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Mr. Paul Clanon
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: SoCalGas and SDG&E Comments on Draft Resolution CSID-005

Dear Mr. Clanon:

Southern California Gas Company (SoCalGas) and San Diego Gas & Electric (SDG&E) hereby provide their comments on Draft Resolution CSID-005 (Draft Resolution) which was issued on October 5, 2011 and is scheduled to appear on the Commission's November 10, 2011 agenda.

The Draft Resolution proposes to continue the Community Help and Assistance with Natural Gas and Electricity Services (CHANGES) Pilot Program, in order to allow the collection of 12 months' worth of data to be used to complete its evaluation of the Pilot Program which will be conducted by an independent consultant. The Draft Resolution sets July 15, 2012 as the date a final Evaluation Report will be submitted to CSID, the Energy Division, and the Assigned Administrative Law Judge in the open 2012 Low Income Program Budget Proceeding (A. 11-05-017, et. al.). The Draft Resolution further proposes to increase the budget adopted in Resolution CSID-004 for the Pilot Program from \$40,000 per month to \$60,000 per month using the funding allocation approved in Resolution E-3585 for all joint utility pilot programs.¹

The CHANGES Program's objective is to provide an in-language outreach, education, and need and dispute resolution program for energy matters to limited English proficient customers of all income levels. The Draft Resolution proposes to continue to charge the costs of the Pilot Program to the CARE program until the Commission determines a different funding level in its CARE Budget Proceeding and to charge the Pilot Program's Evaluation costs (which have not yet been determined) to the CARE Program's Measurement and Evaluation budget.

¹ Resolution E-3585 adopted a funding allocation as follows: PG&E – 30%, SCE – 30%, SoCalGas – 25%, SDG&E – 15%.

Comments

SoCalGas and SDG&E have supported and participated in the CHANGES pilot program at a combined Investor Owned Utility (IOU) funding level of approximately \$40,000 per month. SoCalGas and SDG&E believe the pilot program has the potential to provide a valuable resource to the utilities' hardest to reach customers, but that an appropriate evaluation of costs and relevant results is timely. SoCalGas and SDG&E support the Draft Resolution, but offer the following comments for the Commission's consideration.

- A budget/funding source for a Pilot extension has not been planned for and will require SoCalGas and SDGE to identify it quickly as their ongoing General Rate Case (GRC) proceedings and Low Income Program Application proceedings and their timelines do not align with the proposed CHANGES evaluation process. If CARE funding is to be considered for this continuation, it will have to come from "Bridge Funding" that is currently being considered by the Commission in A.11-05-017.
- SoCalGas and SDG&E would also add that there may be some timing issues with regard to the expected timing of a Commission Decision in the 2012-2014 Low Income Program Budget proceeding, (A. 11-05-017, et. al.) which is currently targeted for April 2012 and the conclusion of the CHANGES pilot program evaluation which is not expected until at least July 2012.
- The expense "...through CARE funds capped at \$60,000 per month..." is 50% more than what SoCalGas and SDG&E is expending under the current contract. A detailed accounting of the budget increase should be included in the Final Resolution. It is not clear in the Draft Resolution whether the proposed budget increase includes the cost of conducting the Pilot Program Evaluation. SoCalGas and SDG&E urge the Commission to consider further clarification in its Final Resolution.
- The funding percentages for the IOUs are incorrectly represented throughout the Draft Resolution document as 30-25-25-15 (PG&E, SCE, SDG&E, and SoCalGas). The SCE amount should be corrected to 30%.
- An unidentified 3rd Party consultant is proposed to perform an important Pilot Evaluation for all stakeholders, however, neither an evaluation protocol nor any "success" metrics have been identified. It isn't clear in the Draft Resolution what data about the program will be collected as part of the evaluation, or if it is indeed being collected to this point. SoCalGas and SDG&E suggest that the Commission sponsor a workshop to further develop the scope of the evaluation and to determine the metrics to be used to evaluate the CHANGES Pilot Program.
- The expenses of this evaluation of the CHANGES Pilot Program are not identified in the Draft Resolution. SoCalGas and SDG&E request that an estimate of the expected evaluation costs be identified in the Draft Resolution to ensure the funding request is adequately considered.
- Though the foundation of the CHANGES program is to provide services to limited-English proficient customers, the service agreement states that no one will be turned

away. SoCalGas and SDG&E request language providing such flexibility be continued and documented in the Draft Resolution.

- Even though a final report is to be submitted by July 15, 2012, the Commission should clarify whether this pilot extension could go on indefinitely or an alternative if no Commission decision to make CHANGES an on-going program is made by the end of 2012. A sunset date for this pilot extension should be considered to provide more certainty of program status and funding.

Conclusion

With consideration of the comments above, SoCalGas and SDG&E support the continuation of the CHANGES Pilot Program as authorized in Draft Resolution CSID-005 to identify the appropriate improvements to best assist our Limited English Proficient customers.

Sincerely,



(Ms.) Rasha Prince
Director, Regulatory Affairs

cc: all via email

Loreen R. McMahon, Director, Consumer Service and Information Division
Karen Miller, Public Advisor, CPUC
Kyle DeVine, CHANGES Program Manager
Michael R. Peevey, Commissioner
Michel Peter Florio, Commissioner
Catherine J.K. Sandoval, Commissioner
Timothy Alan Simon, Commissioner
Mark J. Ferron, Commissioner
Ramon Momoh, Energy Advisor, Commissioner Simon
Karen Clopton, Chief Administrative Law Judge
Kimberly Kim, Administrative Law Judge
Frank Lindh, General Counsel, CPUC
Hazlyn Fortune, Energy Division Demand Side Programs Supervisor
Ava Tran, Energy Division Analyst
Carmen Best, Energy Evaluation and Measurement Supervisor
Attachment B, Draft Resolution CSID-005
Service List, R.10-02-005
Service List, A.11-05-017