(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-1:

(Application p. 18, Attachment A-4)

You provide the number of eligible and treated units broken down by single family versus multifamily and by owner versus renter for each year of the application period. Please provide the proposed budget for multifamily units for each year of the application period. If there currently are no proposed budgets for multifamily units, please explain whether the companies could develop such budgets and what would be involved (e.g., time frame to do so; data that would need to be reviewed collected to develop a budget). Please also specify the expensed budget for multifamily buildings for program years, 2012-2014.

RESPONSE NCLC-SoCalGas-1-1:

SoCalGas did not develop its proposed budget on a housing type basis, and has not prepared a separate budget for the multifamily sector or a breakdown of the proposed budget by housing type. The historical information below provides a basis for an estimated contribution for multifamily budget requirements going forward. In order to develop a representation of the portion of the measure installation budget for multifamily homes only, SoCalGas could use 2013 or other historical information (because 2014 is not yet completely finalized) as appropriate to develop administrative and other cost allocation rates and costs of installation per treated multifamily home for each measure. For program administration costs, the existing budget could be allocated based upon the number of treated units falling into each housing category. A timeframe in this process is unknown due to the level of complexity required to determine such a budget.

The attached tables provide expenditures by housing type for 2012 and 2013. For 2014, multifamily expenditures will be reported in the Annual Report in May 2015.



(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-2:

(Rendler Testimony p. 8, Table 1)

Please break down the underspending in 2014 relative to budget by measure and/or program.

RESPONSE NCLC-SoCalGas-1-2:

For clarification, Table 1 of the Direct Testimony of Daniel J. Rendler presents authorized budget for 2014 (not actual expenditures or underspending).

Table 1 of the December monthly report, below, provides expenditures compared with total budget by category and subcategory. Please note this information represents "year-to-date" expenditures. The final 2014 expenditures will be reported in the 2014 Annual Report to be filed on May 1, 2015.



(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-3:

(Aguirre Testimony p. 107, Table 19)

Please indicate the therm savings attributable to multifamily units. For 2012-2014, provide both the projected and actual therm savings attributable to multifamily units.

RESPONSE NCLC-SoCalGas-1-3:

Table 19 of the Direct Testimony of Mark Aguirre and Hugh Yao shows the estimated first year therm savings by measure for 2016. Please note that 2017 therm savings are identical to 2016. These savings include multi-family, single-family and mobile homes. The amount of therm savings in this table attributed to multi-family homes is 847,778 therms.

Therm Savings ¹					
2012	2012	2013 Actual	2013	2014	2014
Actual ²	Duningtod3		Drainatad ⁴	A -415	Drainatad ⁶
Actual	Projected ³		Projected⁴	Actual ⁵	Projected ⁶

Please note that the savings in the table above will not match the 2012-2014 Application filing or the 2012-2014 annual reports. For this data request, SoCalGas was directed by NCLC to use the most recent therm savings information available. This information is from the ESA Impact Evaluation published in August, 2013. The therm savings information used for the 2012-2014 Application filing and annual reports is from the ESA Impact Evaluation published in June 2011.

There are unique approaches with the raw data available for each year and therefore all values cannot be directly comparable. For example, the 2012 annual report data has hot water conservation measures grouped together and to calculate savings the report uses one therm saving for this grouping. The subsequent annual reports separated hot

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¹ These calculations were not done for the application or the annual reports and were separate calculations completed for this data request.

² The data available has hot water conservation measures grouped together and uses one therm saving for this grouping.

³ The actual, not projected number of M-F installations for FAU standing pilot light conversion and HE clothes washers are included in this number. TSVs are not included.

⁴ The actual, not projected number of M-F installations for FAU standing pilot light conversion, HE clothes washers and TSVs are included in this number.

Preliminary

⁶ The actual, not projected (preliminary) number of M-F installations for FAU standing pilot light conversion, HE clothes washers and TSVs are included in this number.

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water conservation measures individually and used respective therm savings for each measure. Further, for the 2012-2014 application, which was used to calculate the projected therm savings, certain measures' information was not split out by housing type. This is true for measures in which therm savings does not vary by housing type. Therefore, therm savings for MF cannot be separated out. In these cases an actual MF therm savings was used from the annual reports if available. See table footnotes for more details.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-4:

(Aguirre Testimony p. 6)

You state that the program utilizes a "whole house" approach. Do you also intend this to mean a "whole building" approach for multifamily properties, in which the company will deliver all cost effective measures regardless of whether the load runs through a tenant meter versus owner meter? If so, what funding sources will be utilized? If not, does the company agree that it is not in fact taking a "whole house" approach to multifamily buildings?

RESPONSE NCLC-SoCalGas-1-4:

For reference, the applicable portion of the testimony is as follows:

"SoCalGas' ESA Program, as currently formulated, and as proposed, herein strives to meet the dual objective of helping income-qualified customers reduce their energy consumption and costs, while increasing their comfort, health and safety. The program utilizes a "whole house" approach to provide no cost home weatherization, energy efficient appliances and energy education services to income-qualified customers."

In the Direct Testimony of Mark Aguirre and Hugh Yao, SoCalGas describes its ESA program as using a "whole house approach" in that the focus is to reach each dwelling with a suite of energy efficiency measures and education, including, when applicable, in combination with other programs, as opposed to a focus on particular measures. The term is not intended to make a statement as to the eligibility of different metering arrangements.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-5:

D.14-08-030 ordered the utilities to propose heating, hot water, cooling, and common area measures for multifamily housing (see, e.g., Order paragraphs 41 & 42). Please list each measure that you have proposed in response to this order. For each measure, indicate whether it is new or pre-existing; serves individual units or central systems; any caps, restrictions or other requirements related to the measure; the budget allocation; whether the measure would require a co-pay from the building owner; whether the measure is also available through any other energy efficiency program (including Energy Upgrade, MIDI, MFEER or third-party multifamily programs); and how those other programs will be leveraged.

RESPONSE NCLC-SoCalGas-1-5:

Pursuant to D.14-08-030, Ordering Paragraphs 41 and 42, new measures proposed for multifamily homes in the current application to be delivered as part of the ESA program are shown in the table below. In addition, in the Direct Testimony of Mark Aguirre and Hugh Yao SoCalGas provided a proposal to address common areas, specifically central space and water heating systems through integration with EUC-HUP, MFEER, and third party programs using the Single Point of Contact concept (p.83).

Measure	New or existing	Individual or central systems	Caps or restrictions	Budget Allocation	Co-Pay from Building Owner?	Also available through another program/ leveraging
Tub Spout	New	Individual or central hot water	None	Domestic Hot Water subcategory \$6.4 million per year beginning 4th quarter 2015	No	No; leveraging identical to other ESAP measures
HE FAU Furnace	New	Individual	Owner-occupied OR rented by medical baseline customers; high use; existing FAU < 65 AFUE	HVAC subcategory \$7.5 million per year	No	No; leveraging identical to other ESAP measures
Minor Furnace Repair for Renters	Existing (new for renters)	Individual	Under \$300	HVAC subcategory \$1.1 million per year	No	No; leveraging identical to other ESAP measures

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-6:

If an energy audit of a particular multifamily property (otherwise meeting all program requirements) showed that a measure not normally available under ESA was cost-effective, is there a mechanism for using ESA funds for that measure?

RESPONSE NCLC-SoCalGas-1-6:

SoCalGas performs the installation of measures authorized by the Commission in the ESA Program decisions. SoCalGas is not aware of a mechanism for installing measures not normally made available under the ESA Program.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-7:

Please provide all studies of cost-effectiveness of measures in multifamily buildings which you considered in preparing the application.

RESPONSE NCLC-SoCalGas-1-7:

In order to run the cost-effectiveness test models, SoCalGas must input the number of installations, the costs of installation and the energy savings attributed to each measure, by housing type and climate zone if these factors affect the energy savings, into the E3 Calculator and LIPPT model (calculates non-energy benefits). The number of installations and installation costs are estimated by SoCalGas based on historical installation rates and costs, inflation, and other factors. Per-unit therm savings are taken from ESA Program Impact Evaluation reports published in 2013 and 2011, DEER and engineer workpapers. SCG used a workpaper for a proposed high efficiency furnace measure. SCG also proposed a new tub spout measure that is not included in the sources cited, so a manufacturers report was used to provide estimated therm savings (attached).





All ESA Impact studies can be found on CALMAC at: http://www.calmac.org/default.asp
Study IDs: SDG0273.01 and SCE0273.01

DEER values can be found at: http://www.deeresources.com/

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-8:

(Application Attachment A-5; Aguirre testimony p. 103) Explain why the ratio of program benefits to program costs improves over time. Is SoCal Gas able to count energy savings from existing conditions or only above current code? What factors contribute to SCG's Resource Measure TRC being substantially below 1?

RESPONSE NCLC-SoCalGas-1-8:

The ratio of program benefits to program costs has changed over time for a variety of reasons. The mix of measures installed (actual and forecast) varies from year to year. In the 2015-2017 Application SoCalGas has proposed a new tub spout measure (attached), which impacts the overall TRC for those years. Also, therm savings attributed to each measure vary from year to year due to updated impact evaluation reports, updated DEER values and updated workpapers. For the 2015-2017 Application, SoCalGas used the latest ESA Impact Evaluation for therm savings. Although some measures therm savings decreased, overall, the therm savings across all measures increased compared with prior studies. There are also differences in the modeling inputs that will vary cost-effectiveness results across the years. For example, an updated version of the E3 Calculator was used for the 2015-2017 Application. For the 2015-2017 Application, SoCalGas also updated the Expected Useful Lives (EULs) of all measures. SoCalGas has not analyzed how these model input updates have changed the cost-effectiveness tests through time.

SoCalGas counts energy savings as given in the "Energy Savings Assistance Program Impact Evaluation" reports, which use a pre/post billing analysis, along with other methods. In the 2015-2017 Application, a new high efficiency furnace measure was proposed. Since this is a new measure, SoCalGas used only above current code savings as shown in a workpaper (attached to response 7). This is the method used in non-low-income energy efficiency programs. If this measure is approved and analyzed in a future ESA Program Impact Evaluation, the savings that SoCalGas claims in the future will come from that source.

The resource TRC test includes all costs (costs of the measure installations and administrative costs) and energy related benefits (avoided gas costs). The resource TRC does not include non-energy benefits. The resource TRC includes only measures that are classified as "resource measures."

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RESPONSE NCLC-SoCalGas-1-8 (cont.):

The manner in which SoCalGas classified measures as resource included most measures, even if the measure's individual resource TRC was substantially below 1.0. The only benefit included in the resource TRC for SoCalGas as an all gas utility is an avoided gas cost and gas prices are fairly inexpensive, especially compared to electric prices. Lastly, SoCalGas included as resource measures some measures that are very expensive compared to the therm savings generated; however, these measures have high health, safety, comfort and water conservation benefits.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-9:

(Application p. 15)

What is the predicted impact of relaxing the three measure minimum on serving the multifamily sector, including number of units served; number of measures installed; cost-effectiveness; and other program feature or outcome?

RESPONSE NCLC-SoCalGas-1-9:

SoCalGas proposed to relax the three measure minimum in certain circumstances, including for customers in multifamily buildings. SoCalGas has not developed an estimate of the isolated impact of relaxing the three measure minimum, but is optimistic that in combination with other adjustments including new measures, improved coordination with Southern California Edison, and marketing approaches and income qualification procedures described in SoCalGas' budget application, multifamily enrollments can be significantly increased.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-10:

(Application pp. 11-12; Aguirre Testimony pp. 27-28, 43)

Apart from developing "integrated multifamily marketing collateral" and using Rural 23 Development Multifamily Rental lists published by the United States Department of Agriculture, specifically describe how outreach will be targeted to multifamily buildings, both owners and tenants.

RESPONSE NCLC-SoCalGas-1-10:

SoCalGas will conduct outreach to owners and tenants of multifamily buildings through direct mail and door-to-door as these continue to play a large role in awareness. Events and postcards that announce SoCalGas' presence at events also increases awareness. In addition, the Direct Testimony of Mark Aguirre and Hugh Yao (p. 73) references expansion of marketing materials that target multifamily property owners and participating in events and memberships of multifamily associations.

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QUESTION NCLC-SoCalGas-1-11:

(Aguirre Testimony p. 80)

Please define "registered low-income affordable housing" for purposes of satisfying the ESA income qualification requirements.

RESPONSE NCLC-SoCalGas-1-11:

SoCalGas is referring to HUD housing as well as city, county, and non-profit housing that serves low-income residences.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-12:

(Application p. 12, Aguirre Testimony p. 83)

You state that owners of multifamily buildings or their representatives may provide an affidavit certifying that 80% of on-residents are eligible for ESA. Please provide a sample of the proposed affidavit.

RESPONSE NCLC-SoCalGas-1-12:

The Direct Testimony of Mark Aguirre and Hugh Yao notes "SoCalGas proposes to accept an affidavit . . . certifying that at least 80% of the on-site residents meet ESA Program income qualification requirements" (p.80). The affidavit has not yet been developed. If this proposal is adopted by the Commission, SoCalGas will develop an affidavit that will meet all requirements of the ESA Program as directed by the Commission.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-13:

(Aguirre Testimony p. 84)

You state that you will also accept affidavits from owners/representatives in multifamily buildings located in self certification PRIZM Codes or census tracts. Do you anticipate that the substance of that owner affidavit will be identical to the one for registered low-income affordable housing? If not, explain how the affidavit requirement will differ and provide a sample of the affidavit.

RESPONSE NCLC-SoCalGas-1-13:

As stated in response 12 above, the affidavits have neither been developed nor implemented. If this proposal is adopted by the Commission, SoCalGas will develop an affidavit that will meet all requirements of the ESA Program as directed by the Commission and would include the methodology of enrollment for multifamily buildings.

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QUESTION NCLC-SoCalGas-1-14:

(Aguirre Testimony p. 84)

You state that affidavits will be accepted under certain conditions for master meter buildings. Will this affidavit process also be available to non-master metered buildings? If not, what distinguishing factors of non-master metered buildings affect the income certification process?

RESPONSE NCLC-SoCalGas-1-14:

SoCalGas' proposal focuses on master-metered buildings. SoCalGas believes that this proposal improves upon present practices and represents an opportunity to expand outreach and streamline the enrollment process. Where applicable, SoCalGas will explore non-master metered multifamily buildings for the affidavit process if they fall within any approved requirements of the ESA Program.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-15:

(Application p. 10)

What specific criteria or evaluation process does SCG use to choose which measures it includes in its program offerings?

RESPONSE NCLC-SoCalGas-1-15:

As described in SoCalGas' budget application and testimony, the ESA program has evolved over a decade-long period. Measures have been added and retired in response to Commission order, frequently as a result of proposals presented by the utility. In general, SoCalGas has sought to propose measures that meet the Commission's stated objectives of achieving cost effective energy savings and providing health, safety, and comfort benefits to SoCalGas' low-income customers. Other considerations include equipment and training requirements for SoCalGas' contractor network and impact on the program's overall budget requirements. SoCalGas evaluates measures continually as advances in the industry make new opportunities available.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-16:

(Application p. 10)

Please provide a list (or document with the equivalent information) of all ESAP measures that have per-home caps, or total budget caps. Please also provide what the per-home cap and total budget cap is for each of these measures.

RESPONSE NCLC-SoCalGas-1-16:

SoCalGas observes the caps on furnace and hot water heater repair and replacement cost as well as minor home repair provided in the P&P Manual. Table 6-1 at pp.36-37 of the P&P is reproduced below.

Table 6-1 Caps on Home Repairs

Service	Average Cost per Home Receiving Service	Maximum Cost for Individual Home
Furnace Replacements Central Furnaces Wall/Floor/Direct Vent Furnaces		\$2,000 ¹¹ \$1,500
Water Heater Repairs and Replacements (Total Combined Cost for home receiving one or the other)	\$900	\$1,250
Other Home Repairs	\$300	\$750
Furnace Repairs (restriction on repair expenditures relative to cost of replacement) Central Furnaces Wall/Floor/Direct Vent Furnaces		50% ¹⁰ 40%
Total of All Home Repairs		\$2500
1 Does not include the costs of Title 24 compliance.		

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QUESTION NCLC-SoCalGas-1-17:

(Application p. 10)

Please provide a list (or a document with the equivalent information) of all ESAP measures that have climate zone restrictions, renter restrictions, or multifamily restrictions. Specify which measures have which restrictions.

RESPONSE NCLC-SoCalGas-1-17:

SoCalGas currently does not offer any measures with climate zone restrictions. Duct testing and sealing is the only measure not authorized for multifamily homes. Furnace and water heater repair and replacement are the only measures restricted to homeowners. SoCalGas has proposed minor furnace repair for renters as a new measure in the current application.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-18:

(Aguirre Testimony p. 62)

Will high efficiency forced air unit furnaces be available for multifamily buildings? If so, please specify your estimate of how many multifamily tenant units will receive this measure and the corresponding total budget for the multifamily sector.

RESPONSE NCLC-SoCalGas-1-18:

SoCalGas' proposal to provide HE FAU is available for multifamily homes, provided the following: a) the home is owner occupied, or b) the customer is a renter that is enrolled in Medical Baseline (MBL).

Rows 84 - 92 of Table 16 of SoCalGas' 2013 Low-Income Programs Annual Report show that multifamily units received a total of 42 "heating system" (furnace repair and replacement) of 11,575 units across all housing types in 2013 (rows 84 through 114) or 0.4%. At this rate, SoCalGas would expect to deliver roughly 11 HEFAUs to multifamily units at a cost to the program of \$50,600.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-19:

(Application p. 17; Aguirre Testimony p. 25)

SCG indicates that under ESA, a treated home must receive all feasible measures for which it qualifies and that this is a consideration associated with cost effectiveness. Now that the Commission has adopted a portfolio-level approach to cost effectiveness, do any existing program rules prevent SCG from delivery strategies that target measures to high energy users, certain climate zones, and particularly inefficient households, as proposed for high efficiency air unit furnaces? Do any program rules prevent SCG from delivering tailored packages or measures based on needs and energy savings opportunities from low-income households in their service territory? Do any program rules prevent SCG from using an initial energy assessment to tailor measures to achieve maximum energy savings as opposed to an all-feasible measures approach? Please include references/page numbers to existing laws, policies, or quidelines.

RESPONSE NCLC-SoCalGas-1-19:

SoCalGas would need to evaluate the proposed delivery strategy on a case by case basis with respect to consistency with existing program rules. SoCalGas currently employs strategies to enroll customers. The movement to a portfolio-level approach for cost-effectiveness has not impacted the ability to pursue such strategies. As stated at Policy and Procedures Manual, Section 2.8 at p. 22, "a home must receive all feasible measures offered under the ESA Program." SoCalGas interprets this rule to mean that each home must receive every measure for which it qualifies. SoCalGas would need to assess what is covered in "tailored packages or measures" to determine whether delivery is consistent with the all feasible measures rule. To the extent this question contemplates an assessment process beyond SoCalGas' existing in-home assessment, for instance, reviewing a participant's energy use and performing elements of an "energy audit," SoCalGas would seek Commission guidance before implementing such a process. Please see the response to Question 6 regarding allowable measures pursuant to current rules.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-20:

(Application p. 12)

The Application refers to "Energy Upgrade California® Multifamily Home Upgrade Program, Middle Income Direct Install ("MIDI"), Multifamily Energy Efficiency Rebates ("MFEER") and SoCalGas' third party multifamily programs." For a two-year period (2013-2014), and for each program, please provide:

- a) The budget;
- b) The number of units served and the number of buildings served;
- c) The cost-effectiveness of the program;
- d) The measures available, including common area measures (specify whether common or individual-tenant measures and whether measures are available for multifamily buildings);
- e) For heating, cooling, and water heating measures under ESA, MFEER, (and EUC if applicable), please provide equipment specifications/criteria related to the efficiency of the models. Is there a minimum or maximum efficiency level that you will provide?
- f) All requirements or restrictions for participation in the program;
- g) Whether the program requires an energy audit, and if so, how that audit is conducted:
- h) Whether the program includes benchmarking or other data collection, and if so, details of that process;
- For MFEER, the criteria/evaluation process for selecting common area measures; and
- j) The application process and timeline;

Please also provide projections for the above categories for 2015-2017 to the extent available.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

RESPONSE NCLC-SoCalGas-1-20:

a. The following is a list of SoCalGas budget for each of the above stated programs for the two-year period (2013-2014).

MIDI: \$2,000,000EUC MF: \$1,000,000MFEER: \$1,328,972

SoCalGas Third Party Multifamily Programs

MFDTS: \$3,880,900MFHTU: \$2,315,918Ode: \$4,224,481

- b. The number of units (dwellings) served
 - MFEER = SoCalGas does not track this information
 - MIDI (2013-2014) = 546 units served
 - EUC MF= 0 units served⁷
 - MFDTS (2013-2014) = 38,271 units served
 - MFHTU (2013-2014) = 38.271 units served

The number of buildings served

- MFEER and MIDI = SoCalGas does not track this information
- EUC MF = 0 buildings⁸
- MFDTS (2013-2014) = 2,060 buildings
- MFHTU (2013-2014) = 290 buildings
- (MFHTU targeted big multifamily residential buildings)
- ODE (2013-2014) = 1,235 buildings
- c. The final cost effectiveness for the Energy Efficiency (MIDI, EUC, MFEER, 3rd party, ODE) programs listed is not available until May 1, 2015. SoCalGas is in the process of preparing portfolio and program cost effectiveness for the annual report due May 1st. The process includes verifying/gathering all projects and expenditures and running them through the E3 calculator.
- d. Please refer to the attached spreadsheet under the tab "MF 2014 Measures"

⁷ EUC MF notes '0' units served because SoCalGas does not identify these projects as served until they are completed. All current projects under EUC MF are still a work-in-progress.

8 *Id*.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

Copy of Data Request ESA Q20 03'

For heating, cooling, and water heating measures under ESA, MFEER, (and EUC if applicable), please provide equipment specifications/criteria related to the efficiency of the models. Is there a minimum or maximum efficiency level that you will provide?

- e. The following factors are used to assess requirements or restrictions for program participation: product specification, previous participation, property type, and equipment type.
- f. EUC MF is the only programs requiring an energy audit. The EUC MF audit involves initial basic assessment performed by SoCalGas and SCE account executive or consultant to determine property and customer needs. If the customer agrees to participate, a comprehensive assessment (including modeling) is performed prior to installation of measures.
- g. For MFEER the quantity, type, size and efficiency of appliance installed along with customer and address and uploaded in the Energy Efficiency database. Additional Information is captured on the application and invoices submitted but may not uploaded. There is currently no benchmarking included.

For EUC MF the measure, usage, customer and project data are captured in the database. Basic and comprehensive assessments are performed prior to the installation of measure.

For MIDI the quantity and type and project price along with the customer and address information is captured and uploaded in the database. Additional measure, dwelling and tenant information is captured but may not be uploaded. Each dwelling is assessed prior to installation or measures. Currently there is no benchmarking.

For the Third Party Multifamily Programs, all data (number of sites/workorders, number of units installed, number of water measure devices installed) is collected from contractor's install work orders. After the data input it is then entered into their proprietary database with a quality control check point. The information is extracted from the system for invoicing. The number of actual units served is finalized with the creation of measure file for SoCalGas EECP System upload.

h. Please refer to the attached spreadsheet in response 1-20.d under the tab "MF Types".

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

i. For MFEER the application submitted by customer or customer's agent via mail, processed by SCG Rep and uploaded into the EE database.

For MIDI the invoice, application and required forms are submitted by SCG MIDI contractor and uploaded into the EE database upon completion.

For EUC MF the application is submitted by a customer with assistance from a SPOC (single point of contact). Further documentation is submitted by a program consultant. Processing is conducted by SCE or SCG and uploaded to EE database when completed.

The following are SoCalGas' projections for the above categories for 2015-2017 to the extent available.

2015 Goals

- MFEER = 487,771 Therms
- MIDI = 2000 Units (Pilot)
- EUC MF = 1700 Dwellings (Pilot)
- MFDTS
 - No. of Units = about 24,000
 - No. of Buildings = about 1,000
 - Therms = about 228, 712 therms
- MFHTU
 - No. of Units = about 20,000 units
 - No. of Buildings = about 160
 - Therms = about 223,990 therms.
- ODE
 - No. of Units = about 20,000 units
 - No. of Buildings = No set goal
 - Therms = 423,166 therms

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-21:

What information must a multifamily building owner provide and to whom, in order to access each of the energy efficiency programs referenced in the previous question? Can a multifamily building owner access all available programs with a single application? Is installation of common area and in-unit measures across all programs coordinated to minimize the number of visits to the building?

RESPONSE NCLC-SoCalGas-1-21:

Due to the nature of each program and the complexity of the multi-family segment, each program has its own eligibility, programmatic guidelines and applications. Applications are submitted as shown below:

Program	Application
MIDI	Submitted by vendor
ESA	Submitted by vendor
	Submitted by Customer to SCG EE
MFEER	processor
	Submitted by Customer with help from
EUC MF	SPOC
3rd Party	
MF	Submitted by vendor

SoCalGas' ESA program proposed a Single Point of Contact (SPOC (ESA Vendor, SCG AE or other)) as the person who would assist the customer in navigating the various multi-family programs. While SoCalGas' program has proposed an EE and LIEE SPOC coordination, SoCalGas' ESA did not propose a single application do to the complexity of each program. Where applicable, the building owner may work with the SPOC to obtain program information/forms, schedule site visits, and solicit assistance on program paperwork and requirements. Please see response 1-23 for additional information regarding the SPOC.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-22:

(Aguirre Testimony p. 83)

The testimony states that SoCalGas is not proposing ESAP funding of common area measures because those measures are addressed by other efficiency programs. Please identify each multifamily building or project that has received funding under 2 or more energy efficiency programs. For each building or project, indicate the programs that were involved, the amount of funding contributed by each, the measures installed, and the time from initial application to project completion.

RESPONSE NCLC-SoCalGas-1-22:



NCLC Q22 EE and ESA Properties 03201

Attached please find the file which lists the multifamily buildings served by both ESA and MFEER programs in 2013 and 2014. Also, included are the cost and the measures installed.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-23:

(Aguirre Testimony p. 82)

Describe the role and activities of staff who act as "Single Point of Contact(s)."

RESPONSE NCLC-SoCalGas-1-23:

Single Point of Contact (SPOC) is a program representative that performs an initial assessment of the property to evaluate the property's energy needs. The SPOC provides the owner/manager with information regarding SCG's multifamily program offerings. The programs include EUC MF, MFEER and other energy efficiency programs serving multi-family properties.

An energy consultant further assesses the property if needed and assists customer with developing a project scope to determine the property's energy savings potential.

In 2014 SoCalGas hired an account executive to act as a single point of contact (SPOC) for multifamily property owners. This SPOC acts as an advocate for property owners and asset managers. The SPOC works with the owners/managers to better understand their needs and identify opportunities and which energy efficient programs are best suited for each property.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-24:

(Aguirre Testimony p. 11)

Please describe the data sharing partnership with the California Department of Community Services & Development ("CSD"). What information will be shared and how will it benefit the ESA program? Is any information currently shared with CSD, either on a general or pilot basis? Please describe any such program.

RESPONSE NCLC-SoCalGas-1-24:

SoCalGas has discussed data sharing opportunities with the California Department of Community Services & Development (CSD), but as noted is seeking an effective platform for such a collaboration. Currently, there is no information being shared with CSD; however, procedures for data sharing were initiated in an SCE-led pilot to determine "common program data fields" such as address, measures installed, and installation date (p. 85 - 88). As data becomes available from CSD, SoCalGas' ESA Program will leverage opportunities for common program data sharing to maximize cost effectiveness and reduce duplication of services.

(1ST DATA REQUEST FROM THE NATIONAL CONSUMER LAW CENTER)

QUESTION NCLC-SoCalGas-1-25:

Please describe your plans, if any, to coordinate with or leverage energy efficiency programs funded by cap and trade through the CSD. Please make available a template of what leveraging multiple programs would look like to achieve a whole building retrofit of a low income multifamily dwelling including how outreach, contracting and budgets would work together.

RESPONSE NCLC-SoCalGas-1-25:

At the time of its application and the time of this data request, SoCalGas does not know specific communities that have been identified for cap and trade funds. The opportunity to leverage energy efficiency programs funded by cap and trade through CSD represents a significant outreach opportunity that SoCalGas is monitoring closely.