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August 2, 2010

Ms. Julie A. Fitch
California Public Utilities Commission
Energy Division
505 Van Ness Avenue
San Francisco, CA 94102

Re: Report on the Coordination Between Low Income Energy Efficiency and Energy Efficiency

Dear Ms. Fitch,

Per Decision 09-09-047, pages 305-307, Pacific Gas and Electric Company (PG&E) submits its Report on the Coordination Between Low Income Energy Efficiency and Energy Efficiency Programs. On July 1, 2010, PG&E notified Energy Division that it would need additional time to prepare its report and would submit it on August 2, 2010.

Please contact me at (415) 973-2494 if you have any questions.

Sincerely,

/s/

Sandy Lawrie
Principal Regulatory Case Manager
Regulation and Rates

cc: David Gamson, Administrative Law Judge, CPUC
Kimberly Kim, Administrative Law Judge, CPUC
Jeanne Clinton, Energy Division
Jean Lamming, Energy Division
Simon Baker, Energy Division
Sarita Sarvate, Energy Division
Service Lists for A.08-07-021, et al.

**Building Energy Efficiency Opportunities for
Low Income Customers:
Coordination Between PG&E's
Low Income Energy Efficiency and Energy Efficiency Programs**



**Pacific Gas and Electric Company
August 2, 2010**

The California Public Utilities Commission (CPUC) in Decision (D.) 09-09-047 directed the utilities to provide a report to the Energy Division detailing coordination efforts between residential energy efficiency (EE) and Low Income Energy Efficiency (LIEE) programs.¹ In accordance with the decision, Pacific Gas and Electric Company (PG&E) provides this report.

Introduction

Since the inception of its LIEE program in 1983, PG&E has been delivering energy efficiency services through its Energy Partners program to low income customers in close integration with its EE program. As a result, PG&E customers can learn about and receive LIEE options through a variety of EE marketing and delivery channels, such as its core programs, Third Party programs, and Partnership programs.

In addition, PG&E's low income programs integrate service delivery with California Alternate Rates for Energy (CARE) and Family Electric Rate Assistance (FERA).

In encouraging enhanced integration between LIEE and other energy customer programs, the Commission seeks the benefits of greater energy efficiency and savings. Specifically, the Commission has defined integration and its benefits as follows:

Integration constitutes an organization's internal efforts among various departments and programs to identify, develop, and enact cooperative relationships that increase the effectiveness of customer demand side management programs and resources. Integration should result in more economic efficiency and energy savings than would have occurred in the absence of integration efforts.²

In alignment with Commission desires and as part of an overarching goal to offer customers holistic offerings, PG&E has organized service and delivery teams that integrate EE and LIEE, as well as Demand Response (DR) and Distributed Generation (DG, which includes the California Solar Initiative (CSI) and Self Generation Incentive Program (SGIP)). Additionally, PG&E has developed an internal integration team comprised of staff from these various programs and marketing and delivery channels. This team has been meeting weekly and collaborates with the other investor-owned utilities (IOUs) on the statewide Integrated Demand Side Management (IDSM) Task Force to leverage ideas and opportunities that have been identified internally.³ Taken together, these efforts will serve to increase the existing integration between LIEE and EE.

¹ Decision 09-09-047, *Approving 2010 to 2012 Energy Efficiency Portfolios and Budgets*, dated September 24, 2009, pages 305-307. On July 1, 2010, PG&E notified Energy Division that it would need additional time to prepare its report and would submit it on August 2, 2010.

² Decision 08-11-031, *Decision on Large Investor-Owned Utilities' 2009-11 Low Income Energy Efficiency (LIEE) and California Alternate Rates for Energy (CARE) Applications*, page 116, dated November 6, 2008.

³ The statewide IDSM activities are described in the Program Implementation Plan filed in PG&E Advice 3079-G/3595-E, and approved by the Commission with an effective date of March 12, 2010.

PG&E has taken integration of EE and LIEE in several directions—from coordinating between programs and conducting joint marketing efforts to establishing pilots that can serve as examples for the state and the other IOUs. The sections below provide detailed examples of specific PG&E programs that demonstrate the coordination between its LIEE and EE programs.

Direct Install for Manufactured and Mobile Homes Program

PG&E's Direct Install for Manufactured and Mobile Homes Program is being implemented by Energy Efficiency, Inc., DBA Synergy EE. This EE program installs a comprehensive set of energy efficiency measures in the customer's home, at no cost to the customer.

Synergy personnel introduce the program to mobile home park managers and owners. If these decision makers want to make the program available to park residents, the Synergy team then sets up a neighborhood meeting in a community site and delivers program information (a letter and flyer) to the residents. Synergy invites an LIEE Energy Partners representative to attend and participate with the Synergy marketing team at these meetings.

Residents who decide to participate can either set a date for a technician visit and installation of measures at the neighborhood meeting or call the company's toll-free number for an appointment. Synergy's process includes asking if the customer qualifies for the LIEE program and if they have ever received services from LIEE. LIEE-eligible customers who have never received LIEE program services will be provided for as follows:

- Those within Synergy's service territory will be serviced by Synergy.
- All others will be submitted as leads to Richard Heath & Associates (the LIEE prime contractor), who will ensure delivery of the LIEE services.

LIEE Marketing and Outreach

The LIEE marketing and outreach initiatives focus on coordinating activities and advertising with LIEE service providers and other PG&E EE programs and rate options likely to reach low income customers. For example, PG&E requires its LIEE contractors to inform customers about other programs (such as CARE) for which they may be eligible. PG&E combines its LIEE and CARE outreach activities to leverage low income outreach efforts and provide PG&E's low income customers with the knowledge and tools to access the full range of PG&E's free energy services.

LIEE staff regularly makes presentations about the PG&E's low income programs at community and company events throughout the PG&E service area. These presentations educate customers about energy efficiency and inform them about assistance programs and opportunities available to them through PG&E. LIEE marketing staff implements outreach initiatives to increase energy efficiency awareness and interest in hard-to-reach customer segments, leading to customer participation and enrollment in PG&E programs. Marketing and outreach initiatives include information about LIEE and CARE in multiple languages, including English, Spanish, Chinese, Vietnamese, Korean, Hmong, and Russian.

The Breathe Easy brochure, attached to this report, incorporated CARE, LIEE, EE, and DR information in one place, is a prime example of integrated marketing. These programs are also cross-referenced on PG&E's website, www.pge.com. Further, information on LIEE and other EE and DR programs are included in the introductory information provided to customers when their SmartMeter is installed. The LIEE team is also working closely with the Statewide Marketing, Education and Outreach team to ensure coordinated efforts related to statewide branding and use of the Statewide web portal for connecting customers to programs and information relevant to their needs.

Partnerships

PG&E's partnership agreements with public sector agencies, including cities, counties, and quasi-government organizations (e.g., associations of local governments), are designed to help these partners achieve energy efficiency in their facilities and communities. Leveraging and targeting communications to more effectively reach customers who have not responded to traditional utility marketing approaches, Partnership's funnel customers to PG&E's core and Third Party programs, as well as serve customers directly through local direct install programs. Working with Partnerships on customized approaches enables PG&E's programs to be creative and responsive to local needs.

Recognizing that Partnerships provide a vital channel for promoting LIEE, PG&E Energy Partners program works with Partnerships to identify potential opportunities for integrating LIEE into outreach opportunities through presentations to community leaders and stakeholders. These presentations highlight the opportunity for eligible customers to receive energy efficiency improvements in their homes.

In addition, several PG&E Partnerships are working closely with Energy Partners to coordinate the Moderate Income Direct Install Program (MIDI) as described below.

Moderate Income Direct Install (MIDI)

The connection between the Partnerships and LIEE is critical to implementing PG&E's MIDI program, which leverages the LIEE infrastructure to provide audit and installation services free of charge to underserved moderate income customers.

Currently, LIEE contractors encounter customers who do not qualify for LIEE services, because they either have income level above the LIEE income threshold (200% of federal poverty guidelines) or cannot produce the appropriate documentation. LIEE providers participating in the MIDI program will serve these non-LIEE qualifying customers by completing a home audit and installing energy efficiency measures, including comprehensive lighting, attic and pipe insulation, low flow showerheads, and faucet aerators—all at no cost to the customer.

Under the MIDI program, LIEE contractors will receive Partnerships funding to serve these moderate income customers. The local Partnerships will work closely with the LIEE provider to identify underserved neighborhoods and leverage local social service and other community resources. The MIDI program implementer, Richard Heath & Associates, will launch MIDI during the third quarter of 2010.

The MIDI program will coordinate with PG&E's Energy Upgrade California program (see below) and initiatives funded under the American Recovery and Reinvestment Act (ARRA).

Energy Upgrade California

This program—expected to roll out in Q3 2010—promotes the “house as a system” approach by providing contractor training and customer incentives for a variety of retrofits that improve a home's energy profile. The program outlines two paths to efficiency:

- Prescriptive Path: Includes individual measures—such as attic insulation, air sealing, duct sealing, and combustion safety—with required minimum energy efficiency performance values.
- Performance Path: Delivers comprehensive improvement packages tailored to the needs of each existing home and its owner and will include all prescriptive measures, as well as major heating and cooling systems, and hot water systems.

Customers can receive incentives up to \$1,000 for the prescriptive path and up to \$3,500 for the performance path.

PG&E's teams are exploring the feasibility of integrating LIEE and Energy Upgrade California through the MIDI program (see above). Specifically, the MIDI program may be a channel for offering prescriptive path measures to customers who fall just outside of the LIEE eligibility requirements. Program teams are evaluating the feasibility of expanding the existing MIDI measure list to include the complete package of prescriptive path measures. PG&E will provide lessons learned to other IOUs on this effort.

Further, customers inquiring about Energy Upgrade California will receive information on LIEE. Energy Upgrade California and LIEE program staff are discussing which Energy Upgrade California marketing materials should contain summary information on LIEE and CARE/FERA.

Home Energy Efficiency Rebates (HEER)

All of the LIEE-EE integrated outreach is aimed at encouraging customers to participate in EE programs by applying for rebates. Examples of outreach that link LIEE to EE rebates include the Breathe Easy direct mail brochure (see attachment), which links low-income pages to EE pages, and collateral and presentations provided directly to customers at community events and meetings.

Multifamily Affordable Solar Housing (MASH) and Single family Affordable Solar Housing (SASH)

The MASH program provides incentives to owners/operators of multifamily affordable housing units to encourage them to install solar units on their buildings. Since launching MASH in early 2009, PG&E has held numerous online and live training sessions for applicable customers on the value of integrating PG&E's low income program offerings, and specifically, on the value of installing energy efficiency technologies prior to installing solar technologies. Additionally, PG&E representatives have offered and participated in several workshops throughout the service territory, including

presentations for San Francisco's Low Income Oversight Board, Oakland's Green Affordable Housing Coalition and Sacramento's annual Housing California conference.

While PG&E's MASH Track 1 incentive budget is fully subscribed, PG&E will continue outreach to the industry on MASH Track 2 incentives to facilitate reaching such program goals as increasing awareness and appreciation of the benefits of solar and energy efficiency, as well as improving the overall quality of affordable housing through the application of both technologies.

PG&E is also working to further integrate its EE and LIEE program and services with SASH program. For example, PG&E has been leveraging interest in the SASH program to promote energy efficiency by regularly working with the program administrator, GRID Alternatives, to jointly promote the respective programs to a qualified list of customers. Through partnering with the SASH program, LIEE has received 24 new enrollments since January. Another 41 customers who are participating in the SASH program had already received LIEE services in the past.

Multifamily Energy Efficiency Rebate Program (MFEER)

MFEER offers property owners and managers incentives for installing energy efficient measures, slated for the retrofit of existing multifamily properties of two or more units. LIEE outreach is integrated into outreach for MFEER. For example, when multifamily property owners/managers participate in the MFEER Program, they receive a welcome packet that includes descriptions of the CARE/FERA and LIEE programs. CARE/FERA and LIEE programs are also promoted at MFEER outreach events and property owner/manager conferences. Income-eligible residents may enroll in the LIEE program to receive measures not provided by the MFEER program.

Workforce Education and Training (WE&T) School Programs

The Energy Training Center-Stockton (ETC), one of the Workforce Education and Training (WE&T) Centergies programs, has supported training for LIEE programs continuously for 32 years and is the focal point for substantive integration of the WE&T energy efficiency program with LIEE WE&T. ETC support for LIEE includes the following:

- Training for weatherization specialists (installation crews) and energy specialists (assessors/educators); and
- Assistance in managing a pilot program with LA Trade Tech Community College and the San Francisco Office of Economic and Workforce Development to test options to decentralize portions of LIEE program training.

To address coordination with community college and Workforce Investment Board recipients of federal and state funding for green jobs, PG&E expanded its PowerPathway program to create the PowerPathway Training Network on Energy Efficiency and Renewable Energy (PPTNEE).

PPTNEE supports the LIEE workforce by preparing members of the disadvantaged communities for jobs in their communities while keeping green career ladders and stackable credentials in mind for a pathway toward rewarding careers. This new program was formed by a competitive request for applications sent to all community

colleges in PG&E's service area. Six community colleges were selected to be part of the PPTNEE and receive assistance in developing entry-level EE training, mentoring of instructors, and submitting grants. Further, ETC will articulate training with PPTNEE to reduce the time and expense of centralized training.

The WE&T Connections school programs also provide services for hard-to-reach and disadvantaged communities. The Energenius and PEAK WE&T K-12 programs track participation by ZIP code and will set quantifiable goals related to low income and disadvantaged student communities.

Demand Response

The LIEE team is working with the Demand Response team to include SmartAC in the local roll-out of LIEE programs. PG&E's LIEE team is also working with contractors to ensure that SmartAC opportunities are not missed when installing other EE measures in LIEE-qualified homes. In particular, the team is targeting HVAC contractors who are working in the LIEE program in order to identify opportunities to sign up customers for the SmartAC program.

Conclusion

Coordination of the 2010–2012 residential energy efficiency programs with LIEE is occurring at various stages including internal coordination, project initiation, consolidation of program outreach, program delivery, and process enhancement and refinement. The leveraging of these opportunities is helping to ensure that customers are presented with seamless opportunities to participate in, and maximize benefits from, PG&E's programs.

Payment Plans

Automatic Payment Service

www.pge.com/aps
1-800-743-5000

Payments to PG&E are automatically deducted from your bank account. Automatic Payment is also an alternative to a deposit.

Balanced Payment Plan

www.pge.com/bpp
1-800-743-5000

Monthly payments can be averaged out to allow you to budget your energy costs and eliminate big swings in your payments. You will usually pay the same amount every month which can help during extreme-weather months.

Bill Guaranty

1-800-743-5000

A deposit alternative, enables customers to secure their account by having another qualifying PG&E customer sign on their behalf.

Payment Arrangement

www.pge.com/paymentarrangement
1-800-743-5000

Provides additional time to make payments if you cannot pay your bill by the due date.

Cooling Centers

www.pge.com/coolingcenter
1-877-474-3266

A network of community centers and other public buildings where you can go to cool off when the temperature gets unusually and dangerously high.

SmartAC™

www.pge.com/SmartAC
1-866-908-4916

Help your community prevent summer power interruptions while helping the environment by enrolling in PG&E's SmartAC™ program. It's free and easy to join. Plus, you'll get a \$25 reward for participating. Enroll today!

For more information about Breathe Easy Solutions, visit www.pge.com or call PG&E's Smarter Energy Line at 1-800-933-9555

TDD/TTY: 1-800-652-4712

Monday–Friday, 9 a.m.–11 p.m.

If calling outside these hours, customers may leave a message and a representative will call them back the following business day.



If unable to access the TDD/TTY number, please call the California Relay Line at 1-800-735-2929



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English

June 2010 CMM-0710-0631

PG&E prints its materials with soy based inks  on recycled paper 

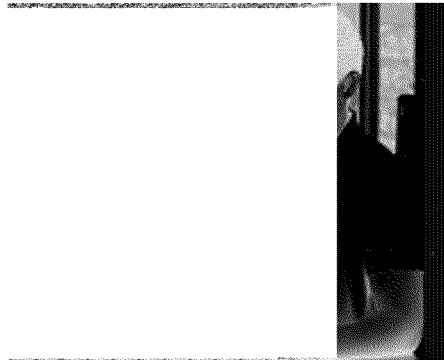


we can manage
energy costs.



PG&E Breathe Easy Solutions™

At Pacific Gas and Electric Company (PG&E), we are dedicated to assisting customers through numerous programs and community outreach projects. With PG&E's Breathe Easy Solutions™, we'll help you manage your energy costs — which can be helpful when there are financial challenges or unexpected changes in your situation. Together, we can find solutions.



Energy Partners

www.pge.com/energypartners
1-800-989-9744

PG&E's Energy Partners program provides income-qualified households with easy, free solutions to help reduce their energy use and save money on their monthly energy bills. With Energy Partners you could be eligible for:

- Free energy education to help you understand how you use energy and simple ways to use less.
- Free weatherization to make your house, apartment or mobile home energy efficient and comfortable.

Weatherization may include attic insulation, weatherstripping, caulking, energy-efficient lighting and refrigerators, window repair and more. Furnace and water heater repair and replacement available to qualifying homeowners.

CARE

California Alternate Rates for Energy

www.pge.com/care
1-866-743-2273

Provides a monthly discount on energy bills for income-qualified households.

FERA

Family Electric Rate Assistance

www.pge.com/fera
1-800-743-5000

Provides a monthly discount on electric bills for income-qualified households of three or more persons.

Income Guidelines		
Number of Persons in Household	Total Combined Annual Income	
	Energy Partners*/ CARE†	FERA†
1-2	\$31,300	N/A
3	\$36,800	\$36,801 – \$46,100
4	\$44,400	\$44,401 – \$55,600
5	\$52,000	\$52,001 – \$65,100
6	\$59,600	\$59,601 – \$74,600
For each additional person, add:	\$7,600	\$7,600 – \$9,500

Valid through May 31, 2011
*Annualized income before taxes
† Before taxes based on current income sources

REACH

Relief for Energy Assistance through Community Help

www.pge.com/reach
1-800-933-9677

REACH is a one-time energy-assistance program sponsored by PG&E and administered by the Salvation Army. REACH helps income-qualified customers who experience severe or unplanned hardships and are unable to pay for their energy needs.

HEAP

Home Energy Assistance Program

www.pge.com/heap
1-866-678-6625

HEAP is a federally funded energy subsidy program administered by the California Department of Community Services & Development (CSD) through local agencies and community-based organizations. It provides income-qualified households with assistance on their energy bills.

Medical Baseline

www.pge.com/medicalbaseline
1-800-743-5000

Residential customers dependent on life-support equipment and/or with special heating or cooling needs due to certain medical conditions may be eligible to receive additional quantities of energy at the lowest (baseline) price.

Third-Party Notification

www.pge.com/thirdpartynotification
1-800-743-5000

Third-Party Notification allows you to name a friend or relative to receive duplicate copies of past-due payment notices. The designated person is not responsible for paying the bill, but can contact PG&E to help resolve the problem.

Energy Efficiency Rebates

www.pge.com/rebates

PG&E offers a wide range of rebates—from instant savings on lighting products to our appliance recycling program—to help you save energy, money and our environment's natural resources.