

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF
CALIFORNIA**

Order Instituting Rulemaking Regarding Policies,
Procedures and Rules for the Low Income Energy
Efficiency Programs of California's Energy Utilities.

Rulemaking 07-01-042

Southern California Edison Company's (U 338-E)
Application for Approval of SCE's "Change a Light,
Change the World," Compact Fluorescent Lamp Program.

Application 07-05-010

**The Opening Comments of
The Association of California Community and Energy Services
On LIEE Renter Access Issues**

Pursuant to the Administrative Law Judge's (ALJ) Ruling dated May 22, 2007, the Association of California Community and Energy Services (ACCES) files these opening comments on renter access to the Low Income Energy Efficiency (LIEE) program.

In her ruling, the ALJ seeks comments on the following questions:

1) *How many houses, apartments, and mobile homes have not yet received LIEE measures? These figures should be broken down between rented units and those that are owned by customers who qualify for LIEE benefits.*

It is our understanding the utilities have this information. ACCES believes it would be useful for utilities to break the information down by year in order to reveal trends. For example, according to Southern California Gas Company's "Rapid Deployment Reports" filed with the Commission, since 2004 there has been a steady decline in the number of households served in SoCalGas' LIEE program: In 2003, over 54,000 low income households were served. By 2006, the yearly number had declined to 34,000, a reduction of 20,000 households, with large amounts of carryover program funds. The decline is greatest in the multi-family sector, which suffered a reduction of almost 20%. Once this trend is revealed, the obvious questions are "What is the cause of the decline and what can be done to correct it?"

2) *Are there barriers to renter participation in LIEE programs that are more critical than the limits of utility LIEE budgets? If so, what are they and what can or should the Commission do to remove those barriers?*

As stated by ACCES in previous filings, utility policies and procedures may be barriers to renter participation.

3) *How detrimental is a landlord's refusal to permit LIEE installations to broaden LIEE participation by renters? Would legislation be needed or useful to overcome barriers caused by*

landlords? What if anything should the Commission do to promote landlord interest and cooperation?

California law requires landlords to provide basic services in a rental unit, including heat. There is nothing in the law which prohibits a landlord to enter into an agreement to have a third party, such as a LIEE contractor, to install or repair required services. Our experience is that landlords, once fully informed, are likely to agree to participate in the LIEE program.

4) *Would increased focus on marketing LIEE installations in public housing or housing owned by non-profit organizations improve renter participation? If so, does the Commission need to take any actions to promote this?*

While ACCES encourages providing LIEE services to all qualified low income households, we believe non-profit housing is a relatively small percentage of the low income renter market. We believe it would be productive to first thoroughly understand the barriers that exist in the larger low income renter market.

5) *Are there ways to improve access to LIHEAP funds or other funding sources that would complement the LIEE program? What should the Commission do to promote their availability?*

There are significant differences between the LIEE program and LIHEAP in terms of services provided and contractor requirements. While utilities should find ways to work with LIHEAP contractors, care should be taken to ensure that LIHEAP funds would supplement, not supplant, LIEE funds.

6) *Are there other ways to improve the LIEE program to increase renter participation or make the program more fair or accessible to renters?*

All program measures that are available for non-renters should be made available to renters, as in the LIEE program of Southern California Edison.

Respectfully submitted,



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June 1, 2007

CERTIFICATE OF SERVICE

I hereby certify, pursuant to the Commission's Rules of Practice and Procedure, that I have this day served a true copy of the "Opening Comments of the Association of California Community and Energy Services on LIEE Renter Access Issues,"

[X] By first class U.S. mail, postage prepaid, to the Administrative Law Judge assigned to this proceeding, to the Assigned Commissioner, and to all parties listed with no e-mail address on the official service list referred to below.

AND

[X] By Electronic Mail – serving the enclosed via e-mail transmission to each person the application lists as being authorized to receive service and to those on the service list of R. 07-01-042.

Dated at Sacramento, California this 1st day of June, 2007.



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CALIFORNIA PUBLIC UTILITIES COMMISSION

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