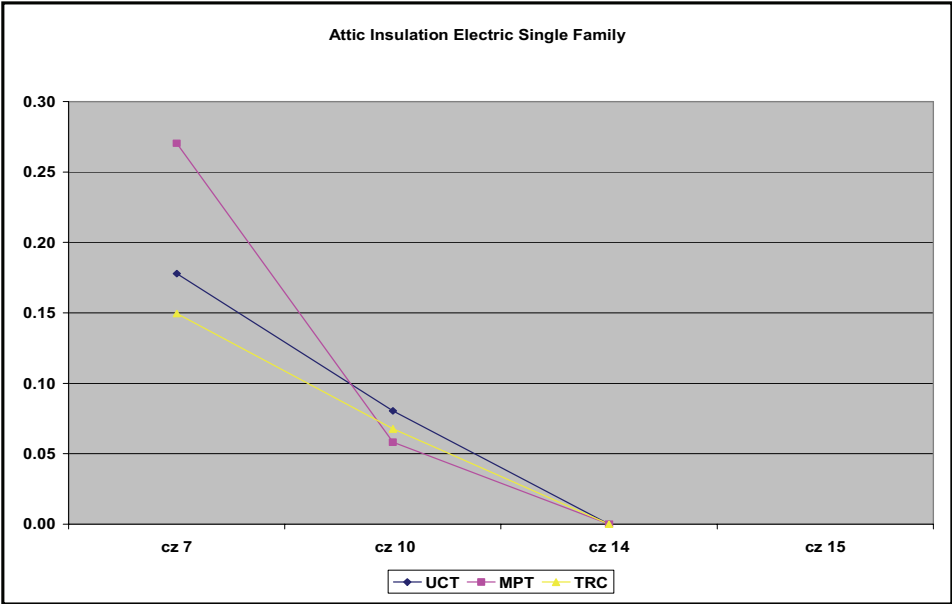
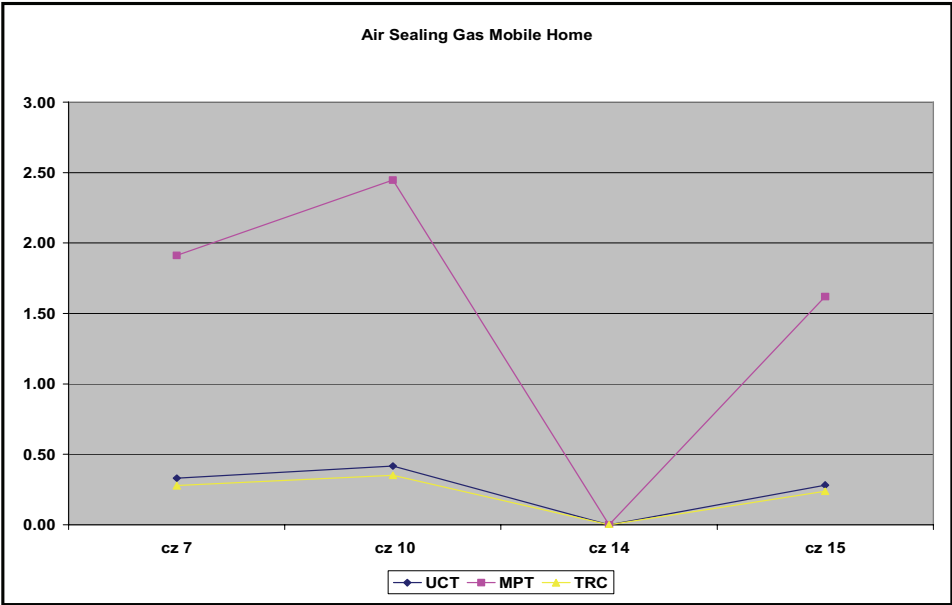
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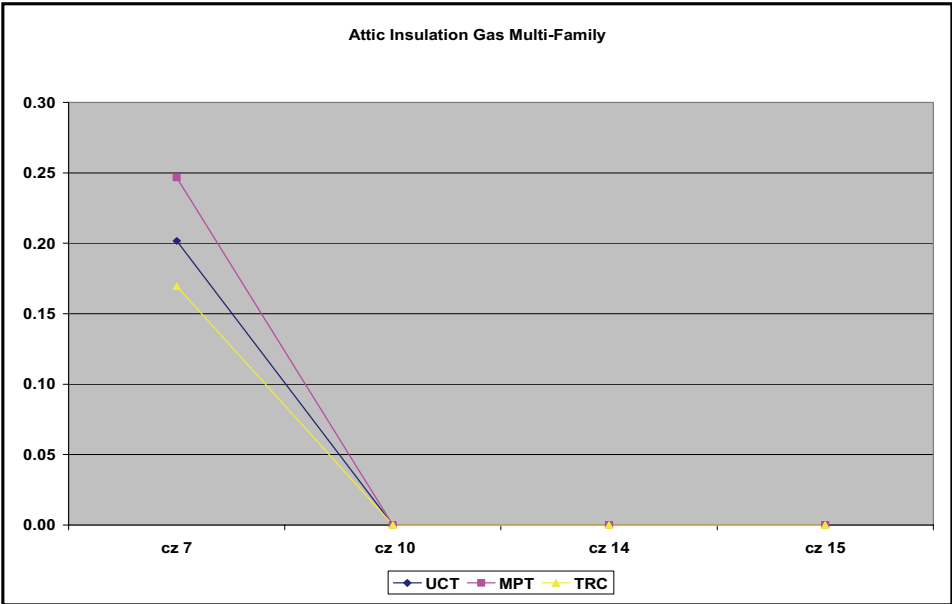
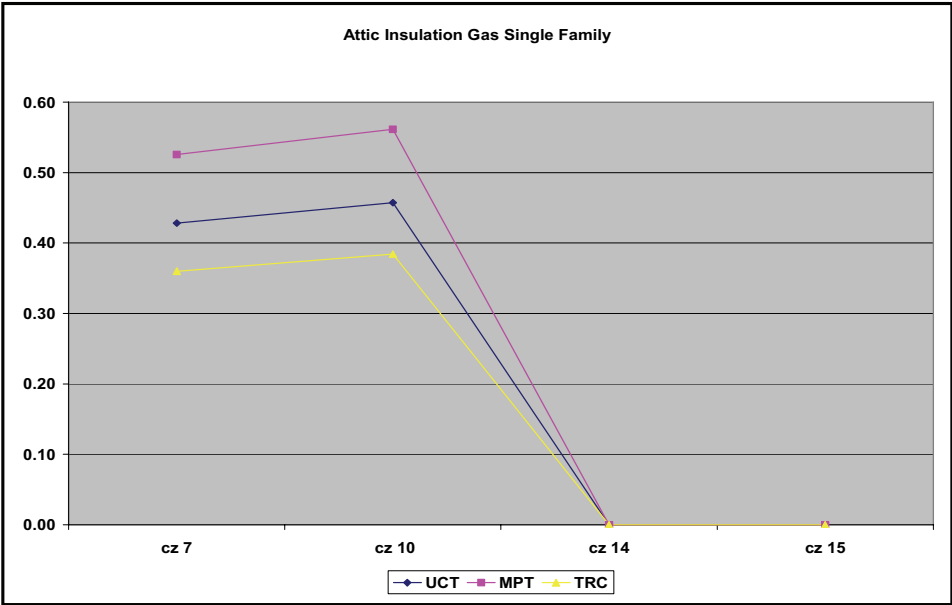
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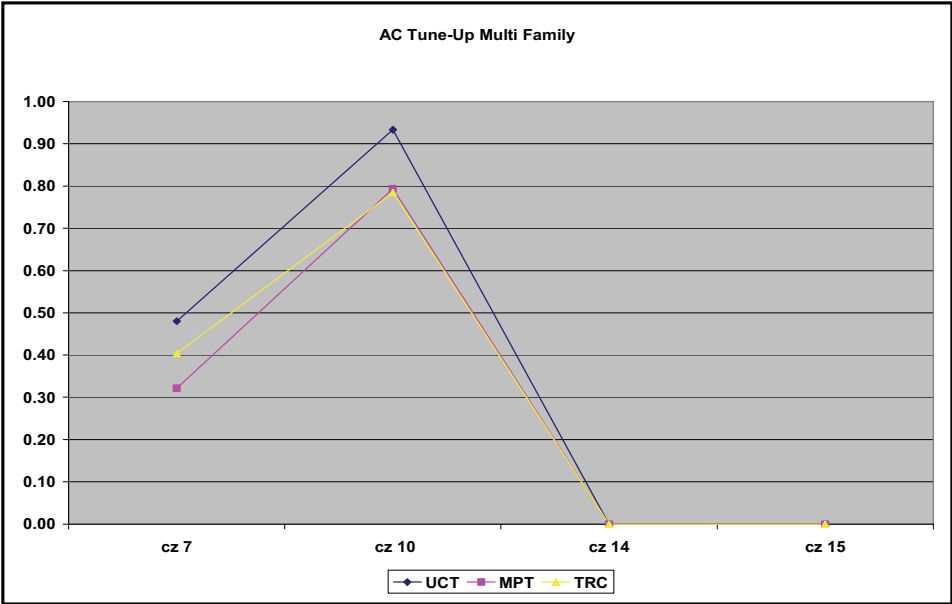
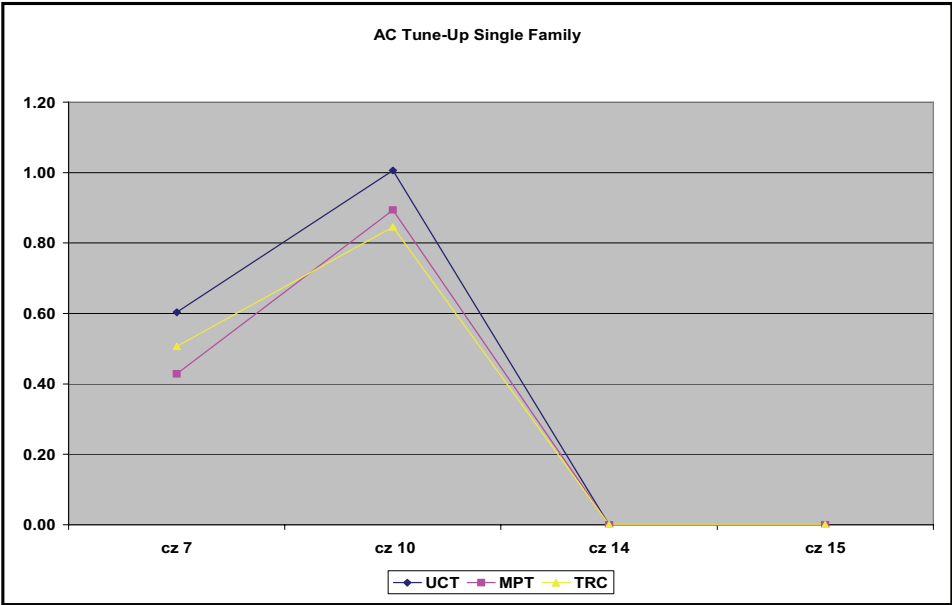
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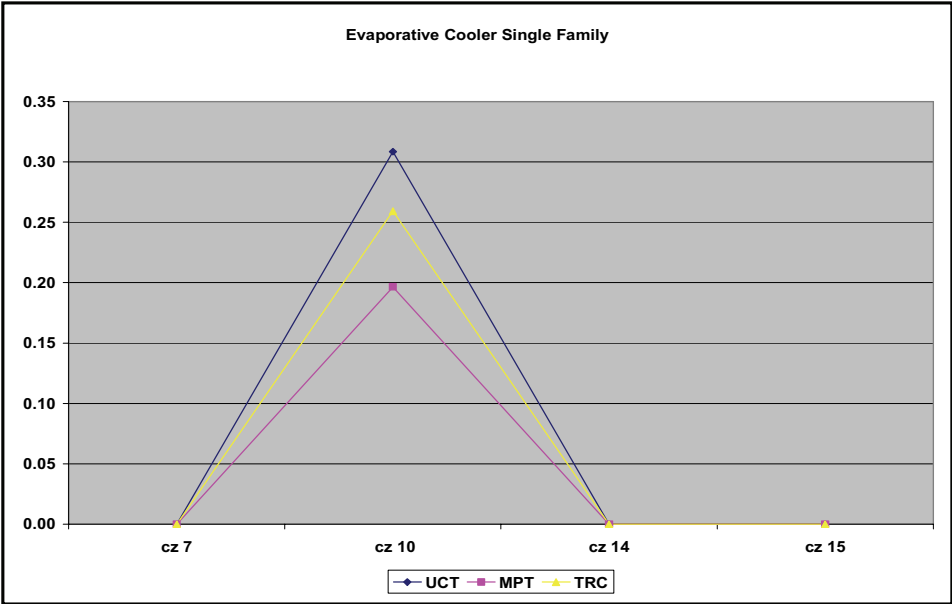
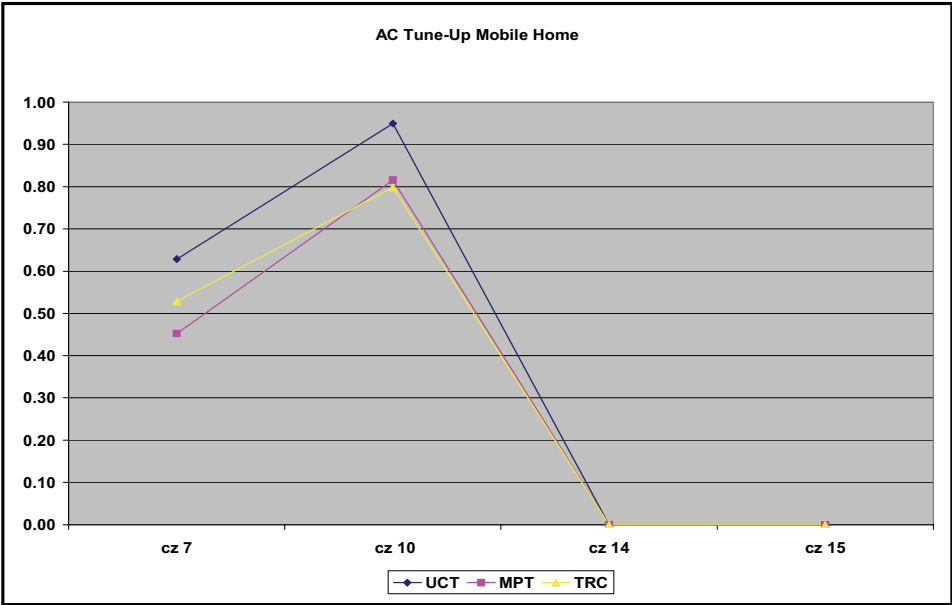
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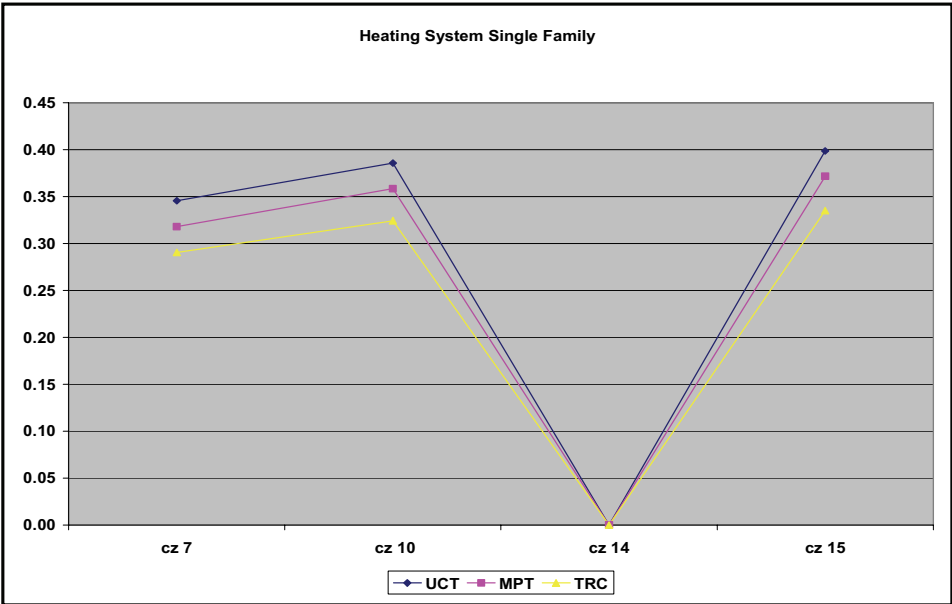
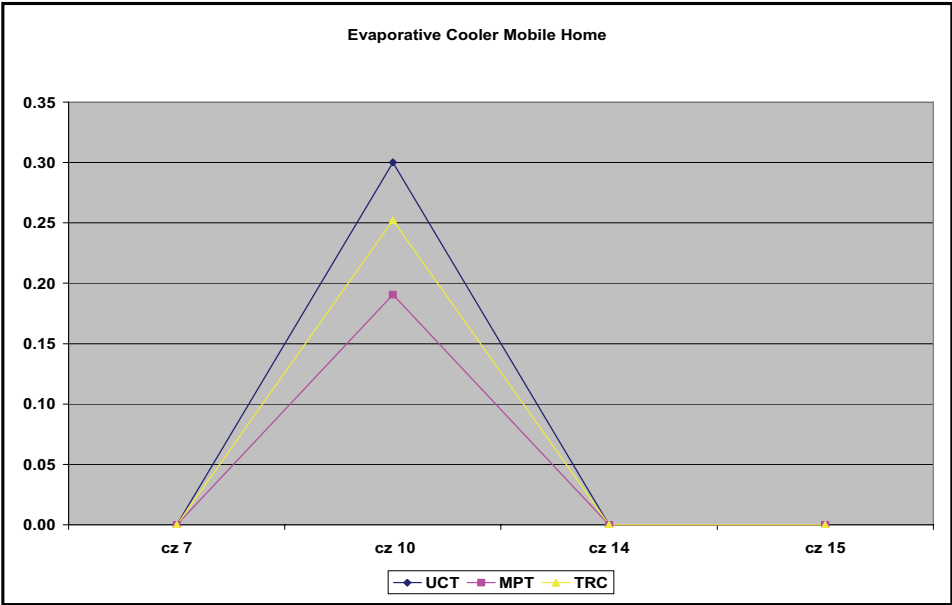
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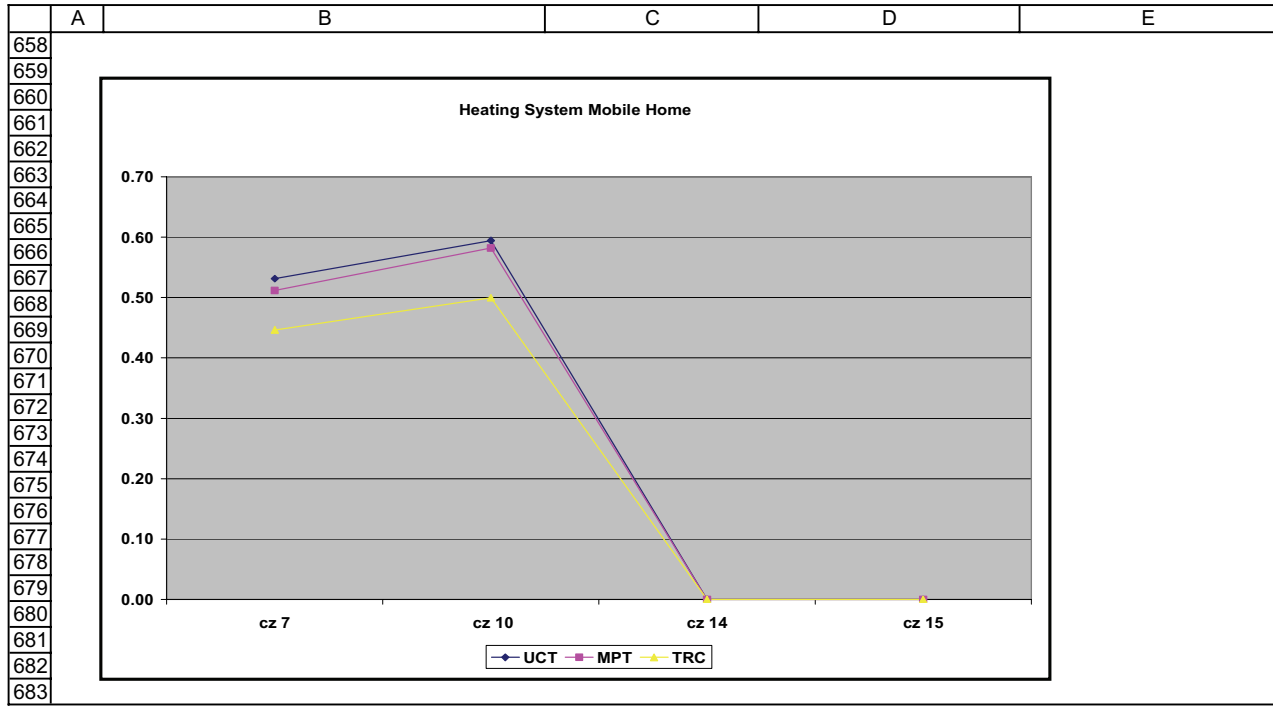


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Attachment A-7

	A	B	C	D	E
1	LIEE Cost-Effectiveness - Non Weather Sensitive Measures				
2	San Diego Gas & Electric Company				
3					
4	Ratio of Benefits Over Costs				
5			Utility Cost Test	Modified Participant Test	Total Resource Cost Test
6	All housing types, Electric				
7		Torchieres	0.73	0.91	0.61
8		Interior Hardwire CFL Fixtures	0.60	0.75	0.50
9		CFL Lighting	0.65	0.80	0.54
10		Nightlights	0.91	1.13	0.76
11		Clothes washer, elec	0.58	0.84	0.49
12		Showerstart elec	1.05	1.54	0.88
13		Microwaves	1.05	1.25	0.88
14	All housing types, Gas				
15		Water heater repair/replace, gas	0.12	0.14	0.10
16		Showerstart gas	0.85	1.23	0.71
17		Gas furnace pilot conversion	0.65	0.80	0.54
18		Clothes washer, gas	0.42	0.61	0.36
19	Single Family Electric				
20		DHW conservation, SF, elec	1.03	1.52	0.87
21		Refrigerators, SF	0.62	0.86	0.52
22	Multi-Family Electric				
23		DHW conservation, MF, elec	0.90	1.33	0.76
24		Refrigerators, MF	0.54	0.75	0.46
25	Mobile Home Electric				
26		DHW conservation, MH, elec	0.98	1.43	0.82
27		Refrigerators, MH	0.63	0.88	0.53
28	Single Family Gas				
29		DHW conservation, SF, gas	0.87	1.26	0.73
30	Multi-Family Gas				
31		DHW conservation, MF, gas	0.66	0.95	0.56
32	Mobile Home Gas				
33		DHW conservation, MH, gas	0.77	1.12	0.65

Attachment A-8

A	B	C	D	E
1	PY 2009 - 2011 LIEE Measurement and Evaluation Studies			
2	San Diego Gas & Electric Company			
3				
4	Line No.	Statewide Study	Total Cost	Percent paid by Utility
5	(1)	Impact Evaluation of the 2010 LIEE Program	\$600,000	15%
6	(1)	Process Evaluation of the 2009 LIEE Program	\$250,000	15%
7	(1)	Non-Energy Benefits Study	\$300,000	15%
8	(1)	Refrigerator Degradation EUL Study	\$200,000	33.33%
9	Total		\$1,350,000	
10				\$90,000
11				\$37,500
12				\$45,000
13	(1)			\$66,660
14				\$239,160

(1) The total dollars for the Studies are reflected in Attachment A-1, Line 20.

Attachment A-9

Attachment A-9
Summary of San Diego Gas & Electric Company LIEE Program Proposals for 2009, 2010, and 2011

Proposal	Description	Benefits	Current Practice
1. Reallocation of Budget Funds	Continue to allow utilities the flexibility to reallocate funds between budget cost categories as needed.	Allows utility to respond to the changing needs within the program activities without delays.	Currently authorized by Commission with exceptions.
2. Budget Flexibility	Allow carry forward or carry back of funding into 2009, 2010, or 2011 three-year funding cycle.	Flexibility will enable the utility to make necessary adjustments among appliance purchases, weatherization measures, marketing, training, and other activities to efficiently achieve ¼ of the Commission’s programmatic initiative by 2011.	Budget is authorized on annual basis instead of the program budget cycle, however utility has authority to carry over unspent funds into following program year. Budget flexibility request is consistent with Commission rules adopted in D.07-10-032.
3. Expansion of Categorical Eligibility to include Public Housing and Section 8 Housing	Expand enrollment process to allow customers to enroll in program if customer participates in Public Housing or Section 8 which is a pre-determined means-tested State or Federal program.	Increase enrollments by simplifying process for customers; reach customers who might not otherwise apply.	Utilities currently offer categorical eligibility as authorized in D.06-12-038.
4. 10-Year “Go Back” Rule	Allow utilities to “go back” to customer home to install new cost-effective measures or technologies that were not offered at the time the utility treated the home.	Increase energy savings and the reduction of low-income customers’ bill.	As currently adopted by the Commission, homes that have participated in the LIEE program within the past 10-years are not eligible for services, however there are exceptions to this rule as

Attachment A-9
Summary of San Diego Gas & Electric Company LIEE Program Proposals for 2009, 2010, and 2011

Proposal	Description	Benefits	Current Practice
5. Customized LIEE Program Approach-	<p>Allow utility to conduct comprehensive energy audit to identify opportunities for energy savings. Measures will be offered based on customer's usage level, the audit profile, climate zone, housing type, special customer needs.</p> <p>Allow utility to conduct a new and innovative approach to customer energy education.</p>	<p>Customized approach allows utility to address the unique needs of individual customer by providing best way for customer to save energy and lower customers' bill.</p>	<p>shown in P&P Manual under Section 2.8 "Previous Program Participation".</p> <p>Current approach is "one-size fits all" approach.</p>
6. Customized Energy Education	<p>Allow utility to conduct a new and innovative approach to customer energy education.</p>	<p>New approach is more personalized to the needs and characteristics of the customer and is aimed at engaging the customer's participation and commitment to becoming energy smart by using energy wisely.</p>	<p>Current approach is "one-size fits all" approach.</p>
7. Customer Rewards	<p>Allow utility to reward customer for consistently reducing energy consumption.</p>	<p>Encourages customer to practice conservation efforts with the objective of creating sustained energy savings expected from installed measures.</p>	<p>Not currently offered through the program.</p>
8. Coordination with Other Utility LIEE Programs	<p>Allow utilities to expand its efforts to enroll customers in the program in Orange County where the customer resides in the service area of both SDG&E and SoCalGas. Also LIEE program will be coordinated with energy</p>	<p>Provide customer with maximum benefits while simplifying the enrollment process.</p>	<p>Currently the utilities aligns it LIEE program with other assistance programs such as CARE, Medical Baseline, FERA, Neighbor-to-Nighbor.</p>

Attachment A-9
Summary of San Diego Gas & Electric Company LIEE Program Proposals for 2009, 2010, and 2011

Proposal	Description	Benefits	Current Practice
	<p>efficiency programs and other Company efforts, including field operations (gas servicemen and collectors), Smart Metering, CARE, and other assistance programs.</p>		
9. New Program Measures	<p>Includes the following new measures: -High Efficiency Clothes Washer -Forced Air Unit Furnace Standing Pilot Light Retrofit -Microwave -Shower Start -LED Night Lights -Furnace Clean and Tune</p>	<p>Increase energy savings and the reduction of low-income customers' bill.</p>	<p>New program measures to be authorized by Commission.</p>
10. Removal of 3-Measure minimum	<p>Removal of the 3-Measure minimum provision</p>	<p>Comprehensive audit will ensure the home receives the appropriate number of measures to make it as energy efficient as practical.</p>	<p>Currently under the program there needs to be at least 3 measures for installation in home.</p>
11. AB 1109 Compliance	<p>Legislation requires that general purpose lights meet specific standards and that the California Integrate Waste Management Board consider methods for safe disposal of hazardous materials. Utility will continue to offer CFLs as measure during 2009-11 program cycle, however</p>	<p>Continued delivery and installation of CFLs can be effective in increased use of CFL technology, increased energy savings, increased public awareness.</p>	<p>To comply with all Federal, State, and Local regulations.</p>

Attachment A-9
Summary of San Diego Gas & Electric Company LIEE Program Proposals for 2009, 2010, and 2011

Proposal	Description	Benefits	Current Practice
12. Continue practice of Revising Installation Standards and Policy and Procedures Manuals	customers will receive information on safe disposal. Allow utilities to continue to revise Manuals without Commission authority. The Manuals are updated on a statewide level in order to develop policy installation criteria for Changes to the Manuals will be made to develop policy installation criteria for new program measures and make updates to the Manuals based on recent Commission decisions.	Manuals are essential to the LIEE programs because they articulate the program policy and procedures and installation measure standards that are used to train, inform, and evaluate LIEE contractors on a statewide basis.	D.06-12-038 at page 22 grants the utilities the authority to make changes to the Manuals without Commission authority.
13. Single Statewide Marketing Campaign	Utilities seek Commission authorization to revise directive in D.07-12-051 to allow utilities to develop a statewide LIEE program name instead of a statewide tagline.	The new program name will be used in all customer communications, including advertising, collateral, and website. The name will help reach low-income customers with interest in lowering energy bills and increasing home comfort.	Currently no statewide marketing campaign.
14. Pilots	Implementation of the following pilots: -In-Home Display -Programmable Controllable Thermostat	Allow customer to save energy and reduce energy bill.	Pilot measures to be authorized by Commission.

Attachment A-9
Summary of San Diego Gas & Electric Company LIEE Program Proposals for 2009, 2010, and 2011

Proposal	Description	Benefits	Current Practice
15. Measurement and Evaluation Studies	<p>Allow utility to conduct following studies:</p> <ul style="list-style-type: none"> -Impact Evaluation of the 2010 LIEE Program -Process Evaluation of the 2009 LIEE Program -Non-Energy Benefits Study -Refrigerator Degradation EUL Study 	<p>Studies allow utility to determine program measure savings, cost effectiveness, and other non-energy benefits to help low income customers.</p>	<p>Studies to be authorized by Commission.</p>
16. Tracking Program Costs	<p>Allows utilities to maintain monthly and annual reporting according to the approved LIEE reporting categories in 2009, 2010, and 2011.</p>	<p>Allows utilities to provide comparable cost/benefit analysis of each program element across the utilities.</p>	<p>The program budget categories are used for monthly and annual LIEE reporting and were recently approved by the Commission in a November 2007 letter from the Energy Division Director to the utilities.</p>

Attachment A-10.1

Attachment A.10-1
LIEE Pilot Implementation Plan
In Home Displays (IHD)

1. Pilot Program Budget

SDG&E has allocated \$145,000 for the IHD Program Pilot. The dollars will be used to purchase the equipment, collateral material, equipment distribution, data collection, customer survey, and customer reporting.

2. Projected Program Impacts

SDG&E anticipates a reduction in customer's energy usage by approximately 10 – 15 percent annually which equates to a reduction of between 50-75 kwh per month per customer. SDG&E's estimated savings are based on the results from a similar pilot conducted in 2007 of SDG&E's Demand Response program.

3. Pilot Description

Market Sector: Residential

Program Classification: SDG&E's Service Territory

Program Status: Proposed Pilot in 2010

In 2010, SDG&E plans the IHD Pilot Program which is a voluntary program designed to provide customers with real-time data in the following manner:

- Total monthly energy costs
- Current rate per kWh
- kWh monthly consumption

This information will be an important component in judging how effectively customers can change their behavior with provided feedback on energy usage of various appliances in their home. With the installation of smart meters¹ customers will be able to see the real-time energy impacts as their appliances are in use.

¹ SDG&E plans to install smart meters within its entire service territory beginning in 2009. Smart meters are two-way communicating meters which can provide hourly consumption data to customers and the utility.

In 2010, SDG&E plans to offer this pilot program to 300 income-qualified customers. Program participants will receive the IHD measure at no cost. Homeowners and renters are eligible to participate in the pilot. These customers will have a smart meter that is ZigBee² enabled and will communicate with a compatible IHD. This program will target customers with monthly kWh in excess of 500 kWh. The customers' consumption will be reviewed to determine if the addition of the IHD had a discernible impact on their consumption patterns. The program will utilize a survey to determine the actual changes a customer made in their behaviors.

4. Pilot Program Rationale and Expected Outcome

Residential customers are often unaware of the correlation between the usage of their appliances and their monthly utility bill. The IHD will provide feedback to assist the customer in understanding the impact of these appliances on their energy usage. Because energy usage information is not always readily available or reflects a customer's habits and equipment the IHD will focus the customer's behavior on changes they can easily make. Once a customer has the ability to see and understand the changes in usage based on their habits – lighting, cooking, cooling, home entertainment systems, etc. – customers will be able to make better informed decisions to reduce their bill.

Educational information will be provided to the customer to reinforce and promote energy conservation. In order to effectively measure the impact of changes and their sustainability the customer's energy consumption will be tracked and analyzed and a report will be provided to the customer quarterly. The expectation is that the customer will see the reduction on their monthly bill and the report will reinforce their behaviors.

SDG&E's marketing efforts will focus on identifying customers with monthly electric consumption over 500 kWh. SDG&E will develop collateral material for direct mail campaign and distribute to target customers.

² Zigbee is a communication protocol that is currently being adopted by the utility and appliance industries, which allows Zigbee-enabled appliances to communicate with the Smart Meter.

5. Pilot Implementation

SDG&E plans to conduct the pilot. SDG&E will manage the pilot, including recruiting participants, distributing equipment, managing customer data, and providing energy conservation information to customer. In addition, SDG&E plans to evaluate the results of the pilot.

Attachment A-10.2

Attachment A-10.2
LIEE Residential Programmable
Communicating Thermostat Program (PCT)

1. Pilot Program Budget

SDG&E has allocated \$230,000 for the PCT Program Pilot. The dollars will be used to purchase the equipment, equipment installation, service calls, develop collateral material, data collection, customer survey, and customer reporting.

2. Projected Program Impacts

There are no projected energy impacts at this time as SDG&E will be implementing a new technology.

3. Pilot Description

Market Sector: Residential

Program Classification: SDG&E's Service Territory

Program Status: Proposed Pilot 2011

In 2011, SDG&E plans to implement the Programmable Communicating Thermostat Pilot Program (PCT) to approximately 250 income qualified low income customers. Homeowners and renters are eligible to participate in the pilot. Participation will be offered to customers with monthly electric usage in excess of 500 kWh. The pilot is designed to test the impact of appliances that are linked via a network device (the PCT) in customers' homes which have both electric consumption above 500 kWh per month and electric appliances that can be controlled by the PCT. Program participants will receive the PCT measure at no cost. Ideally a home would have an operational central air conditioning (A/C) unit, electric water heater or pool pump. The PCT would be ZigBee enabled and the appliances such as A/C will be controlled by the signal from the PCT. The appliances will be retrofitted to receive a signal from the PCT and the PCT would shut down appliances at designated intervals. In addition the home will need to have an SDG&E Smart Meter installed.

In addition, a tariff, Peak Time Rebate (PTR), will be available for customers to use in conjunction with the PCT technology to further enable customers to see the financial impact of load shifting, potentially partner with the utility to manage peak usage and control energy costs. The ability of a customer to successfully participate in the Peak Time Rebate (PTR) program would also be assessed.

4. Pilot Program Rationale and Expected Outcome

The utility may need to initiate curtailment activities during California Independent System Operator (CAISO) during Stage II events, local transmission and/or distribution emergencies. This pilot will help to determine if customers change their behavior during utility requested voluntary demand response curtailment events.

Within the customers homes the targeted appliances that require significant electric peak-time usage include; central A/C, incandescent and non-dimmable lighting, home entertainment and computer equipment, washers and electric dryers, pool pumps, and electric water heaters. This pilot will assist SDG&E in evaluating demand response and energy efficiency whole-house solution by providing the customer with the technology to reduce both electric energy consumption and peak demand.

Potential participants will be requested to supply information identifying the appliances and equipment within the home that meet program requirements. At the time of the PCT installation the customer will be provided information on operating the PCT and strategies for reducing energy during a CAISO Stage II event.

5. Pilot Implementation

SDG&E plans to conduct the pilot. SDG&E will manage the pilot, including recruiting participants, purchasing equipment, managing customer data, and providing energy conservation information to customer. SDG&E plans to contract with a licensed contractor for measure installations. In addition, SDG&E plans to evaluate the results of the pilot.

Attachment A-10.3

Attachment A.10-3 Statewide Process Evaluation

The purpose of the Process Evaluation of the 2009 LIEE Program is to assess the effectiveness of the program and to develop recommendations for changes to program design or delivery that will improve the effectiveness of the program. The primary deliverable is a final report that will present the findings and the recommendations for program changes; however, the joint utilities are also seeking usable information and recommendations as the evaluation progresses, so that program managers can get timely feedback.

1. Pilot or Study Budget Table

Statewide Studies	Total Cost
Process Evaluation of the 2009 LIEE Program	\$250,000

2. Projected Pilot Impacts Table –For each pilot discuss the therm and or kWh savings expected.

Not Applicable for Studies

3. Brief Pilot or Study Description.

In addition to assessing the effectiveness of various components of the LIEE program such as outreach, contractor delivery, data tracking, etc., this study will also look at customer behavior and attitudes towards energy saving opportunities. In particular, we are interested in determining customer willingness to participate in energy saving programs, the particular needs of high usage customers, and how all of our low income customers respond to energy education and communication efforts.

4. Pilot or Study Rationale and Expected Outcome

An assessment of the effectiveness of the program strategy will provide an opportunity to refine and improve delivery and implementation in order to meet the goals of the strategic plan and other initiatives. In addition, understanding customer attitudes toward program messages and energy saving opportunities will inform marketing and outreach plans which will help achieve penetration goals.

5. Pilot or Study Implementation

The primary method of data collection for the study will be customer surveys and focus groups along with in-depth interviews with contractors and other trade allies. The specifics of the study will be documented in a research plan to be submitted for approval to the Joint Utilities by the selected evaluation contractor.

Specific objectives of the evaluation include:

- Document program goals, implementation strategies and procedures across utilities.
- Provide real-time feedback to program implementers with specific focus on improving program recruitment and delivery and identifying both implementation and program design problems for review and modification.
- Assess the effectiveness of the program.
- Evaluate areas of customer and trade ally satisfaction/dissatisfaction. .
- Identify barriers and obstacles to meeting program goals.
- Characterize attitudes and energy-saving behaviors of low-income customers and assess their willingness to participate in energy saving programs.
- Provide recommendations for improving programs.

Attachment A-10.4

Attachment A-10.4 Statewide Impact Evaluation

The Joint Utilities will continue the required two-year program impact review with the Impact Evaluation of the 2010 Low Income Program. The primary objective of the study will be to estimate the first year electric and gas savings by utility, by housing type, and by measure group. Other related program issues will likely be addressed as they arise during the program year.

1. Pilot or Study Budget Table

Statewide Studies	Total Cost
Impact Evaluation of the 2010 LIEE Program	\$600,000

The main cost drivers for this study are as follows:

- Review of program delivery,
- Review of prior impact studies and methodologies,
- Surveys (onsite, telephone, in person),
- Analysis (billing, statistical), and
- Reporting.

2. Projected Pilot Impacts Table

Not Applicable for Studies

3. Brief Pilot or Study Description

The Joint Utilities propose to conduct an impact evaluation of the 2010 LIEE program. An impact evaluation would be expected in 2010 if the previous two-year cycle for requiring impact evaluations continues to be followed, with the next mandated study being the 2008 LIEE programs evaluation.

As is customary, the Impact Evaluation of the 2010 Low Income Program will determine energy and demand savings associated with the PY 2010 program. Other related program issues will likely be addressed as they arise during the program year. An accurate determination of measure savings is critical for guiding program delivery and determining cost effectiveness.

4. Pilot or Study Rationale and Expected Outcome

The study will provide a set of energy savings estimates that will be used for reporting purposes. In addition, it will provide informative information on participant energy consumption and characteristics. The study will also provide a comparison with results from previous years.

The impact evaluation will be the primary determinate of program savings, i.e., it will determine LIEE's contribution to providing energy resource benefits to California.

5. Pilot or Study Implementation

The tasks in the study include the following:

- Development of a detailed research plan to be submitted for approval to the joint utilities,
- Development of a sampling plan and weights,
- Data collection and verification,
- Development of a regression model for estimating energy savings,
- Analysis and evaluation of regression results, and
- Presentation of conclusions and recommendations.

In addition, the study may include customer surveys or other data collection and analysis as approved by the Joint Utilities. As a study of the 2010 program year, the study will commence in 2011 and may not be completed until 2012, which will be covered under a subsequent application.

Attachment A-10.5

Attachment A-10.5 Statewide Refrigerator Efficiency Degradation Study

PG&E, SCE and SDG&E propose a study of refrigerator efficiency degradation in 2009. The purpose of this study is to provide information on potential energy savings resulting from replacing refrigerators manufactured since 1993 with newer models.

1. Pilot or Study Budget Table

Statewide Studies	Total Cost
Refrigerator Degradation EUL Study	\$200,000

2. Projected Pilot Impacts Table

Not Applicable for Studies

3. Brief Pilot or Study Description

Currently, the LIEE Program limits refrigerators that can be replaced to those manufactured prior to 1993. PG&E, SCE, and SDG&E are interested in exploring the potential energy savings resulting from replacing later models. This study will model the efficiency degradation of refrigerators manufactured in various years since 1993 to determine if significant energy savings can be achieved by replacing post-1993 models with newer more efficient models.

4. Pilot or Study Rationale and Expected Outcome

In the most recent impact study of the LIEE Program, refrigerator replacement contributed 78% of the electric savings claimed by the program Statewide. Given the importance of this measure to the Program portfolio, the potential energy savings resulting from replacing later models should be considered. This Study is expected to provide the necessary information and recommendations for informing a decision on whether to replace refrigerators built after 1993. Estimates of energy savings for various vintages and models will be provided along with recommendations for Program planning.

5. Pilot or Study Implementation

The study will examine program data and appliance data and model the consumption of various refrigerator vintages over the estimated useful life of the appliances. A detailed research plan will be required from the evaluator to be approved by the Joint Utilities before the study begins.

Attachment A-10.6

Attachment A-10.6 Statewide Non-Energy Benefits Study

This Study is expected to update the current methodology used by the Joint Utilities to assign non-energy benefits (NEBs) to program measures for the purpose of assessing their cost-effectiveness. The current methodology was established in 2001 and many of the values used to calculate NEBs are outdated and inappropriate for the current program.

1. Pilot or Study Budget Table

Statewide Studies	Total Cost
Non-Energy Benefits Study	\$300,000

2. Projected Pilot Impacts Table

Not Applicable for Studies

3. Brief Pilot or Study Description

The Joint utilities propose a study to quantify the elements of a cost effectiveness analysis, which is a key determinant of program design. Utility personnel and other stakeholders have raised questions about the methods used to develop the current values assigned to non-energy benefits of the programs, which come from a study that is now several years old.

The study will address the following research objectives:

- Provide background on the use of NEBs in cost-effectiveness tests for low-income energy efficiency programs,
- Discuss the effectiveness and appropriate use of NEB values for cost-effectiveness tests, and
- Provide a methodology for assigning NEBs at the measure level for cost-effectiveness testing.

4. Pilot or Study Rationale and Expected Outcome

The current methodology for evaluating the cost-effectiveness of LIEE measures was established in 2001 and many of the values used to calculate NEBs are outdated and inappropriate for the current program. This study will address that problem and provide an updated methodology for assigning NEBs to LIEE measures. Having a more accurate understanding of the cost-effectiveness of program measures will inform program planning and design.

5. Pilot or Study Implementation

The study will include several components including the following:

- A literature review of the use of NEBs in the energy efficiency industry in general and in low-income programs specifically.
- An assessment of the various options for assigning NEBs to program measures including 1) a comprehensive review and revision of the current NEBs model, or 2) development of a set of efficient factors to be applied to energy savings to estimate the relevant NEBs.
- Development of a methodology to be used by the joint utilities to assign NEBs to LIEE program measures for the purpose of cost-effectiveness testing.

Attachment A-11

Attachment A-11

Methodology to Determine Basis for Total Number of Eligible LIEE Customers to be Served Between 2009-2011

First, to derive the number of customers potentially eligible for LIEE services in each utility's service area, the joint utilities¹ used the joint utility methodology adopted by the Commission in D.01-03-028. The joint utility methodology used to calculate the annual estimated number of customers eligible for LIEE and CARE services, for each utility territory, and for the State as a whole was used as a starting point.²

Second, the joint utilities determined how many low income households had been previously served by the LIEE program in the past. Historically, the utilities have adhered to the P&P Manual's "10 year rule" and counted all of those homes treated in the last 10 years as homes that had been previously been served by the LIEE program, and therefore were not currently eligible for participation. However, D.07-12-051 directs the utilities to "eliminate or modify the ten year 'go back' rule to permit installations of new measures and technologies in all households while avoiding duplicative installations." When evaluating this requirement and assessing the levels of service provided to customers over the past 10 years, the joint utilities decided that the number of customers who had been served since the end of 2001, when "Rapid Deployment" measures were included in the program, best represented the number of customers who had received "all feasible measures," because only a few new measures have been introduced to the LIEE program since that time, and because larger saving measures, such as air conditioning were implemented in the program as "go-back" measures.

The joint utilities also agreed that households who have been served by the California Department of Community Services and Development's ("DCSD") LIHEAP should also be considered as homes that have been served because LIHEAP offers most, if not all, of the same measures provided by LIEE, and some not offered by LIEE. Moreover, any home that has been served by LIHEAP would also be deemed ineligible for service under LIEE at the time of an

¹ Joint utilities consist of SoCalGas and SDG&E.

² Sources for this estimation include the Commission's current guidelines, current year small area vendor marginal distributions on household characteristics, Census PUMS 2000 and PUMS 2004-2006 sample data, utility meter and master meter household counts, Department of Finance CPI series, and various GIS sources. The annual estimates for the upcoming year are filed annually by SCE on behalf of the other large utilities on October 15th of each year.

assessment because the home has generally received all feasible measures and should be considered energy efficient.

The third step in developing a base point was to estimate how many customers would likely decline to participate in LIEE. The joint utilities made the determination to use the estimate provided in the KEMA Statewide Needs Assessment Report (“KEMA Report”) of 10%.³ As an example, the numbers would function as follows:

1,948,000	Number of estimated eligible using the Commission-adopted demographic model
348,000	Number of households served by LIEE 2002 thru 2008 (actuals plus estimate for 2008)
77,000	Number of households served by LIHEAP 2002 thru 2008 (actuals plus estimate for 2008) (cite source)
152,000	Estimated number of households unwilling to participate (10%)
1,371,000	Base point for calculating 25% of the programmatic initiative
343,000	25% of programmatic initiative to be served by LIEE during PY 2009 through 2011

Note: Figures above are rounded to the nearest thousand.

The joint utilities recognize that the number of homes served and the number of customers unwilling to participate need to be tracked in order to develop this estimate. The joint utilities have been tracking the number of homes served by the LIEE program since the program’s inception and will continue to do so in the future.

Tracking the number of customers who are unwilling to participate in the LIEE program is a difficult process, because the tracked information is comprised of two sub-components, and because the information has not been tracked in the past. The first sub-component tracks those customers who provide an affirmative rejection for program participation.⁴ Plans are in place to include this functionality in the joint utilities’ LIEE program data systems.

The second component is tracking those customers who have been contacted by LIEE representatives on multiple occasions but do not specifically express affirmatively or negatively their desire to participate in the LIEE program. The most pressing question to address is how much time and money should be expended by the utilities to continue to reach these customers:

³ Phase II Low Income Needs Assessment Report , Volume 1, Final Report, Prepared for the California Public Utilities Commission by KEMA, Inc., October 12, 2007 at 7-20.

⁴ In their Comments on the Preliminary Energy Efficiency Strategic Plan submitted on March 24, 2008, the Division of Ratepayer Advocates stated that they agree that this sub-component of information should be considered when the utilities track the number of customers who have been offered LIEE services. (Comments at 17)

At what point should a utility cease expending resources to enroll a specific customer who remains unresponsive to multiple outreach attempts such as multiple direct mail pieces, telephone calls and actual in-person visits with no affirmative response received. For now, the utilities included this component in the 10% estimate included above and supported by the KEMA Report until more data can be gathered and analyzed by the utilities to improve the methodology used to determine the number of customers who are unwilling to participate in the LIEE program.

The utilities will work together to further refine the standard means of deriving the number of LIEE customers on which to base the achievement of the Commission's programmatic initiative.

Attachment B

Attachment B-1

Attachment B-1 CARE Budget

	A	B	C	D	E
1	PY 2009 - 2011 CARE Proposed Program Budget				
2	San Diego Gas & Electric Company				
3					
4					
5	CARE Budget Categories	2008 Authorized	2009 Planned	2010 Planned	2011 Planned
6	Outreach	\$ 1,581,628	\$ 1,520,638	\$ 1,611,634	\$ 1,734,261
7	Proc., Certification and Verification	\$ 255,360	\$ 216,219	\$ 222,967	\$ 230,015
8	Information Tech./Programming	\$ 371,467	\$ 508,795	\$ 481,841	\$ 452,687
9	Pilots	\$ -	\$ -	\$ -	\$ -
10	Measurement and Evaluation	\$ 3,623	\$ 4,000	\$ 4,160	\$ 4,326
11	Regulatory Compliance	\$ 169,052	\$ 184,015	\$ 190,205	\$ 196,401
12	General Administration	\$ 317,407	\$ 399,065	\$ 410,096	\$ 423,927
13	CPUC Energy Division Staff	\$ 55,037	\$ 102,900	\$ 102,900	\$ 102,900
14	Total Expenses	\$ 2,753,575	\$ 2,935,632	\$ 3,023,803	\$ 3,144,517
15	Subsidies and Benefits	\$ 48,231,658	\$ 47,026,184	\$ 48,492,992	\$ 49,919,937
16	Total Program Costs and Discounts	\$ 50,985,233	\$ 49,961,816	\$ 51,516,795	\$ 53,064,454

Attachment B-2

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
1	PY 2009 - 2011 CARE Estimated Participation															
2	San Diego Gas & Electric Company															
3																
4	(Source)	Total Enrolled 12-31-07	Total Enrolled Through April 2008	PY 2008 Estimated Eligible	Estimated Net PY 2008 Enrollments	Estimated Year End PY 2008 Participation	Estimated PY 2008 Goal Rate	Estimated PY 2009 Net Enrollments	Estimated Year End PY 2009 Participation	Estimated PY 2009 Goal Rate (a)	Estimated PY 2010 Net Enrollments	Estimated Year End PY 2010 Participation	Estimated PY 2010 Goal Rate (a)	Estimated PY 2011 Net Enrollments	Estimated Year End PY 2011 Participation	Estimated PY 2011 Goal Rate (a)
5		(1)	3/31/08 RD Report	(2)	(3)	(Col. B+E)	(Col. F/D)	(2)	(Col. F+H)	(Col. I/D)	(2)	(Col. I+K)	(Col. L/D)	(2)	(Col. L+N)	(Col. O/D)
6	SDG&E	228,759	226,593	329,942	8,900	238,659	72%	8,700	247,359	75%	7,600	254,959	77%	7,500	262,459	80%
7																
8	(a)	Estimated PY2009, PY2010 and PY2011 Goal Rate will fluctuate based on updated CARE Eligibility information to be filed October 2008, 2009, and 2010.														
9		The annual meter growth rate will also negatively impact goal rate.														
10	(1)	CARE Annual Reports, dated 5/1/07														
11	(2)	Each utility's estimate based on eligibility rates filed.														
12	(3)	Most recent estimates of net enrollments.														

Attachment B-3

A	B	C	D	E	F	G
PY 2007-2008 CARE Outreach and Penetration Information						
San Diego Gas & Electric Company						
1						
2						
3						
4						
5						
6	CARE PY 2007					
7	Outreach Method	Cost	Labor Cost*	Total Cost	Estimated # of Customers Reached	Estimated # of Customers Enrolled
8						Percent of New Enrollments for PY 2007
9						
10	Automated Voice Messaging	\$ 4,500		\$ 4,500	122,200	4,900
11	Direct Mail	\$ 188,194		\$ 188,194	259,300	8,850
12	Internet Enrollment	\$ -		\$ -	4,810	3,800
13	CARE Capitation	\$ 14,511		\$ 14,511	7,800	2,600
14	Bill Insert	\$ 72,000		\$ 72,000	2,200,000	2,500
15	Call Center Application Cost	\$ 43,062		\$ 43,062	60,000	15,000
16	Asian Grass Roots Campaign	\$ 29,268		\$ 29,268	425	200
17	LIIE Leveraging	\$ -		\$ -	3,200	1,800
18	Mass Media (including radio, TV, & print)	\$ 239,020		\$ 239,020	5,942,200	900
19	SDG&E/SCG Data Exchange	\$ -		\$ -	270	250
20	Cool Zones	\$ 31,691		\$ 31,691	N/A	10
21	Phone Recertification	\$ 16,061		\$ 16,061	N/A	N/A
22	Postage from PEV, Recert & Incoming CARE applications	\$ 165,237		\$ 165,237	N/A	N/A
23	SDG&E Misc. Outreach and Labor Expenses	\$ 54,544	\$ 390,934	\$ 445,478	N/A	N/A
24	Total	\$ 858,088	\$ 390,934	\$ 1,249,022	(1)	52,010
25						100%
26	CARE PY 2008					
27	Outreach Method	Cost	Labor Cost*	Total Cost	Estimated # of Customers Reached	Estimated # of Customers Enrolled
28						Percent of New Enrollments for PY 2008
29						
30	Automated Voice Messaging	\$ 7,893		\$ 7,893	21,000	12,000
31	Direct Mail	\$ 260,000		\$ 260,000	18,000	12,600
32	Internet Enrollment	\$ -		\$ -	8,000	6,000
33	CARE Capitation	\$ 26,245		\$ 26,245	13,200	3,300
34	Bill Insert	\$ 96,000		\$ 96,000	2,200,000	1,200
35	Call Center Application Cost	\$ 39,000		\$ 39,000	50,000	9,600
36	Third Party Initiatives	\$ 251,463		\$ 251,463	4,000	2,500
37	LIIE Leveraging	\$ -		\$ -	3,500	1,900
38	SDG&E/SCG Data Exchange	\$ -		\$ -	500	500
39	Mass Media (including radio, TV, & print)	\$ 250,380		\$ 250,380	15,000,000	700
40	Cool Zones	\$ 39,000		\$ 39,000	N/A	50
41	Postage from PEV, Recert & Incoming CARE applications	\$ 120,025		\$ 120,025	N/A	N/A
42	SDG&E Misc. Outreach and Labor Expenses	\$ 114,772	\$ 376,850	\$ 491,622	N/A	N/A
43	Total	\$ 1,204,778	\$ 376,850	\$ 1,581,628	(1)	56,650
44						100%
45						
46						
47	* Utilities may but are not required to include estimates on labor cost for each outreach method. Utilities should include estimates on total labor cost for CARE Outreach.					
48	** Data on estimated number of customers enrolled data may not be available for certain types of outreach.					
49	*** Mass Media enrollment tracking is not available for television or radio campaigns.					
50						
51	(1) Data is not cumulative.					

Attachment B-4

Attachment B-4
Summary of San Diego Gas & Electric Company CARE Program Proposals for 2009, 2010, and 2011

Proposal	Description	Benefits	Current Practice
1. Reallocation of Budget Funds	Continue to allow utilities the flexibility to reallocate funds between budget cost categories as needed.	Allows utility to respond to the changing needs within the program activities without delays.	Currently authorized by Commission with exceptions.
2. Change CARE Submetered and Expanded CARE Recertification processes	Align the Submetered renewal process with processes in place for Individual Residential Customers. Submetered tenants and Expanded CARE facilities would renew eligibility using enrollment anniversary dates, every two years. Submetered tenants would also be eligible for fixed income recertification.	Reduce number of eligible customers dropped for non-response; reduce program costs.	Submetered tenants and Expanded CARE facilities are recertified annually.
3. Continue use of Probability Model for Recertification	Allows utility to use probability model for recertification. Customers who pass would be recertified once every 4-years.	Reduce number of eligible customers dropped for non-response to recertification requests; reduce program costs.	Provision authorized in D.06-12-038 as pilot.
4. Continue Recertification by Telephone	Allows utility to contact customers who have not responded to recertification requests and recertify customer over the telephone.	Reduce number of eligible customers dropped for non-response to recertification requests; reduce program costs.	Provision authorized in D.06-12-038 as pilot.
5. Inbound CARE Phone Enrollment	Allow for Inbound CARE phone enrollment using an IVR or live caller.	Expedited program enrollment for customers who chose this enrollment channel. Saves on paper, postage and processing	The practice is currently available for Outbound Phone enrollment as approved in D.06-12-038. Inbound Phone

Attachment B-4
Summary of San Diego Gas & Electric Company CARE Program Proposals for 2009, 2010, and 2011

Proposal	Description	Benefits	Current Practice
6. Expansion of Categorical Eligibility to include Public Housing and Section 8 Housing.	Expand enrollment process to allow customers to enroll in program if customer participates in Public Housing or Section 8 which is a pre-determined means-tested State or Federal program.	Increase enrollments by simplifying process for customers; reach customers who might not otherwise apply.	enrollment is currently not available. Utilities currently offer categorical eligibility as authorized in D.06-12-038.
7. Measurement and Evaluation Studies	CARE Program Eligibility Annual Update. The annual update establishes the CARE program eligibility based on census and economic data.	Allows utilities to determine eligibility and projected penetration.	Studies to be authorized by Commission.

Attachment B-5

Attachment B-5

CARE Pilot and Study Implementation Plans

There were no pilots or studies proposed for the 2009-2011 program cycle.

Attachment B-6

Attachment B-6 CARE On-Line Enrollment

A. Background

On June 30, 2006, SDG&E submitted its Low Income Program Application (A.) 06-06-032 to request program and funding approval for the California Alternate Rates for Energy (CARE) program years 2007 and 2008. In its Application, SDG&E requested the ability to implement an on-line enrollment process for the CARE program, whereby customers would declare their eligibility for the program via an electronic signature process.

On December 27, 2006, the California Public Utilities Commission (Commission) issued Decision (D.) 06-12-038, which approved SDG&E's request to implement the CARE on-line enrollment. Ordering Paragraph (OP) 20 of D.06-12-038 directed SDG&E to submit a Cost Benefit analysis of the implementation of on-line enrollment in their next program application.

SDG&E implemented on-line enrollment in mid April 2007. Therefore in accordance with D.06-12-038, SDG&E hereby submits its cost benefit analysis herein which details the goals, accomplishments, and cost for the implementation of the on-line enrollment.

A. Goal vs. Accomplishment

As part of the PY 2007 - 2008 CARE applications, SDG&E included expected enrollment results for the implementation of CARE on-line enrollment. Prior to implementation of the on-line applications submittal process in mid-April of 2007, SDG&E received approximately 4,400 CARE enrollments from downloaded CARE applications over a two and a half year period. SDG&E believed that the implementation of on-line submittal process for enrollment would provide a significant source of annual program enrollments and estimated program enrollment for this tactic were 5,000 enrollments for each of the program year 2007 and 2008.

Between May and December of 2007, SDG&E received over 4,000 CARE applications and enrolled over 2,900 customers on the program through on-line enrollment. Through March, 2008, SDG&E has received over 3,500 applications and has enrolled over 1,300 customers on the program. Although SDG&E did not meet

the anticipated 2007 program enrollment goal of 5,000, enrollment numbers experienced through the first quarter of 2008 are on track to meet the 2008 enrollment goals.

B. Implementation Cost

SDG&E implemented CARE on-line enrollment using a two phase approach. The first phase of the implementation provided an on-line enrollment submittal process, whereby the applications are submitted by the customers and received via e-mail by the CARE processing group. This phase provided a “no-cost” solution which was implemented relatively quickly. While implementation was quick and effective, this process is also manual and requires CARE processors to check the CARE on-line email box daily in order to print and enroll all applications received in the mailbox.

The second phase implementation would take the enrollment process a few steps further, actually creating the application within the CARE database in real-time and notifying customers if they are ineligible for participation, already participating in the program or are accepted for program enrollment. This would eliminate the manual data entry by the processing group and shift it to a customer entered application that is entered in real-time. SDG&E will begin development of the second phase of on-line enrollment in mid-2008. Costs for this enhancement are estimated at approximately \$75,000.

C. Cost Savings

Implementation of CARE on-line enrollment has provided cost savings for both the CARE program and for the customer. Cost savings for the CARE program is realized any time Customer Service Representative (CSR) refers a customer to the web versus mailing them an application. The elimination of the paper application, inbound, and outbound postage are all cost savings to the program. With postage increases anticipated over the next few years, the cost savings will continue to increase over time. Currently, we cannot track the number of customers who enrolled on the website due to a referral from the CSR. Once the second phase of the project is complete, a tracking mechanism will be put in place that will allow SDG&E to estimate the cost savings more accurately.

Currently, SDG&E has not realized any cost savings in processing the CARE on-line applications. Applications are sent to an email box, printed and processed like all other applications. With additional enhancements scheduled to be put in place, this process would essentially allow customers to process their own applications, eliminating most manual data entry currently done by a CARE processor. The applications will be sent to a review screen where processors will still visually scan the applications and submit it to the SDG&E billing system. It is not clear how much time will be saved by the processing staff without fully implementing the process; however, SDG&E believe the change will be significant.

Finally, customers are realizing cost savings from on-line enrollment. Customers no longer need to print the application, insert it in an envelope, and mail it using a \$.41 cent stamp. They save both time and money from the on-line enrollment process and get immediate response that their applications have been submitted. This provides the customers with a reassurance that their applications have been received and reduces follow-up calls by customers checking to see if their applications have been received.

D. Findings

SDG&E's low-income customers have access and are willing to enroll in the CARE program through the on-line process. Since implementation of CARE on-line enrollment, SDG&E has experienced a significant increase in the number of CARE applications received from this tactic. In 2006, SDG&E enrolled approximately 1,800 customers in CARE using a downloaded CARE application, which required the customer to fill out, sign and mail the applications in order to be enrolled. Between May and December of 2007, SDG&E had increased on-line enrollment by 20% over the entire 2006 program year. Based on current 2008 projections, SDG&E plans to enroll over 5,000 customers on-line during program year 2008.

The first phase of the on-line implementation provided a quick and "no-cost" method for enrolling customers on-line; however, the cost savings from first phase implementation is also minimal. The second phase of on-line enrollment will cost approximately \$75,000 but will also provide a cost saving to the program by significantly reducing application processing cost.

E. Conclusions

SDG&E believes that the implementation of CARE on-line enrollment has provided a successful outreach and enrollment channel for low-income customers. As more and more customers gain internet access over the next few years, SDG&E believe that on-line enrollment will continue to grow and become an important part in the success of the CARE program.

Attachment C

Attachment C-1

A	B	C	D	E	F	G	H
PY 2009 - 2011 CARE and LIEE Rate Impacts - Electric (cents/kWh)							
San Diego Gas & Electric Company							
1							
2							
3							
4	PY 2009	Average Rate Excluding CARE/LIEE Surcharge	CARE Subsidy Portion of Rate	CARE Administration Portion of Rate	LIEE Program Portion of Rate	LIEE Administration Portion of Rate	Average Rate Including CARE/LIEE Surcharge
5		14.537	0.167	0.011	0.047	0.008	14.770
6	Residential (non CARE)	10.812	0.000	0.000	0.047	0.008	10.867
7	Residential (CARE)	15.783	0.167	0.011	0.047	0.008	16.016
8	Small Commercial	13.384	0.167	0.011	0.047	0.008	13.617
9	Comm & Industrial	15.464	0.167	0.011	0.047	0.008	15.697
10	Agricultural	14.833	0.000	0.000	0.000	0.000	14.833
11	Lighting	14.343	0.167	0.011	0.047	0.008	14.576
12	System						
13							
14							
15							
16	PY 2010	Average Rate Excluding CARE/LIEE Surcharge	CARE Subsidy Portion of Rate	CARE Administration Portion of Rate	LIEE Program Portion of Rate	LIEE Administration Portion of Rate	Average Rate Including CARE/LIEE Surcharge
17		14.537	0.173	0.011	0.047	0.008	14.776
18	Residential (non CARE)	10.812	0.000	0.000	0.047	0.008	10.867
19	Residential (CARE)	15.783	0.173	0.011	0.047	0.008	16.022
20	Small Commercial	13.384	0.173	0.011	0.047	0.008	13.623
21	Comm & Industrial	15.464	0.173	0.011	0.047	0.008	15.703
22	Agricultural	14.833	0.000	0.000	0.000	0.000	14.833
23	Lighting	14.343	0.173	0.011	0.047	0.008	14.582
24	System						
25							
26							
27							
28	PY 2011	Average Rate Excluding CARE/LIEE Surcharge	CARE Subsidy Portion of Rate	CARE Administration Portion of Rate	LIEE Program Portion of Rate	LIEE Administration Portion of Rate	Average Rate Including CARE/LIEE Surcharge
29		14.537	0.178	0.012	0.045	0.008	14.780
30	Residential (non CARE)	10.812	0.000	0.000	0.045	0.008	10.865
31	Residential (CARE)	15.783	0.178	0.012	0.045	0.008	16.026
32	Small Commercial	13.384	0.178	0.012	0.045	0.008	13.627
33	Comm & Industrial	15.464	0.178	0.012	0.045	0.008	15.707
34	Agricultural	14.833	0.000	0.000	0.000	0.000	14.833
35	Lighting	14.343	0.178	0.012	0.045	0.008	14.586
36	System						
37							
38							
39							
40	Starting Class Average Rates are based on currently effective rates as of 5/1/08.						
41							
42	Electric CARE Subsidy for this table is illustrative and based on updated CARE Participation Rates shown in Table B-2.						
43	CARE subsidy estimates for 2009, 2010 & 2011 will be updated in an Advice Letter Filing by October 1 per D.03-04-027.						

A	B	C	D	E	F	G	H	
PY 2009 - 2011 CARE and LIEE Rate Impacts - Gas (cents/Therm)								
San Diego Gas & Electric Company								
1								
2								
3								
4	PY 2009	Average Rate Excluding CARE/LIEE Surcharge	CARE Subsidy Portion of Rate	CARE Administration Portion of Rate	LIEE Program Portion of Rate	LIEE Administration Portion of Rate	Average Rate Including CARE/LIEE Surcharge	
5								
6								
7								
8	Residential (non CARE)	0.91	3.02	0.16	1.95	0.38	6.41	
9	Residential (CARE)	0.23	-	-	2.52	0.49	3.23	
10	Commercial ¹	2.93	3.02	0.16	0.56	0.11	6.78	
11	Industrial ²	0.80	3.02	0.16	2.60	0.50	7.09	
12	Agricultural	N/A	N/A	N/A	N/A	N/A	N/A	
13	Lighting	N/A	N/A	N/A	N/A	N/A	N/A	
14	System	N/A	N/A	N/A	N/A	N/A	N/A	
15								
16	PY 2010	Average Rate Excluding CARE/LIEE Surcharge	CARE Subsidy Portion of Rate	CARE Administration Portion of Rate	LIEE Program Portion of Rate	LIEE Administration Portion of Rate	Average Rate Including CARE/LIEE Surcharge	
17								
18								
19								
20	Residential (non CARE)	0.91	3.13	0.17	1.95	0.37	6.52	
21	Residential (CARE)	0.23	-	-	2.51	0.48	3.22	
22	Commercial ¹	2.93	3.13	0.17	0.56	0.11	6.89	
23	Industrial ²	0.81	3.13	0.17	2.60	0.49	7.20	
24	Agricultural	N/A	N/A	N/A	N/A	N/A	N/A	
25	Lighting	N/A	N/A	N/A	N/A	N/A	N/A	
26	System	N/A	N/A	N/A	N/A	N/A	N/A	
27								
28	PY 2011	Average Rate Excluding CARE/LIEE Surcharge	CARE Subsidy Portion of Rate	CARE Administration Portion of Rate	LIEE Program Portion of Rate	LIEE Administration Portion of Rate	Average Rate Including CARE/LIEE Surcharge	
29								
30								
31								
32	Residential (non CARE)	0.91	3.23	0.18	1.87	0.37	6.57	
33	Residential (CARE)	0.25	-	-	2.42	0.48	3.15	
34	Commercial ¹	2.93	3.23	0.18	0.54	0.11	6.99	
35	Industrial ²	0.88	3.23	0.18	2.51	0.50	7.29	
36	Agricultural	N/A	N/A	N/A	N/A	N/A	N/A	
37	Lighting	N/A	N/A	N/A	N/A	N/A	N/A	
38	System	N/A	N/A	N/A	N/A	N/A	N/A	
39								
40	¹ Core C/I							
41	² NonCore C/I							
42								
43	Natural Gas CARE subsidy for this table is illustrative. Actual 2009 CARE subsidy will be updated in an Advice Letter filing by October 31st per Ordering Paragraph 22 in D.04-08-010.							

Attachment C-2

	A	B	C	D	E	F	G	H	I	J	K
1	PY 2007 Customer Usage										
2	San Diego Gas & Electric Company										
3											
4											
5											
6	Number of CARE	2007 Total	Total	Tier 1	Tier 2	Tier 3	Tier 4	Tier 5	Total	Below Baseline	Above Baseline
7	Customers	January	206,908	114,961	29,627	37,871	17,653	6,796	137,017	90,228	46,789
8		February	207,712	122,071	29,716	35,776	14,983	5,166	137,764	92,840	44,924
9		March	208,973	135,121	28,439	30,904	11,397	3,112	138,524	111,419	27,105
10		April	209,970	144,018	26,849	27,755	9,131	2,217	138,950	125,540	13,410
11		May	210,316	138,340	29,390	30,143	10,072	2,371	138,756	101,467	37,289
12		June	210,559	131,015	32,077	33,079	11,407	2,981	138,512	59,836	78,676
13		July	210,618	120,583	33,000	37,490	14,693	4,852	138,200	73,136	65,064
14		August	211,992	109,376	34,224	42,276	18,574	7,542	138,799	83,350	55,449
15		September	211,613	99,637	34,271	45,457	22,056	10,192	138,317	89,583	48,734
16		October	211,640	121,909	33,846	37,903	13,995	3,987	138,804	70,354	68,450
17		November	212,341	132,496	31,507	33,780	11,629	2,929	139,272	105,344	33,928
18		December	214,319	129,549	30,168	35,814	14,336	4,452	141,470	114,608	26,862
19		Total	Total	Tier 1	Tier 2	Tier 3	Tier 4	Tier 5	Total	Below Baseline	Above Baseline
20	Number of	2007 Total									
21	Customers	January	555	338	85	92	35	5	247	158	89
22	Served by LIEE*	February	832	545	114	111	47	15	532	379	153
23		March	725	559	83	66	14	3	429	380	49
24		April	1,076	866	102	90	15	3	702	654	48
25		May	831	608	96	102	18	7	496	362	134
26		June	1,243	855	186	156	39	7	810	501	309
27		July	936	606	137	139	37	17	581	380	201
28		August	1,230	752	203	198	67	10	784	516	268
29		September	861	511	147	130	54	19	568	411	157
30		October	1,314	891	170	197	48	8	886	512	374
31		November	994	705	135	114	31	9	690	499	191
32		December	1,978	1,416	234	237	73	18	1,253	1,099	154
33											
34											
35											

* Does not include master meter or submetered homes.

Attachment C-2A

Attachment C-2A Bill Savings

	A	B	C	D	E
1	PY 2007 Bill Savings				
2	San Diego Gas & Electric Company				
3	Program Year	Program Costs	Program Lifecycle Bill Savings	Program Bill Savings/ Cost Ratio	Per Home Average Lifecycle Bill Savings
4	2005	\$ 12,970,508	\$ 8,864,286	0.68	\$ 788
5	2006	\$ 14,435,838	\$ 9,212,340	0.64	\$ 669
6	2007	\$ 11,983,364	\$ 6,631,660	0.55	\$ 507
7					
8					

Attachment C-3

	A	B	C	D	E	F
1	PY 2009-2011 Projected Customer Usage and Eligibility					
2	San Diego Gas & Electric Company					
3						
4			PY 2007	PY 2009**	PY 2010**	PY 2011**
5			Number of	Estimated	Estimated	Estimated
6			Customers in	Number of	Number of	Number of
7			CARE	Customers	Customers	Customers
8			Customers in	Treated by	Treated by	Treated by
9			PY2007**	LIEE in PY	LIEE in PY	LIEE in PY
				2009	2010	2011
10	Electric	Tier 1*	124,923	5,000	5,000	9,000
11		Tier 2*	31,093			
12		Tier 3*	35,687	7,000	7,000	7,000
13		Tier 4*	14,161			
14		Tier 5*	4,716	8,000	8,000	4,000
15		Total	210,580	20,000	20,000	20,000
16						
17	Gas	Tier 1 (Below Baseline)	93,142	3,300	3,300	5,900
18		Tier 2 (Above Baseline)	45,557	9,900	9,900	7,300
19		Total	138,699	13,200	13,200	13,200
20						
21						
22						
23	*TIER 1: Average electric energy consumption below 101% of baseline					
24	*TIER 2: Average electric energy consumption greater than 100% and less than 131% of baseline					
25	*TIER 3: Average electric energy consumption greater than 130% and less than 200% of baseline					
26	*TIER 4 : Average electric energy consumption greater than 200% and less than 301% of baseline					
27	*TIER 5 : Average electric energy consumption greater than 300% of baseline					
28	** PY2007 CARE customers are listed here as a proxy for depicting Tier usage among LIEE willing and eligible customers. The LIEE baseline of willing and eligible customers is determined by the methodology described in Section III.A of the LIEE testimony. Willing and eligible customers are also described in Table A-3.					