

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Approval of the 2009-2011 Low Income Energy Efficiency and California Alternative Rates for Energy and Programs and Budget (U 39 M).	Application 08-05-022 (Filed May 15)
Application of San Diego Gas & Electric Company (U 902 M) for Approval of Low-Income Assistance Programs for Program Years 2009-2011.	Application 08-05-024 (Filed May 15)
Application of Southern California Gas Company (U 904 G) for Approval of Low-Income Assistance Programs and Budgets for Program Years 2009-2011.	Application 08-05-025 (Filed May 15)
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**The Joint Opening Comments of
The Association of California Community and Energy Services (ACCES) and
The Community Action Agency of San Mateo County, Inc., The East Los Angeles
Community Union (TELACU) and the Maravilla Foundation on the Energy
Division's Draft Whole Neighborhood Approach White Paper**

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The Joint Parties listed above are pleased to have this opportunity to submit these comments. We are grateful that the Commission has been responsive to our concerns and altered the Comment process in order to allow parties to file more meaningful comments to assist the Commission in its efforts to best serve low income ratepayers.

I. Scope of Comments

Administrative Law Judge Kimberly H. Kim's June 2, 2009 "Administrative Law Judge's Ruling Seeking Comment on the Energy Division's Draft Whole Neighborhood Approach [WNA] White Paper and Setting Public Work Shop," described the scope of the comments she was requesting and warned, "Any comment outside the scope of this

ruling ... will not be considered.” In order to take care to avoid commenting outside the scope of her rulings, we here review her two rulings.

In her June 2 ruling ALJ Kim wrote, “...we value the parties' knowledge and experience and parties are directed to file comments *based on those experiences* ... we are particularly interested in nuts and bolts type of comments, insights and input concerning the efficient field implementation logistics *based upon actual field experiences*.” She continued, “Parties' comments to the Draft White Paper shall include, *but need not be limited to*, comments that specifically address the following questions:

- a. What are the most prominent logistical changes that need to be made for LIEE program delivery to implement the Whole Neighborhood Approach? How will it improve current program delivery? What are some of the challenges?
- b. To what extent have entities delivering LIEE measures worked with local governments in the past to implement energy efficiency program delivery? How do you envision using local governments and other organizations assisting and enhancing LIEE program delivery under the Whole Neighborhood Approach?
- c. What mechanisms would your organization like to see enacted that would ensure the fair allotment of leads (and subsequent contract work) amongst several CBOs/contractors working within the same WNA neighborhood event? Could this mechanism be used to "space" LIEE work throughout the year?”

On June 12 ALJ Kim notified parties by email that “Parties are presently working with the Energy Division staff on Data Request(s) (DR) relating to the Draft Whole Neighborhood White Paper (White Paper),” and she was thus revising her June 2 ruling and the due date for comments in order to allow parties to read the utilities’ responses to the data requests and “assure that the Parties are afforded adequate time to conduct foundational work in order to file meaningful comment on the White Paper as well as preparing for a productive Public Workshop...” The Energy Division Data Request asked for “detailed information on:

- An overview of WNA pilots / projects currently being conducted within the IOU's service territory;
- Strategies for the WNA that have thus far been successful; and
- Strategies for the WNA that have not been successful, and why this may be the case.”

It is within the framework of these two rulings that we provide comment.

In addition, we note that on June 4 the Joint Parties met at the Commission to discuss our concerns about the White Paper.¹ In attendance were the joint parties, three members of the Energy Division and six Commissioner Advisors. At that meeting Commissioner Advisors asked if TELACU would be willing to write and submit to the Commission a description of its recent Whole Neighborhood Approach pilot effort. TELACU agreed and will include it in these comments.

Thus, in these comments we will provide an analysis of the White Paper, followed by a description of TELACU's current operation and its recent WNA pilot project and then we will answer the questions presented in the June 2 ruling. We will conclude with our recommendations.

II. The White Paper

Decision 08-11-031, at page 20, lists five reasons for implementing a Whole Neighborhood Approach:

1. Reduce program costs,
2. Leverage the availability of resources at a community level
3. Serve a greater number of customers.
4. Reduce overhead costs
5. Reduce transportation costs

We want to be clear that we do not oppose a Whole Neighborhood Approach; we simply want one that works. But what the Energy Division's White Paper, as written, will not work and could actually harm the program.

The White Paper makes a fundamentally mistaken assessment of the current LIEE program and, therefore, makes fundamentally mistaken recommendations for transformation and improvement of the program. The White Paper is filled with inaccuracies, unsupported assertions, and unrealistic assumptions which, unless corrected, make it unlikely the White Paper's WNA will be able to achieve the Commission's objectives.

Much of what the White Paper proposes is called "new" but, in fact, it is not new and has been in use for some time. The White Paper's misdiagnosis of problems leads it to make recommendations to cure non-existent problems. It envisions that untested program changes and procedures would be mandated, using the word "shall" rather than

¹ See Joint Parties' "Late Filed Notice of Ex Parte Communication," filed June 12, 2009.

“may” or “could,” and sets the stage for serious micromanagement of a program which should, instead, retain the flexibility to respond to local conditions and communities.

Thus, unless significant changes to the White Paper’s WNA proposal are made, and pilots and field tests conducted, it is unlikely to achieve the Commission’s goals.

There should be no mistake about the importance of the White Paper. Although the June 2 ALJ ruling calls the White Paper only “an idea piece,” the ruling goes on to describe the importance of the White Paper: “The Draft White Paper ... once finalized, is intended to serve as a frame work for the IOUs, community-based organizations (CBOs), and program contractors to use in implementing the Whole Neighborhood Approach program delivery strategy.”

Thus, the Draft White Paper is poised to attempt to transform the current “LIEE program delivery model” from what the White Paper incorrectly asserts is a current focus on individual households to a focus on neighborhoods.

Not only will the final White Paper attempt to transform the LIEE program, it will have a tremendous effect on the federally funded low income energy programs. The June 2 ruling further states, “parties should bear in mind that the Whole Neighborhood Approach is also likely to form the basis of efforts to leverage the Commission LIEE program with the Department of Community Services and Development’s (CSD) Low Income Home Energy Assistance Program (LIHEAP) and the Weatherization Assistance Program (WAP).” And the White Paper writes, “The leveraging relationship between the CPUC and CSD can serve as the mainstay of the WNA proposal. In turn, it is anticipated that the IOUs and their contractors and CBOs will work very closely with the LIHEAP/WAP CBOs to develop an enhanced WNA.”²

Because of the importance of this White Paper, it is crucial to point out, based on our knowledge gained from years of actual field experience, the many flaws and shortcomings of the White Paper.

The White Paper:

1. Presents as “new” many procedures and strategies which have been in use for years in the LIEE program

² “Draft Whole Neighborhood Approach - White Paper” CPUC Energy Division, LIEE Programs, May 2009. Page 17.

2. Demonstrates an unfamiliarity with the day to day operations of the current LIEE program
3. Unreasonably implies that energy programs in Kentucky, Minnesota, Montana, and Canada are appropriate models for California's LIEE program
4. References to California energy projects provide incomplete data
5. Presents unfounded assertions of savings and efficiencies for methods, strategies, and techniques that have already been tried or are currently in use or being tested
6. Incorrectly asserts that "a large portion of leads [come] from IOU customer call centers"
7. Incorrectly asserts that "LIEE implementers often drove many miles between each household."
8. Demonstrates an unrealistic optimism on the role of volunteerism.
9. Seems unaware of the role of NGAT and the installation of measures
10. Seems unaware of the role of LIEE income documentation, property owner waivers, and property manager waivers
11. Seems unaware of issues of "customer availability."
12. Seems unaware of LIEE regulations for "gifts" such as Compact Fluorescent Lights (CFL).
13. Seems unaware of the most common reasons for low income households unable or unwilling to participate
14. Seems overly prescriptive in its directives, using "shall" rather than "may" or "could."
15. Fails to take into account the diversity within California's urban and rural population and demographics
16. Seems unaware of the difference in goals of LIEE and LIHEAP/DOE and to barriers to integration of the programs

Discussion

- 1. The White Paper presents as "new" many procedures and strategies which have been in use for years in the LIEE program.**

As Richard Villasenor of TELACU writes below, “The WNA is something contractors in the Southern California Gas and Southern California Edison territories have been doing for many years. Assessors have been canvassing neighborhoods and going block to block for the last twenty years. I don't know of any assessors who only service single families at a time. Over the years we have tried many approaches to outreaching low-income families and we have found that not one approach works better than the other. We have tried community events, churches, direct mail, telemarketing, door to door, senior groups, mobile home parks and talking with property management companies.”

PG&E, in its Data Response, states, “The LIEE program has always utilized a Whole Neighborhood Approach, but not through one single method, as outlined in the White Paper.”³

The White Paper describes as new “theories of community-based social marketing (CBSM),” which “promotes behavior change in a community using social networks to facilitate change.”⁴ But this theory has been a mainstay of the LIEE program for decades. Also called “the social diffusion of innovations” and popularized by the textbook of Everett Rogers (1962), *Diffusion of Innovations*, it is what Rogers describes as “the process by which an innovation is communicated through certain channels over time among the members of a social system.” It is the basis upon which the LIEE’s “word of mouth” emphasis in outreach and networking has rested for decades. It is not new to the LIEE program.

2. The White Paper demonstrates unfamiliarity with the day to day operations of the current LIEE program.

The White Paper asserts low income programs can no longer operate with a business-as-usual approach but seems not to be aware of how business is currently conducted in the LIEE program. The White Paper appears to be unaware of, among other things, CBO/Contractor employee training requirements, background checks, past and current outreach efforts, income verification requirements, property owner waivers,

³ PG& Data Response, page 9.

⁴ “White Paper,” page 4.

minimum measure requirements, Natural Gas Appliance Testing requirements, and lead generation techniques.

The White Paper shows no awareness of long standing LIEE involvement with local governments, community leaders, churches, and non-profit groups as described in the Data Request responses of the utilities and the experience of TELACU and other LIEE contractors.

3. The White Paper unreasonably implies that energy programs in Kentucky, Minnesota, Montana, and Canada are appropriate models for California's LIEE program.

The out-of-state programs cited by the White Paper are not comparable to the LIEE program as can be seen by a visit to the websites of the projects the ED cites in Appendix A.

- *One Change's Project Porchlight Campaign:* <http://www.projectporchlight.com>
Canada While they attempt to generate "high visibility and interest," their program goal is only one CFL per home.
- *Project Warm* <http://www.projectwarm.org> Louisville, Kentucky. Teams of volunteers work together for three weekends each November. No experience necessary, orientation and training is available for team leaders. Over 2,000 served since 1991, averaging only about one hundred units per year.
- *Neighborhood Energy Connection* <http://www.thenec.org>, St. Paul Minnesota The program is small and their services are not free.
- *Warm Hearts, Warm Homes Initiative:*
<http://www.deq.mt.gov/energy/warmhomes/> Montana: Operating relatively small LIHEAP and DOE Weatherization programs with, apparently, mom and pop volunteer help.

4. References to California energy projects provide incomplete data.

The White Paper cites the *Better Idea Program* of the Los Angeles Department of Water and Power (LADWP) which operated from 1991 to 1993.

http://www.swenergy.org/pubs/direct_installation_programs.pdf.

The Better Idea Program delivered several CFLs, conservation information and installed low flow shower and faucet devices, as well as a toilet tank bag. It included

cleaning refrigerators coils until LADWP decided that they were not comfortable with the liability of the two CBOs delivering the program moving refrigerators. The Better Idea Program was a very simple Non-Infiltration Measure (NIM) program. Today, in PG&E's service territory, for example, about 77% of the LIEE homes treated are not simple NIM jobs.

The website notes, "The utility found the following barriers to higher penetration rates: lack of people home during the day to receive canvassers, language and immigration concerns for non-native speakers, fear and suspicion of racially mixed crews, and the misimpression that door hangers were actually advertisements." These problems still exist today, as shown below in the TELACU experience.

The Better Idea Program was for simple low-cost energy saving measures and can serve as an example of the limitations, not the success, of the WNA.

GRID Alternatives (<http://www.gridalternatives.org/>) does not install the LIEE measures, they install solar. And while they say they will train volunteers for free, they ask for donations. From a June 17, 2009 email announcing "Volunteer Opportunities" GRID Alternatives writes, "There is a \$20-\$50 suggested donation for the volunteer training. No one will be turned away for lack of funds." Further their website states, "Our low-income clients typically provide direct 'sweat equity' by working as part of this volunteer installation team. We then lead the team to install solar electric systems on one or more homes, with assistance from a network of local professional contractors who volunteer as team leaders to provide additional technical assistance."

Clearly, the LIEE program should not ask for donations from people who seek to be trained for free. Nor should LIEE households be required to provide "sweat equity" in order to receive LIEE services.

5. The White Paper presents unfounded assertions of savings and efficiencies for methods, strategies, and techniques that have already been tried or are currently in use or being tested.

The White Paper asserts, "this focus on neighborhoods will result in a more efficient LIEE program,"⁵ and "By concurrently assessing and treating households in

⁵ Ibid, page 4

specific geographic segments, the WNA will result in reduced transportation and overhead costs.”⁶ But neighborhoods have always been a focus in LIEE.

To support its assertions of reduced costs, the White Paper says, “Preliminary research shows that contractors offer up to a 20 percent discount for weatherizing homes in a 20 – 30 household cluster as part of Minnesota’s Xcel Energy’s Neighborhood Energy Connection. In this same study, insulation contractors cited a 5 – 10 percent discount for treating up to ten homes in a neighborhood cluster. Also, the study cites potential savings achieved through parking a trailer of measures in the community being served.”⁷ But is unclear how this discount information is relevant to the LIEE program where LIEE customers are not charged for services, but instead the prices are set in contracts between contractors and utilities. Nor is “parking a trailer of measures” in certain of California’s urban areas the most inviting idea.

The White Paper says that in this new innovative approach “Marketing and outreach under WNA will include canvassing, which constitutes a neighborhood-based form of outreach. Canvassers are based in a specific neighborhood and walk from door to door. If a customer is not home, a door-hanger with LIEE information can be left on their doorknobs.”⁸ But, as described by TELACU and the utilities, this is done on a regular basis in the LIEE program. But when done in a “Neighborhood Blitz” effort, the results have been disappointing.

A “neighborhood blitz” approach does not guarantee more customers will be signed up. As TELACU describes below, and as written in the responses of SoCalGas, SCE, and PG&E, the “blitz” approach has been disappointing and costly.

In addition, a “blitz-only” approach will create much down time for paid crew members while the next “blitz” is being organized.

6. The White Paper incorrectly asserts that “a large portion of leads [come] from IOU customer call centers”⁹

PG&E writes, “Leads or referrals from these sources have never accounted for more than 20% of all participants in these programs.”¹⁰

⁶ Ibid, page 11

⁷ Ibid, page 11.

⁸ Ibid, page 9.

⁹ Ibid, page 7.

We have been informed in discussions with utilities that call centers account for less than 5% of leads in SDG&E’s program and that about 50% of SCE’s leads come from the SoCalGas program and contractor outreach.

7. The White Paper incorrectly asserts that “LIEE implementers often drove many miles between each household.”¹¹

The White Paper gives no basis for this statement. TELACU writes below, “The claim outreach workers drive many miles to sign up one customer is not true. I don't know any assessor that would only sign up one customer and leave.”

Utilities assign contractors to ZIP codes (PG&E and SoCalGas) or geographic areas (SDG&E) to, among other things, minimize travel.¹²

8. The White Paper demonstrates an unrealistic optimism on the role of volunteerism

LIEE assessors, who canvass neighborhoods and conduct outreach in search of LIEE qualified households, are required to be trained in home energy assessment, energy education, and be familiar with all aspects of program eligibility. It is unlikely a volunteer effort could provide a consistent supply of trained assessors.

Because LIEE workers will be in the homes of ratepayers, there are important issues of insurance, liability, training, and workforce reliability which are unlikely to be resolved with a program model which places an emphasis on volunteerism.

In addition, for any non-profit or community organization that is asked to volunteer its time and personnel to assist in the LIEE effort, there are real costs to be incurred by the agency for its commitment of time and personnel. It is unrealistic to assume many non-profit and community organizations will be willing or able to commit to serious LIEE involvement for free.

Finally, White Paper's emphasis on volunteers seems at odds with its goal to “create jobs.”¹³

9. The White Paper seems unaware of the role of NGAT and the installation of measures.

¹⁰ Pacific Gas and Electric Data Response, page 7.

¹¹ “White Paper,” page 7.

¹² Data Responses of SDG&E, PG&E, SoCalGas

¹³ “White Paper,” page 17.

Before a dwelling may receive air infiltration measures it must pass a Natural Gas Appliance Test (NGAT). It is unrealistic to assume this test could be conducted by volunteers. And the effect of this NGAT requirement on the White Paper's "1st Wave, 2nd Wave" model is unexplored.

10. The White Paper seems unaware of the role of LIEE income documentation, property owner waivers, and property manager waivers.

The effect of current income eligibility documentation requirements and property owner waivers on the White Paper's "1st Wave, 2nd Wave" model are unexplored.

11. The White Paper seems unaware of issues of "customer availability."

As stated above, back in the 1990's the LADWP Better Idea Program found, "the following barriers to higher penetration rates: lack of people home during the day to receive canvassers, language and immigration concerns for non-native speakers, fear and suspicion of racially mixed crews, and the misimpression that door hangers were actually advertisements." These problems still exist today, as shown below in the TELACU experience and the written in the responses of SoCalGas, SCE, and PG&E. Many potential customers are simply not at home for a "neighborhood blitz."

And if contractors are not allowed the flexibility to respond to individual customer requests for service, it seems there would be a potential loss of customers at "Step 6: Follow-up," which require customers to wait for a secondary sweep which "may be conducted in that particular neighborhood as soon as enough eligible customers express interest in LIEE program participation."¹⁴

Unexplored by the White Paper is the effect of "targeting high energy use households" on overall production.

12. The White Paper seems unaware of LIEE regulations for "gifts" such as Compact Fluorescent Lights (CFL).

A "gift" of a single CFL would not be allowed unless other measures were installed to reach the minimum energy savings requirement established in D.08-11-031.

13. The White Paper seems unaware of the most common reasons for low income households unable or unwilling to participate.

Described below by TELACU, these reasons include:

¹⁴ Ibid, page 13.

1. Customer is over income
2. Customer does not want to ask landlord for permission
3. Landlord will not allow work to be done
4. Customer does not want help
5. Customer is unaware of program
6. Customer does not trust strangers
7. Customer never responds to letters or phone calls
8. Customer does not want to be classified as low-income
9. Dwelling does not qualify due to too few measures needed or NGAT problems

14. The White Paper seems overly prescriptive in its directives, using “shall” rather than “may” or “could.”

As TELACU writes below, “Contractors need to have the flexibility to try different approaches to outreach and be able to work in multiple cities at the same time. If the commission wants these programs to be successful then allow those people who have been doing this work for years to run their own business and don't micromanage the contractors and utilities.”

15. The White Paper fails to take into account the diversity within California’s urban and rural population and demographics.

PG&E’s experience in Firebaugh shows the potential for LIEE enrollment in smaller, more rural settings based on community events such as a Farmer’s Market.¹⁵ But the White Paper presents a “one size fits all” approach that does not take into account California’s diversity.

16. The White Paper seems unaware of the difference in goals of LIEE and LIHEAP/DOE and the barriers to integration of the programs.

Though both the LIEE program and the federal LIHEAP/DOE programs install energy efficiency measures, their goals are different and, therefore, integration of the programs is problematic.

The WNA White Paper recommendations would change the fundamental character of the existing LIEE program, especially in the areas of outreach, scheduling, and measure installation. The Paper envisions "new roles for various stakeholders" and

¹⁵ PG&E Data Response, pages 5-6.

"LIEE partners" ¹⁶ including volunteer networks, neighborhood associations, schools, high school students, local governments, contractors, CBOs, LIHEAP providers, local financial institutions, and utility CARE staff.

Most importantly for CSD contractors, the Paper says "the leveraging relationship between the CPUC and CSD can serve as the mainstay of the WNA proposal," and sets a goal of "100% LIHEAP and LIEE leveraging." ¹⁷ But the White Paper's WNA is not consistent with the way LIHEAP and WAP contractors currently implement their programs. If CSD intends to strive toward "100% LIHEAP and LIEE leveraging," then it is likely that CSD's contractors will have to change the way they implement those programs in order to work within the framework of the new Whole Neighborhood Approach.

Concerning the CSD administered energy programs, the Paper says, "The Commission mandated that the programs work together in carrying out the WNA, thereby enabling both programs to reach more households at a reduced cost. Specifically, D. 08-11-031 states: 'The goal is for LIHEAP and LIEE measure installation to happen at the same time, or sequentially, as part of the Whole Neighborhood Approach. The IOUs shall, as part of their leveraging strategies, immediately begin the process of trying to close data gaps that hamper LIHEAP-LIEE leveraging. We expect to see significant progress toward a goal of 100% LIHEAP and LIEE leveraging and coordination in the IOUs' annual reports. '" ¹⁸

The White Paper envisions transforming the current LIEE, and by implication, the LIHEAP and WAP programs, into a program with a focus on serving an entire neighborhood at one time, giving high priority to households with high energy use, and emphasizing cost-effectiveness over health and safety.

It envisions giving the utility final say on which neighborhood is served and when it is served. If a low income dwelling is, for whatever reason, not served at that time, it will have to wait until the utility decides to go back to that neighborhood for a "secondary sweep"... "as soon as enough eligible customers express interest in LIEE program participation."

¹⁶ "White Paper," page 14.

¹⁷ Ibid, page 17.

¹⁸ Ibid, page 17.

It envisions, "the incorporation of volunteers, students and local organizations into LIEE program delivery," though the White Paper's emphasis on volunteers is at odds with its goal to "create jobs."

Conclusion of analysis of the White Paper

The White Paper makes a fundamentally mistaken assessment of the current LIEE program and, therefore, makes fundamentally mistaken recommendations for transformation and improvement of the program. The White Paper is filled with inaccuracies, unsupported assertions, and unrealistic assumptions which, unless corrected, make it unlikely the White Paper's WNA will be able to achieve Commission objectives.

We believe the Commission can gain insight from the real world experience of LIEE contractors such as TELACU and others which can help design and implement the best LIEE program possible.

III. The TELACU Experience: Current Practices and a WNA pilot.

A. TELACU Current Practices for Outreaching Customers for LIEE

My name is Richard Villasenor and I am the Executive Director of TELACU Weatherization.

Currently TELACU uses many ways to reach potential clients to sign up for LIEE program. Over the years TELACU has used door to door canvassing, direct mail, community events, energy education workshops and telemarketing. We have found that door to door canvassing and direct contact with customers has been our most successful way to reach clients.

Our assessors canvass neighborhoods and talk to as many people who will speak to them. Those who are not home are left a door hanger with information about the program and who to contact. We find that only a small percentage of customers respond to door hangers. The average assessor canvasses around 75 to 100 customers per day, explaining the program to those who are home. Of those who are willing to talk to us only around 8 to 10 % will sign up for the program but that number changes in some neighborhoods and it could be a lot less or more.

The claim that outreach workers drive many miles to sign up one customer is not true. I don't know any assessor who would only sign up one customer and leave.

Assessors work neighborhoods street by street until the enrollments start to decrease or if they find that many customers have already participated. They then pick a new part of town or even a new city to work and start the process all over again.

The last several years we have been receiving PRIZM code leads from the gas company. These leads are potential customers who fall within the PRIZM zip codes that are self certification. These leads are given to us by specific zip codes with customer's information and account numbers. We check these customers to see if they have had previous participation and those that have not are given to assessors to contact and explain the program.

We first try to contact customers by phone and set up as many appointments as we can. If we get no response we then canvass the neighborhood and leave door hangers and try to sign up as many as possible before moving on. This type of approach will normally get us around 10-12 % enrollment.

Assessors always try to get referrals from clients before leaving and they leave their contact information so customer can give it to family members or friends. This type of neighborhood approach has been very successful for us, those neighborhoods that have been under serviced result in higher number of enrollments. But we find that when working in neighborhoods that have been serviced for many years the new enrollments are low. Not all contractors have the option to work in neighborhoods that are under serviced, so this type of approach will not always be successful.

The WNA is something contractors have been doing for many years. Assessors have been canvassing neighborhoods and going block to block for the last twenty years. Over the years we have tried many approaches to outreaching low-income families and we have found that not one approach works better than all others. We have tried community events, churches, direct mail, telemarketing, door to door, senior groups, mobile home parks and talking with property management companies.

All these types of outreaching work great together but I couldn't say one is better than the other. Contractors need to be able to try different approaches to find customers. If we are limited to one approach for outreach it will cut down on the number of clients that we service.

Barriers to participation

The biggest problem we have is no awareness of the program and a lot of people don't believe they can receive these services for free. Some of the renters don't want to ask permission from their landlord in fear that he may raise the rent. Some landlords won't allow us to do work on their property.

A lot of people feel the enrollment process asks for too much personal information and documents and you can't blame them with all the identity theft going on.

The other issue that nobody wants to talk about is NGAT. We are still cancelling 10 to 15 % of the application we receive due to NGAT fails. If we could sit down with the utilities and see if we could make some changes, it would help more customers to participate. Every little bit would help.

The commission needs to know that just because there are 5 million low-income families that are eligible doesn't mean they all want to participate. There are a lot of reasons why people are unable or unwilling to participate in these programs, including:

1. Customer is over income
2. Customer does not want to ask landlord for permission
3. Landlord will not allow work to be done
4. Customer does not want help
5. Customer is unaware of program
6. Customer does not trust strangers
7. Customer never responds to letters or phone calls or is not home
8. Customer does not want to be classified as low-income
9. Dwelling does not qualify due to too few measures needed or NGAT problems

Recommendations to increase participation

There are many ways to increase participation in the program by making some changes to the current policies:

1. Stream line the application process to reduce paperwork
2. Allow customers to self certify
3. Allow all CARE customers to be categorically eligible
4. Re-visit NGAT issues to allow more customers to participate
5. Utilities should provide list of all low-income families that have not participated in LIEE

6. Re-visit Block Weatherization in which specific blocks are exempted from income documentation requirements and the homes are, with permission, weatherized.
7. More marketing
8. Utilities could pay a fee for contractors to market program and pay organization to canvass neighborhoods or do telemarketing

If these programs were marketed more aggressively and the awareness of what these programs offer could somehow get into the hands of all these low-income families it would make life easier for all of us.

Contractors need to have the flexibility to try different approaches to outreach and be able to work in multiple cities at the same time and should not be limited to a single one-size-fits a Whole Neighborhood Approach. If the commission wants these programs to be successful then allow those people who have been doing this work for years to run their own business and don't micromanage the contractors and utilities.

B. TELACU's Whole Neighborhood Approach Pilot in the City of La Habra

The reason we targeted La Habra was that it was a new zip code for us and currently no contractors were working this zip code full time.

We went to the City Of La Habra and talked to their Community Development Department staff to see if they could give us some help and also promote the program. They gave us a map of the city that showed all the low-income neighborhoods. We then proceeded to map out streets where the majority of the homes were single family. This information was given to SoCalGas to run DMRI for these neighborhoods. They gave us a list of all customers who have not participated in the program, we then Data Quicked all these customers to get proof of ownership.

Our WNA pilot was designed to target around 1,000 residences. SoCalGas DMRI'd over 1,000 potential customers who had not been serviced before. These customers were sent a flyer by SoCalGas explaining the program and telling them the days TELACU was going to be in their neighborhoods. Our event was planned to take place for three days: Thursday, Friday and Saturday.

We had 7 or 8 assessors working each day from 9:00 am to 6:00 pm. The first day we targeted over 500 customers but were able to enroll only 35 customers. Many

customers said they had not received the flyer or even opened the letter sent from SoCalGas. We found that a majority of the customers were not home. Those customers were left a door hanger with the assessor's phone number. We received phone calls from only 1% of the customers who received a door hanger.

The second day we targeted the remaining 500 customers, we were able to sign up around 30 customers. We had the same problem as on the first day: customers not aware of the program or even receiving the flyer. The majority of the customers on this day were not home but we left door hangers and we received a few phone calls.

The last day we used as a pick up day and some of the assessors went back through the neighborhoods and tried to sign up those customers that we missed the first time. We signed up 10 additional customers this day. Overall we were able to sign up only about 7% of the customers we targeted

Customers' homes were inspected and scheduled on the same day as assessments. All work being done in the home was to be done on the same day. (Weatherization, Attic Insulation and furnace work)

We found that a majority of the customers did not open the letter

When we signed up the renters we still had to track down the property owners and get their permission.

We found that a majority of the customers were unaware of the LIEE program

Additional information regarding WNA event:

Number of vehicles rolled out on day of assessments: 10

Number of assessors: 8

Number of homes visited: 900

Number of leads generated: 80

Number of leads enrolled: 70

Number of trucks rolled out: 8

Number of weatherization workers: 10

Number of homes treated: 9

Number of homes weatherized: 61

Number of customers not home: 746

Number of customers not interested: 38

Number of over income: 19

Pending: 15

Already signed up: 12

Additional resources and costs:

We had a mobile office in the neighborhood

We had three inspectors available to assessors

We had two clerical staff on site to check docs and help with qualifying customers

We had a temp hired to Data Quick 1000 customers to check proof of ownership

Cost of Motor Home for three days \$600.

Cost of Clerical staff for two days \$789.

Data Quick Temp \$288.

Inspectors for three days \$ 1,800.

Total additional cost \$3,477.

IV. Answers to June 2 ruling questions

a. What are the most prominent logistical changes that need to be made for LIEE program delivery to implement the Whole Neighborhood Approach? How will it improve current program delivery? What are some of the challenges?

Changes:

1. Stream line the application process to reduce paperwork
2. Allow customers to self certify
3. Allow all CARE customers to be categorically eligible
4. Re-visit NGAT issues to allow more customers to participate
5. Utilities should provide list of all low-income families that have not participated in LIEE
6. Re-visit Block Weatherization in which specific blocks are exempted from income documentation requirements and the homes are, with permission, weatherized.
7. More marketing
8. Utilities could pay a fee for contractors to market program and pay organization to canvass neighborhoods or do telemarketing

Improvement: It will allow for easier sign ups for the program.

Challenges: Find ways to overcome the most common reasons for non-participation:

1. Customer is over income
2. Customer does not want to ask landlord for permission
3. Landlord will not allow work to be done
4. Customer does not want help
5. Customer is unaware of program
6. Customer does not trust strangers
7. Customer never responds to letters or phone calls or is not home
8. Customer does not want to be classified as low-income
9. Dwelling does not qualify due to too few measures needed or NGAT problems

b. To what extent have entities delivering LIEE measures worked with local governments in the past to implement energy efficiency program delivery? How do you envision using local governments and other organizations assisting and enhancing LIEE program delivery under the Whole Neighborhood Approach?

As is shown in the Data Request Responses of the utilities and in the TELACU report, local government has been involved to varying degrees in the LIEE program and we assume this will continue.

c. What mechanisms would your organization like to see enacted that would ensure the fair allotment of leads (and subsequent contract work) amongst several CBOs/contractors working within the same WNA neighborhood event? Could this mechanism be used to "space" LIEE work throughout the year?"

It is our understanding that contractors are assigned to work in certain ZIP codes and assume a neighborhood event within that ZIP code would be the responsibility of that contractor. We do not know how leads and work allotments would work if a neighborhood event required the involvement of several contractors and, therefore, do not know if any mechanism could be used to “space” LIEE work throughout the year.

Conclusion

We want to be clear that we do not oppose a Whole Neighborhood Approach; we simply want one that works. But what the Energy Division's White Paper, as written, will not work and could actually harm the program.

The White Paper makes a fundamentally mistaken assessment of the current LIEE program and, therefore, makes fundamentally mistaken recommendations for transformation and improvement of the program. The White Paper is filled with inaccuracies, unsupported assertions, and unrealistic assumptions which, unless corrected, make it unlikely the White Paper's WNA will be able to achieve Commission objectives.

We believe the Commission can gain insight from the real world experience of LIEE contractors such as TELACU and others which can help design and implement the best LIEE program possible.

We close with the recommendation of TELACU, which reflects the experience of many long-time LIEE service providers: Contractors need to have the flexibility to try different approaches to outreach and be able to work in multiple cities at the same time and not be limited to a single one-size-fits all Whole Neighborhood Approach. If the commission wants these programs to be successful then allow those people who have been doing this work for years to run their own business and don't micromanage the contractors and utilities.

Respectfully submitted,

July 3, 2009



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CERTIFICATE OF SERVICE

I hereby certify, pursuant to the Commission's Rules of Practice and Procedure, that I have this day served a true copy of the "The Joint Opening Comments of The Association of California Community and Energy Services (ACCES) and The Community Action Agency of San Mateo County, Inc., The East Los Angeles Community Union (TELACU) and the Maravilla Foundation on the Energy Division's Draft Whole Neighborhood Approach White Paper"

[X] By first class U.S. mail, postage prepaid, to the Administrative Law Judge assigned to this proceeding, to the Assigned Commissioner, and to all parties listed with no e-mail address on the official service list referred to below.

AND

[X] By Electronic Mail – serving the enclosed via e-mail transmission to each person the application lists as being authorized to receive service and to those on the consolidated service list of A08-05-022, A08-05-024, A08-05-025, and A08-05-026.

Dated at Sacramento, California this 3rd day of July, 2009.



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California Public
Utilities Commission

CPUC Home

CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: A0805022 - PG&E - FOR APPROVAL
FILER: PACIFIC GAS AND ELECTRIC COMPANY
LIST NAME: LIST
LAST CHANGED: JULY 1, 2009

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