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

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

A.08-05

#### APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY FOR APPROVAL OF LOW-INCOME ASSISTANCE PROGRAMS AND BUDGETS FOR PROGRAM YEARS 2009-2011

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#### I. INTRODUCTION

In accordance with the California Public Utilities Commission's ("Commission" or "CPUC") Decision ("D.") 07-12-051,<sup>1</sup> Ordering Paragraph ("OP") 3,<sup>2</sup> Southern California Gas Company ("SoCalGas") hereby submits its Application for Approval of Low Income Assistance Programs and Budgets for Program Years ("PY") 2009-2011 ("Application"). In this Application, SoCalGas 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.

<sup>&</sup>lt;sup>1</sup> D.07-12-051 was a companion case to D.07-10-032, in which the Commission instituted a comprehensive, longterm energy efficiency strategy to make energy efficiency an integral part of "business as usual" in California. D.07-10-032 directed SoCalGas, San Diego Gas & Electric Company ("SDG&E"), 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.

<sup>&</sup>lt;sup>2</sup> 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 2009-2011

## 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.<sup>3</sup>

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."<sup>4</sup> 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;
- 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;

<sup>&</sup>lt;sup>3</sup> D.07-12-051, at p. 25.

<sup>&</sup>lt;sup>4</sup> Id.

- 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" rule<sup>5</sup> 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; and
- 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.<sup>6</sup>

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

In this Application, SoCalGas 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

<sup>&</sup>lt;sup>5</sup> 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, Ordering Paragraph ("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").

<sup>&</sup>lt;sup>6</sup> D.07-12-051, at pp. 74-75.

and eligible households in PY 2009-2011. In order to comply with the directives outlined in D.07-12-051, SoCalGas 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;
- Leverages SoCalGas' 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 SoCalGas to assess program achievements and inform current and future program designs.

Consistent with the newly revised LIEE objectives articulated in D.07-12-051, SoCalGas' 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-cost ratio of the program.

#### 3. Proposed PY 2009-2011 LIEE Budget

To fund the proposed PY 2009-2011 LIEE program plans and measures, SoCalGas requests a budget of \$53.999 million for PY 2009, \$65.849 million for PY 2010, and \$67.184 million for PY 2011. SoCalGas' proposed PY 2009 – 2011 LIEE budget amounts and projected energy savings are shown in Table 1 below.

	Proposed PY 2009-2011		
Budget	2009	2010	2011
Projected Total Budget**	53,599,000 <sup>7</sup>	\$65,849,000	\$67,184,000
Energy Savings			
Therms	2,564,567	3,292,424	3,345,967
Greenhouse Gas Reduction - C02 (Tons)	13,494	17,473	17,757
Vehicle Reduction Count	3,033	3,893	3,957

Table 1 - SoCalGas Proposed LIEE Program Budget and Energy Savings\*

\* 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.<sup>8</sup> 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"<sup>9</sup> decision and "Winter Initiative" decisions.<sup>10</sup> In these 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 a state energy resource. The Commission clarified that "the complementary objectives of LIEE programs are to provide an energy resource for

<sup>&</sup>lt;sup>7</sup> SoCalGas proposes to partially fund the 2009 budget requirements of \$53.599 million by using \$13.0 million in unspent LIEE program funds from previous years. For rate making purposes, SoCalGas is only seeking recovery of the net amount of \$40.599 million.

<sup>&</sup>lt;sup>8</sup> See, e.g., D.89-12-057, D.95-05-045, D.99-03-056 and D.05-12-026.

<sup>&</sup>lt;sup>9</sup> D.01-05-033.

<sup>&</sup>lt;sup>10</sup> D.01-05-033 and D.05-10-044.

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."<sup>11</sup>

#### C. PROGRAM GOALS

#### 1. Program Achieves <sup>1</sup>/<sub>4</sub> of Programmatic Initiative

SoCalGas' 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 program 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 utilities<sup>12</sup> worked together to develop a methodology to determine the estimated total number of customers.<sup>13</sup> Based on this methodology, the estimated number of customers SoCalGas plans to serve is 343,000 low income households during PY 2009 - 2011.

### 2. Program Meets Policy Objectives

SoCalGas' 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, SoCalGas 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, SoCalGas 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.

#### 3. Goals by Population/Segments

SoCalGas 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, SoCalGas will identify those customers within these neighborhoods who are participating in the CARE program, but have not enrolled in LIEE. From these two strategies, SoCalGas will generate a segment of highly eligible LIEE customers.

<sup>&</sup>lt;sup>11</sup> D.07-12-051, at p. 2.

<sup>&</sup>lt;sup>12</sup> Joint utilities consist of SoCalGas and SDG&E.

<sup>&</sup>lt;sup>13</sup> See Attachment A-11 for a detailed description of the methodology used.

SoCalGas will then group the identified, highly eligible customers into tiers, based on their household energy usage-customers above the baseline allowance will be identified as high users and customers at or below the baseline allowance will be identified as low users.<sup>14</sup>

SoCalGas proposes the following program participation goals for PY 2009-2011: 171,000 high users and 172,000 low users. SoCalGas' PY 2009-2011 goal is to serve a total of 343,000 households.<sup>15</sup> SoCalGas' budget to meet its program participation goal is approximately \$186.6 million.

#### 4. **Program Meets Savings Goal**

SoCalGas' 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 SoCalGas' 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.<sup>16</sup>

#### 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.<sup>17</sup> Because the measure level benefit/cost ratios produced for this Application assess the cost effectiveness of the program as a 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 planning<sup>18</sup> ("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.

<sup>&</sup>lt;sup>14</sup> These levels represent the actual electric and natural gas consumption tiers under which customers are billed.

<sup>&</sup>lt;sup>15</sup> These numbers are based SoCalGas' attempt to enroll high energy users during PY 2009-2011, in order to achieve the programmatic initiative

<sup>&</sup>lt;sup>16</sup> 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."

<sup>&</sup>lt;sup>17</sup> Assigned Commissioner's Ruling Providing Guidance for Low-Income Energy Efficiency 2009-2011 Budget Applications; Rulemaking 07-01-042, April 1, 2008.

SoCalGas Tool 5c downloaded from http://www.ethree.com/cpuc cee tools.html on 04/21/08.

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<sup>19</sup>

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.<sup>20</sup> 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 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

<sup>&</sup>lt;sup>19</sup> 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. <sup>20</sup> 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.

energy savings of the measure. The TRC test <sup>21</sup> 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, gas furnace pilot conversion contributes roughly 29% in lifecycle therm savings to the proposed portfolio; however, the large proportion of energy savings causes this measure to bear a large portion of the allocated indirect costs, and this drives the benefit cost ratio for this measure below one.

#### 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 provisions<sup>22</sup> described in D.03-10-041. Following this direction, the 2005 Program was evaluated by West Hill Energy & Computing, Inc.<sup>23</sup> The primary purpose of the 2005 evaluation was to estimate the first year 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,

<sup>&</sup>lt;sup>21</sup> 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.

<sup>&</sup>lt;sup>22</sup> 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.

<sup>&</sup>lt;sup>23</sup> West Hill Energy & Computing, Inc. *Impact Evaluation of the 2005 California Low Income Energy Efficiency Program Final Report*, December 19, 2007.

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.<sup>24</sup>

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

- Focus energy education on actions with higher savings and lower acceptance
- Improve the quality of the CFL lamps and ensure their installation to raise retention rates from the 65% found in the on-site survey;
- 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 on 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, SoCalGas' proposed program design focuses special marketing attention on those customers/homes who are the highest energy consumers, without excluding those potentially eligible customers who have lower energy consumption.

#### E. PROGRAM DESIGN

#### 1. Section Overview

SoCalGas 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, SoCalGas 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<sup>25</sup>, 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

<sup>&</sup>lt;sup>24</sup> See direct testimony of Witness McKinley for a summary of these results for the LIEE program's natural gas measures.

<sup>&</sup>lt;sup>25</sup> E.g., WIC, TANF, and LIHEAP.

behavioral changes and sustained energy savings, SoCalGas proposes to augment its program delivery to include a customized energy education element and a customer rewards element. In order to maximize savings, SoCalGas also proposes to integrate general energy efficiency 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. Additionally, SoCalGas' proposal maximizes the use of program funds to reach the greatest number of eligible customers by 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.

SoCalGas' 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 in household consumption and modifying measures where appropriate. Consistent with the Strategic Plan and the programmatic initiative, SoCalGas' 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 171,000 high users and 172,000 low users into the program for PY 2009-2011 and achieve maximum savings as soon as possible, SoCalGas proposes to prioritize the focus of its marketing efforts, based on customer energy usage levels. For example, SoCalGas will focus its marketing efforts on customers identified as high users, since these customers have the greatest potential for energy savings and customer benefits. Marketing efforts may include canvassing, direct customer contact by customer service representatives or other customer contact personnel, and telemarketing. SoCalGas 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. SoCalGas fully intends that willing and eligible customers in all usage levels will have the ability to participate in the program at all times.

To achieve its program participation goal, SoCalGas also plans to develop multiple marketing materials aimed at reaching customers based on various socioeconomic characteristics, such as income, age, owner/renter, language, etc. The marketing materials will be customized based on certain customer characteristics to generate higher responses to the marketing efforts. For example, in focus groups, SoCalGas 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, SoCalGas could refer to the rental unit as a "residence."

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

#### b. Increased Coordination Between Utilities

Currently, SoCalGas and SDG&E refer customers to each other. In order to provide customers with the opportunity to take advantage of the LIEE programs in the joint service territories of SoCalGas and SDG&E, where SoCalGas provides natural gas service and SDG&E provides electric service, a joint enrollment process is being developed to ensure that customers receive all recommended program measures. This process will maximize customer benefits, while simplifying the enrollment process and reducing customer inconvenience. Implementing a joint utility process will simplify the enrollment process and provide cost savings (e.g., duplicative costs, outreach, assessment, and enrollment) for both utilities. Similarly, this approach will also reduce any inconveniences that may be experienced by the customer, e.g. multiple in-home assessments and program enrollment.

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

SoCalGas and SCE are currently working on an effort to develop common forms, where possible, which will require the contractors that serve both utilities' LIEE programs to only complete one form when qualifying a customer for their LIEE programs. This will streamline the enrollment process for both the customer and program personnel.

#### c. Program Delivery Process

SoCalGas' 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.

#### 1. <u>Enrollment</u>

SoCalGas proposes to maintain its current form of streamlined enrollment options, as adopted by the Commission, which include: targeted self certification,<sup>26</sup> categorical eligibility<sup>27</sup> and eligibility verified though CARE's post enrollment verification process.<sup>28</sup> 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. <u>Customized LIEE Energy Audit</u>

The current LIEE program includes an in-home energy assessment, which is a basic audit, that identifies "all feasible measures"<sup>29</sup> to be installed, and delivers a standard energy education package, designed to highlight and discuss conservation practices. SoCalGas' 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 customer household and have the potential to yield the greatest energy savings. As part of the post-audit results package provided to the customer, SoCalGas intends to include a graphic that

<sup>&</sup>lt;sup>26</sup> See D.06-08-025.

<sup>&</sup>lt;sup>27</sup> 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

<sup>&</sup>lt;sup>28</sup> See Assigned Commissioner's Ruling, dated March 29, 2008 in R.04-01-006.

<sup>&</sup>lt;sup>29</sup> "All feasible measures" has been defined as being all measures that can be installed in conformance with the Statewide LIEE Installation Standards.

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. water heating, space heating, etc, which will help customers understand where they have the greatest opportunities to achieve energy savings and cost savings.

SoCalGas also intends to use the energy audit tool to provide additional program benefits. In particular, SoCalGas is exploring using the energy audit tool to automate the customer enrollment process for the LIEE program. This will greatly streamline the enrollment process for both the customer and program personnel, and also provide environmental benefits by greatly reducing the amount of hard-copy customer enrollment forms currently used. Also, during the development of the audit tool, SoCalGas will approach electric utilities<sup>30</sup> with service territories that overlap with SoCalGas' to determine what interest they may have in incorporating the customized audit with their low-income programs.

SoCalGas' customized 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, SoCalGas proposes to eliminate the three-measure minimum currently required for participation in the LIEE program, which will enable SoCalGas to serve more customers.<sup>31</sup>

#### 3. Customized Energy Education

SoCalGas is proposing to implement a new and innovative approach to customer energy education. This new educational approach differs from SoCalGas' current process because it 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. The success of the energy education program will largely depend on customers' understanding and appreciation of the importance of energy savings, developing skilled program personnel to promote and encourage changes in customer behavior, and providing performance feedback to

<sup>&</sup>lt;sup>30</sup> Such electric utilities include but are not limited to: SDG&E, SCE, PG&E, Los Angeles Department of Water and Power, and Imperial Irrigation District.

<sup>&</sup>lt;sup>31</sup> As articulated in the P&P Manual, a home must require a minimum number (3) of program measures in order to be eligible for participation in the program.

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

- 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;
- 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 community based organizations ("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. SoCalGas contractors will perform a post-installation inspection on a sampling of homes.

#### 5. Inspections

Inspections are performed by CBOs and contractors participating in the LIEE program and contractors do not inspect their own installation work. The contractors have a trained staff of experts who provide third-party inspection services to ensure that all LIEE program measures were installed correctly.

#### 6. <u>Customer Rewards</u>

SoCalGas proposes a new LIEE program element to reinforce energy education, achieve long-term behavioral changes, and create sustained energy savings. 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 rewards component of SoCalGas' LIEE program is simple and easy to understand. The following describes the methodology that will be used to determine the target percentage reduction and the levels of potential rewards. The customized energy audit will analyze natural gas customer energy usage after LIEE measures are installed and the energy usage will be compared to the same timeframe during the previous year. If, for a consecutive six month period after the last LIEE measure is installed, customers achieve and maintain a certain level of

energy savings, they will be eligible to receive a customer reward. And, if they continue to maintain the energy savings, then they will be eligible for a second reward at the end of 12 months after the date of the last measure installation. To encourage maximum energy savings, two levels of incentive rewards will be available. The Platinum Level Incentive of \$20.00 will be awarded to customers who reduce their energy consumption by 20% or more. Customers who reduce their energy consumption by 20% or more. Customers who reduce their energy consumption by 20% or more. 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 customer. SoCalGas' new LIEE program will offer two mixes of measures, depending on the customer's usage category (High 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. SoCalGas 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. SoCalGas intends that the mix of measures may be modified to meet unique customer needs where necessary.

SoCalGas' proposed portfolio of measures includes a combination of measures, both old and new, that have a benefit cost ratio of less than one. However, SoCalGas 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 SoCalGas' proposed plan for PY 2009 – 2011, improve the programs benefit to cost ratio. The mix of measures for each usage level is detailed in the following table:

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			
Low Flow Showerhead	Furnace Filter			
Minor Home Repair*	Furnace Repair/Replacement**			
Standing Pilot Change Out***	High Efficiency Clothes Washer			
Water Heater Blanket	Low Flow Showerhead			
Water Heater Pipe Wrap	Minor Home Repair			
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.				

Table - 8

Of the measures listed in the above tables, the following are new measures that SoCalGas proposes to add to its PY 2009-2011 LIEE program:

 High-Efficiency Clothes Washer – SoCalGas 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 SoCalGas' 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 if the dryer is natural gas and water savings is expected to be 10,000 gallons.

- Forced Air Unit Furnace Standing Pilot Light Retrofit Natural gas forced air unit ("FAU") furnaces manufactured prior to January 1, 1992<sup>32</sup> 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.
- Furnace Clean and Tune The temperate climate of SoCalGas' service territory contributes to relatively low customer heating bills. Because heating systems in SoCalGas' 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 forced air unit furnaces where the filter needs to be replaced, a new furnace filter will be included as part of the clean and tune. For these reasons, SoCalGas proposes to add this new measure.

SoCalGas selected these new measures by examining what measures might 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 SoCalGas' LIEE program.

<sup>&</sup>lt;sup>32</sup> The 1992 CEC 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.

#### a. Assembly Bill 1109 ("AB1109")

AB 1109<sup>33</sup> will have no impact on SoCalGas' PY 2009-2011 LIEE program because compact fluorescent lamps, are not offered under its LIEE program.

#### 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 SoCalGas full flexibility to return to homes that have been treated in the past and to provide the customers with cost effective measures that were either not available at the time the home was treated, or were not offered due to a condition that has now changed. SoCalGas currently utilizes a state-of-the-art workflow automation tool to avoid duplicative installations, and SoCalGas intends to do so in the future.

#### 4. ME&O

SoCalGas' 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. SoCalGas has found that the best way to reach potential LIEE-eligible customers is through a focused approach, utilizing methods expected to encourage customers to respond positively, with materials that address customer's unique needs and characteristics. SoCalGas will continue to use and expand outreach methods that have proven successful, in order to ensure that all customers are aware of the LIEE program and provided the opportunity to participate. The following describes current ME&O activities that will be continued for the PY 2009 – 2011:

<sup>&</sup>lt;sup>33</sup> AB 1109 - The California Lighting Efficiency and Toxics Reduction Act, Chapter 534. Approved by Governor Schwarzenegger on October 12, 2007. Filed with the Secretary of State October 12, 2007.

- 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.
- Cross-Promotion The LIEE program is promoted along with CARE and other SoCalGas assistance programs, such as Medical Baseline.<sup>34</sup> SoCalGas also provides customers enrolled in other assistance programs with information on LIEE. Another method of cross-promotion that SoCalGas will employ will be through co-branding with other utility low income programs.
- Email Blasts Email blasts are emails that are sent to mass distribution lists. As more low-income customers utilize email, and SoCalGas receives their email addresses, this method will be expanded as it has been effective at a very low cost.
- Canvassing SoCalGas intends to continue the use of door-to-door canvassing campaigns to enroll potential LIEE customers through face-to-face contact. When customers are not available, promotional program materials will be left.
- 5. Advertising SoCalGas will consider expanding its use of print and radio promotions, focusing on in-language media for various customer segments.
- Community Events SoCalGas will continue to participate in community events where there is the potential to reach eligible low-income customers. Many of these events are coordinated with local agencies and/or governments.
- 7. Coordination with Local Agencies SoCalGas 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 the agencies to enroll their clients into the LIEE program. SoCalGas' coordination of LIEE program promotion with its Medical Baseline program involves coordination with agencies that serve persons with disabilities. SoCalGas' work with agencies that serve senior customers also is helpful, as there is often overlap between seniors and those with disabilities. SoCalGas plans to continue this coordination effort in PY 2009 2011.
- 8. SoCalGas Customer Contact SoCalGas' customer service representatives and other customer contact personnel inform customers about SoCalGas' assistance programs,

<sup>&</sup>lt;sup>34</sup> 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.

including LIEE. Information on these programs is also included on SoCalGas' website. SoCalGas will continue to utilize this resource in PY 2009 - 2011.

 Brochures – SoCalGas has several program informational materials that are distributed through the various outreach methods. Brochures are provided in multiple languages, including English, Spanish, Korean, Chinese and Vietnamese.

The following describes ME&O activities not currently performed by SoCalGas, but are planned to be implemented for the PY 2009 - 2011 LIEE program:

1. Telemarketing - SoCalGas will utilize telemarketing services to contact potentially eligible customers. Telemarketing will be done in conjunction with other communication methods such as Direct Mailers and Bill Inserts.

2. On-Line Request Form– Customers visiting the SoCalGas website will have the opportunity to complete an online request form that will be electronically transmitted to LIEE program personnel. Customers will then receive a call back from a program representative that will explain the program and start the enrollment process for eligible customers.

SoCalGas will continue to evaluate outreach and marketing efforts to determine the best ways to overcome barriers to customer participation in LIEE and other assistance programs. For example, SoCalGas 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. SoCalGas 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 programs in an integrated and coordinated fashion, as set forth herein."<sup>35</sup> 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.

<sup>&</sup>lt;sup>35</sup> D.07-10-032, Conclusions of Law 13, 14, and Ordering Paragraph 8.

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.<sup>36</sup> 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 consensus, and in an effort to maximize the exposure that the LIEE program would receive through an integrated statewide marketing campaign, SoCalGas 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, SoCalGas is willing to coordinate with the other IOUs to develop a statewide program name, tagline or program description.

#### b. ME&O by population/segments

SoCalGas will continue to target its marketing and outreach strategies to customer segments, taking into account their level of energy usage and certain characteristics as described in SoCalGas' segmentation strategies. SoCalGas 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, SoCalGas provides program materials in several languages, for customers whose primary language is not English.

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

SoCalGas 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, SoCalGas plans to contact and collaborate with the public housing authorities to ensure they have an understanding of the program and program collateral.

<sup>&</sup>lt;sup>36</sup> 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."

A large segment of SoCalGas' LIEE customers are renters, and SoCalGas 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. SoCalGas reported at that workshop that 49% of those households treated between 2004 and 2006 were owner occupied, while 51% were occupied by renters. SoCalGas expects this ratio to continue through 2009 through 2011. Additionally, in Finding of Fact 23 of 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, SoCalGas does not believe that more efforts are needed to increase its marketing efforts specifically to renters.

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

SoCalGas currently utilizes two approaches to training those working in SoCalGas' LIEE program. The first approach utilizes the training personnel at SoCalGas to provide training to outreach personnel employed directly by CBOs and contractors. The second approach requires SoCalGas to work with installation contractors to ensure that personnel 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. 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, SoCalGas will continue to encourage contractors and CBOs to hire and train from the local low income communities.

To expand its WE&T efforts, SoCalGas 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 more than 75 "One-Stop Career

Centers" located within SoCalGas service territory, 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, SoCalGas plans to initiate discussions with the California Employment Training Panel ("ETP"), which provides funding to California businesses to support customized worker training, and to assess the potential for collaboration.

SoCalGas is exploring the option of participating in the LA Trade Tech College Utilities and Construction Prep Program—a program which creates an industry driven pathway providing adults the full range of skills and competencies needed to secure entry level jobs and enter apprenticeships or other continuing education programs with public and private utilities, unions, and construction trades employers. Specifically, SoCalGas plans to send LIEE representatives to give presentations to the students on the LIEE program and describe potential employment opportunities.

#### 5. Integration with Energy Efficiency

Because it is important for LIEE customers to be aware of all energy savings opportunities, SoCalGas 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 the Mobile/Manufactured Home Innovative Outreach and Measure Program, where low-income customers residing in mobile/manufactured homes will be provided the opportunity to enroll in LIEE and other assistance programs. 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. SoCalGas' goal is to ensure that customers are aware of the portfolio of energy savings programs and services that are available to them and 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.

SoCalGas will coordinate its LIEE program with SDG&E's LIEE program in their overlapping service territory in South Orange County. In Section B.2, I discuss SoCalGas' planned co-branding activities with other IOUs to increase customer awareness about the LIEE programs and services available. In Section B.2, I also discuss SoCalGas' development of joint

forms with SCE. This will streamline the enrollment process for both the customer and LIEE program personnel.

SoCalGas plans 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 general energy efficiency programs and other utility efforts, including field operations (gas energy technicians and collectors), CARE, and other assistance programs. For example, SoCalGas' field operations personnel will refer a potentially eligible customer to LIEE program staff or will inform LIEE program staff of a potentially eligible customer. SoCalGas will continue to leverage all areas, where feasible, in the promotion of CARE and LIEE and in identifying eligible customers for enrollment in both programs.<sup>37</sup>

#### b. Coordination with other programs and entities

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

- LIHEAP<sup>38</sup> There are several potential opportunities for SoCalGas to work with local LIHEAP agencies for better coordination with the LIEE program, which include:
  - Implement 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.
  - Track customer referral in the program database and measures installed by LIEE or LIHEAP.
  - Provide LIHEAP contractors serving the SoCalGas service territory access to SoCalGas' LIEE database to enable them to pre-screen their clients to see if they have received LIEE services from SoCalGas along with a list of the measures installed.
- Imperial Irrigation District In an effort to establish leveraging opportunities with non-IOUs within its service territory, SoCalGas is currently in the final stages of securing a strategic partnership with Imperial Irrigation District ("IID") to provide customers in the

<sup>&</sup>lt;sup>37</sup> Other programs may include, Medical Baseline, Gas Assistance Fund ("GAF")

<sup>&</sup>lt;sup>38</sup> 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.

overlapping service territories those measures offered by each utility. By leveraging resources, both SoCalGas and IID will provide their customers with co-branded program collateral and a turn-key solution to receive no cost energy saving home improvements. Once the work is completed SoCalGas will invoice IID for all appropriate fees and measures. This partnership will also help SoCalGas enroll customers in the LIEE program who reside in hard to reach areas.

• Metropolitan Water District - As stated in Section C, SoCalGas and the Metropolitan Water District have been collaborating to develop a strategic partnership to leverage program funds for the direct installation of high-efficiency clothes washers. Many MWD member agencies have individual rebate budgets for high-efficiency clothes washers and SoCalGas and MWD plan to jointly approach these agencies to discuss the potential of leveraging funds.

This partnership not only provides the LIEE program and customer with energy savings but also complies with D.06-12-038 which states, "[t]he utilities should begin work on proposals for low income energy efficiency programs that promote water conservation for the Commission's future consideration".<sup>39</sup>

- Los Angeles Department of Water and Power SoCalGas and the Los Angeles
   Department of Water and Power ("LADWP") are currently working together to identify
   opportunities to leverage one another's low-income energy efficiency programs.
   Currently, LADWP offers replacement of old, inefficient refrigerators with new energy
   saving models to low income customers. SoCalGas intends to enter into an agreement
   with LADWP which will enable both utilities to cross promote each others programs.
- Cities and Local Communities SoCalGas plans ongoing coordination with local agencies, city governments and businesses to promote and deliver the LIEE program.
   Such coordination includes working with city and county officials, agencies, and local businesses to provide program information and collateral for distribution. SoCalGas will continue to partner with various cities in its service territory by working with their representatives, local politicians, state elected officials and various community organizations to conduct targeted neighborhood events.<sup>40</sup> These events include customers

<sup>&</sup>lt;sup>39</sup> D.06-12-038 Conclusions of Law 6.

<sup>&</sup>lt;sup>40</sup> Some examples include: Boyle Heights and City of Ontario

having their homes weatherized through the LIEE program, enrolling in other SoCalGas programs, and also receiving other types of non-utility funded services. Media involvement in these events will increase LIEE program brand awareness and will likely generate a significant number of customer leads.

- Water agencies SoCalGas 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-** SoCalGas plans to expand its efforts to work with various CBOs to broaden LIEE participation and involve the CBOs in the LIEE referral process.
- Other Agencies SoCalGas LIEE program information is available on California's vast health & human services referral network, including participating 211 counties<sup>41</sup>, the Tulare, King & Imperial county systems and LA City's 311 program. These agencies serve SoCalGas' service territory and provide customers easy access to Company programs and services.

# c. Coordination with California Solar Initiative ("CSI") – Low Income Program

SoCalGas intends to support the administrators of the Commission's low income singlefamily solar programs in making the programs a viable resource for electric load reduction and environmentally sound energy source for low income housing. D. 07-11-045 requires the installation of LIEE program measures on homes qualified for solar photovoltaic systems prior to those systems being installed to ensure maximum load reduction is achieved and SoCalGas supports this requirement. 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.

#### 7. Pilots

SoCalGas proposes to implement the following pilot in PY 2009 – 2011:

SoCalGas proposes to offer a natural gas high-efficiency forced air unit ("FAU") furnace pilot to customers with high space heating needs during the winter season. The pilot will replace

<sup>&</sup>lt;sup>41</sup> Counties include: Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Ventura, San Luis Obispo, Kern and Fresno.

existing, inefficient operational natural gas FAU furnaces with high-efficiency units that have an efficiency rating of at least 92%.

Natural gas high-efficiency FAU furnaces were installed as part of the Winter Initiative and the majority of the installations did not produce significant energy savings. The replacement criteria used during the Winter Initiative was based on the energy efficiency rating of the existing FAU instead of completing an upfront customized energy audit to identify customers with high space heating needs.

The pilot will be implemented for approximately 250 customers and the installations will occur after the 2008-2009 winter season. SoCalGas will use bill analysis to determine the cost effectiveness for each installation and the results will be evaluated to determine if this potential measure will be offered in upcoming program years to customers with high space heating needs.<sup>42</sup>

#### 8. Studies

SoCalGas proposes that its LIEE program be evaluated through the following three statewide studies to be conducted during PY 2009-2011:

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

Each of these is discussed below.

#### **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 likely utilize customer surveys, focus groups, and ride-alongs with program contractors in addition to secondary data sources to provide a comprehensive assessment.

<sup>&</sup>lt;sup>42</sup> See Attachment A-10.1.

#### **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 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.

Historically, impact evaluations have been conducted every two years, and the most recent study was completed for the 2005 Program. West Hill Energy & Computing Inc., the study consultant, recommended that the joint utilities forgo a PY2007 load impact study and conduct a study on the PY 2008 because the PY2005 evaluation had just been completed. As such, the joint utilities in each of their respective applications, are requesting approval to defer and conduct the next impact evaluation on the 2008 program. D.06-12-038 authorized funding to conduct the PY 2007 load impact evaluation. SoCalGas proposes to carryover these unspent funds to the PY 2009-2011 cycle. Therefore, SoCalGas is not requesting any additional funds to conduct the PY 2008 load impact evaluation. Assuming the two-year study cycle remains in place,<sup>43</sup> the next study would be conducted on the 2010 program, for which SoCalGas is requesting approval of a pro rata share of the total projected study cost.

#### **NEBs Study**

The role of NEBs as currently used in the methodology for LIEE cost-effectiveness needs to be reexamined. 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. In addition, the original theories used to determine whether or not NEBs and which NEB should be included in the cost-effective calculations remain controversial and need to be re-examined.

The large IOUs are proposing a NEBs study that could be used to update the 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

<sup>&</sup>lt;sup>43</sup> Established in D.02-12-019.

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.

If it is determined that NEBs should continue to be included in the LIEE program and measure cost-effectiveness calculations there are two possible paths that could be taken:

- Attempt to measure NEBs in detail as currently used in the Low Income Public Purpose Test ("LIPPT") model. This would require an extensive study focused on examining NEBs nationwide, determining which values should stay and which should be eliminated; then determining new values for the NEBs being retained; or
- 2) Develop a factor (e.g. 25%) which would be used to inflate the energy benefits of the LIEE program to account for the NEBs. This factor could be developed through a lower cost study and would still give a boost to the cost benefit ratios to account for variables not represented by the energy benefits.

It could be that the most appropriate path would be to examine NEBs in detail once every 3 to 5 years. Then in the interim years develop a factor based on those values that would be used to inflate the energy benefits to account for NEBs.

SoCalGas is very interested in assuring that all appropriate benefits are accrued to the LIEE programs. It is apparent that the current cost effectiveness methodology with regard to NEBs needs revision. SoCalGas encourages the Commission to grant funding for an evaluation to ensure that NEBs are handled properly in the cost-effectiveness calculations for LIEE programs.

#### F. BUDGET

#### 1. Budget Discussion

SoCalGas' proposed PY 2009-2011 LIEE program budgets, on an annual basis, are \$53.599 million for PY 2009, \$65.849 million for PY 2010, and \$67.184 million for PY 2011. SoCalGas proposes to partially fund the 2009 budget requirements of \$53.599 million by using \$13.0 million in unspent LIEE program funds from previous years. For ratemaking purposes, SoCalGas is only seeking recovery of the net amount of \$40.599 million. As compared to the authorized 2008 funding level of \$33.21 million, the proposed budgets represent a significant increase on an annual basis. Attachment A-1 disaggregates the proposed budgets by major expense categories.

#### 2. Tracking Program Costs

SoCalGas 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. SoCalGas proposes to maintain monthly and annual reporting according to the approved LIEE reporting categories in PY 2009, PY 2010, and PY 2011. SoCalGas believes this will permit comparable cost/benefit analysis of each program element across the utilities.

#### **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, SoCalGas 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, SoCalGas 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, SoCalGas requests that the fund shifting restrictions adopted for the 2007 – 2008 program cycle be removed to allow SoCalGas more flexibility to make program adjustments and modifications expeditiously and eliminate potential delays.

If the Commission should be delayed in issuing a decision on SoCalGas' 2009-2011 low income programs budget application, SoCalGas 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

SoCalGas' LIEE program costs are recovered from the residential customer class. SoCalGas has not proposed any changes to the revenue allocation methodology in this proceeding.<sup>44</sup> The LIEE program rates are calculated by multiplying the program cost by the allocation factor and dividing by the applicable billing determinants. SoCalGas used the LIEE program costs provided in the direct testimony of Witness, Lucas to develop the rates. Per Dxx, the applicable billing determinant is the three-year average gas billed volumes, adjusted to exclude constitutionally exempt customer throughput and to include interstate pipeline volumes, if appropriate.<sup>45</sup>

#### 2. Rate Impacts

SoCalGas 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.

The LIEE present and proposed rates submitted by SoCalGas are shown in Attachment A-1. SoCalGas 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 2009-2011.

#### H. COMPETITIVE BID

SoCalGas does not plan to conduct a competitive bid process of its LIEE program administration for the PY 2009-2011 planning cycle.

#### I. CONCLUSION

SoCalGas requests that the Commission authorize the program plans and budgets proposed in this Application for SoCalGas' LIEE program for PY 2009-2011.

<sup>&</sup>lt;sup>44</sup> SoCalGas has filed a joint application (A. 07-12-006) with PG&E and SDG&E 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.

<sup>&</sup>lt;sup>45</sup> In D.04-08-010, 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.

## III.CARE PROGRAM PLAN AND BUDGETS APPLICATION FOR PY 2009-2011A.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, SoCalGas proposes modifications to its CARE program plans, enrollment efforts, and recertification processes to supports the Commission's goal.

SoCalGas' 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 community based organizations ("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. SoCalGas' proposed methods for program enrollment and processing efficiencies, combined with its coordination with local organizations, and expanded outreach strategies will allow SoCalGas to reach its enrollment goals of 31,000 in PY 2009, 25,000 in PY 2010 and, 21,000 in PY 2011 with minimal impact to SoCalGas' 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.<sup>46</sup> The CARE program since its inception in 1989 has evolved and expanded through the years.

The Commission has issued numerous decision and directives which continue to be applicable to the program administered today and the 2009 - 2011 proposed program. The following provides a brief synopsis of the many decisions the Commission has issued regarding the CARE program:

• D.92-12-039 expanded the program to include eligibility for qualified customers living in non-profit group living facilities.

<sup>&</sup>lt;sup>46</sup> 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.

- 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 SoCalGas to implement a temporary process to enroll certain prospective CARE-qualified households by telephone from November 1, 2005 through April 30, 2006.<sup>47</sup>
- D. 06-12-038 adopted the IOUs' CARE program plans and budgets for PY 2007 2008. The decision also authorized the following for SoCalGas: 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 allow customers to recertify their CARE eligibility by its Interactive Voice Recognition ("IVR") system, and 5) internet- based CARE enrollment and recertification.

<sup>&</sup>lt;sup>47</sup> SoCalGas' 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 SoCalGas' direct mail campaign that was directed towards households located in geographic areas where a high percentage of income-qualified customers reside.

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

#### 1. Program Goals

As of March 2008, 1,348,714 million customers were enrolled in SoCalGas' CARE program. SoCalGas projects that participation will continue to increase to 1,364,235 million customers by year-end 2008, which will bring its CARE penetration rate to 79.6%. Consistent with the Commission's goal to enroll all CARE-eligible customers who wish to participate in the program, SoCalGas proposes several initiatives in PY 2009 - PY 2011 to not only encourage CARE enrollment, but also retain eligible customers in the program.

Specifically, SoCalGas' 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 SoCalGas to reach its enrollment goals with minimal impact to SoCalGas' budget. SoCalGas' enrollment goal for PY 2009-2011 is to add approximately 31,000 new CARE customers in PY 2009, 25,000 in PY 2010, and 21,000 in PY 2011. With the projected net enrollment increases, the forecasted CARE penetration rates are 81% in PY 2009, 82% in PY 2010, and 83% in PY 2011, based on the estimated total CARE eligible customers in 2008.<sup>48</sup> SoCalGas has established these 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, SoCalGas proposes an annual administrative budget of \$6.3 million for PY 2009, \$6.4 million for PY 2010, and \$6.51 million

<sup>&</sup>lt;sup>48</sup> 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.

for PY 2011.<sup>49</sup> The proposed PY 2009 budget reflects an increase of approximately \$1.57 million over the PY 2008 budget of \$4.71 million authorized in D. 07-06-004.<sup>50</sup> 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.<sup>51</sup> 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.<sup>52</sup>

#### 1. Processing/Certification/Verification

SoCalGas' 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, SoCalGas proposes funding of \$1,173,000, \$1,239,000 and \$1,249,000 for PY 2009, PY 2010, and PY 2011, respectively. This request represents an increase from the 2008 authorized budget of \$873,049. With the advent of more customer-friendly and customer-convenient ways of enrolling, recertifying, and processing customers, SoCalGas expects increases in CARE application process time and customer inquiries. The additional funding is needed to hire more personnel to hasten CARE application processing time and call handling. Moreover, because SoCalGas proposes to expand its Third Party Outreach program in PY 2009–2011, the costs for maintaining and tracking records for proper payment to the Capitation and Third Party Outreach agencies will increase.

<sup>&</sup>lt;sup>49</sup> See Attachment B-1.

<sup>&</sup>lt;sup>50</sup> In D. 07-06-044, issued June 7, 2007, the Commission corrected the authorized budget tables of D. 06-12-038 to reflect the SoCalGas' correct CARE authorized budget.

<sup>&</sup>lt;sup>51</sup> Consistent with the D. 05-04-052, SoCalGas worked with the other IOUs to ensure uniformity of how costs are categorized.

<sup>&</sup>lt;sup>52</sup> On April 4, 2008, Energy Division issued the Guidance Document for CARE Budget Applications for Program Years 2009, 2010, and 2011.

In order to further the Commission's goal to enroll all willing and eligible CARE customers, SoCalGas is also proposing modifications to its Processing/Certification/Verification procedures, to further encourage customer enrollment and customer retention. The proposed modifications are described in detail below.

#### **Continuation of Recertification Probability Model** я.

In D.06-12-038, SoCalGas 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, approximately 298,000 or 52% of the CARE customers who passed the CARE probability model had their CARE eligibility automatically extended for an additional two years. SoCalGas believes that the model is accurately targeting customers and is a useful tool for reducing attrition of potentially eligible CARE customers. For these reasons, SoCalGas requests authorization to continue using of the probability model for recertification on an ongoing basis.

#### **Recertification for Sub-metered Customers** b.

Currently, sub-metered CARE tenants are required to recertify their eligibility annually. SoCalGas requests Commission authorization to make the CARE program requirements for submetered tenants in master-metered facilities consistent with the requirements for individuallymetered residential customers, i.e., two years or four years. SoCalGas' proposal will permit submetered tenants to recertify their CARE eligibility every two years, except those CARE tenants who are on a fixed income,<sup>53</sup> will be required to recertify every four years. This modification to the CARE program is proposed to increase the likelihood that potentially eligible sub-metered tenants remain in the program. Moreover, SoCalGas' proposal furthers the State Legislature's mandate that all utilities provide tenants of sub metered facilities the same CARE enrollment opportunities as individual residential customers.54

<sup>&</sup>lt;sup>53</sup> 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. <sup>54</sup> See AB 2104.

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

SoCalGas also seeks Commission authorization to change the CARE Expansion Program's<sup>55</sup> 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. 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. Thus, a two-year period recertification period would facilitate SoCalGas' efforts to retain these eligible CARE customers, some of whom might not otherwise recertify.

#### d. CARE telephone enrollment

SoCalGas proposes to expand its current recertification IVR to a full-service CARE IVR that will allow customers to apply for the CARE program, recertify their eligibility, check CARE status, and have an option to speak with a CARE representative. At present, SoCalGas Customer Service Representatives ("CSR") in the Customer Contact Center ("CCC") inform customers about the CARE program when customers either initiate or transfer service, and when customers request bill payment arrangements or extensions. Customers who are interested in the program are mailed a CARE application with pre-printed account information from SoCalGas' Customer Information System ("CIS"). However, many such customers ultimately do not apply or return the CARE application. To ensure customers actually review and apply for the CARE program, SoCalGas proposes to offer customers the option of transferring to SoCalGas' CARE IVR system when the customers indicate they may qualify for the program.

#### 2. Information Technology/Programming

SoCalGas' Billing System/Programming cost category includes IT costs to maintain CARE functions in SoCalGas' billing system, enrollment and reporting system, telephone IVR system, to fund data exchanges with other assistance programs, and to implement system enhancements to comply with regulatory mandates and improve operational efficiencies. Total projected IT/Programming costs are \$489,000 for PY 2009, \$506,000 for PY 2010, and \$523,000 for PY 2011, which reflects a \$109,851 increase in this cost category, compared to the PY 2008 authorized budget of \$ 379,600. The increases in this cost category are needed to fund the new

<sup>&</sup>lt;sup>55</sup> 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.

program requirements for sub-metered CARE tenants,<sup>56</sup> CARE IVR Enrollment, streamlined enrollment processes and enhancements to improve processing efficiencies.

#### 3. Pilots

SoCalGas does not propose any pilots for its CARE program for PY 2009-2011.

#### 4. Measurement and Evaluation

SoCalGas is not proposing any new M&E studies for the CARE program during PY 2009–2011. The only M&E study budgeted for PY 2009-2011, in the M&E budget category, is the annual IOUs' CARE program eligibility update.<sup>57</sup> SoCalGas developed the cost for the CARE eligibility update for PY 2009-2011, based on the actual study cost of \$15,099 in 2007, and added an upward trend in inflation.<sup>58</sup> Planned costs for PY 2009-2011 are \$16,237, \$16,707 and \$17,192 respectively.

#### 5. Regulatory Compliance

SoCalGas' regulatory compliance costs for PY 2009-2011 are expected to be consistent with the authorized PY 2008 budget, after adjustments are made for the assumed inflation factor of 3.4%, and are estimated at \$222,000 for PY 2009, \$230,000 for PY 2010, and \$237,000 for PY 2011. The funding is needed to facilitate SoCalGas' 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

SoCalGas estimates general administration costs of \$567,000, \$586,000, and \$605,000 for PY 2009, PY 2010, and PY 2011, respectively. These proposed costs compare to the 2008 authorized budget of \$530,000, and are primarily due to an annual inflation assumption of 3.4%. Within this cost category, SoCalGas 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 maintenance, and business reimbursements.

<sup>&</sup>lt;sup>56</sup> As required by AB 2104.

<sup>&</sup>lt;sup>57</sup> SoCalGas, 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 utilities to file annual eligibility updates no later than October 15.

<sup>&</sup>lt;sup>58</sup> Global Insight 4<sup>th</sup> Quarter 2007 utility cost forecast, released March 2008. Assumptions include increase for PY 2009 - 2011 of 3.4%, 2.9% and 2.9% respectively.

SoCalGas program management personnel are responsible for all aspects of the CARE program, including ensuring that SoCalGas is in full compliance with CARE regulations. As SoCalGas' CARE enrollment approaches 80% of the estimated CARE eligible customers, 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 requested 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. SoCalGas has budgeted \$171,500 for PY 2009, \$171,500 for PY 2010 and \$171,500 for PY 2011.

#### E. OUTREACH

SoCalGas' outreach plan for PY 2009 - 2011 builds on the success of its currently effective outreach strategies, as it modifies SoCalGas' 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. SoCalGas will also investigate more convenient methods to help these customers apply for the CARE program. SoCalGas' proposed outreach plan is based on the use of multiple communication channels, designed to effectively segment SoCalGas' low-income customers and communicate the program to those identified as most likely to be eligible.

SoCalGas' proposed outreach efforts for PY 2009-2011 will include the continued use of bill inserts, direct mailing, automated voice messaging ("AVM"), web enrollment, third party door-to-door outreach, the capitation program, grassroots outreach,<sup>59</sup> and mass media. While SoCalGas will continue to market the CARE program to Spanish speakers, Chinese, Korean,

<sup>&</sup>lt;sup>59</sup> 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.

Vietnamese, disabled persons, and seniors, SoCalGas will also 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, SoCalGas must conduct outreach beyond its traditional low-income customer segments in order to reach the remaining nonparticipating but eligible customers. The traditional methods used to reach hard-to-reach customers may no longer be as successful in reaching these customers, and SoCalGas intends to employ new methods to encourage customer enrollment. SoCalGas 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, SoCalGas will continue to employ existing enrollment strategies (e.g., use of H&R Block, internet, canvassing, and new capitation contractors), explore the reasons for attrition, and devise new approaches for enrolling and retaining eligible customers.

SoCalGas is estimating outreach expenditures of \$3,648,000, \$3,755,000, and \$3,786,000 for PY 2009, PY 2010, and PY 2011, respectively, compared to the previously authorized PY 2008 CARE outreach budget of \$2,626,000. As the CARE-eligible customer pool shrinks with increasing program penetration, there is a corresponding increase in the difficulty and associated cost to reach the remaining customers. SoCalGas expects that this funding increase will sufficiently support SoCalGas' outreach strategies and enable the program to meet its objective.

#### 1. Marketing Education and Outreach

#### a. Bill Inserts and CARE bill messages

Bill inserts continue to be an important and cost-effective communication medium to inform approximately 3.5 million non-CARE residential customers in SoCalGas' service territory about the CARE program. Experience indicates that bill inserts are a preferred method for both CARE enrollment and program information. Incorporating CARE messages on customer bill is a practical way to provide large numbers of residential customers with general information, including their enrollment status, about the program.<sup>60</sup> SoCalGas coordinates its bill messages to coincide with other outreach activities such as direct mail, bill inserts and mass media campaigns to provide message reinforcement.

<sup>&</sup>lt;sup>60</sup> For example, on a quarterly basis, non-CARE customers receive a special bilingual CARE message (English/Spanish) promoting the program. On their first discounted bill, new CARE customers receive a bill message informing them that they are enrolled in the CARE program and that their gas bill reflects a 20% CARE discount.

In 2007, over 29,000 customers enrolled in the CARE program through bill inserts. SoCalGas plans to continue using three CARE application bill inserts (bilingual English/Spanish), and one CARE Expansion Program information insert for each program year during 2009-2011. SoCalGas will continue utilizing the various forms of bill messages to promote the CARE program in PY 2009 - 2011. The approximate cost for these CARE bill inserts is \$258,000 for each program year.

#### b. Direct Mailing

For the past three completed program years, SoCalGas has achieved greater than 9% response rates from its direct mailing campaigns, approximately 7% higher than the industry average.<sup>61</sup> SoCalGas conducted ten separate direct mail campaigns in 2007, consisting of approximately one million pieces directed at highly eligible non-participating customers. SoCalGas received more than 90,000 returned applications from low-income customers, resulting in approximately 60,000 new CARE enrollments. In 2007, SoCalGas initiated a direct mailing campaign specifically focused on non-CARE sub-metered tenants, which produced over 5,300 new CARE enrollments and pushed SoCalGas CARE participation in the sub-metered segment to a new high.

SoCalGas 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 campaigns will focus on three separate customer segments including: 1) eligible non-participating customers, 2) customers recently dropped from CARE due to recertification, and 3) customers recently dropped from CARE due to a previously closed account. These campaigns will produce approximately one million pieces of targeted direct mail. SoCalGas will continue to match its direct mail efforts with information provided from their probability 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, and will specifically focus on customers in the English, Hispanic, Asian and submetered customer segments. The approximate cost for the direct mail cost category is around \$700,000 for each program year.

<sup>&</sup>lt;sup>61</sup> 2003 Direct Marketing Association study states 2.55% as the average direct mail response rate.

#### c. Automated Voice Messaging ("AVM")

SoCalGas' use of AVM<sup>62</sup> has proven to be a very cost-effective and efficient method to communicate to CARE-eligible customers. In 2007, over 21,000 customers were enrolled through AVM telephone calls at a cost of less than \$5 per enrollment. SoCalGas 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, SoCalGas plans to contact approximately 700,000 SoCalGas customers annually, regarding the CARE program, using AVM at an estimated cost of \$162,000 for PY2009, and adjusted for inflation at a rate of 2.9% for PY 2010 - 2011.

#### d. Multi-Language Mass Media

SoCalGas proposes to conduct creative mass media campaigns in multiple languages during the winter and fall periods of the CARE program years, and will employ communication media shown to be effective at reaching eligible CARE customers. The purpose for these campaigns will continue to be driven by both the need to increase CARE participation, as well as general program awareness across SoCalGas' large 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, including radio, print, and billboards. Mass media messages will contain specific customer "calls to action" directing customers to check their CARE program eligibility, using one or more of SoCalGas' enrollment options.

#### e. Capitation Contracts

Thirty-four CBOs enrolled over 8,000 CARE customers in 2007. CBOs continue to play an important role in helping SoCalGas reach out to some of its most needy and hardest-to-reach low-income communities. CBOs, such as Community Action agencies, Catholic Charities, Boys & Girls Clubs of America, and the Salvation Army continue to provide vital services to lowincome children and families. Many CBOs serve special community needs for racial and ethnic minorities, seniors, veterans, disabled groups, along with non-English speaking groups like the Hmong, Laotian, and Cambodian communities.

To increase CARE penetration among less recognized community groups, SoCalGas plans to proactively search for new CBOs with established relationships with these unique

<sup>&</sup>lt;sup>62</sup> AVM is an automated voice messaging system used by 3<sup>rd</sup> party vendors on behalf of SoCalGas to call customers and inform them about the CARE program.

customer segments and encourage the CBOs to participate in SoCalGas' Capitation program. The approximate cost for this category is \$50,000 per program year.

#### f. Community Outreach

In 2007, SoCalGas modified its community outreach efforts, in order to improve its CARE program cost-per-enrollment ratio in the SoCalGas service territory. By focusing on various community-based outreach events that target ethnic groups, seniors, and disabled lowincome customers, the SoCalGas CARE program enrolled over 500 customers in 2007. SoCalGas 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 SoCalGas' low-income customers. SoCalGas' approximate cost for the community outreach cost category is \$52,000 per program year.

## g. CARE Outreach Application and Community Outreach Collateral Material

SoCalGas anticipates that it will exhaust its stock of CARE customer assistance program brochures by PY 2010. SoCalGas uses these brochures throughout its service territory as the primary collateral piece used to promote low-income assistance programs at all public and private outreach events. SoCalGas plans to replenish the stock and make changes to the brochure design and copy. Planned revisions include: information on water conservation and greenhouse gas reductions, as well as changes to better support visually and hearing-impaired customers, and more information promoting new or enhanced program enrollment opportunities, e.g. web, interactive voice messaging system, etc. SoCalGas approximates \$50,000 per program year for this cost category.

#### h. Internet Enrollment & Recertification

Based on the favorable internet enrollment results received since the implementation of the internet CARE application in December 2007 – approximately 13,000 applications were received, and 60.8% or about 8,200 customers enrolled. SoCalGas plans on expanding its webbased outreach strategy in the areas of CARE enrollment, recertification, and customer notification.

SoCalGas' web-based outreach plan will have the following emphasis: creating a customer friendly website and enrollment /recertification portal, determining which customer segments are receptive to web-based communication and interaction, developing a CARE

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eligible customer e-mail distribution database, and designing e-mail campaigns and implementation strategies. Funding for these efforts is included in the Information Technology and Programming cost category.

#### i. Special Markets

SoCalGas is committed to serving its special needs customers and ensuring that its programs and service offerings are accessible to them.<sup>63</sup> For example, SoCalGas has program brochures and applications available in multiple languages and large font. SoCalGas has also designed a brochure, *Services for Customers with Disabilities, for customers with* special needs customers in mind. The brochure describes all SoCalGas assistance programs and service offerings such as: CARE, Low-Income Energy Efficiency ("LIEE"), Medical Baseline, LIHEAP, Gas Assistance Fund ("GAF"), free appliance checks, and Braille marking 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, SoCalGas provides TTY/TTD telephone service 24 hours a day, seven days a week for hearing impaired customers. SoCalGas notes the accounts of hearing and vision impaired customers as well as accounts identified as having a senior citizen in the household. These account notations enable SoCalGas to generate a list for direct mailing, and outbound dialing campaigns. SoCalGas uses these strategies to notify special needs customers when GAF are available and when vision impaired customers request notification that it is time for them to recertify for the medical baseline allowance.

SoCalGas website is designed to ensure that visually impaired customers have full access to information on SoCalGas' website. The website, which conforms to the Web Content Accessibility Guidelines of the World Wide Web Consortium, is compatible with assistive technology such as screen readers, and the webpages contain text alternative tags for webpage descriptions. In addition, rather than simply bolding section headings, SoCalGas is exploring ways in which to make its website easier for visually impaired customers to navigate.

SoCalGas' 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 SoCalGas'

<sup>&</sup>lt;sup>63</sup> Examples of "special markets" customers include: 1) non-English speakers, 2) senior shut-ins 3) the disabled, and 4) sub-metered tenants.

service territory. In addition, SoCalGas will advertise CARE and Medical Baseline<sup>64</sup> in local newspapers and medical publications, and participate in local events focusing on persons with disabilities. SoCalGas approximates \$35,000 is needed to fund this cost category for each program year.

#### j. Local Government Partnerships

Currently, SoCalGas works directly and indirectly with several local government entities, including County-based non-profit Community Action Partnerships and city organizations. While working with these and other local government partnerships, SoCalGas plans to integrate CARE program promotions with the general residential Energy Efficiency ("EE") program promotions. SoCalGas plans to continue developing additional relationships with local government organizations to increase customer awareness and enrollment in the CARE, LIEE, and general EE programs.

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

#### k. Data Exchange

SoCalGas' CARE program Data Exchange Agreements ("Agreements") continue to be an excellent low-cost source for program enrollments, and SoCalGas will explore opportunities to expand this strategy. Currently, SoCalGas has Agreements with SCE, PG&E, SDG&E, and LIHEAP, which produced over 65,000 no-cost enrollments in 2007. SoCalGas plans to partner with additional entities for data exchange, such as the municipal utilities located within SoCalGas service areas that have compatible programs and guidelines. SoCalGas management met with Pasadena Water and Power ("PWP"), Imperial Irrigation District ("IID") and the Los Angeles Department of Water and Power ("LADWP") in 2007 to discuss data exchange opportunities, and is currently working with LADWP and IID on such an agreement. Funding for those efforts is included in the Information Technology and Programming cost category.

#### I. School Districts

Throughout PY 2009 - 2011, SoCalGas plans to work with school districts in its service territory to help build customer awareness about the CARE, LIEE, and general programs and other assistance programs, and to provide energy education to younger school children (4<sup>th</sup> and

<sup>&</sup>lt;sup>64</sup> The Medical Baseline program is not funded with CARE funds.

5<sup>th</sup> grade range). 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. These efforts are planned with existing CARE staff with no budget increase requested to implement

#### m. Other Collaborative Efforts

SoCalGas plans to continue developing relationships with a variety of organizations and agencies that focus on special needs and/or lower-income customers, such as the United Long Term Care Workers' Union ("SEIU") and the Centers for Independent Living ("CIL"). During PY 2009 - 2011, SoCalGas will conduct training classes for staff members of these organizations, i.e. train the trainer. Staff members will receive information on SoCalGas' CARE and other assistance programs, given applications and other collateral materials, and be educated on all specifics of program enrollment requirements. Trained staff members will then circulate throughout their organizations, educating and enrolling their eligible members in SoCalGas programs, and will continue this practice to ensure all eligible, interested customers participate.

During PY 2009 - 2011, SoCalGas' low-income program staff plans to work more closely with other SoCalGas employees to leverage outreach opportunities, whenever cost effective and feasible. These efforts are planned with existing CARE staff with no budget increase requested to implement

#### 2. Section 8 Housing

Ordering Paragraph 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, SoCalGas 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, thus have met income requirements.

SoCalGas views categorical enrollment of public housing and Section 8 customers as an interim step to automatic enrollment of these customers. SoCalGas will work with the local

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housing agencies within it 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")<sup>65</sup> 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.<sup>66</sup>

Based on these shared commonalities, there is a potential opportunity for sharing customer information between the Lifeline and CARE programs, which would enable SoCalGas to automatically enroll customers into the CARE program. However, there are differences between the programs, such as the fact that the Lifeline program allows for more than one household<sup>67</sup> within a dwelling unit to enroll in its program, whereas the CARE program only permits one household to enroll in the program. Coordination with the Lifeline program has the potential to further increase SoCalGas' CARE penetration rate; however, the Commission must thoroughly examine the programs in order to align the requirements for each program, so that automatic enrollment is viable.

#### F. REVENUE REQUIREMENTS AND RATE IMPACTS

#### 1. Revenue Requirements

SoCalGas' CARE program costs are currently allocated to the customer class using an equal-cent-per-therm ("ECPT") approach. SoCalGas proposes no change to this revenue allocation methodology in this proceeding. The CARE program rates are calculated by multiplying the program cost by the allocation factor and dividing by the applicable billing determinants. SoCalGas used the CARE program costs provided in the direct testimony of

<sup>&</sup>lt;sup>65</sup> Also known as the Universal Lifeline Telephone Service.

<sup>&</sup>lt;sup>66</sup> 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.

<sup>&</sup>lt;sup>67</sup> 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.

Witness Rudshagen to develop rates for this Application.<sup>68</sup> 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.<sup>69</sup>

#### 2. Rate Impact

SoCalGas 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.

The CARE present and proposed rates submitted by SoCalGas are shown in Attachment C-1. Although rate increases vary by customer class, the percentage increase is the same for all Non-CARE customers. SoCalGas 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.

#### 3. Balancing Account

SoCalGas maintains natural gas balancing account called the California Alternate Rates for Energy Account ("CAREA") which, as currently authorized, provides 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.

Revenues recorded to the CAREA 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.

<sup>&</sup>lt;sup>68</sup> The CARE program subsidy will be updated in the October 31<sup>st</sup> Advice filing, pursuant to Commission established policy in D.04-08-010.

<sup>&</sup>lt;sup>69</sup> See D.04-08-010.

## 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, SoCalGas requests authorization: 1) to carry forward or carry back funding into 2009, 2010, or 2011 during the three-year funding cycle, and 2) authority to shift funds among program categories in 2009, 2010, and 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, SoCalGas has proposed a modification and expansion of its program plans, enrollment efforts, and certification process. Therefore, SoCalGas requests that the fund shifting restrictions adopted for the 2007 – 2008 program cycle be removed to allow SoCalGas flexibility to make program adjustments and modifications expeditiously and eliminate potential delays.

If the Commission should be delayed in issuing a decision on SoCalGas' 2009-2011 low income programs budget application, SoCalGas 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.

#### IV. STATUTORY AND PROCEDURAL REQUIREMENTS

## A. Proposed Category, Issues to Be Considered, Need for Hearings and Proposed Schedule--Rule 6(a)

SoCalGas 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, SoCalGas does not anticipate a need for hearings. In the event hearings do become necessary, SoCalGas 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

SoCalGas 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 Southern California Gas Company. SoCalGas is a public utility corporation organized and existing under the laws of the State of California, with its principal place of business at 555 West 5<sup>th</sup> Street, Los Angeles, California 90012.

#### D. Correspondence - Rule 2.1(b)

Correspondence or communication regarding this Application should be addressed to:

Joy Yamagata Regulatory Manager

Southern California Gas 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 Southern California Gas 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

A copy of SoCalGas' current Articles of Incorporation, as amended and restated, certified by the California Secretary of State, was previously filed with the Commission in connection with Application 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 SoCalGas' Balance Sheet as of December 31, 2007.

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

A statement of presently effective and proposed rates for SoCalGas is set forth in Appendices A and B, respectively. The Applicants' current rates and charges for gas service are contained in their respective gas tariffs and schedules on file with the Commission. These tariffs and schedules are filed with, and made effective by, the Commission in its decision, orders, resolutions, and approvals of advice letter filings made pursuant to Commission General Order 96-A.

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

SoCalGas owns natural gas transmission pipelines, compressor plants, distribution pipelines, services and appurtenant meters, regulators, metering and regulating stations, booster stations, general office buildings, regional and district office buildings, general shops, laboratory buildings, warehouses and other storage facilities, supplies and equipment necessary for the operation of its business. In addition, SoCalGas owns underground gas storage reservoirs at Playa del Rey, Honor Rancho, Aliso Canyon, Goleta and Montebello. SoCalGas' gas distribution system includes, as of December 31, 2004, 2,723 miles of transmission pipelines, 47,307 miles of distribution mains, and 45,954 miles of service lines.

Appendix B to this Application is a statement of SoCalGas' 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 SoCalGas for the 3 months ended December 31, 2007.

#### J. Depreciation – Rule 3.2(a)(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, SoCalGas 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, SoCalGas has computed its tax depreciation using the Accelerated Cost Recovery System. For years after 1986, SoCalGas has computed its tax depreciation using the effects of the depreciation differences in accordance with the Economic Recovery Tax Act of 1981 and the Tax Reform Act of 1986.

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#### K. Proxy Statement – Rule 3.2(a)(8)

A copy of SoCalGas' most recent proxy statement, dated April 4, 2008, was mailed to the Commission on April 29, 2008.

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

The changes that SoCalGas seeks in this Application reflect estimated costs to SoCalGas, and passes through to customers only costs that SoCalGas incurs for the services and commodities that it furnishes.

#### M. Service and Notice – Rule 3.2(b)

SoCalGas is serving this Application on all parties to R.07-01-042. Within ten days of filing this application, SoCalGas will mail notice of this Application to the State of California and to cities and counties that SoCalGas serves and SoCalGas 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, SoCalGas 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, SoCalGas respectfully asks the Commission to:

- 1) Consider this Application and grant all the relief requested herein.
- Find that SoCalGas' proposals are in conformance with Commission directives and policies.
- Approve SoCalGas' low-income assistance program plans, measures, pilots, and budgets for PY 2009-2011
- Approve SoCalGas' request to be fund shift between CARE administrative categories.
- 5) Approve SoCalGas' request to be fund shift between LIEE administrative categories.
- 6) Authorize SoCalGas to record all PY 2009-2011 program costs in appropriate balancing accounts.
- Grant such other and further relief which the Commission finds to be just and reasonable.

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- 8) Approve SoCalGas' 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 SoCalGas' rate increase.
- SoCalGas requests that the LIEE fund shifting restrictions adopted for the 2007
   2008 program cycle be removed to allow SoCalGas more flexibility to make program adjustments and modifications expeditiously and eliminate potential delays.
- 11) If the Commission should be delayed in issuing a decision on SoCalGas' 2009-2011 low income programs budget application, SoCalGas requests:
  - 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.
- 12) Approve the Impact Evaluation proposal.
- 13) Approve SoCalGas' proposal to use \$13.0 million in unspent funds to partially

offset the increase in the requested expenditures.

Respectfully submitted this 15th day of May 2008

By: /s/ Hal Snyder Hal Snyder Vice President - Customer Programs Southern California Gas Company

/s/ Kim F. Hassan

Kim F. Hassan Attorney for: SOUTHERN CALIFORNIA GAS COMPANY

May 15, 2008

#### VERIFICATION

I am an officer of Southern California Gas 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 Southern California Gas Company

# Appendix A

#### SOUTHERN CALIFORNIA GAS COMPANY FINANCIAL STATEMENT DECEMBER 31, 2007

(a)	Amounts and Kinds of Stock Authorized:				
	Preferred Stock		160,000	shares	Par Value \$4,000,000
	Preferred Stock		840,000	shares	Par Value \$21,000,000
	Preferred Stock		5,000,000	shares	Without Par Value
	Preference Stock		5,000,000	shares	Without Par Value
	Common Stock		100,000,000	shares	Without Par Value
	Amounts and Kinds of Stock Outstanding: PREFERRED STOCK				
		6.0%	79,011	shares	\$ 1,975,275
		6.0%	783,032	shares	\$ 19,575,800
	COMMON STOCK		91,300,000	shares	\$ 834,888,907

(b) Terms of Preferred Stock:

Full information as to this item is given in connection with Application Nos. 96-09-036 and 06-07-012, to which references are hereby made.

(c) Brief Description of Mortgage:

Full information as to this item is given in Application Nos. 03-07-008 and 06-07-012 to which references are hereby made.

(d) Number and Amount of Bonds Authorized and Issued:

-,		Nominal	Par	/alue	
		Date of	Authorized		Interest Paid
	First Mortgage Bonds:	Issue	and Issued	Outstanding	in 2007
	4.80% Series GG, due 2012	10-02-02	250,000,000	250,000,000	12,000,000
	5.45% Series HH, due 2018	10-14-03	250,000,000	250,000,000	13,625,000
	Var % Series II, due 2011	12-15-03	250,000,000	250,000,000	10,937,500
	Var% Series JJ, due 2009	12-10-04	100,000,000	100,000,000	5,664,762
	5.75% Series KK, due 2035	11-18-05	250,000,000	250,000,000	14,375,000
	Other Long-Term Debt				
	4.750% SFr. Foreign Interest Payment Securities	05-14-06	7,877,038	7,475,533	355,091
	5.67% Medium-Term Note, due 2028	01-15-98	5,000,000	5,000,000	283,500

#### SOUTHERN CALIFORNIA GAS COMPANY FINANCIAL STATEMENT DECEMBER 31, 2007

	Date of	Date of	Interest		Interest Paid
Other Indebtedness:	<u>Issue</u>	<u>Maturity</u>	<u>Rate</u>	<u>Outstanding</u>	<u>in 2007</u>
Commercial Paper & ST Bank Loans	11/01/04	08/05/10	Various	0	\$0

#### Amounts and Rates of Dividends Declared:

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

	Shares		D	Dividends Declared		
Preferred Stock	Outstanding @ 12-31-07	2003	2004	2005	2006	2007
6.0% 6.0%	79,011 783,032	\$118,516 1,174,548	\$118,516 1,174,548	\$118,516 1,174,548	\$118,516 1,174,548	\$118,516 1,174,548
	862,043	\$1,293,064	\$1,293,064	\$1,293,064	\$1,293,064	\$1,293,064
<u>Common Stock</u> Amount		\$200,000,000	\$200,000,000	\$200,000,000	\$150,000,000	\$250,000,000 [1]

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] Southern California Gas Company dividend to parent company, Sempra Energy.

#### SOUTHERN CALIFORNIA GAS COMPANY BALANCE SHEET ASSETS AND OTHER DEBITS DECEMBER 31, 2007

	1. UTILITY PLANT	2007
101	UTILITY PLANT IN SERVICE	\$8,089,647,314
102	UTILITY PLANT PURCHASED OR SOLD	-
105 106	PLANT HELD FOR FUTURE USE COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	- 180,008,877
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(3,391,629,042)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(16,288,136)
117	GAS STORED-UNDERGROUND	55,521,950
	TOTAL NET UTILITY PLANT	4,917,260,963
	2. OTHER PROPERTY AND INVESTMENTS	
121	NONUTILITY PROPERTY	120,468,312
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF NONUTILITY PROPERTY	(95,696,986)
123	INVESTMENTS IN SUBSIDIARY COMPANIES	(90,090,900) -
124	OTHER INVESTMENTS	70,535
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	62,994,051
	TOTAL OTHER PROPERTY AND INVESTMENTS	87,835,912

#### SOUTHERN CALIFORNIA GAS COMPANY BALANCE SHEET ASSETS AND OTHER DEBITS DECEMBER 31, 2007

#### 3. CURRENT AND ACCRUED ASSETS

131       CASH       30,238,491         132       INTEREST SPECIAL DEPOSITS       -         134       OTHER SPECIAL DEPOSITS       -         135       WORKING FUNDS       97,820         136       TEMPORARY CASH INVESTMENTS       28,600,000         141       NOTES RECEIVABLE       9,739         142       CUSTOMER ACCOUNTS RECEIVABLE       679,908,534         137       NOTES RECEIVABLE       8,388,326         138       ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS       (4,797,837)         143       OTHER ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES       146,189,553         144       ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES       142,917         151       FUEL STOCK       -         152       FUEL STOCK EXPENSE UNDISTRIBUTED       -         154       PLANT MATERIALS AND OPERATING SUPPLIES       20,157,107         155       MERCHANDISE       66,827         164       GAS STORED       -         173       ACCRUED UTILITY REVENUES       -         185       PREPAYMENTS       225,203,306         197       ACCRUED UTILITY REVENUES       -         101       INTEREST AND DIVIDENDS RECEIVABLE       217,616,792         11<		_	2007
134OTHER SPECIAL DEPOSITS-135WORKING FUNDS97,820136TEMPORARY CASH INVESTMENTS28,600,000141NOTES RECEIVABLE9,739142CUSTOMER ACCOUNTS RECEIVABLE679,908,534143OTHER ACCOUNTS RECEIVABLE8,388,326144ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS(4,797,837)145NOTES RECEIVABLE FROM ASSOCIATED COMPANIES136,189,553146ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES442,917147FUEL STOCK-158FUEL STOCK EXPENSE UNDISTRIBUTED-159PLANT MATERIALS AND OPERATING SUPPLIES20,157,107150MERCHANDISE66,827151FUEL STOCK EXPENSE UNDISTRIBUTED-152FUEL STOCK EXPENSE UNDISTRIBUTED-154PLANT MATERIALS AND SUPPLIES20,157,107155MERCHANDISE80,238,148156PREPAYMENTS25,203,306171INTEREST AND DIVIDENDS RECEIVABLE271,987173ACCRUED UTILITY REVENUES-174MISCELLANEOUS CURRENT AND ACCRUED ASSETS12,195,246175DERIVATIVE INSTRUMENT ASSETS1,029,670,338181UNAMORTIZED DEBT EXPENSE5,184,101182UNAMORTIZED DEBT EXPENSE5,184,101182UNAMORTIZED DEBT EXPENSE1,418,972183PRELIMINARY SURVEY & INVESTIGATION CHARGES1,418,972184CLEARING ACCOUNTS-185PRELIANEARY FACLILITES-			30,238,491 -
136         TEMPORARY CASH INVESTMENTS         28,600,000           141         NOTES RECEIVABLE         9,739           142         CUSTOMER ACCOUNTS RECEIVABLE         679,908,534           143         OTHER ACCOUNTS RECEIVABLE         8,388,326           144         ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS         (4,797,837)           145         NOTES RECEIVABLE FROM ASSOCIATED COMPANIES         136,189,553           146         ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES         142,917           151         FUEL STOCK         -           152         FUEL STOCK EXPENSE UNDISTRIBUTED         -           154         PLANT MATERIALS AND OPERATING SUPPLIES         20,157,107           155         MERCHANDISE         66,827           166         OTHER MATERIALS AND SUPPLIES         -           175         MERCHANDISE         66,827           166         OTHER MATERIALS AND SUPPLIES         -           167         OTHER MATERIALS AND SUPPLIES         -           168         STORES EXPENSE UNDISTRIBUTED         -           164         GAS STORED         80,238,148           165         PREPAYMENTS         25,203,306           171         INTEREST AND DIVIDENDS RECEIVABLE         271,98	134	OTHER SPECIAL DEPOSITS	- 97 820
142       CUSTOMER ACCOUNTS RECEIVABLE       679,908,534         143       OTHER ACCOUNTS RECEIVABLE       8,388,326         144       ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS       (4,797,837)         145       NOTES RECEIVABLE FROM ASSOCIATED COMPANIES       136,169,553         146       ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES       142,917         151       FUEL STOCK       -         152       FUEL STOCK EXPENSE UNDISTRIBUTED       -         154       PLANT MATERIALS AND OPERATING SUPPLIES       20,157,107         155       MERCHANDISE       66,827         156       OTHER MATERIALS AND SUPPLIES       -         157       MERCHANDISE       66,827         158       STORES EXPENSE UNDISTRIBUTED       -         154       PLANT MATERIALS AND SUPPLIES       25,203,306         155       MERCHANDISE       25,203,306         164       GAS STORED       80,238,148         165       PREPAYMENTS       25,203,306         174       MISCELLANEOUS CURRENT AND ACCRUED ASSETS       12,195,246         175       DERIVATIVE INSTRUMENT ASSETS       7,793,016         176       LONG TERM PORTION OF DERIVATIVE ASSETS - HEDGES       4,667,158         176       LO	136	TEMPORARY CASH INVESTMENTS	28,600,000
144       ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS       (4,797,837)         145       NOTES RECEIVABLE FROM ASSOCIATED COMPANIES       136,189,553         146       ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES       1442,917         151       FUEL STOCK       -         152       FUEL STOCK EXPENSE UNDISTRIBUTED       -         154       PLANT MATERIALS AND OPERATING SUPPLIES       20,157,107         155       MERCHANDISE       66,827         164       GAS STORED       80,238,148         165       PREPAYMENTS       25,203,306         171       INTEREST AND DIVIDENDS RECEIVABLE       271,987         173       ACCRUED UTILITY REVENUES       -         174       MISCELLANEOUS CURRENT AND ACCRUED ASSETS       12,195,246         175       DERIVATIVE INSTRUMENT ASSETS       7,793,016         176       LONG TERM PORTION OF DERIVATIVE ASSETS - HEDGES       4,667,158         176       UNRECOVERED PLANT AND ACCRUED ASSETS       1,029,670,338         181       UNAMORTIZED DEBT EXPENSE       5,184,101         182       UNRECOVERED PLANT AND OTHER REGULATORY ASSETS       1,418,972         183       TEMPORARY FACILITIES       -         184       UNAMORTIZED DEBT EXPENSE       6,164,363	142	CUSTOMER ACCOUNTS RECEIVABLE	679,908,534
146ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES442,917151FUEL STOCK-152FUEL STOCK EXPENSE UNDISTRIBUTED-154PLANT MATERIALS AND OPERATING SUPPLIES20,157,107155MERCHANDISE66,827156OTHER MATERIALS AND SUPPLIES-163STORES EXPENSE UNDISTRIBUTED-164GAS STORED80,238,148165PREPAYMENTS25,203,306171INTEREST AND DIVIDENDS RECEIVABLE271,987173ACCRUED UTILITY REVENUES-174MISCELLANEOUS CURRENT AND ACCRUED ASSETS12,195,246175DERIVATIVE INSTRUMENT ASSETS7,793,016176LONG TERM PORTION OF DERIVATIVE ASSETS - HEDGES4,667,158TOTAL CURRENT AND ACCRUED ASSETS1,029,670,338INTELIMINARY SURVEY & INVESTIGATION CHARGES1,418,972181UNAMORTIZED DEBT EXPENSE5,184,101182UNRECOVERED PLANT AND OTHER REGULATORY ASSETS1,029,670,338183TEMPORARY FACILITIES-184CLEARING ACCOUNTS98,913185TEMPORARY FACILITIES-186MISCELLANEOUS DEFERRED DEBITS6,164,363188RESEARCH AND DEVELOPMENT-189UNAMORTIZED LOSS ON REACQUIRED DEBT33,549,738190ACCUMULATED DEFERRED INCOME TAXES32,970,302	144	ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(4,797,837)
152       FUEL STOCK EXPENSE UNDISTRIBUTED       -         154       PLANT MATERIALS AND OPERATING SUPPLIES       20,157,107         155       MERCHANDISE       66,827         156       OTHER MATERIALS AND SUPPLIES       -         153       STORES EXPENSE UNDISTRIBUTED       -         164       GAS STORED       80,238,148         155       PREPAYMENTS       25,203,306         171       INTEREST AND DIVIDENDS RECEIVABLE       271,987         173       ACCRUED UTILITY REVENUES       -         174       MISCELLANEOUS CURRENT AND ACCRUED ASSETS       12,195,246         175       DERIVATIVE INSTRUMENT ASSETS       7,793,016         176       LONG TERM PORTION OF DERIVATIVE ASSETS - HEDGES       4,667,158         TOTAL CURRENT AND ACCRUED ASSETS       1,029,670,338         INVESTIGATION CHARGES       1,029,670,338         INVESTIGATION CHARGES       1,418,972         INVESTIGATION CHARGES       98,913         IEMPORARY FACILITIES       -         IMSCELLANEOUS DEFERRED DEBITS       6,164,363         IMSCELLANEOUS DEFERRED DEBITS       6,164,363         IMSCELLANEOUS DEFERRED DEBITS       6,164,363	146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	
<ul> <li>OTHER MATERIALS AND SUPPLIES</li> <li>STORES EXPENSE UNDISTRIBUTED</li> <li>GAS STORED</li> <li>GAS STORED</li> <li>NTEREST AND DIVIDENDS RECEIVABLE</li> <li>271,987</li> <li>ACCRUED UTILITY REVENUES</li> <li>MISCELLANEOUS CURRENT AND ACCRUED ASSETS</li> <li>DERIVATIVE INSTRUMENT ASSETS</li> <li>LONG TERM PORTION OF DERIVATIVE ASSETS - HEDGES</li> <li>4,667,158</li> <li>TOTAL CURRENT AND ACCRUED ASSETS</li> <li>1,029,670,338</li> <li>UNAMORTIZED DEBT EXPENSE</li> <li>UNRECOVERED PLANT AND OTHER REGULATORY ASSETS</li> <li>PRELIMINARY SURVEY &amp; INVESTIGATION CHARGES</li> <li>TEMPORARY FACILITIES</li> <li>TEMPORARY FACILITIES</li> <li>MISCELLANEOUS DEFERRED DEBITS</li> <li>ACCUMULATED DEFERRED INCOME TAXES</li> <li>32,970,302</li> </ul>	152 154	FUEL STOCK EXPENSE UNDISTRIBUTED	- 20,157,107
164       GAS STORED       80,238,148         165       PREPAYMENTS       25,203,306         171       INTEREST AND DIVIDENDS RECEIVABLE       271,987         173       ACCRUED UTILITY REVENUES       -         174       MISCELLANEOUS CURRENT AND ACCRUED ASSETS       12,195,246         175       DERIVATIVE INSTRUMENT ASSETS       7,793,016         176       LONG TERM PORTION OF DERIVATIVE ASSETS - HEDGES       4,667,158         TOTAL CURRENT AND ACCRUED ASSETS       1,029,670,338         ACCEVERED PLANT AND ACCRUED ASSETS         INTERCOVERED PLANT AND ACCRUED ASSETS         UNAMORTIZED DEBT EXPENSE         VINCESTIGATION CHARGES         INTELIMINARY SURVEY & INVESTIGATION CHARGES         INVESTIGATION CHARGES         INTEMPORARY FACILITIES         INTEMPORARY FACILITIES         INTEMPORARY FACILITIES         INAMORTIZED LOSS ON REACQUIRED DEBT         MISCELLANEOUS DEFERRED DEBITS         INAMORTIZED LOSS ON REACQUIRED DEBT	156	OTHER MATERIALS AND SUPPLIES	66,827 -
<ul> <li>171 INTEREST AND DIVIDENDS RECEIVABLE</li> <li>173 ACCRUED UTILITY REVENUES</li> <li>174 MISCELLANEOUS CURRENT AND ACCRUED ASSETS</li> <li>12,195,246</li> <li>175 DERIVATIVE INSTRUMENT ASSETS</li> <li>12,195,246</li> <li>176 LONG TERM PORTION OF DERIVATIVE ASSETS - HEDGES</li> <li>176 TOTAL CURRENT AND ACCRUED ASSETS</li> <li>1,029,670,338</li> <li>181 UNAMORTIZED DEBT EXPENSE</li> <li>181 UNAMORTIZED DEBT EXPENSE</li> <li>181 UNAMORTIZED DEBT EXPENSE</li> <li>182 UNRECOVERED PLANT AND OTHER REGULATORY ASSETS</li> <li>14182 PRELIMINARY SURVEY &amp; INVESTIGATION CHARGES</li> <li>1,418,972</li> <li>183 TEMPORARY FACILITIES</li> <li>184 MISCELLANEOUS DEFERRED DEBITS</li> <li>185 TEMPORARY FACILITIES</li> <li>186 MISCELLANEOUS DEFERRED DEBITS</li> <li>187 ESEARCH AND DEVELOPMENT</li> <li>189 UNAMORTIZED LOSS ON REACQUIRED DEBT</li> <li>33,549,738</li> <li>190 ACCUMULATED DEFERRED INCOME TAXES</li> </ul>	164	GAS STORED	
174MISCELLANEOUS CURRENT AND ACCRUED ASSETS DERIVATIVE INSTRUMENT ASSETS LONG TERM PORTION OF DERIVATIVE ASSETS - HEDGES12,195,246 7,793,016 4,667,158TOTAL CURRENT AND ACCRUED ASSETS - HEDGES1,029,670,338 <b>LOTAL CURRENT AND ACCRUED ASSETS</b> 1,029,670,338 <b>LOTAL CURRENT AND ACCRUED ASSETS</b> 5,184,101 <b>UNAMORTIZED DEBT EXPENSE</b> 5,184,101 <b>UNAMORTIZED DEBT EXPENSE</b> 5,184,101 <b>LUNAMORTIZED DEBT EXPENSE</b> 5,184,101 <b>LINE COVERED PLANT AND OTHER REGULATORY ASSETSLIAT AND OTHER REGULATORY ASSETSLIAT AND OTHER REGULATORY ASSETSLIAT AND OTHER REGULATORY ASSETSLIAT CLEARING ACCOUNTSSEMPORARY FACILITIES------</b>	171	INTEREST AND DIVIDENDS RECEIVABLE	
TOTAL CURRENT AND ACCRUED ASSETS1,029,670,338A. DEFERRED DEBITS181UNAMORTIZED DEBT EXPENSE5,184,101182UNRECOVERED PLANT AND OTHER REGULATORY ASSETS217,616,792183PRELIMINARY SURVEY & INVESTIGATION CHARGES1,418,972184CLEARING ACCOUNTS98,913185TEMPORARY FACILITIES-186MISCELLANEOUS DEFERRED DEBITS6,164,363188RESEARCH AND DEVELOPMENT-189UNAMORTIZED LOSS ON REACQUIRED DEBT33,549,738190ACCUMULATED DEFERRED INCOME TAXES32,970,302	174	MISCELLANEOUS CURRENT AND ACCRUED ASSETS	
4. DEFERRED DEBITS181UNAMORTIZED DEBT EXPENSE5,184,101182UNRECOVERED PLANT AND OTHER REGULATORY ASSETS217,616,792183PRELIMINARY SURVEY & INVESTIGATION CHARGES1,418,972184CLEARING ACCOUNTS98,913185TEMPORARY FACILITIES-186MISCELLANEOUS DEFERRED DEBITS6,164,363188RESEARCH AND DEVELOPMENT-189UNAMORTIZED LOSS ON REACQUIRED DEBT33,549,738190ACCUMULATED DEFERRED INCOME TAXES32,970,302	176	LONG TERM PORTION OF DERIVATIVE ASSETS - HEDGES	4,667,158
181UNAMORTIZED DEBT EXPENSE5,184,101182UNRECOVERED PLANT AND OTHER REGULATORY ASSETS217,616,792183PRELIMINARY SURVEY & INVESTIGATION CHARGES1,418,972184CLEARING ACCOUNTS98,913185TEMPORARY FACILITIES-186MISCELLANEOUS DEFERRED DEBITS6,164,363188RESEARCH AND DEVELOPMENT-189UNAMORTIZED LOSS ON REACQUIRED DEBT33,549,738190ACCUMULATED DEFERRED INCOME TAXES32,970,302		TOTAL CURRENT AND ACCRUED ASSETS	1,029,670,338
181UNAMORTIZED DEBT EXPENSE5,184,101182UNRECOVERED PLANT AND OTHER REGULATORY ASSETS217,616,792183PRELIMINARY SURVEY & INVESTIGATION CHARGES1,418,972184CLEARING ACCOUNTS98,913185TEMPORARY FACILITIES-186MISCELLANEOUS DEFERRED DEBITS6,164,363188RESEARCH AND DEVELOPMENT-189UNAMORTIZED LOSS ON REACQUIRED DEBT33,549,738190ACCUMULATED DEFERRED INCOME TAXES32,970,302			
182UNRECOVERED PLANT AND OTHER REGULATORY ASSETS217,616,792183PRELIMINARY SURVEY & INVESTIGATION CHARGES1,418,972184CLEARING ACCOUNTS98,913185TEMPORARY FACILITIES-186MISCELLANEOUS DEFERRED DEBITS6,164,363188RESEARCH AND DEVELOPMENT-189UNAMORTIZED LOSS ON REACQUIRED DEBT33,549,738190ACCUMULATED DEFERRED INCOME TAXES32,970,302		4. DEFERRED DEBITS	
185TEMPORARY FACILITIES-186MISCELLANEOUS DEFERRED DEBITS6,164,363188RESEARCH AND DEVELOPMENT-189UNAMORTIZED LOSS ON REACQUIRED DEBT33,549,738190ACCUMULATED DEFERRED INCOME TAXES32,970,302	182 183	UNRECOVERED PLANT AND OTHER REGULATORY ASSETS PRELIMINARY SURVEY & INVESTIGATION CHARGES	217,616,792 1,418,972
189UNAMORTIZED LOSS ON REACQUIRED DEBT33,549,738190ACCUMULATED DEFERRED INCOME TAXES32,970,302	186	MISCELLANEOUS DEFERRED DEBITS	-
	189 190	UNAMORTIZED LOSS ON REACQUIRED DEBT ACCUMULATED DEFERRED INCOME TAXES	

TOTAL ASSETS AND OTHER DEBITS \$ 6,331,770,394

297,003,181

TOTAL DEFERRED DEBITS

#### SOUTHERN CALIFORNIA GAS COMPANY BALANCE SHEET LIABILITIES AND OTHER CREDITS DECEMBER 31, 2007

#### 5. PROPRIETARY CAPITAL

		2007
201	COMMON STOCK ISSUED	\$834,888,907
204	PREFERRED STOCK ISSUED	21,551,075
207	PREMIUM ON CAPITAL STOCK	-
208	OTHER PAID-IN CAPITAL	-
210	GAIN ON RETIRED CAPITAL STOCK	9,722
211	MISCELLANEOUS PAID-IN CAPITAL	31,306,680
214	CAPITAL STOCK EXPENSE	(143,261)
216	UNAPPROPRIATED RETAINED EARNINGS	586,583,206
219	ACCUMULATED OTHER COMPREHENSIVE INCOME	(3,791,398)
	TOTAL PROPRIETARY CAPITAL	1,470,404,931

#### 6. LONG-TERM DEBT

221	BONDS	1,100,000,000
224	OTHER LONG-TERM DEBT	12,475,533
225	UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226	UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	(2,110,369)
	TOTAL LONG-TERM DEBT	1,110,365,164

### 7. OTHER NONCURRENT LIABILITIES

<ul> <li>227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT</li> <li>228.2 ACCUMULATED PROVISION FOR INJURIES AND DAMAGES</li> <li>228.3 ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS</li> </ul>	- 76,130,652 94,245,582
228.4 ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS 230 ASSET RETIREMENT OBLIGATIONS	- 576,867,113
TOTAL OTHER NONCURRENT LIABILITIES	747,243,347

#### SOUTHERN CALIFORNIA GAS COMPANY BALANCE SHEET LIABILITIES AND OTHER CREDITS DECEMBER 31, 2007

#### 8. CURRENT AND ACCRUED LIABILITES

		2007
231	NOTES PAYABLE	-
232	ACCOUNTS PAYABLE	421,260,461
233	NOTES PAYABLE TO ASSOCIATED COMPANIES	-
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES	29,144,070
235	CUSTOMER DEPOSITS	90,356,955
236	TAXES ACCRUED	45,269,144
237	INTEREST ACCRUED	16,682,167
238	DIVIDENDS DECLARED	150,323,266
241	TAX COLLECTIONS PAYABLE	20,837,897
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES	187,213,497
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT	-
244	DERIVATIVE INSTRUMENT LIABILITIES	45,063
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES	
	TOTAL CURRENT AND ACCRUED LIABILITIES	961,132,520

### 9. DEFERRED CREDITS

252	CUSTOMER ADVANCES FOR CONSTRUCTION	86,779,503
253	OTHER DEFERRED CREDITS	250,149,055
254	OTHER REGULATORY LIABILITIES	1,540,219,390
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	32,958,047
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	116,832,438
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	15,685,999
	TOTAL DEFERRED CREDITS	2,042,624,432
	TOTAL LIABILITIES AND OTHER CREDITS	\$ 6,331,770,394

#### SOUTHERN CALIFORNIA GAS COMPANY STATEMENT OF INCOME AND RETAINED EARNINGS TWELVE MONTHS ENDED DECEMBER 31, 2007

#### **1. UTILITY OPERATING INCOME**

400 401 402 403-7 408.1 409.1 410.1 411.1 411.4 411.6 411.7	OPERATING REVENUES OPERATING EXPENSES MAINTENANCE EXPENSES DEPRECIATION AND AMORTIZATION EXPENSES TAXES OTHER THAN INCOME TAXES INCOME TAXES PROVISION FOR DEFERRED INCOME TAXES PROVISION FOR DEFERRED INCOME TAXES - CREDIT INVESTMENT TAX CREDIT ADJUSTMENTS GAIN FROM DISPOSITION OF UTILITY PLANT LOSS FROM DISPOSITION OF UTILITY PLANT	\$3,416,131,744 125,850,116 280,637,549 65,720,120 151,551,816 57,508,013 (50,619,725) (2,662,755)	\$4,325,048,227		
	TOTAL OPERATING REVENUE DEDUCTIONS	-	4,044,116,878		
	NET OPERATING INCOME		280,931,349		
2. OTHER INCOME AND DEDUCTIONS					
415 417 417.1 418 418.1 419 419.1 421 421.1	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WOR REVENUES FROM NONUTILITY OPERATIONS EXPENSES OF NONUTILITY OPERATIONS NONOPERATING RENTAL INCOME EQUITY IN EARNINGS OF SUBSIDIARIES INTEREST AND DIVIDEND INCOME ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION MISCELLANEOUS NONOPERATING INCOME GAIN ON DISPOSITION OF PROPERTY TOTAL OTHER INCOME	- 180,757 328,931 - 21,686,710 5,460,930 575,553 - 28,232,881			
425 426	MISCELLANEOUS AMORTIZATION MISCELLANEOUS OTHER INCOME DEDUCTIONS	<u>3,585,277</u> 3,585,277			
408.2 409.2 410.2 411.2 420	TAXES OTHER THAN INCOME TAXES INCOME TAXES PROVISION FOR DEFERRED INCOME TAXES PROVISION FOR DEFERRED INCOME TAXES - CREDIT INVESTMENT TAX CREDITS TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	129,555 243,271 4,561,605 (1,136,774) (46,120) 3,751,537			
	TOTAL OTHER INCOME AND DEDUCTIONS	-	20,896,067		
	INCOME BEFORE INTEREST CHARGES NET INTEREST CHARGES*	-	301,827,416 70,713,540		
	NET INCOME	=	\$231,113,876		

\*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION. (\$2,167,726).

#### SOUTHERN CALIFORNIA GAS 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	\$608,151,433
NET INCOME (FROM PRECEDING PAGE)	231,113,876
DIVIDEND TO PARENT COMPANY	(250,000,000)
DIVIDENDS DECLARED - PREFERRED STOCK	(1,293,065)
OTHER RETAINED EARNINGS ADJUSTMENT	(1,389,038)
RETAINED EARNINGS AT END OF PERIOD	\$586,583,206

# Appendix B

#### SOUTHERN CALIFORNIA GAS COMPANY

#### Plant Investment and Accumulated Depreciation As of December 31, 2007

ACCOUNT NUMBER	DESCRIPTION		ORIGINAL COSTS		ACCUMULATED RESERVE
INTANGIBLE A	SSETS				
301	Organization	\$	76,457	\$	-
302	Franchise and Consents	Ŷ	532,578	Ŧ	
	Total Intangible Assets	\$	609,035	\$	-
UNDERGROUM	ID STORAGE:				
350	Land	\$	5,150,548	\$	-
350	Storage Rights		17,649,213		16,275,872
350	Rights-of-Way		25,354		11,648
351	Structures and Improvements		31,798,988		16,654,700
352	Wells		185,145,225		121,411,115
353	Lines		81,300,145		90,437,578
354	Compressor Station and Equipment		102,124,155		66,917,174
355	Measuring And Regulator Equipment		4,652,555		1,232,488
356	Purification Equipment		76,998,518		56,253,869
357	Other Equipment		8,213,356		2,340,420
	Total Underground Storage	\$	513,058,059	\$	371,534,864
TRANSMISSIO	N PLANT- OTHER:				
365	Land	\$	2,666,000	\$	-
365	Land Rights		20,456,148		12,445,453
366	Structures and Improvements		28,064,131		19,688,289
367	Mains		885,293,157		473,989,787
368	Compressor Station and Equipment		173,180,269		91,819,152
369	Measuring And Regulator Equipment		41,511,887		24,334,787
371	Other Equipment		3,915,341		1,839,813
	Total Transmission Plant	\$	1,155,086,933	\$	624,117,282
DISTRIBUTION	I PLANT:				
374	Land	\$	29,277,069	\$	-
374	Land Rights		2,646,609		12,264
375	Structures and Improvements		187,642,657		45,348,267
376	Mains		2,723,135,952		1,511,175,412
378	Measuring And Regulator Equipment		56,247,614		38,246,147
380	Services		1,880,615,264		1,503,206,526
381	Meters		387,704,866		117,899,443
382	Meter Installation		231,579,800		148,467,075
383	House Regulators		106,792,074		42,396,271
387	Other Equipment		22,626,386		18,034,361
	Total Distribution Plant	\$	5,628,268,291	\$	3,424,785,765
GENERAL PLA	NT:				
389	Land	\$	1,243,021	\$	
389	Land Land Rights	Φ	74,300	φ	-
390	Structures and Improvements		103,784,503		- 82,777,301
390 391	Office Furniture and Equipment		334,751,422		174,092,919
391					
392 393	Transportation Equipment		1,836,625		1,276,077
393 394	Stores Equipment		106,344		104,633
394 395	Shop and Garage Equipment		48,984,775		21,119,954
395 396	Laboratory Equipment		6,948,704 94,507		3,885,532
397	Construction Equipment Communication Equipments		64,158,484		68,556 29,167,980
398	Miscellaneous Equipment		3,987,669		(2,151,678)
290			3,301,009		(2,101,078)

#### SOUTHERN CALIFORNIA GAS COMPANY

Plant Investment and Accumulated Depreciation As of December 31, 2007

ACCOUNT NUMBER	DESCRIPTION	ORIGINAL COSTS	ACCUMULATED RESERVE
	Total General Plant	\$ 565,970,354	\$ 310,341,274

# Appendix C

### SOUTHERN CALIFORNIA GAS COMPANY SUMMARY OF EARNINGS TWELVE MONTHS ENDED DECEMBER 31, 2007 (DOLLARS IN MILLIONS)

Line No.	ltem	<u>Amount</u>
1	Operating Revenue	\$4,325
2	Operating Expenses	4,044
3	Net Operating Income	\$281
4	Weighted Average Rate Base	\$2,642
5	Rate of Return*	8.68%

\*Authorized Cost of Capital

# Appendix D

ATTORNEY GENERAL STATE OF CALIFORNIA 1300 "I" STREET SACRAMENTO, CA 95814

COUNTY COUNSEL FRESNO COUNTY 2220 TULARE ST., 5TH FLOOR FRESNO, CA 93721

COUNTY COUNSEL KERN COUNTY 1415 TRUXTUN BAKERSFIELD, CA 93301

COUNTY CLERK KINGS COUNTY 1400 W. LACEY BLVD. HANFORD, CA 93230

DISTRICT ATTORNEY ORANGE COUNTY 700 CIVIC CENTER DRIVE WEST SANTA ANA, CA 92701

COUNTY CLERK RIVERSIDE COUNTY 4080 LEMON STREET RIVERSIDE, CA 92501

COUNTY CLERK SAN LUIS OBISPO COUNTY COURT HOUSE ANNEX SAN LUIS OBISPO, CA 93408

DISTRICT ATTORNEY SANTA BARBARA COUNTY 105 E. ANAPUMA ST. SANTA BARBARA, CA 93102

DISTRICT ATTORNEY VENTURA COUNTY 800 SO. VICTORIA AVE. VENTURA, CA 93009 DEPARTMENT OF GENERAL SERVICES STATE OF CALIFORNIA 915 CAPITOL MALL SACRAMENTO, CA 95814

COUNTY CLERK IMPERIAL COUNTY EL CENTRO, CA 92243

CLERK OF THE BOARD KERN COUNTY 1115 TRUXTON BAKERSFIELD, CA 93301

DISTRICT ATTORNEY LOS ANGELES COUNTY 111 NO. HILL STREET LOS ANGELES, CA 90012

COUNTY CLERK ORANGE COUNTY 700 CIVIC CENTER DR. RM D100 SANTA ANA, CA 92701

COUNTY CLERK SAN BERNARDINO COUNTY 175 W. 5TH ST SAN BERNARDINO, CA 92415

DISTRICT ATTORNEY SAN LUIS OBISPO COUNTY COURT HOUSE ANNEX SAN LUIS OBISPO, CA 93408

COUNTY CLERK TULARE COUNTY CIVIC CENTER VISALIA, CA 93277

COUNTY CLERK VENTURA COUNTY 800 SO. VICTORIA AVE. VENTURA, CA 93009 COUNTY CLERK FRESNO COUNTY 2221 KERN ST. FRESNO, CA 93721

DISTRICT ATTORNEY IMPERIAL COUNTY 940 W. MAIN ST., STE. 101 EL CENTRO, CA 92243

DISTRICT ATTORNEY KINGS COUNTY 1400 W. LACEY BLVD. HANFORD, CA 93230

COUNTY CLERK LOS ANGELES COUNTY 12400 E. IMPERIAL HIGHWAY NORWALK, CA 90650

DISTRICT ATTORNEY RIVERSIDE COUNTY 2041 IOWA AVE. RIVERSIDE, CA 92501

DISTRICT ATTORNEY SAN BERNARDINO COUNTY 175 W. 5TH ST. SAN BERNARDINO, CA 92415

COUNTY CLERK SANTA BARBARA COUNTY 105 E. ANAPUMA ST. SANTA BARBARA, CA 93102

DISTRICT ATTORNEY TULARE COUNTY CIVIC CENTER VISALIA, CA 93277

CITY CLERK YUCAIPA CITY 34272 YUCAIPA BLVD. YUCAIPA, CA 92399 CITY ATTORNEY ADELANTO CITY HALL P.O. BOX 10 ADELANTO, CA 92301

CITY CLERK AGOURA HILLS CITY HALL 30101 AGOURTA CT., #102 AGOURA HILLS, CA 91301

CITY ATTORNEY ANAHEIM CITY HALL P.O. BOX 3222 ANAHEIM, CA 92803

CITY ATTORNEY ARCADIA CITY HALL 240 W. HUNTINGTON DR ARCADIA, CA 91006

CITY ATTORNEY ARTESIA CITY HALL 18747 CLARKDALE AVE. ARTESIA, CA 90701

CITY CLERK ARVIN CITY HALL 200 CAMPUS DR. ARVIN, CA 93203

CITY ATTORNEY AVENAL CITY HALL 919 SKYLINE AVE. AVENAL, CA 93204

CITY CLERK AZUSA CITY HALL 213 E. FOOTHILL BLVD. AZUSA, CA 91702

CITY ATTORNEY BALDWIN PARK CITY HALL 14403 E. PACIFIC AVE. BALDWIN PARK, CA 91706

CITY CLERK BANNING CITY HALL 99 EAST RAMSEY ST. BANNING, CA 92220 CITY CLERK ADELANTO CITY HALL P. O. BOX 10 ADELANTO, CA 92301

CITY ATTORNEY ALHAMBRA CITY HALL 111 S. FIRST ST ALHAMBRA, CA 91801

CITY CLERK ANAHEIM CITY HALL P.O. BOX 3222 ANAHEIM, CA 92803

CITY ATTORNEY ARROYO GRANDE CITY HALL 214 E. BRANCH ST ARROYO GRANDE, CA 93420

CITY CLERK ARTESIA CITY HALL 18747 CLARKDALE AVE. ARTESIA, CA 90701

CITY ATTORNEY ATASCADERO CITY HALL 6500 PALMA AVE. ATASCADERO, CA 93422

CITY CLERK AVENAL CITY HALL 919 SKYLINE AVE. AVENAL, CA 93204

CITY ATTORNEY BAKERSFIELD CITY HALL 1501 TRUXTUN AVE. BAKERSFIELD, CA 93301

CITY CLERK BALDWIN PARK CITY HALL 14403 E. PACIFIC AVE. BALDWIN PARK, CA 91706

CITY ATTORNEY BEAUMONT CITY HALL 550 6TH AVE. BEAUMONT, CA 92223 CITY ATTORNEY AGOURA HILLS CITY HALL 30101 AGOURA CT., #102 AGOURA HILLS, CA 91301

CITY CLERK ALHAMBRA CITY HALL 111 S. FIRST ST. ALHAMBRA, CA 91801

CITY CLERK ARCADIA CITY HALL 240 W. HUNTINGTON DR. ARCADIA, CA 91006

CITY CLERK ARROYO GRANDE CITY HALL 214 E. BRANCH ST. ARROYO GRANDE, CA 93420

CITY ATTORNEY ARVIN CITY HALL 200 CAMPUS DR. ARVIN, CA 93203

CITY CLERK ATASCADERO CITY HALL 6500 PALMA AVE. ATASCADERO, CA 93422

CITY ATTORNEY AZUSA CITY HALL 213 E. FOOTHILL BLVD. AZUSA, CA 91702

CITY CLERK BAKERSFIELD CITY HALL 1501 TRUXTUN AVE. BAKERSFIELD, CA 93301

CITY ATTORNEY BANNING CITY HALL 99 EAST RAMSEY ST. BANNING, CA 92220

CITY CLERK BEAUMONT CITY HALL 550 6TH AVE. BEAUMONT, CA 92223 CITY ATTORNEY BELL CITY HALL 6330 PINE AVE. BELL, CA 90201

CITY CLERK BELL GARDENS CITY HALL 7100 SO. GARFIELD AVE. BELL GARDENS, CA 90201

CITY ATTORNEY BEVERLY HILLS CITY HALL 450 NO. CRESCENT DR. BEVERLY HILLS, CA 90210

CITY CLERK BIG BEAR LAKE CITY P. O. BOX 2800 BIG BEAR LAKE, CA 92315

CITY ATTORNEY BRADBURY CITY HALL 600 WINSTON AVE. BRADBURY, CA 91010

CITY CLERK BRAWLEY CITY HALL 400 MAIN STREET BRAWLEY, CA 92227

CITY ATTORNEY BUENA PARK CITY HALL 6650 BEACH BLVD. BUENA PARK, CA 90620

CITY CLERK BURBANK CITY HALL 275 E. OLIVE AVE. BURBANK, CA 91502

CITY ATTORNEY CALIFORNIA CITY CITY HALL 21000 HACIENDA BLVD. CALIFORNIA CITY, CA 93505 CITY CLERK BELL CITY HALL 6330 PINE AVE. BELL, CA 90201

CITY ATTORNEY BELLFLOWER CITY HALL 16600 E. CIVIC CENTER DR. BELLFLOWER, CA 90706

CITY CLERK BEVERLY HILLS CITY HALL 450 NO. CRESCENT DR. BEVERLY HILLS, CA 90210

CITY CLERK BLYTHE CITY HALL 200 NO. SPRING ST. CITY OF BLYTHE, CA 92225

CITY CLERK BRADBURY CITY HALL 600 WINSTON AVE. BRADBURY, CA 91010

CITY ATTORNEY BREA CITY HALL 1 CIVIC CENTER CIRCLE BREA, CA 92621

CITY CLERK BUENA PARK CITY HALL 6650 BEACH BLVD. BUENA PARK, CA 90620

CITY CLERK CALIFORNIA CITY CITY HALL 21000 HACIENDA BLVD. CALIFORNIA CITY, CA 93505 CITY ATTORNEY BELL GARDENS CITY HALL 7100 SO. GARFIELD AVE. BELL GARDENS, CA 90201

CITY CLERK BELLFLOWER CITY HALL 16600 E. CIVIC CENTER DR. BELLFLOWER, CA 90706

CITY ATTORNEY BIG BEAR LAKE CITY P. O. BOX 2800 BIG BEAR LAKE, CA 92315

CITY ATTORNEY BLYTHE CITY HALL 200 NO. SPRING ST. CITY OF BLYTHE, CA 92225

CITY ATTORNEY BRAWLEY CITY HALL 400 MAIN ST. BRAWLEY, CA 92227

CITY CLERK BREA CITY HALL 1 CIVIC CENTER CIRCLE BREA, CA 92621

CITY ATTORNEY BURBANK CITY HALL 275 E. OLIVE AVE. BURBANK, CA 91502

CITY CLERK CALEXICO CITY HALL 408 HEBER AVE. CALEXICO, CA 92231

CITY ATTORNEY CALIPATRIA CITY HALL 101 NO. LAKE AVE. CALIPATRIA, CA 92233 CITY CLERK CALIPATRIA CITY HALL 101 NO. LAKE AVE. CALIPATRIA, CA 92233

CITY ATTORNEY CANYON LAKE CITY 31532 RAILROAD CANYON RD, #101 CANYON LAKE, CA 92587

CITY CLERK CARPINTERIA CITY HALL 5775 CARPINTERIA AVE. CARPINTERIA, CA 93013

CITY ATTORNEY CATHEDRAL CITY CITY HALL 68625 PEREZ ROAD CATHEDRAL CITY, CA 92234

CITY CLERK CERRITOS CITY HALL BLOOMFIELD AND 183RD ST. CERRITOS, CA 90701

CITY CLERK CLAREMONT CITY HALL 207 HARVARD AVE. CLAREMONT, CA 91711

CITY CLERK COACHELLA CITY HALL 1515 SIXTH ST. COACHELLA, CA 92236

CITY ATTORNEY COMMERCE CITY HALL 5655 JILSON ST. COMMERCE, CA 90040

CITY CLERK COMPTON CITY HALL 205 SO. WILLOWBROOK AVE. COMPTON, CA 90220 CITY ATTORNEY CAMARILLO CITY HALL 601 CARMEN DRIVE CAMARILLO, CA 93010

CITY CLERK CANYON LAKE CITY 31532 RAILROAD CANYON RD, #101 CANYON LAKE, CA 92587

CITY ATTORNEY CARSON CITY HALL 701 E. CARSON ST. CARSON, CA 90745

CITY CLERK CATHEDRAL CITY CITY HALL 68625 PEREZ ROAD CATHEDRAL CITY, CA 92234

CITY ATTORNEY CHINO CITY HALL 13220 CENTRAL AVE. CHINO, CA 91710

CITY ATTORNEY CLAREMONT CITY HALL 207 HARVARD AVE. CLAREMONT, CA 91711

CITY ATTORNEY COLTON CITY HALL 650 N. LACADENA DR. COLTON, CA 92324

CITY CLERK COMMERCE CITY HALL 5655 JILSON ST. COMMERCE, CA 90040

CITY ATTORNEY CORCORAN CITY HALL 1033 CHITTENDEN AVE. CORCORAN, CA 93212 CITY CLERK CAMARILLO CITY HALL 601 CARMEN DRIVE CAMARILLO, CA 93010

CITY ATTORNEY CARPINTERIA CITY HALL 5775 CARPINTERIA AVE. CARPINTERIA, CA 93013

CITY CLERK CARSON CITY HALL 701 E. CARSON ST. CARSON, CA 90745

CITY ATTORNEY CERRITOS CITY HALL BLOOMFIELD AND 183RD ST. CERRITOS, CA 90701

CITY CLERK CHINO CITY HALL 13220 CENTRAL AVE. CHINO, CA 91710

CITY ATTORNEY COACHELLA CITY HALL 1515 SIXTH ST. COACHELLA, CA 92236

CITY CLERK COLTON CITY HALL 650 N. LACADENA DR. COLTON, CA 92324

CITY ATTORNEY COMPTON CITY HALL 205 SO. WILLOWBROOK AVE. COMPTON, CA 90220

CITY CLERK CORCORAN CITY HALL 1033 CHITTENDEN AVE. CORCORAN, CA 93212 CITY ATTORNEY CORONA CITY HALL 815 W. SIXTH ST. CORONA, CA 91720

CITY CLERK COSTA MESA CITY HALL 77 FAIR DRIVE COSTA MESA, CA 92626

CITY ATTORNEY CUDAHY CITY HALL 5240 SANTA ANA ST. CUDAHY, CA 90201

CITY CLERK CULVER CITY CITY HALL 9770 CULVER BLVD. CULVER CITY, CA 90230

CITY ATTORNEY DANA POINT CITY 33282 GOLDEN LANTERN ST. DANA POINT, CA 92629

CITY CLERK DELANO CITY HALL 1015 11TH AVE. DELANO, CA 93215

CITY ATTORNEY DIAMOND BAR CITY 21660 E. COPLEY DR. #100 DIAMOND BAR, CA 91765

CITY CLERK DINUBA CITY HALL 1390 E. ELIZABETH WAY DINUBA, CA 93618

CITY CLERK DUARTE CITY HALL 1600 HUNTINGTON DR. DUARTE, CA 91010 CITY CLERK CORONA CITY HALL 815 W. SIXTH ST. CORONA, CA 91720

CITY ATTORNEY COVINA CITY HALL 125 E. COLLEGE ST. COVINA, CA 91723

CITY CLERK CUDAHY CITY HALL 5240 SANTA ANA ST. CUDAHY, CA 90201

CITY ATTORNEY CYPRESS CITY HALL 5275 ORANGE AVE. CYPRESS, CA 90630

CITY CLERK DANA POINT CITY 33282 GOLDEN LANTERN ST. DANA POINT, CA 92629

CITY ATTORNEY DESERT HOT SPRINGS CITY HALL 65950 PIERSON BL. DESERT HOT SPRINGS, CA 92240

CITY CLERK DIAMOND BAR CITY 21660 E. COPLEY DR., #100 DIAMOND BAR, CA 91765

CITY ATTORNEY DOWNEY CITY HALL 8425 2ND ST. DOWNEY, CA 90241

CITY ATTORNEY DUARTE CITY HALL 1600 HUNTINGTON DR. DUARTE, CA 91010 CITY ATTORNEY COSTA MESA CITY HALL 77 FAIR DRIVE COSTA MESA, CA 92626

CITY CLERK COVINA CITY HALL 125 E. COLLEGE ST. COVINA, CA 91723

CITY ATTORNEY CULVER CITY CITY HALL 9770 CULVER BLVD. CULVER CITY, CA 90230

CITY CLERK CYPRESS CITY HALL 5275 ORANGE AVE. CYPRESS, CA 90630

CITY ATTORNEY DELANO CITY HALL 1015 11TH AVE. DELANO, CA 93215

CITY CLERK DESERT HOT SPRINGS CITY HALL 65950 PIERSON BL. DESERT HOT SPRINGS, CA 92240

CITY ATTORNEY DINUBA CITY HALL 1390 E. ELIZABETH WAY DINUBA, CA 93618

CITY CLERK DOWNEY CITY HALL 8425 2ND ST. DOWNEY, CA 90241

CITY ATTORNEY EL CENTRO CITY HALL 1275 MAIN ST. EL CENTRO, CA 92243 CITY CLERK EL CENTRO CITY HALL 1275 MAIN ST. EL CENTRO, CA 92243

CITY ATTORNEY EL SEGUNDO CITY HALL 350 MAIN ST. EL SEGUNTO, CA 90245

CITY CLERK EXETER CITY HALL P. O. BOX 237 EXETER, CA 93221

CITY ATTORNEY FILLMORE CITY HALL 524 SESPE AVE. FILLMORE, CA 93015

CITY ATTORNEY FONTANA CITY HALL 8353 SIERRA AVE. FONTANA, CA 92335

CITY ATTORNEY FOWLER CITY 128 SOUTH FIFTH FOWLER, CA 23625

CITY CLERK FULLERTON CITY HALL 303 W. COMMONWEALTH FULLERTON, CA 92632

CITY ATTORNEY GARDENA CITY HALL 1700 W 162ND ST. GARDENA, CA 90247

CITY CLERK GLENDALE CITY HALL 613 E. BROADWAY GLENDALE, CA 91205 CITY ATTORNEY EL MONTE CITY HALL 11333 VALLEY BLVD. EL MONTE, CA 91734

CITY CLERK EL SEGUNDO CITY HALL 350 MAIN ST. EL SEGUNDO, CA 90245

CITY ATTORNEY FARMERSVILLE CITY HALL 147 E. FRONT ST. FARMERSVILLE, CA 93223

CITY CLERK FILLMORE CITY HALL 524 SESPE AVE. FILLMORE, CA 93015

CITY ATTORNEY FOUNTAIN VALLEY CITY HALL 10200 SLATER AVE. FOUNTAIN VALLEY, CA 92708

CITY CLERK FOWLER CITY 128 SOUTH FIFTH FOWLER, CA 93625

CITY ATTORNEY GARDEN GROVE CITY HALL 11300 STANFORD AVE. GARDEN GROVE, CA 92640

CITY CLERK GARDENA CITY HALL 1700 W 162ND ST. GARDENA, CA 90247

CITY ATTORNEY GLENDORA CITY HALL 116 E. FOOTHILL BLVD. GLENDORA, CA 91740 CITY CLERK EL MONTE CITY HALL 11333 VALLEY BLVD. EL MONTE, CA 91734

CITY ATTORNEY EXETER CITY HALL P. O. BOX 237 EXETER, CA 93221

CITY CLERK FARMERSVILLE CITY HALL 147 E. FRONT ST. FARMERSVILLE, CA 93223

DEP. CITY CLERK FONTANA CITY 8353 SIERRA AVE. FONTANA, CA 92335

CITY CLERK FOUNTAIN VALLEY CITY HALL 10200 SLATER AVE. FOUNTAIN VALLEY, CA 92708

CITY ATTORNEY FULLERTON CITY HALL 303 W. COMMONWEALTH FULLERTON, CA 92632

CITY CLERK GARDEN GROVE CITY HALL 11300 STANFORD AVE. GARDEN GROVE, CA 92640

CITY ATTORNEY GLENDALE CITY HALL 613 E. BROADWAY GLENDALE, CA 91205

CITY CLERK GLENDORA CITY HALL 116 E. FOOTHILL BLVD. GLENDORA, CA 91740 CITY ATTORNEY GRAND TERRACE CITY HALL 22795 BARTON ROAD GRAND TERRACE, CA 92324

CITY CLERK GROVER CITY CITY HALL 154 SO. 8TH ST. GROVER CITY, CA 93433

CITY ATTORNEY HANFORD CITY HALL 400 NO. DOUTY HANFORD, CA 93230

CITY CLERK HAWAIIAN GARDENS CITY HALL 21815 PIONEER BLVD. HAWAIIAN GARDENS, CA 90716

CITY ATTORNEY HEMET CITY HALL 450 E. LATHAN AVE. HEMET, CA 92343

CITY CLERK HERMOSA BEACH CITY HALL 1315 VALLEY DR. HERMOSA BEACH, CA 90254

CITY ATTORNEY HIDDEN HILLS CITY HALL 6165 SPRING VALLEY RD. HIDDEN HILLS, CA 91302

CITY CLERK HIGHLAND CITY 26985 BASE LINE HIGHLAND, CA 92346

CITY ATTORNEY HUNTINGTON BEACH CITY HALL 2000 MAIN ST. HUNTINGTON BEACH, CA 92648 CITY CLERK GRAND TERRACE CITY HALL 22795 BARTON ROAD GRAND TERRACE, CA 92324

CITY ATTORNEY GUADALUPE CITY HALL 918 OBISPO ST. GUADALUPE, CA 93434

CITY CLERK HANFORD CITY HALL 400 NO. DOUTY HANFORD, CA 93230

CITY ATTORNEY HAWTHORNE CITY HALL 4455 W. 126TH ST. HAWTHORNE, CA 90250

CITY CLERK HEMET CITY HALL 450 E. LATHAM AVE. HEMET, CA 92343

CITY ATTORNEY HESPERIA CITY 15776 MAIN STREET HESPERIA, CA 92345

CITY CLERK HIDDEN HILLS CITY HALL 6165 SPRING VALLEY RD. HIDDEN HILLS, CA 91302

CITY ATTORNEY HOLTVILLE CITY HALL 121 W. 5TH ST. HOLTVILLE, CA 92250

CITY CLERK HUNTINGTON BEACH CITY HALL 2000 MAIN ST. HUNTINGTON BEACH, CA 92648 CITY ATTORNEY GROVER CITY CITY HALL 154 SO. 8TH ST. GROVER CITY, CA 93433

CITY CLERK GUADALUPE CITY HALL 918 OBISPO ST. GUADALUPE, CA 93434

CITY ATTORNEY HAWAIIAN GARDENS CITY HALL 21815 PIONEER BLVD. HAWAIIAN GARDENS, CA 90716

CITY CLERK HAWTHORNE CITY HALL 4455 W. 126TH ST. HAWTHORNE, CA 90250

CITY ATTORNEY HERMOSA BEACH CITY HALL 1315 VALLEY DR. HERMOSA BEACH, CA 90254

CITY CLERK HESPERIA CITY 15776 MAIN STREET HESPERIA, CA 92345

CITY ATTORNEY HIGHLAND CITY 26985 BASE LINE HIGHLAND, CA 92346

CITY CLERK HOLTVILLE CITY HALL 121 W. 5TH ST. HOLTVILLE, CA 92250

CITY ATTORNEY HUNTINGTON PARK CITY HALL 6550 MILES AVE. HUNTINGTON PARK, CA 90255 CITY CLERK HUNTINGTON PARK CITY HALL 6550 MILES AVE. HUNTINGTON PARK, CA 90255

CITY ATTORNEY INDIAN WELLS CITY HALL 44-950 EL DORADO DR. INDIAN WELLS, CA 92210

CITY CLERK INDIO CITY HALL 150 CIVIC CENTER MALL INDIO, CA 92202

CITY ATTORNEY INGLEWOOD CITY HALL 1 MANCHESTER BLVD. INGLEWOOD, CA 90301

CITY CLERK IRVINE CITY HALL P. 0. BOX 19575 IRVINE, CA 92713

CITY ATTORNEY KINGSBURG CITY HALL 1401 DRAPER ST. KINGSBURG, CA 93631

CITY CLERK LA CANADA FLINTRIDGE CITY HALL 1327 FOOTHILL BLVD. LA CANADA FLINTRIDGE, CA 91011

CITY ATTORNEY LA HABRA HEIGHTS CITY HALL 1245 NO. HACIENDA BLVD. LA HABRA HEIGHTS, CA 90631

CITY CLERK LA MIRADA CITY HALL 13700 SO. LA MIRADA BLVD. LA MIRADA, CA 90638 CITY ATTORNEY IMPERIAL CITY HALL 420 SO. IMPERIAL AVE. IMPERIAL, CA 92251

CITY CLERK INDIAN WELLS CITY HALL 44-950 EL DORADO DR. INDIAN WELLS, CA 92210

CITY ATTORNEY INDUSTRY CITY HALL 15651 STANFORD ST. CITY OF INDUSTRY, CA 91744

CITY CLERK INGLEWOOD CITY HALL 1 MANCHESTER BLVD. INGLEWOOD, CA 90301

CITY ATTORNEY IRWINDALE CITY HALL 5050 NO. IRWINDALE AVE. IRWINDALE, CA 91706

CITY CLERK KINGSBURG CITY HALL 1401 DRAPER ST. KINGSBURG, CA 93631

CITY ATTORNEY LA HABRA CITY HALL CIVIC CENTER LA HABRA, CA 90631

CITY CLERK LA HABRA HEIGHTS CITY HALL 1245 NO. HACIENDA BLVD. LA HABRA HEIGHTS, CA 90631

CITY ATTORNEY LA PALMA CITY HALL 7822 WALKER ST. LA PALMA, CA 90623 CITY CLERK IMPERIAL CITY HALL 420 SO. IMPERIAL AVE. IMPERIAL, CA 92251

CITY ATTORNEY INDIO CITY HALL 150 CIVIC CENTER MALL INDIO, CA 92202

CITY CLERK INDUSTRY CITY HALL 15651 STANFORD ST. CITY OF INDUSTRY, CA 91744

CITY ATTORNEY IRVINE CITY HALL P. 0. BOX 19575 IRVINE, CA 92713

CITY CLERK IRWINDALE CITY HALL 5050 NO. IRWINDALE AVE. IRWINDALE, CA 91706

CITY ATTORNEY LA CANADA FLINTRIDGE 300 SOUTH GRAND SUITE 1500 LOS ANGELES, CA 90071

CITY CLERK LA HABRA CITY HALL CIVIC CENTER LA HABRA, CA 90631

CITY ATTORNEY LA MIRADA CITY HALL 13700 SO. LA MIRADA BLVD. LA MIRADA, CA 90638

CITY CLERK LA PALMA CITY HALL 7822 WALKER ST. LA PALMA, CA 90623 CITY ATTORNEY LA PUENTE CITY HALL 15900 E. MAIN ST. LA PUENTE, CA 91744

CITY CLERK LA QUINTA CITY HALL P. O. BOX 1504 LA QUINTA, CA 92253

CITY ATTORNEY LAGUNA BEACH CITY HALL 505 FOREST AVE. LAGUNA BEACH, CA 92651

CITY CLERK LAGUNA NIGUEL CITY 27821 LA PAZ ROAD LAGUNA NIGUEL, CA 92656

CITY ATTORNEY LAKEWOOD CITY HALL 5050 CLARK AVE. LAKEWOOD, CA 90714

CITY CLERK LANCASTER CITY HALL 44933 N. FERN AVE. LANCASTER, CA 93534

CITY ATTORNEY LEMOORE CITY HALL 119 FOX ST. LEMOORE, CA 93245

CITY CLERK LINDSAY CITY HALL 251 E. HONOLULU ST. LINDSAY, CA 93247

CITY ATTORNEY LOMITA CITY HALL 24300 NARBONNE AVE. LOMITA, CA 90717 CITY CLERK LA PUENTE CITY HALL 15900 E. MAIN ST. LA PUENTE, CA 91744

CITY ATTORNEY LA VERNE CITY HALL 3660 D STREET LA VERNE, CA 91750

CITY CLERK LAGUNA BEACH CITY HALL 505 FOREST AVE. LAGUNA BEACH, CA 92651

CITY ATTORNEY LAKE ELSINORE CITY HALL 130 S. MAIN ST. LAKE ELSINORE, CA 92330

CITY CLERK LAKEWOOD CITY HALL 5050 CLARK AVE. LAKEWOOD, CA 90714

CITY ATTORNEY LAWNDALE CITY 611 ANTON BL., SUITE 1400 COSTA MESA, CA 92628

CITY CLERK LEMOORE CITY HALL 119 FOX ST. LEMOORE, CA 9 3245

CITY ATTORNEY LOMA LINDA CITY 11800 Central Ave, Suite 125 CHINO, CA 91710

CITY CLERK LOMITA CITY HALL 24300 NARBONNE AVE. LOMITA, CA 90717 CITY ATTORNEY LA QUINTA CITY HALL P. O. BOX 1504 LA QUINTA, CA 92253

CITY CLERK LA VERNE CITY HALL 3660 D STREET LA VERNE, CA 91750

CITY ATTORNEY LAGUNA NIGUEL CITY 27821 LA PAZ ROAD LAGUNA NIGUEL, CA 92656

CITY CLERK LAKE ELSINORE CITY HALL 130 S. MAIN ST. LAKE ELSINORE, CA 92330

CITY ATTORNEY LANCASTER CITY HALL 44933 N. FERN AVE. LANCASTER, CA 93534

CITY CLERK LAWNDALE CITY HALL 14717 BURIN AVE. LAWNDALE, CA 90260

CITY ATTORNEY LINDSAY CITY HALL 251 E. HONOLULU ST. LINDSAY, CA 93247

CITY CLERK LOMA LINDA CITY HALL 25541 BARTON RD. LOMA LINDA, CA 92354

CITY ATTORNEY LOMPOC CITY HALL 100 CIVIC CENTER PLAZA LOMPOC, CA 93438 CITY CLERK LOMPOC CITY HALL 100 CIVIC CENTER PLAZA LOMPOC, CA 93438

CITY ATTORNEY LOS ALAMITOS CITY HALL 3191 KATELLA LOS ALAMITOS, CA 90720

CITY CLERK LOS ANGELES CITY HALL 200 NO. Main St., Ste 1216. LOS ANGELES, CA 90012-4125

CITY ATTORNEY MANHATTAN BEACH CITY HALL 1400 HIGHLAND AVE. MANHATTAN BEACH, CA 90266

CITY CLERK MARICOPA CITY HALL P. 0. BOX 548 MARICOPA, CA 93252

CITY ATTORNEY MCFARLAND CITY HALL 401 W. KERN MCFARLAND, CA 93250

CITY CLERK MISSION VIEJO CITY 25909 PALA, STE. 150 MISSION VIEJO, CA 92691

CITY ATTORNEY MONTCLAIR CITY HALL 5111 BENITO ST. MONTCLAIR, CA 91763

CITY CLERK MONTEBELLO CITY HALL 1600 BEVERLY BLVD. MONTEBELLO, CA 90640

CITY ATTORNEY MOORPARK CITY HALL 799 MOORPARK AVE. MOORPARK, CA 93021 CITY ATTORNEY LONG BEACH CITY HALL 333 W. OCEAN BLVD. LONG BEACH, CA 90802

CITY CLERK LOS ALAMITOS CITY HALL 3191 KATELLA LOS ALAMITOS, CA 90720

CITY ATTORNEY LYNWOOD CITY HALL 11330 BULLIS RD. LYNWOOD, CA 90262

CITY CLERK MANHATTAN BEACH CITY HALL 1400 HIGHLAND AVE. MANHATTAN BEACH, CA 90266

CITY ATTORNEY MAYWOOD CITY HALL 4319 E. SLAUSON AVE. MAYWOOD, CA 90270

CITY CLERK MCFARLAND CITY HALL 401 W. KERN MCFARLAND, CA 93250

CITY ATTORNEY MONROVIA CITY HALL 415 SO. IVY AVE. MONROVIA, CA 91016

CITY CLERK MONTCLAIR CITY HALL 5111 BENITO ST. MONTCLAIR, CA 91763

CITY ATTORNEY MONTEREY PARK CITY HALL 320 W. NEWMARK AVE. MONTEREY PARK, CA 91754

CITY CLERK MOORPARK CITY HALL 799 MOORPARK AVE. MOORPARK, CA 93021 CITY CLERK LONG BEACH CITY HALL 333 W. OCEAN BLVD. LONG BEACH, CA 90802

CITY ATTORNEY LOS ANGELES CITY HALL 200 NO. SPRING ST. LOS ANGELES, CA 90012

CITY CLERK LYNWOOD CITY HALL 11330 BULLIS RD. LYNWOOD, CA 90262

CITY ATTORNEY MARICOPA CITY HALL P. 0. BOX 548 MARICOPA, CA 93252

CITY CLERK MAYWOOD CITY HALL 4319 E. SLAUSON AVE. MAYWOOD, CA 90270

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# Appendix E

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of **NOTICE OF AVAILABILITY OF THE APPLICATION OF SOUTHERN CALIFORNIA GAS 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



**CPUC Home** 

# CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

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1516 NINTH STREET, MS 14 SACRAMENTO, CA 95816 FOR: CALIFORNIA ENERGY COMMISSION

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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 Southern California Gas Company for Approval of Low Income Assistance Program s 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"), Southern California Gas Company hereby provides this Notice of Availability of: **APPLICATION OF SOUTHERN CALIFORNIA GAS 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 <u>http://www.socalgas.com/regulatory/efficiency/</u>.

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

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-	РҮ 2009	9-201	1 LIEE Pro	bose	ed Electric	8	009-2011 LIEE Proposed Electric & Gas Budget				
с С		Sol	Southern California Gas Company	forni	a Gas Con	npa	h				
4		∢	Authorized				Planned			ų	3-Year Request
5			PY 2008		PY 2009		PY 2010		PY 2011	Ē	PY 2009 - 2011
9	LIEE Program:										
2	Energy Efficiency										
∞	- Gas Appliances	\$	5,545,241	\$	15,869,178	\$	20,546,410	\$	20,992,044	\$	57,407,632
ი	- Electric Appliances	Υ		ۍ	ı	မ		\$		φ	
10		Υ	16,866,660	ۍ	16,488,952	မ	21,348,809	\$	21,967,143	φ	59,804,904
1	<ol> <li>Outreach &amp; Assessment</li> </ol>	φ	5,026,515	φ	11,507,500	ഗ	14,516,409	φ	14,748,384	မ	40,772,293
12	2 - In Home Education	φ	447,000	ω	1,425,000	ക	1,845,000	φ	1,875,000	မ	5,145,000
13	3 - Education Workshops	\$		\$		ۍ		\$	1	φ	
14	t   - Pilot	မ	1	မ	725,000	မ		\$	ı	φ	725,000
15	Energy Efficiency Total	ۍ	27,885,416	ഗ	46,015,631	ω	58,256,628	<del>ഗ</del>	59,582,570	φ	163,854,829
16											
17	7 Training Center	\$	91,538	\$	263,645	\$	269,178	\$	274,712	\$	807,535
18	3 Inspections	\$	2,058,676	\$	1,237,675	\$	1,406,198	\$	1,458,050	\$	4,101,923
19	∂  Marketing	ۍ	200,000	\$	800,000	\$	900'006	\$	000'006	\$	2,600,000
20	) M&E Studies	မ		\$	75,000	ъ	62,500	\$	150,000		287,500
21	I Regulatory Compliance	ۍ	278,512	\$	295,568	ъ	227,181	\$	233,795		756,544
22		\$	2,657,829	\$	4,837,982	\$	4,653,815	\$	4,511,372	\$	14,003,169
23	3 CPUC Energy Division	ۍ	40,000	\$	73,500	ക	73,500	\$	73,500	ۍ	220,500
24											
25	5 TOTAL PROGRAM COSTS*	\$	33,211,971	\$	53,599,000	\$	65,849,000	\$	67,184,000	\$	186,632,000
26		\$	I	\$	13,000,000	\$	1	\$	I	\$	13,000,000
27	TOTAL PROGRAM COSTS w/carryover	\$	33,211,971	\$	40,599,000	ъ	65,849,000	\$	67,184,000	\$	173,632,000
28	8	Fun	Funded Outside of LIEE Program Budget	of LIE	E Program I	Bude	get				
29	) NGAT Costs		\$1,400,000		\$1,400,000		\$1,400,000		\$1,400,000		
30											
č	Note: SoCalGas proposes to partially fund the 2009 budget requirements of \$53.599 million by using \$13.0 million in unspent LIEE program funds from	oudget	requirements o	of \$53.0	599 million by u	using	\$13.0 million in	dsun	oent LIEE prog	gram 1	funds from
2	I previous years. For rate making purposes, socialdas is only seeking recovery on the rier amount or \$40.339 minion.		iy seekiiig recov	very u			040.039 [[[[[[01].				

354										- 2011 E	E Planning	PV 2009 - 2011   FE Planning Assumptions	v									
0									Sout	thern Calif	Southern California Gas Company	Company	2									
4					PY 2008 Authorized	uthorized				PY 2009 Authorized	thorized			4	PY 2010 Planned	hed				PY 2011 Planned	ned	
L.	Measures*	Units	Quantity	kWh (Annual)	kW (Annual)	Therms (Annual)	Projected	ad Quantity	ity kWh ed (Annual)	h kW	Therms	Projected	Quantity	kWh (Annial)	kW (Annual)	Therms (Annual)	Proposed	Quantity Installed	kWh (Annual)	kW (Annual)	Therms	Proposed
6 Heating Systems	Systems				-	-	-		-	-	-				/mmillion		-		(mm	(	(mmmm)	
7 Furnaces		Each	6,917	Ľ	Ľ	175,867	\$5,228,676		7,402		- 208,507	17 \$6,525,629	29 10,355		•	270,435	\$8,448,972	10,535	•	•	274,833	\$8,693,683
8 Cooling N	Cooling Measures																					
9 A/C Repla	A/C Replacement - Room	Each	•	'	•		<del>сэ</del> -				•	۰ ج	•	•	•	•	, \$	•	•	•	•	<del>6</del>
10 A/C Repla	A/C Replacement - Central	Each	•	'			<del>со</del> -				•	۰ ج	•	•	•	•	, \$	•	•	•	•	<del>ഗ</del>
11 A/C Tune-	A/C Tune-up - Central	Each	•	•	•		-				•		•	•	•	•	ج	•	1	•	•	<del>6</del> 9
12 A/C Servic	A/C Services - Central	Each	'	'	'		<del>ب</del>				•	' ج	•	•	•	•	ج	•	•	•	•	ω
13 Heat Pump	ď	Each	•	'			\$				•	\$	•	•	•	•	ج	•	•	•	•	¢
14 Evaporativ	Evaporative Coolers	Each	•	'	'		<del>ب</del>				•	۰ ج	•	'	•	•	, \$	•	•	•	•	ь
15 Evaporativ	Evaporative Cooler Maintenance	Each	•	•			\$				•		•	•	•	•	ج	•	•	•	•	¢
16 Infiltratio	Infiltration & Space Conditioning																					
17 Envelope	Envelope and Air Sealing Measures	Home	42,482	'		- 253,119	f	Ľ		-	- 319,130	L		•	•	413,188	\$11,577,419	71,350	•	•	419,911	\$11,912,74(
18 Duct Sealing	ling	Home	3,233	'		73,486	$\vdash$		2,749		- 57,962				•	75,046	\$2,507,213			•	76,266	\$2,579,831
19 Attic Insulation	lation	Home	1,790	'		- 41,515	\$1,123,468		4,236		- 173,818	3 \$3,102,339	39 5,484	•	•	225,048	\$4,016,712		•	•	228,708	\$4,
	Water Heating Measures																					
	Water Heater Conservation Measures	Home	42,737	'		- 510,862	\$1,441,475		88,464	-	- 1,136,217	\$	114,			1,471,102	\$3,247,464	116,400	1	-	1,495,022	\$3,341,522
22 Water Hea	Water Heater Replacement - Gas	Each	'	'	'		\$		218		- 2,633	3 \$229,057	57 282			3,409	\$296,569	286	1	-	3,464	\$305,159
23 Water Hea	Water Heater Replacement - Electric	Each	'	'			\$							•	•	'	•		•	•	'	
	Tankless Water Heater - Gas	Each	75	'		- 2,100	\$316,565	2	11		- 305	5 \$27,299	99 14	'	'	392	\$35,345	14		'	401	\$36,365
	Tankless Water Heater - Electric	Each	'	'	'		\$	-	•		'	'	'	'	'	'	'	'		'	'	
	Lighting Measures																					
	CFLs - Fixtures - Torchieres	Each	'	'			<del>ره</del>		•		•	' ج	'	'	'	'	, ج	'		'	'	\$
	ators					-															-	
	tors	Each	'	'	'		<del>69</del>			-	-	• •	'	'	'	•	۰ به	'	'	·	'	\$
	ups						ŀ					e				Ī						•
	sd	Each	'	'			≁ -	-		-	'	- ~	'	'		'	, ≁	'	'	'	'	≁
32 New Measures	Isures						ŀ		400		ŀ	0 00 F04 40F	0.00			017 000	#0 040 044	004 0			014.011	000 000 00
	Figh-Eniciency Clothes washer	Each	'	'			, ,	·	103		- 181,030			'	•	241,333	10,240,04		•	•	000'107	000
34 Retrofit	Porcea All Offic Furnace Standing Filor Retrofit		'				<del>9</del>	- 10	10.295		452.965	5 \$2.728.086	36 13.329			586.471	\$3.532.153	13,546			596,007	\$3,589,586
	Furnace Clean and Tune	Each	'		'		\$	- 76	76.184							-	\$4.891.026	-				\$4.970,555
36 Pilots																					-	
37 High-Effici	High-Efficiency Forced Air Unit Furnace	Each	 	'			\$		250	-	- 22,000	0 \$725,000	- 00		•	•	۔ ج		•	•	•	\$
38 Customer	Customer Enrollment																					
39 Outreach	Outreach & Assessment	Home	44,700	1			- \$5,026,515		95,000					'	•	•	\$14,516,409		•	•	1	\$14,748,384
40 In-Home E	In-Home Education	Home	44,700		1	1	- \$447,000		95,000		-	\$1,425,000	00 123,000	1			\$1,845,000	125,000		-		\$1,875,000
41 Education	Education Workshops	Participant									-					•			1	•		
43 Total						1.056.94	.949 \$ 27.885.416	416			- 2,564,567	7 \$46,015,631	31			3,292,424	3,292,424 \$58,256,628			•	3,345,967	\$59,582,57

	A	В	С	D	E	F	G
1			LIEE	E Program Pe	netration	-	
2			Souther	n California (	Gas Company	/	
3							
4		Number of			Number of		
5		Number of	Number of	Number of	Eligible and	Customers	Percent of LIEE
6		Residential	Eligible and	Treated LIEE	Willing	Treated by	Programmatic
7		Customers in	Willing LIEE	Customers	Customers	LIEE in	Initiative
8		Utility Service	Customers**	Since 2002	Remaining to	Program Year	Achieved
9		Area			be Treated**		
10	PY 2007	5,232,672	1,841,477	282,862	N/A	44,176	N/A
11	PY 2008	5,267,509	1,753,200	327,038	N/A	65,000	N/A
12	PY 2009	5,267,509	1,753,200	392,038	1,426,162	95,000	7%
13	PY 2010	5,267,509	1,753,200	487,038	1,426,162	123,000	15%
14	PY 2011	5,267,509	1,753,200	610,038	1,426,162	125,000	24%
15							_
10	** Number	of eligible and w	illing LIFE custo	mers hased on i	itility's proposed	"standard mean	s of deriving the

16 |\*\* Number of eligible and willing LIEE customers based on utility's proposed "standard means of deriving the
 17 number of LIEE customers on which to base 1/4 of the Commission's programmatic initiative," as discussed
 18 in Section III of utility budget application.

	∢	В	ပ	D	ш	Ŀ	G	т
- (				gram Detail	LIEE Program Detail by Housing Type	I Type		
0 N			Souther	rn Californi	southern California Gas Company	any		
4			PY 2007	PY 2007	PY 2008	PY 2009	PY 2010	PY 2011
5 V			Customers			,		
io I			Estimated	Customers	Cu	<b>Customers Treated (Projected)</b>	ated (Project	(pa)
7			Eligible for LIEE	l reated				
∞	Gas	<b>Gas and Electric Customers</b>						
6	Owr	Owners - Total	N/A	-				
10		Single Family	N/A	-	1		,	
11		Multi Family	N/A	-	-	,	,	
12		<b>Mobile Homes</b>	N/A	-	-			
13	Ren	Renters - Total	N/A	I	I	I	I	ı
14		Single Family	N/A	I	I	I	I	I
15		Multi Family	A/N	-	I	ı	1	
16		<b>Mobile Homes</b>	N/A	I	I	I	I	ı
17	Elec	Electric Customers (only)						
18	<u>N</u>	Owners - Total	N/A	ı	·	ı	ı	
19		Single Family	N/A	I	I	ı	I	I
20		Multi Family	N/A	I	I	I	I	I
21		<b>Mobile Homes</b>	N/A	I	I	1	I	
22	Ren	Renters - Total	A/N	-	I	ı	1	
23		Single Family	N/A	-	I	1	1	
24		Multi Family	N/A	I	I	I	I	I
25		<b>Mobile Homes</b>	N/A	I	I	I	I	I
26	Gas	Gas Customers (only)						
27	Owr	Owners - Total	713,174	20,186		46,721	60,491	61,475
28		Single Family	587,937	17,865	27,412	41,207	53,352	54,219
29		Multi Family	31,023	242	395	429	555	564
30		<b>Mobile Homes</b>	94,214	2,079	3,383	5,085	6,584	6,691
31	Ren	Renters - Total	1,332,912	23,990	33,810	48,279	62,509	63,525
32		Single Family	586,231	10,305		21,746	28,155	28,613
33		Multi Family	716,392	13,	17,	23,850	30,879	31,381
34		Mobile Homes	30,289	220	306	2,684	3,475	3,531

	A	В	С	D						
1		Summary o	f LIEE Program Cost Effe	ctiveness						
2		South	ern California Gas Comp	any						
3										
4		Ratio	o of Program Benefits over Pro	gram Costs						
5		Utility Cost Test	Modified Participant Test	Total Resource Cost Test						
6	PY 2008	0.23	0.57	0.17						
7	PY 2009 0.46 0.86 0.35									
8	PY 2010	0.46	0.86	0.35						
9	PY 2011	0.46	0.86	0.35						
10										
11	from the 2		2009 - 2011 was calculated usir ation. The benefit cost ratio for P dies.							

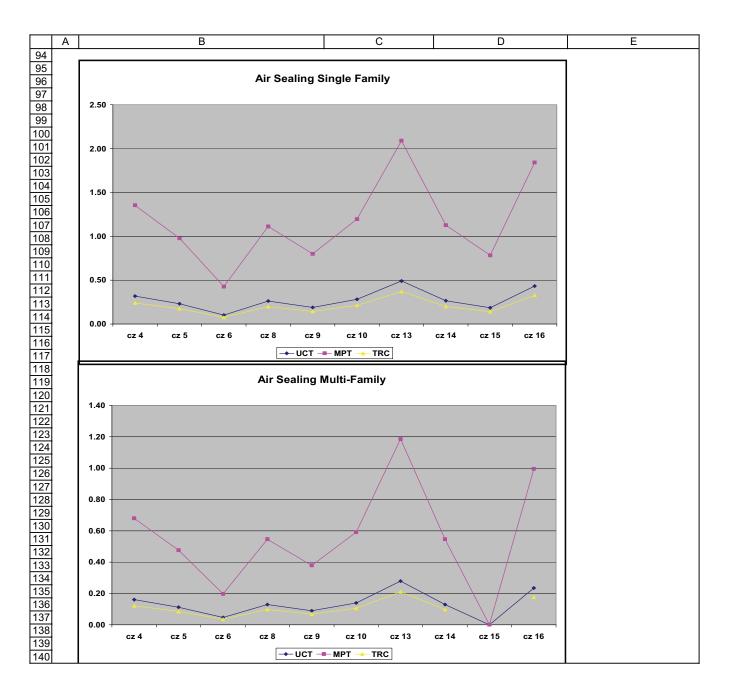
	Α	В	C	D	E
1	LIEE	E Cost-Effectiveness - Weather Sensitiv	e Measures	•	
2	SoC	alGas			
3					
4				Ratio of Benefits Over Co	osts
5		· · ·			
6		Measure*	Utility Cost Test	Modified Participant Test	Total Resource Cost Test
7	Sing	le Family Gas			
8		Air sealing / envelope, SF, cz4	0.32	1.35	0.24
9		Air sealing / envelope, SF, cz5	0.23	0.98	0.17
10		Air sealing / envelope, SF, cz6	0.10	0.43	0.08
11		Air sealing / envelope, SF, cz8	0.26	1.11	0.20
12		Air sealing / envelope, SF, cz9	0.19	0.80	0.14
13		Air sealing / envelope, SF, cz10	0.28	1.20	0.21
14		Air sealing / envelope, SF, cz13	0.49	2.09	0.37
15		Air sealing / envelope, SF, cz14	0.26	1.13	0.20
16		Air sealing / envelope, SF, cz15	0.18	0.78	0.14
17		Air sealing / envelope, SF, cz16	0.43	1.84	0.33
18		Attic insulation, SF, cz5	0.49	0.09	0.37
19		Attic insulation, SF, cz6	0.46	0.08	0.35
20		Attic insulation, SF, cz8	0.44	0.08	0.34
21		Attic insulation, SF, cz9	0.46	0.08	0.35
22		Attic insulation, SF, cz10	0.51	0.10	0.38
23		Attic insulation, SF, cz13	0.60	0.13	0.45
24		Attic insulation, SF, cz14	0.60	0.13	0.45
25		Attic insulation, SF, cz15	0.60	0.13	0.45
26		Attic insulation, SF, cz16	0.56	0.12	0.42
27		Heating system repair / replace, SF, cz5	0.24	0.05	0.18
28		Heating system repair / replace, SF, cz6	0.17	0.03	0.13
29		Heating system repair / replace, SF, cz8	0.17	0.03	0.13
30		Heating system repair / replace, SF, cz9	0.17	0.03	0.13
31		Heating system repair / replace, SF, cz10	0.22	0.36	0.17
32		Heating system repair / replace, SF, cz13	0.25	0.39	0.19
33		Heating system repair / replace, SF, cz14	0.24	0.39	0.18
34 35		Heating system repair / replace, SF, cz15	0.12	0.19 0.34	0.09
35		Heating system repair / replace, SF, cz16 Duct sealing & testing,SF,gas, cz4	0.21	0.34	0.16
30		Duct sealing & testing, SF, gas, cz4	0.35	0.53	0.26
38		Duct sealing & testing,SF,gas, c25	0.28	0.44	0.33
39		Duct sealing & testing,SF,gas, cz8	0.20	0.41	0.20
40		Duct sealing & testing,SF,gas, cz9	0.29	0.45	0.22
41		Duct sealing & testing,SF,gas, cz10	0.35	0.54	0.27
42		Duct sealing & testing, SF, gas, cz13	0.35	0.54	0.27
43		Duct sealing & testing,SF,gas, cz14	0.35	0.54	0.26
44		Duct sealing & testing,SF,gas, cz15	0.21	0.32	0.16
45		Duct sealing & testing,SF,gas, cz16	0.48	0.73	0.37

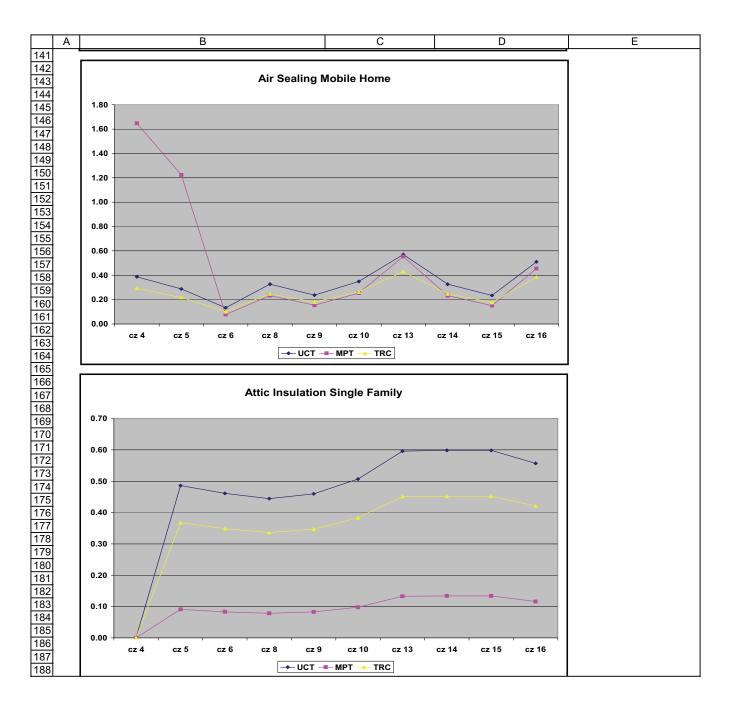
	Α	В	С	D	E
16	Multi	-Family Gas	•		
17		Air sealing / envelope, MF, cz4	0.16	0.68	0.12
18		Air sealing / envelope, MF, cz5	0.11	0.48	0.08
19		Air sealing / envelope, MF, cz6	0.05	0.20	0.04
50		Air sealing / envelope, MF, cz8	0.13	0.55	0.10
51		Air sealing / envelope, MF, cz9	0.09	0.38	0.07
52		Air sealing / envelope, MF, cz10	0.14	0.59	0.11
3		Air sealing / envelope, MF, cz13	0.28	1.19	0.21
64		Air sealing / envelope, MF, cz14	0.13	0.55	0.10
5		Air sealing / envelope, MF, cz16	0.23	1.00	0.18
6		Attic insulation, MF, cz5	0.33	0.05	0.25
7		Attic insulation, MF, cz6	0.22	0.03	0.17
8		Attic insulation, MF, cz8	0.21	0.03	0.16
59		Attic insulation, MF, cz9	0.21	0.03	0.16
0		Attic insulation, MF, cz10	0.26	0.04	0.19
51		Attic insulation, MF, cz13	0.33	0.05	0.25
2		Duct sealing & testing,MF,gas, cz9	0.02	0.03	0.01
-		le Home Gas	1 I		
4		Air sealing / envelope, MH, cz4	0.39	1.65	0.29
5		Air sealing / envelope, MH, cz5	0.29	1.22	0.22
6		Air sealing / envelope, MH, cz6	0.13	0.08	0.10
57		Air sealing / envelope, MH, cz8	0.33	0.23	0.25
8		Air sealing / envelope, MH, cz9	0.24	0.15	0.18
59		Air sealing / envelope, MH, cz10	0.35	0.25	0.26
0		Air sealing / envelope, MH, cz13	0.57	0.55	0.43
1		Air sealing / envelope, MH, cz14	0.33	0.23	0.25
2		Air sealing / envelope, MH, cz15	0.23	0.15	0.18
3		Air sealing / envelope, MH, cz16	0.51	0.45	0.39
4		Heating system repair / replace, MH, cz5	0.27	0.43	0.20
·5		Heating system repair / replace, MH, cz6	0.27	0.43	0.20
6		Heating system repair / replace, MH, cz8	0.26	0.42	0.20
7		Heating system repair / replace, MH, cz9	0.27	0.44	0.21
8		Heating system repair / replace, MH, cz10	0.34	0.55	0.26
9		Heating system repair / replace, MH, cz13	0.38	0.62	0.29
0		Heating system repair / replace, MH, cz14	0.36	0.59	0.28
1		Heating system repair / replace, MH, cz15	0.19	0.31	0.15
2		Heating system repair / replace, MH, cz16	0.33	0.53	0.25
3		Duct sealing & testing,MH,gas, cz4	0.26	0.40	0.20
34		Duct sealing & testing,MH,gas, cz5	0.46	0.69	0.35
5		Duct sealing & testing,MH,gas, cz8	0.28	0.43	0.21
86		Duct sealing & testing,MH,gas, cz9	0.31	0.47	0.23
87		Duct sealing & testing,MH,gas, cz14	0.35	0.54	0.27
8			0.00	0.01	0.21

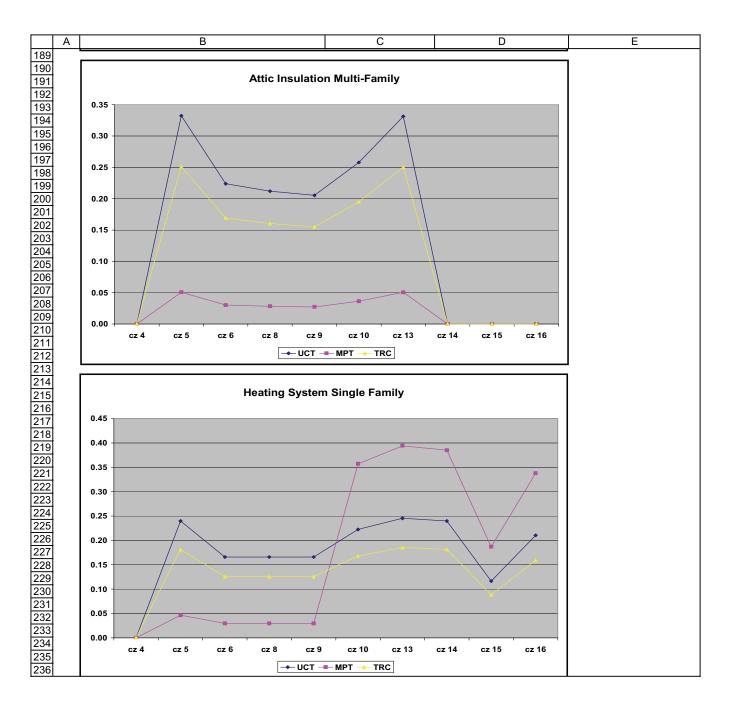
\* Include chart pertaining to each proposed measure, with information included on type of home (ie. Single Family, Multi Family, Mobile
 Home) and electric or gas (if applicable).

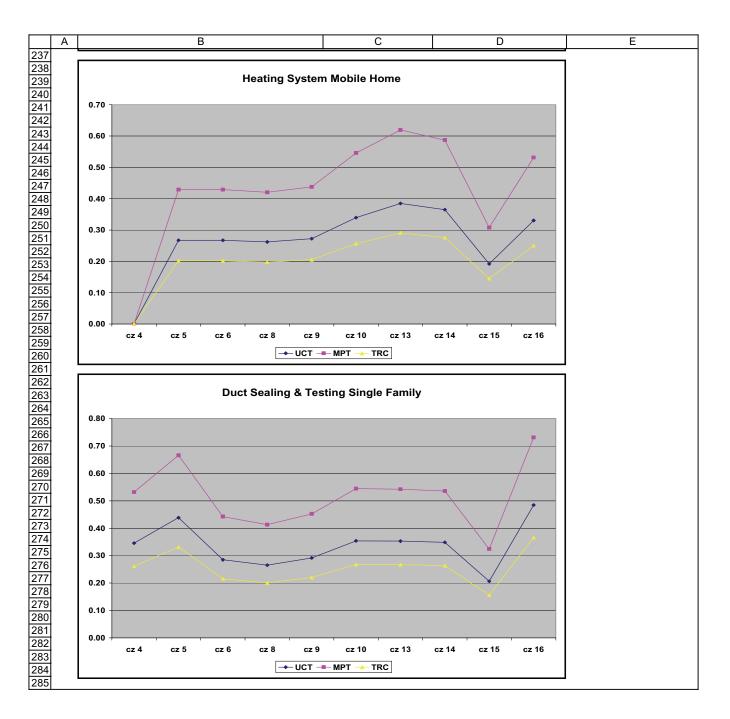
91 \*\* Charts to include information on each climate zone in utility service area. 92

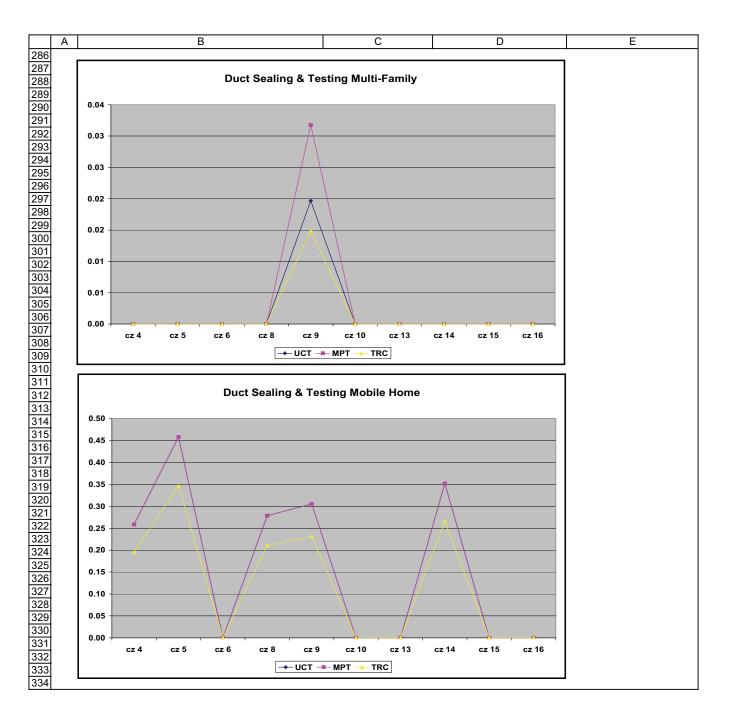
The figures below illustrate the benefit cost ratios for the SoCalGas proposed weather sensitive measures. Note that the Utility Cost Test 93 (UCT) and the Modified Participant Test (MPT) include non-energy benefits while the Total Resource Cost (TRC) test does not.











	Α	В	С	D	E			
1		LIEE Cost-Effe	ctiveness - Non V	Veather Sensitive Meas	ures			
2		So	uthern California	Gas Company				
3								
4				Ratio of Benefits Over	Costs			
5			Utility Cost Test	Modified Participant Test	Total Resource Cost Test			
6	Sin	gle Family Gas						
7		DHW Conservation, SF, gas	0.84	1.19	0.63			
8		DHW repair/replace, SF, gas	0.06	0.10	0.05			
9	Mul	ti-Family Gas						
10								
11	Mol	bile Home Gas						
12		DHW conservation, MH, gas	0.76	1.09	0.57			
13		DHW repair/replace, MH, gas	0.06	0.10	0.05			
14	All	housing types, Gas						
15		Forced Air Unit Furnace pilot conversion	0.75	1.22	0.57			
16		Tankless water heater	0.13	0.21	0.10			
17		Clothes washer	0.46	0.69	0.35			

	A	В	С	D	E
1		PY 2009 - 2011 LI	EE Measur	ement and Evaluation	n Studies
2	1	South	ern Califor	nia Gas Company	
3					
4	Line No.	Statewide Study	Total Cost	Percent Paid by Utility	Total Cost Paid by Utility
		Impact Evaluation of the 2010 LIEE	\$600,000	25%	\$150,000
5	1	Program			
		Process Evaluation of the 2009 LIEE	\$250,000	25%	\$62,500
6	2	Program			
7	3	Non-Energy Benefits Study	\$300,000	25%	\$75,000
8	Total		\$1,150,000		\$287,500

Summary of Southern California Gas Company LIEE Program Proposals for 2009, 2010, and 2011 Attachment A-9

Current Practice	Currently authorized by Commission with exceptions.	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.	Utilities currently offer categorical eligibility as authorized in D.06-12-038.	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
Benefits	Allows utility to respond to the changing needs within the program activities without delays.	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.	Increase enrollments by simplifying process for customers; reach customers who might not otherwise apply.	Increase energy savings and the reduction of low-income customers' bill.
Description	Continue to allow utilities the flexibility to reallocate funds between budget cost categories as needed.	Allow carry forward or carry back of funding into 2009, 2010, or 2011 three-year funding cycle.	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.	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.
Proposal	<ol> <li>Reallocation of Budget Funds</li> </ol>	2. Budget Flexibility	3. Expansion of Categorical Eligibility to include Public Housing and Section 8 Housing	4. 10-Year "Go Back" Rule

—

Current Practice	shown in P&P Manual under Section 2.8 "Previous Program Participation".	Current approach is "one- size fits all" approach. by mer		Current approach is "one- l size fits all" approach.	er		argy .	tice Not currently offered through the program.		the New program measures to be authorized by	Commission.
Benefits		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.		New approach is more personalized to the needs and	characteristics of the customer and is aimed at engaging the	customer's participation and	commutent to becoming energy smart by using energy wisely.	Encourages customer to practice conservation efforts with the	objective of creating sustained energy savings expected from installed measures.	Increase energy savings and the reduction of low-income	customers' bill.
Description		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.	Allow utility to conduct a new and innovative approach to	customer energy education.			Allow utility to reward customer for consistently reducing energy	consumption.	Includes the following new measures:	-High Efficiency Clothes Washer -Forced Air Unit Furnace Standing Pilot Light Retrofit -Furnace Clean and Tune
Proposal		<ol> <li>Customized LIEE Program Approach</li> </ol>		6. Customized Energy Education				7. Customer Rewards		8. New Program Measures	

Summary of Southern California Gas Company LIEE Program Proposals for 2009, 2010, and 2011 Attachment A-9

2

Summary of Southern California Gas Company LIEE Program Proposals for 2009, 2010, and 2011 Attachment A-9

Proposal	Description	Benefits	Current Practice
9. Removal of 3-Measure	Removal of the 3-Measure	Comprehensive audit will ensure	Currently under the program
minimum	minimum provision	the home receives the	there needs to be at least 3
		appropriate number of measures	measures for installation in
		to make it as energy efficient as	home.
		practical.	
10. Continue practice of	Allow utilities to continue to	Manuals are essential to the	D.06-12-038 at page 22
Revising Installation Standards	revise Manuals without	LIEE programs because they	grants the utilities the
and Policy and Procedures	Commission authority. Changes	articulate the program policy and	authority to make changes
Manuals	to the Manuals will be made to	procedures and installation	to the Manuals without
	develop policy installation	measure standards that are used	Commission authority.
	criteria for new program	to train, inform, and evaluate	
	measures and make updates to	LIEE contractors on a statewide	
	the Manuals based on recent	basis.	
	Commission decisions		
11. Single Statewide	Utilities seek Commission	The new program name will be	Currently no statewide
Marketing Campaign	authorization to revise directive	used in all customer	marketing campaign.
	in D.07-12-051 to allow utilities	communications, including	
	to develop a statewide LIEE	advertising, collateral, and	
	program name instead of a	website. The name will help	
	statewide tagline.	reach low-income customers	
		with interest in lowering energy	
		onlis and increasing nome comfort.	
12. Pilots	Implementation of the following	Allow customer to save energy	Pilot measures to be
	pilots:	and reduce energy bill.	authorized by Commission.
	-Natural Gas High Efficiency		
	Forced Air Unit Furnace		
13. Measurement and	Allow utility to conduct	Studies allow utility to determine	Studies to be authorized by
Evaluation Studies	following studies:	program measure savings, cost	Commission.
	-Impact Evaluation of the 2010	effectiveness, and other non-	

Summary of Southern California Gas Company LIEE Program Proposals for 2009, 2010, and 2011 Attachment A-9

Proposal	Description	Benefits	Current Practice
	LIEE Program	energy benefits to help low	
	-Process Evaluation of the 2009	income customers.	
	LIEE Program		
	-Non-Energy Benefits Study		
14. Tracking Program Costs	Allows utilities to maintain	Allows utilities to provide	The program budget
	monthly and annual reporting	comparable cost/benefit analysis	categories are used for
	according to the approved LIEE	of each program element across	monthly and annual LIEE
	reporting categories in 2009,	the utilities.	reporting and were recently
	2010, and 2011.		approved by the
			Commission in a November
			2007 letter from the Energy
			Division Director to the
			utilities.

## Attachment A-10.1

#### Attachment A-10.1

#### Natural Gas High-Efficiency Forced Air Unit (FAU) Furnace Pilot

SoCalGas proposes to offer a natural gas high-efficiency forced air unit (FAU) furnace pilot to customers with high space heating needs during the winter season. The proposed pilot will be implemented for approximately 250 customers and the installations will occur starting after the 2008-2009 winter season.

#### 1. Pilot or Study Budget Table

Pilot	Total Cost
Natural Gas High-Efficiency FAU Furnace – 250 Units	\$725,000

#### 2. Projected Pilot Impacts Table

The pilot will replace existing, inefficient operational natural gas FAU furnaces with an Annual Fuel Utilization Efficiency (AFUE) rating of 65 or lower, according to the Preston Guide or Carrier Blue Book, with high-efficiency FAU furnaces with an efficiency rating of at least 92%. The pilot will be offered to low-income customers having a minimum estimated space heating need of 300 therms during the 2008/2009 Winter Season.

		Energy Efficiency	Projected
	Winter Season Space Heating	Gain of High	Annual Savings
	Use (therms)	Efficiency FAU*	(therms)
2008/2009 Winter			
Season	300	42%	88

\* Assumes existing, inefficient FAU has AFUE rating of .65.

#### 3. Brief Pilot or Study Description

The existing policy of the LIEE program provides furnace repair and replacement services for furnaces identified as: 1) inoperable or 2) having a hazardous condition. This policy provides customers with "health, comfort and safety" benefits while providing very little, if any, energy savings. The pilot seeks to replace high-use, inefficient, operational FAU furnaces with high-efficiency units aimed at providing significant energy savings and lowering customer bills.

#### 4. Pilot or Study Rationale and Expected Outcome

Natural gas high-efficiency FAU furnaces were installed as part of the Winter Initiative and the majority of the installations did not produce significant energy savings. The replacement criteria used during the Winter Initiative was based on the energy efficiency rating of the existing FAU furnace without consideration of the historical space heating needs of the home.

SoCalGas believes one of the primary reasons significant energy savings were not realized is due to the fact that a comprehensive energy audit was not performed at the time of assessment to determine the space heating needs of the home. SoCalGas' proposed 2009-2011 LIEE program includes a comprehensive energy audit and this will identify customers with high space heating needs *who also have* an inefficient FAU furnace.

This pilot fully supports Strategy 5 of the Low Income Section of the CEESP by focusing on long-term and enduring energy savings. This pilot may provide significant reductions in energy use for customers with high space heating needs and assist the program in meeting the resource needs of California.

#### 5. Pilot or Study Implementation

The pilot will be implemented for approximately 250 low-income customers and FAU furnace installations will occur after the 2008-2009 winter season utilizing the existing LIEE contractor infrastructure. The pilot will be evaluated starting in May of 2010 using bill analysis to compare natural gas space heating energy use before and after the installation of the high-efficiency unit. SoCalGas will use bill analysis to determine the cost effectiveness for each installation and the results will be evaluated to determine if this potential measure will be offered in upcoming program years to customers with high space heating needs.

## Attachment A-10.2

#### Attachment A.10-2 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

1	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-10.3

#### Attachment A.10-3 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-10.4

#### Attachment A.10-4 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 costeffectiveness tests, and
- Provide a methodology for assigning NEBs at the measure level for costeffectiveness 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.

#### 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 utilities<sup>1</sup> 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.<sup>2</sup>

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

<sup>&</sup>lt;sup>1</sup> Joint utilities consist of SoCalGas and SDG&E.

<sup>&</sup>lt;sup>2</sup> 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 15<sup>th</sup> 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%.<sup>3</sup> 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.<sup>4</sup> 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:

<sup>&</sup>lt;sup>3</sup> 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.

<sup>&</sup>lt;sup>4</sup> 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.

	Α		В		С		D		E
1		2011	=	206	ed Program	Bu	-		<u> </u>
					-		uyei		
2	Sou	Ithe	rn California	a G	as Company				
3									
4	•								
_	CARE Budget Categories							_	
5		200	8 Authorized	2	009 Planned	2	010 Planned	2	011 Planned
6	Outreach	\$	2,625,886	\$	3,647,684	\$	3,755,053	\$	3,785,932
7	Proc., Certification and Verification	\$	873,049	\$	1,173,027	\$	1,235,832	\$	1,248,928
8	Information Tech./Programming	\$	379,600	\$	489,451	\$	506,003	\$	522,554
9	Pilots	\$	-	\$	-	\$	-	\$	-
10	Measurement and Evaluation	\$	5,175	\$	16,237	\$	16,707	\$	17,192
11	Regulatory Compliance	\$	213,056	\$	222,130	\$	229,513	\$	236,919
12	General Administration	\$	530,447	\$	566,635	\$	585,518	\$	604,963
	CPUC Energy Division Staff	\$	85,905	\$	171,500	\$	171,500	\$	171,500
14	Total Expenses	\$	4,713,118	\$	6,286,664	\$	6,500,126	\$	6,587,988
15	Subsidies and Benefits	\$	126,365,941	\$	132,846,122	\$	134,237,154	\$	135,901,649
16	Total Program Costs and Discounts	\$	131,079,059	\$	139,132,786	\$	140,737,280	\$	142,489,637

В-2	
Attachment	

$ \begin{array}{ c c c c c c c c c c c c c c c c c c c$
M N O timated Estimated PY Estimated 7 2010 2011 Net 2011 al Rate Enrollments Participation (a) (2) (Coi.L+N) 82.2% 16,891 1,425,984
E     F     G     H     I     J     K     L     M     N       Southern California Gas Company       Southern California Gas Company       Southern California Gas Company       Southern California Gas Company       Setimated Estimated Estimated Estimated Estimated Estimated Vear End PY 2008     Estimated Estimated Estimated Estimated Estimated Estimated PY 2009       Net PY 2008     PY 2008     PY 2009     PY 2009     PY 2009       Net PY 2008     PY 2008     PY 2009     PY 2009       Net PY 2008     PY 2008     PY 2009     PY 2010     PY 2010       Net PY 2008     PY 2009     PY 2009     PY 2010     PY 2010       Net PY 2008     PY 2008     PY 2009     PY 2010     PY 2010       Net PY 2008     Col. EHD     (2)     (Col. FHD)     (2)     (Col. LHD)       No     (3)     (Col. EHE)     (2)     (Col. LHD)     (2)     (Col. LHD)       No     (3)     (Col. EHE)     (2)     (Col. HK)     (Col. LHD)     (2)       No     (2)     (Col. HD)     (2)     (Col. HK)     (Col. LHD)     (2)       No     (1)     (2)     (Col. FHD)     (2)     (Col. LHD)     (2)       No     (2)
E     F     G     H     I     J     K     L     M       PY 2009 - 2011 CARE Estimated Participation     Southern California Gas Company     PY 2009 - 2011 CARE Estimated Factoria Gas Company     PX 2009 - 2011 CARE Estimated Factoria Gas Company     PX 2010
E       F       G       H       I       J       K       L         PY 2009 - 2011 CARE Estimated Farticipation       Southern California Gas Company       N       N       N       L       L         008       Estimated Farticipation       Southern California Gas Company       P       2009       P       P       2009         010       Vear End PY PY 2008       PY 2008 PY 2008 Net PY 2009 Net PY 2009 Net PY 2009 PY 2010 Net PY 2009       PY 2010 Net PY 2009       PY 2010 Net PY 2009       PY 2010 Net PY 2009         010       (3)       (Col. B+E)       (Col. F/D)       (2)       (Col. IPI)
E     F     G     H     I     J     K       PY 2009 - 2011 CARE Estimated Participation       Southern California Gas Company       D08     Estimated Tech     Estimated Participation     Estimated PY 2008     Estimated PY 2010 Net     Estimated PY 2010 Net       D08     Estimated Estimated     Estimated Participation     Estimated PY 2008     Estimated PY 2010 Net     Estimated PY 2010 Net       D1     (3)     (Col. B+E)     (Col. F/D)     (2)     (Col. F+H)     (Col. I/D)     (2)       (.606     31,621     1,364.235     79.6%     24,526     1,388,761     81.0%     20,332       (.606     31,621     1,364.235     79.6%     24,526     1,388,761     81.0%     20,332       (.606     31,621     1,364.235     79.6%     24,526     1,388,761     81.0%     20,332       (.606     31,621     1,364.235     79.6%     24,526     1,388,761     81.0%     20,332       (.606     31,621     1,364.235     79.6%     24,526     1,388,761     81.0%     20,332       (.606     31,621     1,364.235     79.6%     24,526     1,388,761     81.0%     20,332       (.606     31,621     1,364.235     79.6%     20,520     1,388,761     81.0%<
E     F     G     H     I     J       PY 2009 - 2011 CARE Estimated Participar Southern California Gas Company       008     Estimated Festimated Vear End PY 2008     Estimated Festimated PY 2008     Estimated Festimated PY 2009     Estimated PY 2009     Estimated PY 2009     Estimated PY 2009     Image PY 2009     Image PY 2009       01     (3)     (Col. B+E)     (Col. F/D)     (2)     (Col. FH)     (Col. IN)       01     (3)     (Col. B+E)     (Col. F/D)     (2)     (Col. IN)     (a)       01     (3)     (Col. B+E)     (Col. F/D)     (2)     (Col. IN)     (a)       03     31,621     1,364,235     73.6%     24,526     1,388,761     81.0%       03     Rate based on updated CARE Eligibility information to be filed October 200
E     F     G     H     I       D08     Estimated Estimated Vear End PY (3)     Estimated Estimated Fertinated Coil CARE Estimated Southern California Gas Co Southern California Gas Co Southern California Gas Co Southern California Gas Co Southern California Gas Co Py 2009 Net Py 2009
E     F     G     H       008     Estimated ted Net PY 2008     Southern Calify       011     Estimated Testimated     Estimated Ferminated       011     Col. B+E     Col. F/D       010     31.621     1,364.235       011     Col. B+E     Col. F/D       012     Col. B+E     Col. F/D       013     Col. B+E     Col. F/D       014     Col. B+E     Col. F/D       015     Col. B+E     Col. F/D       016     St.626     24.526
E     F     G       08     Estimated ted     Y     2009       08     Estimated Year End PY     You PY     2008       09     Estimated Year End PY     PY     2008       01     2008     Col. B+E)     Col. F/D)       05     31,621     1,364,235     79.6%       05     31,621     1,364,235     79.6%
E     F       08     Estimated       108     Estimated       ated     Net PY 2008       ble     Enrollments       coll     Participation       (3)     (Coll B+E)       (,606     31,621       1,606     31,621       1,364,235       uoal Rate will fluctuate based on upd
D08 Estimated ated Net PY 2008 ble Enrollments (506 31,621 (506 31,621
oal R. 000
D PY 20 Estima Eligib 1,714 1,714 1,714 1,714 1,716 07.
A     B     C     D       2     3     2       3     1     Total Enrolled Enrolled Enrolled Enrolled Through Estimated 12-31-07 March 2008 Eligible 6     PY 2008 Eligible 12-31-07 March 2008 Eligible 12-31-07 March 2008 Eligible 12-31-07 March 2008 Eligible 6       5     Source)     (1)     4/21/08 RD (2)       6     SocalGas     1,332.614 1,348,714 1,714,606       7     SocalGas     1,332.614 1,348,714 1,714,606       8     (a) Estimated PY 2009, PY 2010 and PY 2011 Goal R, 10,12601 R, 10
A B Total Total Enrolled 12-31-07 (Source) 13-31-07 (1) SoCalGas 1,332,614 (a) Estimated PY 2009, (1) CARE Annual Repo
s d b at
A (Source) SocalGas (a) Estimat (1) CARE ( (1) CARE ( (3) Most re

	A		В		С		D	E	F	G
1	P	Y 20	007-2008 CA	ARE	Outreach	and	l Penetratio	n Information		
2			Sou	thern	Californi	a G	as Compan	v		
3								,		
-	CARE PY 2007									
5	0/11/2 1 1 2001									
6	Outreach Method		Cost	Lal	oor Cost*		Total Cost	Estimated Number of Customers Reached	Estimated Number of Customers Enrolled**	Percent of New Enrollments for PY 2007
7										
8	Automated Voice Messaging	\$	63,530			\$	63,530	470,282	21,425	6.92%
9	Bill Insert	\$	235,100			\$	235,100	8,274,600	29,002	9.37%
10	Direct Mail	\$	613,949			\$	613,949	978,746	58,391	18.86%
11	3rd Party Outreach	\$	459,955			\$	459,955	39,834	29,997	9.69%
12	Data Exchange	\$	-			\$	-	n/a	73,146	23.63%
13	Customer Contact	\$	159,623			\$	159,623	246,015	87,043	28.11%
14	Capitation Program	\$	97,939			\$	97,939	11,998	8,157	2.63%
15	Web	\$	-			\$	-	3,683	1,681	0.54%
16	Events and miscellaneous outreach	\$	33,247			\$	33,247	1,953	762	0.25%
17	Mass Media	\$	349,687			\$	349,687	n/a	n/a	n/a
18	Recertification and PEV (postage, etc.)	\$	267,785			\$	267,785	n/a	n/a	n/a
	Labor and miscellaneous expense	\$	7,418	\$	190,645	\$	198,063	n/a	n/a	n/a
20	-		,		,		,			
21	Total	\$	2,288,233	\$	190,645	\$	2,478,878		309,604	100.00%
22										
23	CARE PY 2008									
24 25								Estimated Number of	Estimated Number of	Percent of New
26	Outreach Method		Cost	Lai	bor Cost*		Total Cost	Customers Reached	Customers Enrolled**	Enrollments for PY 2008
27	Automated Voice Messaging	\$	124,346			\$	124,346	348,050	26,773	9.5%
28	Bill Insert	\$	169,305			\$	169,305	6,720,000	27,305	9.7%
29	Direct Mail	\$	360,965			\$	360,965	551,675	31,997	11.4%
30	3rd Party Outreach	\$	752,835			\$	752,835	79,666	50,189	17.8%
31	Data Exchange	\$	-			\$	-	n/a	58,517	20.8%
32	Customer Contact	\$	127,698			\$	127,698	196,812	69,634	24.7%
33	Capitation Program	\$	53,021			\$	53,021	5,999	4,078	1.4%
34	Web	\$	25,000			\$	25,000	25,027	12,388	4.4%
35	Events and miscellaneous outreach	\$	16,289			\$	16,289	1,953	610	0.2%
	Mass Media	\$	517,500			\$	517,500	n/a	n/a	n/a
36		\$	268,886			\$	268,886	n/a	n/a	n/a
	Recertification and PEV (postage, etc.)	φ	200,000							
37	Recertification and PEV (postage, etc.) Labor and miscellaneous expense	э \$	7,678	\$	202,363	\$	210,041	n/a	n/a	n/a
37				\$	202,363			n/a	n/a	n/a
37 38 39				\$ \$	202,363			n/a	n/a 281,491	n 100.0

41
 42
 \* 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
 43
 44
 \*\* Data on estimated number of customers enrolled data may not be available for certain types of outreach.

Attachment B-4 Summary of Southern California Gas Company CARE Program P	Attachment B-4	Summary of Southern California Gas Company CARE Program Proposals for 2009, 2010, and 2011		
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Proposal	Description	Benefits	Current Practice
1. Reallocation of Budget Funds	Continue to allow 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.	Provision is currently authorized by Commission.
2. Change Sub-metered CARE and Expanded CARE Recertification Requirements	Align the sub-metered CARE tenants' recertification requirement and process with that in place for individually-metered residential customers. Sub-metered CARE tenants would recertify their CARE eligibility using enrollment anniversary dates, every two years. Submetered tenants would also be eligible for four-year recertification if on fixed income or pass the CARE probability model at the end of second year.	Reduce number of eligible customers dropped for non- response; reduce program costs.	Sub-metered tenants are recertified annually.
3. Change Expanded CARE Recertification Requirements	Expanded CARE facilities would recertify their CARE eligibility every two years.	Reduce number of eligible facilities dropped for non- response; reduce program costs.	Expanded CARE facilities are recertified annually.
<ol> <li>Continue Use of Probability Model for Recertification</li> </ol>	Allows using probability model for recertification. Customers who pass would be recertified once every four 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.
<ol> <li>Expansion of Categorical</li> <li>Eligibility to Include Section 8 and Public Housing</li> <li>Participants</li> </ol>	Expand CARE eligibility to include customers participating in Public Housing or Section 8 which is a pre-determined means-tested State or Federal program.	Increase enrollments by simplifying CARE requirement and process for customers; reach customers who might not otherwise apply.	Utilities currently offer categorical eligibility as authorized in D.06-12-038.
<ol> <li>Continue funding for the CARE Eligibility Annual Update</li> </ol>	The annual update establishes the CARE program eligibility based on census and economic data.	Allows utilities to determine eligibility and projected penetration.	Provision is currently authorized by Commission.

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#### **CARE** Pilot and Study Implementation Plans

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

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<del>,</del> α ∞		РҮ 2009 - 2	011 CARE ar Southerr	2009 - 2011 CARE and LIEE Rate Impacts - Gas (cents/Therm) Southern California Gas Company	npacts - Ga is Company	s (cents/Theri /	Ē	
4	PY 2009	Average Rate	CARE		LIEE			Average Rate
9		Excluding CARE/LIEE Surcharge	Subsidy Portion of Rate	CARE Administration Portion of Rate	Program Portion of Rate	LIEE Administration Portion of Rate	Total CARE/LIEE Surcharge	Including CARE/LIEE Surcharge
ω	Residential (non CARE)	1.46	2.86	0.135		0.30	4.59	6.05
6	Residential (CARE)	1.46	0	0	1.29	0.30	1.59	3.05
10	Commercial	3.83	2.86	0.14	0	0	3.00	6.82
1		0.41	2.86	0.14	0	0	3.00	3.41
12	Agricultural	NA	NA	NA	NA	NA	NA	NA
13		NA	NA	NA	NA	NA	NA	NA
14	System	NA	NA	NA	NA	NA	NA	NA
15								
16	PY 2010	Average Rate	CARE		LEE			Average Rate
17		Excluding	Subsidy	CARE	Program		Total	Including
<del>2</del> 80		CARE/LIEE	Portion of	Administration Portion of Rate	Portion of	Administration Portion of Rate	CAKE/LIEE Surcharge	CARE/LIEE
20	Residential (non CARE)	1.46		0.14		0.30	5.62	7.08
21		1.46		0	2.28	0:30		4.04
22	Commercial	3.83	2.90	0.14	0	0	3.04	6.87
23	23 Industrial	0.41	2.90	0.14	0	0	3.04	3.45
24	Agricultural	NA	NA	NA	NA	NA	NA	NA
25	Lighting	NA	NA	NA	NA	NA	NA	NA
26	System	NA	NA	NA	NA	NA	NA	NA
27								
28	PY 2011	Average Rate	CARE		LIEE	100	Totol	Average Rate
29 30		Excluding CARE/LIEE	Subsidy Portion of	Administration	Program Portion of	Administration	CARE/LIEE	Including CARE/LIEE
3		Surcharge	Rate		Rate		ourcriate	Surcharge
32	Residential (non CARE)	1.46	2.94		2.34			7.18
33	Residential (CARE)	1.46	0	00.00	2.34	0:30		4.09
34	Commercial	3.83			0	0		6.91
35	Industrial	0.41	2.94	0.14	0	0		3.49
36		NA	NA	NA	NA	NA	AN	NA
37		NA	NA	NA	NA	NA	NA	NA
88	System	NA	NA	NA	NA	NA	NA	NA

	PY 2007 Customer Usage and Bill Savings Southern California Gas Company	Electric Gas Gas	Tier 3 Tier 4 Tier 5 Total Below Baseline Above Baseline								426,599			359,323			Tier 3 Tier 4 Tier 5 Total Below Baseline Above Baseline		2,286 1,121 1,165	2,433 2,031	7,092 4,422 2,670	3,008		7,044	9,623			28,746 14,743 14,003		34,351 19,505 14,846
0	ΡΥ 2( S		Tier 1 Tier					1		-	1	1					Tier 1 Tier		-	-	-	-			•	,	•	•	•	1
υ			Total T		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Total T		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
В				2007 Total	January	February	March	April	May	June	July	August	September	October	November	December		2007 Total	January	February	March	April	May	June	July	August	September	October	November	December
A	321	4	5	CARE	7 Customers 7	8	6	10	11	12	13	14	15	16	17	18	19	20 Number of	21 Customers		23	24	25			28			31	32

## PY 2005 - 2007 Bill Savings

# Southern California Gas Company

\$ 160	0.26	\$ 7,062,428	\$ 27,097,166	2007
\$ 196	0.26	\$ 7,218,569	\$ 27,317,476	2006
\$ 164	0.23	\$ 6,652,911	\$ 28,834,254	2005
Bill Savings	Ratio	Savings	Program Costs	Program Year
Program Bill Savings/ Cost Per Home Average Litecycle	Program Bill Savings/ Cost	Program Litecycle Bill		

	A	В	С	D	E	F							
1		PY 2009-2011 Pro	jected Custom	er Usage and E	ligibility								
2		South	ern California G	as Company									
3													
4			PY 2007	PY 2009**	PY 2010**	PY 2011**							
5				Estimated	Estimated	Estimated							
6			Number of	Number of	Number of	Number of							
7			CARE	Customers	Customers	Customers							
8			Customers in	Treated by	Treated by	Treated by							
			PY2007**	LIEE in PY	LIEE in PY	LIEE in PY							
9				2009	2010	2011							
	Electric	Tier 1*	N/A	-	-	-							
11		Tier 2*	N/A	-	-	-							
12		Tier 3*	N/A	-	-	-							
13		Tier 4*	N/A	-	-	-							
14		Tier 5*	N/A	-	-	-							
15	Total N/A												
16													
	Gas	Tier 1 (Below Baseline)*	780,230	47,746	61,818	62,823							
18		Tier 2 (Above Baseline)*	552,384	47,254	61,182	62,177							
19		Total	1,332,614	95,000	123,000	125,000							
20													
21													
	* Utility specifi 2011.	ic note describing how tiers have bee	n grouped, if discuss	ed in Section V of L	IEE Budget Applicat	ions PY 2009-							
	LIEE baseline	RE customers are listed here as a proof willing and eligible customers is d Y 2009-2011. Willing and eligible cu	etermined by the me	thodology described	in Section III.A of th								