From: Dietz, Sidney
Sent: 3/11/2013 6:33:36 PM
To: Michael.Campbell@cpuc.ca.gov (Michael.Campbell@cpuc.ca.gov)
Cc:
Bcc:
Subject: Re: Dude, I rearead that AL -- I didn't find it terribly clear

Proposed game plan -- let's agree early, then let the crazier issues take up the rest of the time. And yes, 1000a Wed is tentative. If they change it, let's not agree unless we both can come.

Do I seem terse? Blame the thumb keyboard.

From: Campbell, Michael [mailto:Michael.Campbell@cpuc.ca.gov]
Sent: Monday, March 11, 2013 06:19 PM
To: Dietz, Sidney
Subject: Re: Dude, I rearead that AL -- I didn't find it terribly clear

Am planning to be there. Is that time locked in? I have it as tentative on my calendar for now.

Fun times!

On Mar 11, 2013, at 6:11 PM, "Dietz, Sidney" <SBD4@pge.com> wrote:

> I agree that this will be easy to resolve. I plan to be there when we meet at 1000a on Wed – can you be there? I want enough cool heads to prevail. The relevant paragraph is the one before the conclusion:
>
> As an alternative option, the IOUs propose that the Commission retain the current list of
>
> categorical eligible programs, and permit the IOUs to determine whether the customer would be
>
> required to provide income documentation, or allow the customer to provide proof of enrollment
>
> in one of the categorical program by providing an award letter or some other proof. If the

Commission were to select this option, the IOUs believe the PEV option is necessary to assist

with confirming alignment with the legislated income basis of the program, given that certain

programs currently listed do not align with either the household unit of measure or the income

threshold. As noted above, the IOUs request the Commission to address this condition of the

alternative option in the April 1 annual approval letter.

This is probably not explicit enough about the light-touch PEV method we prefer (which is inexpensive and something we learned about from the southerners). Note that the PD's compromise (were you around for the original PD that had all the categorical enrollment removed?) really pointed us in this direction and that the CPUC does not seem unanimous on the direction it wants to go, and that we don't think categorical inclusions will drive enrollments in the future either way. That is to say, we'll be able to keep enrollments high either way. But PEV should be allowed – to disallow it just because you are repeatedly able to show enrollment in one of these categories (for instance ones that you and I know of that never bump you off) is too much. If the statistical model shows you're likely too rich, we should be able to ask.

From: Campbell, Michael [mailto:Michael.Campbell@cpuc.ca.gov]
Sent: Monday, March 11, 2013 5:51 PM
To: Dietz, Sidney
Subject: Dude, I rearead that AL -- I didn't find it terribly clear

If the intention is as you described earlier today, I think we can make some progress. From our discussion I thought I'd misread something obvious – but the conclusion of the Cat Elibility isn't as clear to me as you'd made it sound (once you get past the "continue to support" clause). I'm looking forward to having a discussion with the IOU folks directly – I'm still optimistic that we can better understand one another and come up with something that satisfies everyone.

You think the AL language is crystal clear and says the IOUs are okay with all the current categorical eligible programs? In particular, the bolded language (after the "ask the Commission"), sure makes it sound like the IOUs are suggesting only three programs would be included for cat eligibility. Is there something I'm missing?

Conclusion

In summary, the IOUs continue to support the categorical eligibility and enrollment process. In

order to comply with D.12-08-044's directives to retain the categorical eligibility process, and

include only those programs that are consistent with the ESA and CARE Programs, the IOUs

propose the following updated list of categorical eligible programs for Commission approval:

- CalFresh/Supplemental Nutrition Assistance Program (SNAP)
- National School Lunch Program (NSLP)
- Women, Infants, and Children (WIC) program.

The IOUs ask the Commission**, as a condition of including the three broadly aligned programs**, to

grant the IOUs the option of income verifying or accepting a categorical eligible program award

letter for customers selected for PEV