

October 25, 2011

Loreen R. McMahon, Director  
Consumer Service and Information Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**Re: Support for Resolution CSID – 005**

Dear Ms. McMahon:

The Center for Accessible Technology (CforAT) and the Greenlining Institute (Greenlining) are pleased to support Draft Resolution CSID – 005, which would approve continued funding of the CHANGES pilot program while the Commission considers whether it should become a permanent program. CforAT and Greenlining support the resolution because it advances ongoing efforts to partner with existing institutions and community based organizations in order to improve understanding of utility service by low-income households.

CforAT represents people with disabilities, many of whom are low-income. Certain populations within the disability community also have difficulty with standard forms of communication about utility issues; this is particularly true of the deaf/hard-of-hearing population. For this community, particularly those who communicate primarily using American Sign Language, effective communication requires the same targeted effort as for other communities who do not speak English as their first language.<sup>1</sup> Community-based organizations focused on serving the deaf/hard-of-hearing population can serve an important role by assisting their constituency in understanding their energy bills and providing them with help on energy-related issues.<sup>2</sup>

Greenlining's mission includes empowering communities of color and other disadvantaged groups. Greenlining appreciates the role of CHANGES in providing education and assistance to limited English Proficient consumers. Such services will always be needed, but take additional importance as more and more customers have arrearages and are facing disconnections. Greenlining also appreciates the strategy of working with community-based organizations who may have particular insight and expertise in working with targeted communities.

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<sup>1</sup> American Sign Language is not a form of English that substitutes gestures for sounds; rather, it is its own language, with its own grammar and idiom. A person who uses ASL as his or her primary form of communication may not be proficient in English, and may not be able to effectively understand written communications in English.

<sup>2</sup> While the existing pilot is limited in scope, it does include one CBO that serves the deaf/hard-of-hearing community, and the needs of this community are specifically mentioned in the background discussion of the CHANGES program in the draft resolution.

Even through the limited pilot program, CHANGES is providing a valuable service to vulnerable customers who are receptive to receiving information from a familiar and trusted source. While it is vital for utilities to continue their own outreach efforts, and while programs such as CHANGES cannot be expected to serve as a substitute for direct outreach (in part because many consumers never make use of CBO services), they are a valuable supplement and should be supported.

CforAT and Greenlining expect that the evaluation of the CHANGES program required in the draft resolution will confirm the usefulness of the program. While the review is pending, we support an extension of the existing pilot program. Because the populations served by the participating CBOs are overwhelmingly CARE-eligible, we support the continued use of CARE program funds to continue with CHANGES.

CforAT and Greenlining support the adoption of Draft Resolution CSID – 005 without reservation.

Respectfully submitted,

Center for Accessible Technology

Greenlining Institute

/s/ Melissa W. Kasnitz

Melissa W. Kasnitz  
Legal Counsel

/s/ Enrique Gallardo

Enrique Gallardo  
Legal Counsel

cc: Karen Miller  
Kyle DeVine  
President Michael R. Peevey  
Commissioner Timothy Alan Simon  
Commissioner Michel Peter Florio  
Commissioner Catherine J. K. Sandoval  
Commissioner Mark J. Ferron  
Ramon Momoh,  
Chief ALJ Karen Cloptin  
ALJ Kimberly Kim  
Frank Lindh  
Hazlyn Forture  
Ava Tran  
Carmen Best  
Interested parties identified in Attachment B to Draft Resolution CSID – 005  
Service list for R.10-02-005  
Service list for A.11-05-017 et al.