

**SOUTHERN CALIFORNIA GAS COMPANY
LOW INCOME ASSISTANCE PROGRAMS & BUDGETS
FOR PROGRAM YEARS 2015-2017
(A.14-11-011)
(TURN-SCG-01)**

QUESTION 1:

Please provide SoCalGas' responses to ORA Data Request No. ORA_SoCalGas_004 (2015), Questions 1 and 2.

RESPONSE 1:

Attached please find SoCalGas' work papers for the 2015-2017 CARE Administrative budgets which were provided as response 1 to ORA_SoCalGas_004.



2015-2017 SCG
CARE Workpaper.pdf



SoCalGas CARE
2015-2017 Outreach

Attached please find SoCalGas' workpapers for 2011-2014 CARE Administrative budgets which were provided as response 2 to ORA_SoCalGas_004. Please note that program year 2011 includes documentation for program years 2009 and 2010. These years were part of the time frame specified in SoCalGas' 2009-2011 Low-Income Application for the CARE program so SoCalGas' work papers were prepared to cover this timeframe.

Program Years 2012-2014:



2012-2014 CARE
budget.pdf



2012-2014 CARE
enrollment and discon



2012-2014 CARE
rates.pdf



2012-2014
Escalation factors.pdf



2012-2014 CARE
Outreach detail.pdf

Program Years 2009-2011:



Budget detail by
year.pdf



CARE detail by
category.pdf



FTE Employee
information.pdf



Non Labor budget
detail.pdf



Outreach write up
detail.pdf



Outreach detail by
year.pdf

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QUESTION 2:

Please provide the following information about SoCalGas' CARE enrollment practices:

- a. Describe all circumstances under which a customer could be enrolled in CARE without submitting an application.
- b. Identify the Commission policies that support each enrollment practice identified in part a.
- c. Indicate the steps taken by SoCalGas to minimize the risk that customers who are ineligible for CARE will be enrolled through the practices identified in part a.

RESPONSE 2.a:

SoCalGas' customers apply for CARE by submitting their applications via e-mail, interactive voice response (IVR), or on-line. CARE enrollment is also offered by CARE clerks over the phone when customers call-in with inquiries.

Customers can also be enrolled in CARE without submitting an application. Customer information obtained from other utilities' CARE Programs, SoCalGas' Energy Savings Assistance (ESA) Program, Gas Assistance Fund (GAF) Program and Low Income Home Energy Assistance Program (LIHEAP) are utilized for CARE enrollment. Additionally, the following scenarios offer CARE enrollment:

- i. Customers who do not participate in SoCalGas' CARE Program, but are enrolled in other utilities' CARE Programs, are automatically eligible for SoCalGas' CARE Program. To ensure that eligible customers in overlapping territories receive all discounts for which they qualify, SoCalGas exchanges its CARE customer data with Southern California Edison (SCE), San Diego Gas & Electric (SDG&E) and Pacific Gas & Electric (PG&E). SoCalGas customers enrolled through data-sharing are mailed a letter notifying them of the enrollment and they are provided the opportunity to opt-out of SoCalGas' program if they choose.
- ii. SoCalGas cross-references customers who receive ESA Program benefits. Customers who are found in the ESA Program system are automatically

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RESPONSE 2.a (cont.):

enrolled for the CARE discount and exempt from Post Enrollment Verification (PEV) if their eligibility has been verified by the ESA Program.

- iii. SoCalGas' GAF Program provides one-time bill assistance on a qualified customer's winter natural gas bill. The program typically begins in February and continues through the end of March, or until funds are depleted. The income guidelines for the GAF Program are the same as for the CARE Program.

SoCalGas' GAF customer data and CARE customer data are interfaced. Customers participating in the GAF Program, but not in CARE, are automatically enrolled in CARE. Additionally, because GAF customers provide proof of income when applying, customers approved for GAF are not subject to CARE's PEV process.

- iv. Lastly, SoCalGas utilizes the LIHEAP payment information from the Department of Community Services and Development (DCSD), which was used to apply LIHEAP payment assistance to a low-income customer's bill. Customers approved for LIHEAP are not subject to CARE's PEV process because LIHEAP customers provide proof of income when applying.

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RESPONSE 2.b:

The following are the Commission policies which support each of the enrollment practices in question 2a:

- i. Data sharing between investor-owned utilities (IOUs) - D. 02-07-033, D.06-12-038, D.08-11-031

Decision (D.) 02-07-033, Ordering Paragraph (OP) 6 adopted the guidelines for automatic enrollment. Page 35 of this decision provides additional details on the SoCalGas and SCE data exchange.

“The automatic enrollment program for CARE described in this decision is adopted. Under this program, customers of PG&E, SCE, SDG&E and SoCal shall be enrolled into CARE when they participate in any of the following programs:

- a. Medi-Cal, administered by the California Department of Health Services (DHS);
- b. Healthy Families, administered by Managed Risk Medical Insurance Board (MRMIB);
- c. Woman, Infants and Children administered by DHS, and
- d. Energy Assistance Programs administered by the Department of Community Services and Development (DCSD).”

In D.06-12-038, OP 21 the IOUs were given authorization to implement automatic enrollment.

“SDG&E, SCE, PG&E and SoCalGas shall implement automatic enrollment and categorical eligibility as set forth herein and to the extent they are able to procure necessary customer information.”

In D.08-11-031, OP 49 authorized data sharing between departments within the utility and/or multiple programs managed by the utility.

“In order to be counted as successful, IOUS shall demonstrate that their integration efforts accomplish at least two of the following four goals:”

Data Sharing: Increased information and data sharing between departments within the utility and/or multiple programs managed by the utility. This type of integration results in cost and/or resource savings as well as one or both of the following:

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RESPONSE 2.b (cont.):

- Greater number of customers served,
- Consolidation of work efforts.

The California Public Utilities Code (CPUC) Section 386(c) states, “[a] publicly owned electric utility shall streamline enrollment for low-income programs by collaborating with existing providers for the Low-Income Home Energy Assistance Program (LIHEAP) and other electric or gas providers within the same service territory.” As a result, SoCalGas began exchanging information with the following utilities:

- SoCalGas began exchanging new CARE customer enrollment data with SCE, on a weekly basis, a process established in 2001.
- SoCalGas and SDG&E began sharing information on CARE customers within the shared service territory of Orange County in 2004.
- In November 2004, SoCalGas signed an information exchange and Non-disclosure agreement with PG&E to exchange CARE customer data in the shared service counties. The first data file exchange with PG&E was completed in December.

In SoCalGas’ 2012-2014 and 2015-2017 Program Application, SoCalGas reiterated the intent to continue data sharing for the purpose of CARE enrollment. D.12-08-44 approved the utilities outreach proposals and continued to support leveraging efforts to simplify customer enrollment.

ii. Enrolling ESA customers in the CARE program

The IOUs were given authorization to enroll ESA customers in the CARE program in D. 08-11-031, OP 32.

“IOUs shall enroll in CARE all eligible customers they add to the LIEE program as part of the 15% goal for enrollment of customers with disabilities.”

iii. GAF customers in the CARE program

GAF was established in 1983 and since then, SoCalGas customers, employees, and shareholders have contributed more than \$21 million, with funds distributed annually. The Gas Assistance Fund is administered by the United Way of Greater Los Angeles and has so far helped more than 220,000 SoCalGas customers pay their natural gas utility bills in times of need.

There was no directive from the CPUC that ordered SoCalGas to enroll customers participating in GAF into the CARE program. However, since the

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RESPONSE 2.b (cont.):

guidelines for CARE and GAF were the same, SoCalGas began in February 2007 to implement the enrollment of GAF customers into CARE as a leveraging initiative to increase CARE participation.

iv. LIHEAP customers enrolled into CARE

The IOUs were given authorization to enroll LIHEAP customers into the CARE program in D.02-07-033, OP 6d.

“The automatic enrollment program for CARE described in this decision is adopted. Under this program, customers of PG&E, SCE, SDG&E and SoCal shall be enrolled into CARE when they participate in any of the following programs:

- a. Medi-Cal, administered by the California Department of Health Services (DHS);
- b. Healthy Families, administered by Managed Risk Medical Insurance Board (MRMIB);
- c. Woman, Infants and Children administered by DHS, and
- d. Energy Assistance Programs administered by the Department of Community Services and Development (DCSD).”

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RESPONSE 2.c:

All the Programs mentioned in response 2a have the same eligibility requirements as CARE. Customers who have not been verified by other programs are subject to SoCalGas' PEV practice to minimize the risk of ineligible customers in the CARE Program.

SoCalGas prudently and diligently oversees the CARE Program to ensure that qualified customers receive the benefit of the CARE discount. In addition to the information on the CARE application, PEV is another method used to accomplish this objective. SoCalGas uses a CPUC-approved probability model to identify customers who have recently enrolled or recently recertified and are likely to be ineligible; they are mailed a request to provide proof of eligibility. If the customer fails to respond within one-hundred days from the PEV request, the customer will be terminated from the Program.