



Rasha Prince
Director
Regulatory Affairs

555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011
Tel: 213.244.5141
Fax: 213.244.4957
RPrince@semprautilities.com

October 21, 2010

Ms. Kyle Devine
Assistant Public Advisor
Consumer Service and Information Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: SoCalGas and SDG&E Comments on Draft Resolution CSID-004

Dear Ms. Devine:

Southern California Gas Company (SoCalGas) and San Diego Gas & Electric (SDG&E) hereby provide their joint comments on Draft Resolution CSID-004 (the Draft Resolution) which is scheduled to appear on the Commission's November 19, 2010 agenda. The Draft Resolution proposes to implement a Pilot program, the Community Help and Assistance with Natural Gas and Electricity Services (CHANGES), to provide to limited English proficient customers, an in-language education, complaint resolution and outreach program for energy matters.

Comments

SoCalGas and SDG&E fully support the Draft Resolution's proposal to approve the CHANGES pilot program. SoCalGas and SDG&E believe the pilot program will provide a valuable resource to the utilities' hardest to reach customers. SoCalGas and SDG&E offer a few comments below as clarification for the record.

The Draft Resolution proposes that costs for the Pilot program will be paid for by the IOUs through their California Alternate Rates for Energy (CARE) program funding. ¹SoCalGas and SDG&E support this funding source to support the CHANGES pilot program and offer to further clarify that their CARE program costs are tracked in a two-way balancing account and are subject to a reasonableness review by the Commission. Therefore, the costs for the CHANGES pilot program will not put the CARE program over budget. With approval of Draft Resolution CSIS-004 any over expenditure to the CARE program as a result of the CHANGES Pilot program would be an authorized CARE expense.

Ordering Paragraphs 3 and 4 of Draft Resolution CSID-004 provide that CSID and IOUs will meet regularly to evaluate the CHANGES program and modify it, if necessary, within the scope

¹ Draft Resolution CSID-004, page 2.

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of the program and that the CSID will audit the program and its related expenditures to assure the program is making the best use of the funds that are set aside for the program.² SoCalGas and SDG&E further propose that they will provide a separate report to detail the progress of the CHANGES program during the term of the pilot program.³ SoCalGas and SDG&E will work with CSID staff to determine the appropriate reporting requirements for the CHANGES program (including specific information the utilities should track and report) and determine how often this information should be submitted.

Finally, the Draft Resolution at a number of points refers to the fact that the CHANGES pilot program will augment the IOUs' education, complaint resolution, and outreach programs.⁴ SoCalGas and SDG&E propose to change the term "complaint resolution" to "dispute resolution" to differentiate from the Commission's formal and informal complaint process.

Conclusion

With the comments outlined above, SoCalGas and SDG&E recommend approval of Draft Resolution CSID-004 at the Commission's November 19, 2010 Commission Meeting.

Sincerely,



Rasha Prince
Director, Regulatory Affairs

cc: all via email
Service List R.10-02-005
Karen Miller, Public Advisor, Consumer Service and Information Division

² Draft Resolution CSID-004, page 8.

³ SoCalGas recommends that since the CHANGES program is a pilot program, that any monthly reports not be incorporated into the existing Low Income Program Monthly Reports.

⁴ Draft Resolution CSID-004, FOF 4.