





and The Utility Reform Network (TURN)<sup>2</sup> regarding SCE’s “Change A Light, Change The World,” Compact Fluorescent Lamp Program (“CFL Program”) Application.<sup>3</sup>

SCE appreciates Greenlining’s support of the proposed CFL Program and its intent to fully cooperate with SCE, the Commission and other utilities that voluntarily develop big, bold and innovative strategies for improving energy efficiency. DRA and TURN raise some concerns about the CFL Program in their protest. These concerns, however, have already been considered by SCE in the design of the CFL Program and are addressed further below. Neither Greenlining’s comments, nor DRA and TURN’s protest raise issues of fact that would require hearings in this proceeding. Accordingly, SCE respectfully requests that the Commission approve SCE’s CFL Program Application without delay.

## II.

### **BACKGROUND**

SCE’s proposed CFL Program will set the standard in California for national participation in the ENERGY STAR® “Change a Light, Change the World” campaign.<sup>4</sup> The CFL Program is intended to place the most cost-effective and most practical energy-saving appliance – the CFL – in the hands of those customers most in need of bill savings. The CFL Program represents a unique opportunity to provide immediate bills savings to low income customers; immediate resource benefits and greenhouse gas reductions; a timely leveraging opportunity provided by the national ENERGY STAR® “Change a Light, Change the World” campaign; and reductions in the CARE subsidy that will benefit all ratepayers as a result of reduced energy consumption by low income customers participating in the CFL Program.<sup>5</sup>

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<sup>2</sup> *Joint Protest of the Division of Ratepayer Advocates and The Utility Reform Network on Southern California Edison’s Application for Approval of its “Change a Light, Change the World,” Compact Fluorescent Lamp Program*, filed June 13, 2007.

<sup>3</sup> A.07-05-101, filed May 10, 2007.

<sup>4</sup> *See Testimony of Southern California Edison Company in Support of Application for Approval of SCE’s “Change a Light, Change the World,” Compact Fluorescent Lamp Program*, dated May 10, 2007 (SCE’s Testimony).

<sup>5</sup> SCE notes that Disability Rights Advocates (DisabRA), in previous filings in R.07-01-042, advocated for the distribution of CFLs to low income households as a first phase low income energy efficiency measure, stating that “...the provision of CFLs to qualified households could serve as an important outreach tool, educating utilities about their target population and drawing people into the [LIEE] program by providing a tangible benefit. As DisabRA conceived it, the provision of CFLs would be the first step in providing energy efficiency

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As proposed in SCE's Application, through the CFL Program SCE plans to reach one million homes through a household-to-household outreach campaign in low income neighborhoods with an offer to provide six CFLs per home at no cost to the household in return for a customer pledge to immediately remove existing incandescent bulbs and replace them with CFLs. SCE will partner with community-based organizations (CBOs), faith-based organizations (FBOs), and other partners to conduct this campaign with the goal of reaching 926,000 homes with six CFLs and 74,000 households currently planned for treatment under SCE's existing Low Income Energy Efficiency (LIEE) program with two CFLs in addition to the CFLs received through LIEE. SCE's Application seeks approval of a \$22 million budget for the CFL Program, and SCE plans to reach these one million homes by December 31, 2008. As proposed, SCE's CFL Program is expected to generate 280.6 million kilowatt hours of annual energy savings, 23.7 MW of demand reduction, and 156,700 tons of CO<sub>2</sub> emission reductions, which is the equivalent of removing nearly 30,000 cars off of California roads.<sup>6</sup>

The CFL Program and SCE's desire to vigorously implement such a bold strategy are a direct result of the Commission's vision to encourage investor-owned utilities to aggressively pursue energy efficiency as the first choice for meeting California's energy needs and to make energy, an essential commodity, affordable to disadvantaged customers. As such, SCE looks forward to working side-by-side with the Commission's progressive leadership to implement the CFL Program.

### III.

#### COMMENTS

##### **A. SCE Appreciates the Support of Greenlining**

SCE appreciates Greenlining's support and its enthusiasm for big, bold strategies to increase energy efficiency. This reply clarifies and builds upon some of the points made by Greenlining in its comments.

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measures so as to reach more people with energy savings sooner." *See Disability Rights Advocates' Reply Comments on LIEE Program Objectives and Goals*, dated May 8, 2007, p. 5.

<sup>6</sup> *See* SCE's Testimony, p. 2.

**1. SCE Will Partner with a Broad, Experienced and Diverse Group of Community and Faith Based Organizations to Deliver the CFL Program**

SCE agrees with Greenlining that SCE should partner with a broad group of community based organizations (CBOs) and faith based organizations (FBOs) with deep roots in the community, and that such organizations should be effectively recruited and properly compensated for their efforts. As described in more detail in SCE's Testimony, SCE plans to partner with a broad, diverse and experienced group of CBOs and FBOs to deliver the CFL Program and fairly compensate them for their efforts.<sup>7</sup> Working with community organizations, such as CBOs and FBOs, is a proven approach to gaining community trust and support. CBOs and FBOs have built-in, existing networks, and have gained the experience and trust of their local communities. This experience and trust allows SCE to improve access to customers in order to increase awareness of energy efficiency programs, and proper disposal practices. SCE welcomes any recommendations that Greenlining, or other interested parties, may have of specific community organizations that would be willing to partner with SCE to deliver the CFL Program.

SCE will also fairly compensate the CBOs and FBOs who deliver the CFL Program. As described in more detail below (and in SCE's Testimony), for each household that receives educational materials, receives a CARE application, receives a six-CFL pack, and signs a pledge to install the CFLs in their home, \$10 will be provided to the canvassing organization. SCE believes that this is fair and reasonable compensation that will make the canvassing organizations' participation in the CFL Program worth their while.

**2. SCE Will Use Ethnic Media Outlets to Advertise the CFL Program**

SCE agrees with Greenlining that ethnic media outlets should be used to promote the CFL Program. As discussed in SCE's Testimony,<sup>8</sup> as part of the overall marketing and outreach strategy for promoting SCE's CFL Program, SCE will be looking at the specific targeted communities and the

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<sup>7</sup> *Id.*, pp. 7-8; Appendix B to SCE's Testimony, B-4.

<sup>8</sup> *Id.*, pp. 10-11; B-11.

ethnic communities represented therein (e.g., Hispanic, Chinese and African-American communities), and developing in-paper advertising with relevant messaging points about the CFL Program. SCE will also be looking at the ethnic newspapers in those communities and developing in-paper ads in the relevant languages to reach the residents who rely on those publications for local information.

Additionally, SCE will develop CFL fact sheets that will further educate customers about, among other things, energy efficiency, the impact that replacing just one incandescent light bulb with a CFL can have on the environment, and how taking steps like this will help everyone improve the environment. These fact sheets will be distributed along with the CFLs in English as well as ethnic/in-language versions. SCE will work closely with the CBOs and FBOs to ensure that the appropriate facts sheets are provided to such communities.

### **3. SCE Will Educate Customers About the Proper Disposal of Spent CFLs**

SCE also agrees with Greenlining that education on the safe disposal of CFLs is imperative.<sup>9</sup> As part of the CFL Program, canvassers will be providing customers with educational materials on the proper disposal of CFLs. Canvassers will also remind customers to keep the materials for use when the CFLs stop operating to ensure that customers will know how to properly and safely dispose of spent bulbs. SCE is hopeful that its CFL Program can increase awareness among the general population about the proper disposal of CFLs and highlight to manufacturers and suppliers of CFLs the importance of education on the safe disposal of CFLs.

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<sup>9</sup> According to the EPA, “CFLs contain a very small amount of mercury sealed within the glass tubing – an average of 5 milligrams, which is roughly equivalent to an amount that would cover the tip of a ball-point pen. No mercury is released when the bulbs are intact or in use. By comparison, older thermometers contain about 500 milligrams of mercury. It would take 100 CFLs to equal that amount.” The EPA “recommends that consumers take advantage of local recycling options for compact fluorescent light bulbs ... .” [http://www.energystar.gov/ia/partners/promotions/change\\_light/downloads/Fact\\_Sheet\\_Mercury.pdf](http://www.energystar.gov/ia/partners/promotions/change_light/downloads/Fact_Sheet_Mercury.pdf).

**B. The Concerns of DRA and TURN Should Not Delay the Commission’s Approval of the CFL Program**

**1. SCE’s Delivery and Outreach Approach is Tailored to Maximize Participation in the CFL Program**

DRA and TURN raise concerns about SCE’s proposed household-to-household delivery and outreach approach. While SCE appreciates DRA and TURN’s concerns, SCE’s proposed CFL Program uses a variety of strategies to reach the targeted population and is designed to mitigate obstacles to reaching customers through canvassing, such as the fear of opening doors to strangers, language barriers, and cultural differences. Through the delivery of its low income assistance programs, SCE has considerable experience addressing barriers to program delivery and has used lessons-learned to design a CFL Program that will maximize customer participation. Further, as described in more detail below, SCE will be conducting immediate and continuous measurement and evaluation of the CFL Program that will allow SCE to alter program delivery and outreach, if necessary, to ensure a successful program. As a result, the small-scale pilot program that DRA and TURN suggest is not only unnecessary, but will delay the achievement of immediate energy and bill savings and drive up administrative costs.

SCE has developed several strategies to maximize the effectiveness of the household-to-household delivery approach. For instance, SCE plans to work with CBOs, FBOs, capitation contractors,<sup>10</sup> various local governments, and other community groups throughout SCE’s service territory in order to increase the probability of community acceptance of the CFL Program so that customers are not fearful of opening their doors to canvassers. By using local organizations, canvassers are more likely to identify with the culture, language and demographics of the community. Further, SCE believes that customers will either have a relationship with the canvasser’s organization or be familiar with the organization’s name, thus establishing a level of trust that will allow the delivery of CFLs.

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<sup>10</sup> Under the CARE program, SCE pays a capitation fee to entities for each new customer they help enroll in CARE.

Additionally, in order to increase awareness of the CFL Program, SCE has built into its outreach strategy opportunities for "Awareness Events" where local residents can receive their six CFLs and learn about, among other things, how they can take steps to protect the environment by reducing greenhouse gas emissions and how to properly and safely dispose of spent CFLs. These one-time community events will be followed-up by a canvassing of the neighborhood to distribute CFLs to families who did not receive them at the community event.

DRA and TURN also claim that SCE's CFL Proposal does not take into consideration that some low-income energy bills may be included as part of rent and households may therefore not have incentives to use CFLs. On the contrary, SCE plans to communicate with master-metered account holders to encourage their involvement – and their tenants' involvement – with the CFL Program. Although master-metered accounts represent less than 1% of SCE's total customer base, SCE is committed to reaching all segments of low-income customers with CFLs.

Finally, DRA and TURN suggest that SCE's CFL Program should be modified into a small-scale pilot program in order to test multiple approaches. DRA and TURN's suggestion not only misses the point of the CFL Program, but will unnecessarily delay bringing energy savings, bill reductions and greenhouse gas reduction benefits to customers and will drive up administrative costs. The point of SCE's proposed CFL Program is to place a proven and easy-to-install energy saver – the CFL – immediately into the hands of low income customers who may not otherwise have access to the technology. The CFL Program is not designed to supplant already existing energy efficiency programs, such as the Low Income Energy Efficiency (LIEE) program. Through the LIEE program, low income customers will still receive installation of energy saving appliances, including refrigerators, air conditioners and CFLs. The CFL Program is intended and designed to compliment SCE's already successful LIEE and energy efficiency programs. Moreover, the CFL Program is a tightly focused program, built upon lessons learned, that reduces costs through a household-to-household delivery approach and at the same time provides a proven energy and bill saving technology. The CFL Program also provides a unique opportunity to reach potentially CARE-eligible households in pursuit of enrolling



100% of customers wishing to participate in the CARE program.<sup>11</sup> SCE sees no reason why its CFL Program should be delayed.

## **2. The Compensation Payment of \$10 is Reasonable**

DRA and TURN claim that SCE's proposed \$10 payment for canvassing organizations is excessive. SCE disagrees. The payment is reasonable and appropriate compensation for the community canvassers that will be delivering CFLs to low income homes.

The proposed payment of \$10 will be paid to the canvassing organizations for each household that receives educational materials, receives a CARE application, receives a six-CFL pack, and signs a pledge to install the CFLs in their home.<sup>12</sup> SCE drew upon its 25 years of experience in outreach and delivering programs to low income customers to determine the appropriate amount of compensation. Services delivered have ranged from providing energy education and installing CFLs to conducting complete appliance assessments and installing a comprehensive list of energy efficient measures. SCE has reviewed past program efforts and the efforts of other giveaway programs. In addition, SCE has contacted CBOs who have extensive household-to-household canvassing experience to arrive at a reasonable fee. The \$10 payment will reasonably and fairly compensate the canvassers for their efforts to deliver CFLs and educate customers.

DRA and TURN also raise concerns that the \$10 fee may create "undesirable incentives," such as encouraging canvassers to target only high density areas. This is not the case. The CFL Program is designed to mitigate such concerns. Organizations will be assigned to canvass specific ZIP-7 geographic areas, and will receive lists of addresses that must be contacted. Canvassing outside of those areas will not be permitted. Accordingly, canvassers will not have an option of "cherry picking" the most densely populated areas, but will be limited to their community and the list of addresses provided.

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<sup>11</sup> SCE will provide canvassers with CARE program applications, which will include a unique source code to identify the CFL Program and participating agency. Canvassers will be encouraged to help customers fill out the CARE applications and submit them to SCE for processing.

<sup>12</sup> Customers who are not home will be left a door hanger providing instructions on how they can obtain their CFLs.

### **3. The Proposed Marketing Budget is Reasonable**

DRA and TURN comment that SCE’s marketing budget “seems high.”<sup>13</sup> SCE’s proposed marketing budget of \$500,000 is reasonable and necessary to reach the desired one million low income households within the timeframe proposed. In contrast to long-term programs that may have multi-year marketing efforts that build upon and leverage each year’s outreach, the CFL Program is a shorter program that requires intensive marketing in order to ensure that eligible customers are reached within the limited timeframe.

As outlined in SCE’s Testimony, SCE will target smaller areas through the use of a ZIP7, or ZIP+2, geographic unit as the basis for canvassing households for CFL delivery.<sup>14</sup> Targeting by smaller neighborhoods or communities does not allow SCE to leverage mass-market communication outlets (such as radio or major newspapers). Mass-market communications may lead to “spillover” (i.e., because of the large geographic reach of the publication, readers for whom the program is not intended will see the ad) and possible customer confusion over who is eligible for and who will receive the CFLs. With the marketing budget proposed, SCE will take advantage of newspaper print ads at the local community level, including ethnic media. Local advertising will provide specific information about community events regarding the CFL Program and provide specific dates of when SCE’s delivery partners will be in a particular local area. Additionally, smaller media outlets allow SCE multiple advertising opportunities, or increased frequency, to further increase the awareness of the CFL Program within the smaller communities who will benefit most from the CFLs. This type of local marketing, as opposed to mass-market communications, will also contribute to the effectiveness of the household-to-household delivery approach.

The development of one million fact sheets and other collateral material in multiple languages and large-print materials for visually impaired customers aimed at educating customers about

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<sup>13</sup> DRA and TURN attempt to compare the marketing for SCE’s CFL Program to the marketing budget for the “Proposed California Solar Initiative-Low Income Incentive Program for Single Family Homes.” This is not a meaningful or accurate comparison.

<sup>14</sup> See SCE’s Testimony, p. 10.

energy efficiency, the environment, and the proper disposal of CFLs, will also be produced from the marketing budget.

The marketing budget also allows for additional marketing tactics such as targeted direct mail that will be developed, as needed, to further increase the awareness and participation of qualified customers in the CFL Program.

**4. SCE's Proposed Measurement and Evaluation of the CFL Program is Reasonable**

DRA and TURN express concern that not enough detail is provided on SCE's proposed Measurement and Evaluation (M&E) of the CFL Program. SCE believes that its Testimony on M&E contains detailed justification for its request of \$90,000 for a program impact study and \$45,000 for a process study. As noted in SCE's Testimony,<sup>15</sup> because the CFL Program is a new program, SCE recommends both a process evaluation to examine and refine program operations and an impact evaluation to determine the effectiveness of the program in terms of kWh savings. SCE believes that both studies will facilitate a well-functioning program that delivers customers bill and energy savings and will provide efficient data collection and data sharing between the two studies. SCE remains committed to ensuring that both process and impact evaluations are well served by the various program survey components and describes the proposed studies below for further clarification.

**a) Process Evaluation**

Fundamentally, the process evaluation research will address the effectiveness and efficiency of the program delivery strategy as an effective method for delivering a large volume of CFLs to low income neighborhoods. Using mail/post card and phone surveys as well as a limited on-site component, the process evaluation will gather data for timely use of the information on individual provider performance, the training of the program canvassers, the household-to-household delivery operation, customer satisfaction with CBO and FBO personnel, educational material quality and other key parameters critical for a successful program operation and evaluation.

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<sup>15</sup> *Id.*, pp. 13-16.

### Mail/Postcard Survey Component

The mail/postcard survey sample will include mailings to at least 5,000 homes (in two or more waves) and will provide both quick program snapshot information and identification of quality control issues to address early in the program period. Later postcard survey waves will likely be scheduled around program rollout waves.

By use of a small incentive (local charity donation in respondent's name upon return of postcard), SCE plans to accomplish 3,000 postcard returns, without exceeding a total mail-out of 5,000-6,000 households.

In addition to quality control issues, the mail/postcard surveys will collect some key impact evaluation data for the more immediate needs of confirming or modifying some important parameter assumptions used in calculating per unit energy savings for the CFL Program:

- Basic bulb delivery/installation/disposition data
- Quality of service/quality of educational/collateral materials
- Bulb quantities received
- Bulb quality
- Installed/uninstalled bulbs by bulb wattage/location
- Portability of CFLs
- Other relevant process and impact areas

In terms of timing, SCE expects to mail a first wave of cards within two months of program rollout in order to provide early feedback to the SCE program manager. By heavily “frontloading” the postcard survey effort, the feedback obtained will allow the program manager to respond in a timely way to initial shortcomings in the outreach, educational, and bulb delivery/installation aspects of the CFL Program. This feedback will allow the program manager to quickly institute any program design changes needed to overcome these shortcomings.

### Phone Survey Component

The mail/postcard survey will be supplemented by a more intensive phone survey of 1,000 participants that will delve more deeply into critical program parameters necessary to support the

impact evaluation as well as provide more detailed information to increase the effectiveness of the ongoing program. The phone component will be fielded in at least two waves in order to discover any performance and service issues on the front end and to examine trends in these key outcomes.

The phone survey component will gather detailed data on the following process evaluation areas:

- Individual provider performance
- Program canvasser training
- Household-to-household delivery operation
- Customer satisfaction with the CBO and FBO personnel
- Educational materials
- Other areas deemed relevant to program success
- Other issue areas discovered in the mail survey

#### On-Site Survey Component

The program evaluation also will include an on-site survey of a small portion of the phone sample; about 100 participants (perhaps larger if necessary for establishing reliability estimates for the lighting parameters obtained in the mail and/or phone surveys). These on-sites will also add some context to both mail and phone survey results.

Since on-site surveys are the most difficult to achieve and the most costly to conduct, the sample for on-site surveys will be developed as a subset of the telephone survey respondents. This initial interaction from the phone survey should reduce participant concerns about agreeing to an on-site survey. It should be noted that through its various low income program contractors, SCE has extensive experience in conducting on-site surveys of low income customers.

#### **b) Impact Evaluation**

The data collection components described in the process study plan will lay the foundation for a thorough impact evaluation. This will be achieved by addressing several key issues regarding CFL savings for the CFL Program including:

- Installed bulbs by bulb wattage: location (including outdoors), wattage by type of replaced bulb, and approximate installation date
- Uninstalled bulbs by bulb wattage: current location (in home or given to others); if they are being held in home, their anticipated future use--location, wattage by type of bulb to be replaced and anticipated installation date (if any)
- Hours of use by wattage and location
- Program participants' prior experience with CFL bulbs
- Demographic and residential characteristics

#### Follow-Up Phone Survey Component

If the results of the on-site component suggest that mail and/or phone survey responses are significantly misstating some parameters (like in-service or in-storage rates) or it becomes necessary to examine how parameters are trending, SCE will add a brief component specifically oriented to measurement issues (including, for example, program and non-program bulb wattage and location, reported hours of use, and current satisfaction with the program bulbs, and quite importantly, any other parameters suggested by results from recent studies). This optional component would most likely be a one year follow-up survey of approximately 400 sample respondents, most likely from the phone survey population.

#### **c) Sample Size Considerations**

The data collection methods envisioned here will yield the following sample sizes:

- 3,000 incentivized postcard surveys of program participants, obtained in waves during program implementation from a mail-out of 5,000-6,000 postcards
- 1,000 completed phone surveys of program participants

- 100 on-site surveys of participants drawn from the 1,000 phone survey respondents
- 400 (optional) follow-up phone surveys to enhance the reliability of impact-related bulb disposition and use parameters

Since this plan examines in excess of 4,000 households, negligible sampling error will allow for very good estimates of program performance.

The sample design will be stratified to secure adequate geographical and demographic (income level) variation. The sampling plan is also geared to generate representation from CBOs and low income program participants. It should be noted that the CBO sample points will augment the postcard sample design which will allow the program manager to determine problems in specific areas of program control.

#### **5. Funding Flexibility Will Ensure the Smooth and Successful Administration and Implementation of the CFL Program**

DRA and TURN express reservations about SCE's request for funding flexibility. SCE believes that its request for funding flexibility is appropriate. SCE's Application requests funding flexibility to adjust the proposed budget allocations in order to ensure the successful implementation of the CFL Program. As explained above, SCE will conduct immediate and continuous M&E to identify initial shortcomings in the outreach, educational, and bulb delivery/installation aspects of the CFL Program and to allow SCE to quickly institute any program design changes needed to overcome these shortcomings. In order to capture and timely act upon continual improvement opportunities, SCE has requested flexibility to make adjustments to the budget allocations as necessary. A lengthy review and approval process for such fund-shifting will only hinder SCE's ability to quickly make identified improvements to this rapid CFL campaign.

**6. The CFL Program's Achievements Should Count Toward the Commission's Adopted Energy Efficiency Goals**

DRA and TURN suggest that the Commission should “reserve judgment” on whether the savings from the CFL Program should count toward the energy efficiency goals established by D.04-09-060. SCE disagrees. DRA and TURN do not, and cannot, provide any compelling reason why the savings should not be counted. Accordingly, the Commission should allow SCE to count the CFL Program's achievements toward the adopted energy efficiency goals.

As described in Section II.E. of SCE's Testimony, SCE proposes to record all energy efficiency results associated with the CFL Program toward the achievement of the Commission-adopted energy efficiency goals. In D.04-09-060, the Commission explicitly directed that all low income energy efficiency results be counted toward the achievement of the energy efficiency goals in the year in which the energy savings and demand reductions are realized (*i.e.*, installed). DRA and TURN acknowledge the Commission's direction and then turn right around and protest that the Commission should not apply this direction to the CFL Program. By starting down the road of carving out exceptions to savings that may apply toward the goal, DRA and TURN would have the Commission undermine the foundation which led to the development of the goals in the first place. The Commission set the goals with the explicit understanding that LIEE savings should count toward meeting the goal.<sup>16</sup> SCE finds it distressing that, despite all of this, DRA and TURN attempt to punish SCE's shareholders by withholding earnings precisely because SCE has taken a leadership position and proposed a bold and innovative program that would increase net benefits and therefore provide shareholder incentives – just as the State's Energy Action Plan (EAP) calls for.

DRA and TURN's comment about "easy forecasted savings" is an affront to SCE's leadership in delivering energy savings to customers. SCE is a national leader in energy efficiency.<sup>17</sup> Taken in its entirety, DRA and TURN's recommendation would not only prevent possible shareholder

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<sup>16</sup> D.04-09-060, Findings of Fact 13, pp. 46-7.

<sup>17</sup> See <http://www.edison.com/pressroom/pr.asp?id=6602>; see also U.S. Department of Energy, Energy Information Administration, Form EIA-861.



earnings, but would also prevent SCE and its customers from increasing energy savings, bill savings and greenhouse gas reductions. This recommendation is contrary to the Commission's policy as articulated in the EAP. SCE's proposal to count the savings from the CFL Program toward the achievement of its energy efficiency goal is consistent with Commission policy and should be adopted.

#### IV.

#### CONCLUSION

The CFL Program represents a unique opportunity to provide immediate bills savings to low income customers; immediate resource benefits and greenhouse gas reductions; a timely leveraging opportunity provided by the national ENERGY STAR® "Change a Light, Change the World" campaign; and reductions in the CARE subsidy that will benefit all ratepayers as a result of reduced energy consumption by low income customers participating in the CFL Program. Neither Greenlining's comments, nor DRA and TURN's protest raise any issues necessitating hearings in this matter. For this reason, and given the immediate benefits the CFL Program could bring, SCE respectfully requests that the Commission approve SCE's CFL Program Application without delay.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY TO THE COMMENTS OF THE GREENLINING INSTITUTE AND THE JOINT PROTEST OF DIVISION OF RATEPAYER ADVOCATES AND THE UTILITY REFORM NETWORK REGARDING SOUTHERN CALIFORNIA EDISON COMPANY'S "CHANGE A LIGHT, CHANGE THE WORLD" COMPACT FLUORESCENT LAMP PROGRAM APPLICATION on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **25th day of June, 2007**, at Rosemead, California.

/s/ SARA CARRILLO

Sara Carrillo

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**R.07-01-042**

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SAN FRANCISCO, CA 94106  
R.07-01-042

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R.07-01-042

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5213 ROSEANA COURT  
FAIR OAKS, CA 95628  
R.07-01-042

DAVID J. COYLE  
ANZA ELECTRIC COOPERATIVE, INC  
58470 HIGHWAY 371  
ANZA, CA 92539-1909  
R.07-01-042

KEVIN CUDD  
SENIOR PROGRAM MANAGER  
PG&E  
1320 EL CAPITAN DRIVE, SUITE 330  
DANVILLE, CA 94526  
R.07-01-042

**R.07-01-042**

Monday, June 25, 2007

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CHIEF FINANCIAL OFFICER  
WEST COAST GAS COMPANY  
9203 BEATTY DRIVE  
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MARISA DECRISTOFORO  
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ALTA LOMA, CA 91737  
R.07-01-042

SHEILA DEY  
WESTERN MANUFACTURED HOUSING  
COMMUNITIES  
455 CAPITOL MALL STE 800  
SACRAMENTO, CA 95814  
R.07-01-042

JOHN DUTCHER  
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MOUNTAIN UTILITIES  
3210 CORTE VALENCIA  
FAIRFIELD, CA 94534-7875  
R.07-01-042

Jeannine Elzey  
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505 VAN NESS AVENUE  
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SAN FRANCISCO, CA 94102-3214  
R.07-01-042

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ROSEMEAD, CA 91770  
R.07-01-042

LAW DEPARTMENT FILE ROOM  
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AREA 4-A  
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R.07-01-042

LINDA FONTES  
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123 MISSION ROOM 1404 MC H14F  
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ENRIQUE GALLARDO  
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LATINO ISSUES FORUM  
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R.07-01-042

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R.07-01-042

ROBERT GNAIZDA  
THE GREENLINING INSTITUTE  
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R.07-01-042

THALIA N.C. GONZALEZ  
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RHA INC  
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COMMERCE ENERGY, INC.  
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R.07-01-042

**R.07-01-042**

Monday, June 25, 2007

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ACCES  
1069 45TH STREET  
SACRAMENTO, CA 95819  
R.07-01-042

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MODESTO IRRIGATION DISTRICT  
1231 11TH STREET  
MODESTO, CA 95354  
R.07-01-042

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R.07-01-042

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R.07-01-042

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R.07-01-042

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15 ST. ANDREWS ROAD, SUITE 7  
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**R.07-01-042**

Monday, June 25, 2007

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R.07-01-042

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PRAXAIR PLAINFIELD, INC.  
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R.07-01-042

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R.07-01-042

**R.07-01-042**

Monday, June 25, 2007

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R.07-01-042

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R.07-01-042

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R.07-01-042

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R.07-01-042

GREGORY REDICAN  
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MATEO  
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PO BOX 770000  
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R.07-01-042

Sarita Sarvate  
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SAN FRANCISCO, CA 94102-3214  
R.07-01-042

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MARY O. SIMMONS  
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6100 NEIL ROAD, P.O. BOX 10100  
RENO, NV 89520  
R.07-01-042

**R.07-01-042**

Monday, June 25, 2007

ALEX SOTOMAYOR  
MARAVILLE FOUNDATION  
5729 UNION PACIFIC AVENUE  
LOS ANGELES, CA 90022  
R.07-01-042

DAVE STEPHENSON  
RATE REGULATION MANAGER - WESTERN  
REGIO  
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R.07-01-042

Terrie J. Tannehill  
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FRANCES L. THOMPSON  
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LUKE TOUGAS  
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TELACU  
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R.07-01-042

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R.07-01-042

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R.07-01-042

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DEVELOPMEN  
700 NORTH 10TH STREET, ROOM 258  
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R.07-01-042



**R.07-01-042**

Monday, June 25, 2007

DON WOOD SR.  
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R.07-01-042

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R.07-01-042

**A.06-06-032**

Monday, June 25, 2007

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
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A.06-06-032

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A.06-06-032

CRISTAL BEDORTHA  
RESIDENTIAL WALL INSULATION  
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OROVILLE, CA 95965  
A.06-06-032

BILL BELANSKY  
WESTERN INSULATION  
16465 VIA ESPRILLO  
SAN DIEGO, CA 92127  
A.06-06-032

SCOTT BERG  
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INC.  
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A.06-06-032

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A.06-06-032

BEN CARROLL  
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A.06-06-032

Melicia Charles  
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A.06-06-032

LUIS CHAVEZ  
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A.06-06-032

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A.06-06-032

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A.06-06-032

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A.06-06-032

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**A.06-06-032**

Monday, June 25, 2007

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A.06-06-032

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A.06-06-032

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**A.06-06-032**

Monday, June 25, 2007

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Monday, June 25, 2007

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Monday, June 25, 2007

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