



**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 (Filed January 25, 2007)
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 (Filed May 10, 2007)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS  
REGARDING AB 2104 IMPLEMENTATION AND RENTER ACCESS TO LOW  
INCOME ENERGY EFFICIENCY PROGRAMS**

**I.**

**INTRODUCTION**

Pursuant to Administrative Law Judge (ALJ) Kim Malcolm’s Ruling<sup>1</sup> issued on May 22, 2007 in Rulemaking (R.) 07-01-042 Regarding Policies, Procedures and Rules for the Low Income Energy Efficiency Programs of California’s Energy Utilities, Southern California Edison Company (SCE) provides these comments on AB 2104 implementation and renter access to the Low Income Energy Efficiency (LIEE) program.

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<sup>1</sup> *Administrative Law Judge’s Ruling Addressing Renter Access to Low Income Energy Efficiency Programs, AB 2104 Implementation Regarding Tenants of Master-Meter Customers and Consideration of LIEE Furnace Programs and Natural Gas Appliance Testing.*

The Ruling asks the utilities and other interested parties to address questions regarding renter access to the LIEE program and implementation of AB 2104. SCE responds to each of the Ruling’s questions below. In addition, as directed by the Ruling, the presentations made at the AB 2104 workshop on April 17 and the renter access workshop on May 10 are included in Appendix A hereto.

## II.

### COMMENTS

#### A. Renter Access to LIEE

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.**

	Eligible Population		Treated Since 1997		Homes to be treated	
	Own	Rent	Own	Rent	Own	Rent
<b>Mobile Home</b>	112,004	12,992	39,875	8,074	72,129	4,918
<b>Multi-Family</b>	32,725	313,290	7,510	263,803	25,215	49,487
<b>Single Family</b>	465,630	435,687	138,423	145,859	327,207	289,828
<b>Total</b>	<b>610,359</b>	<b>761,969</b>	<b>185,808</b>	<b>417,736</b>	<b>424,551</b>	<b>344,233</b>
<b>Overall Totals</b>	<b>1,372,328</b>		<b>603,544</b>		<b>768,784</b>	

Note: Estimates are derived from distribution estimates contained in RASS 2003 and applied to the estimated households as of March 31, 2007.

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?**

The Commission lifted a critical barrier to renter participation in SCE’s LIEE program (or Energy Management Assistance (EMA) program) by allowing renters to be eligible for air conditioning and heat pumps in eligible Climate Zones.<sup>2</sup> Another critical barrier was lifted when the Energy Division confirmed that no owner’s waiver is needed

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<sup>2</sup> D.06-12-038, Conclusion of Law 12.

for the replacement of a renter/tenant-owned refrigerator. Allowing renters who own their refrigerators to be exempt from having the property owners/landlord provide permission through an owner's waiver not only expedited installation of refrigerators, but prevented renters from dropping out of the process due to lack of landlord follow-up.

As shown in the table above, SCE has had considerable success in providing electric energy efficiency services to low-income renters over the last 10 years, reaching almost 55% of the potentially eligible population. With the program guideline changes noted above, SCE has not identified barriers to renter participation that require Commission attention.

**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?**

Based on SCE's experience, landlords rarely refuse installation of LIEE measures in rented units. SCE may occasionally experience service delays where property owner authorization is needed (e.g. to replace an inefficient central air conditioner) and the authorizing party is not readily available. However, as described above, the Commission has already removed the barriers that truly hindered renter participation.

**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?**

SCE believes that a dialogue between Public Housing Authorities (PHA), the Commission, and the investor-owned utilities could result in an increase in eligible PHA tenants receiving LIEE services. One of the misconceptions of PHA income eligibility is that guidelines are set at 50% of the median county income. This is, in fact, the highest of three eligibility categories for PHA housing. Eligibility for PHA is set at Low (50% of median county income), Very Low and Extremely Low. While PHA tenants qualifying under the Low guidelines generally do not qualify for LIEE, those qualifying at Very Low and Extremely Low guidelines do meet the LIEE and CARE income guidelines. A

more thorough understanding of PHA eligibility requirements and the procedures it uses to document eligibility could result in a Commission policy adjustment that would allow the utilities to automatically qualify certain PHA tenants for LIEE and CARE assistance, eliminating the need to collect income documentation from each tenant.

**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?**

SCE currently provides refrigerators paid for through the LIEE program to contractors who deliver both the LIEE and LIHEAP programs. SCE proposes to strengthen and increase its existing leveraging agreements with LIHEAP contractors by offering to LIHEAP contractors, at no cost, all measures – not just refrigerators – mutually offered through the LIHEAP and LIEE programs. Both the State Department of Community Services and Development (CSD), and the agencies that receive LIHEAP funding from CSD, have historically shown a willingness to cooperate however they can with SCE to leverage resources and maximize assistance to eligible customers.

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

In the Low Income Needs Assessment Study, 65% of SCE’s low-income population were deemed renters. SCE’s numbers vary from the Needs Assessment estimate, showing that approximately 55% are renters. Over the last ten years, SCE’s LIEE program has treated almost 55% of these units, and SCE therefore believes it has successfully implemented its program in such a way to make it accessible to renters.

**B. AB 2104 Implementation**

**1. How can a sub-metered tenant apply for CARE discounts? If the application is incomplete, what should the utility do to follow-up with the applicant to complete enrollment? What information does the sub-metered tenant need to provide in order to enroll in CARE?**

A sub-metered tenant can apply for CARE by completing a CARE application and returning it to SCE. The CARE application requires the tenant’s annual household

income; number of persons in the tenant's household; tenant's name, mailing address, apartment/space number, and telephone number(s); tenant's signature; and the master-metered customer's name, daytime telephone number, SCE service account number, meter number, and property address.

If the application is incomplete, the CARE processing department will contact the applicant by phone one time in an attempt to secure the necessary information. If this attempt is unsuccessful, the application is rejected, and a letter noting the reason for the rejection is sent to the applicant along with the original application.

**2. How does the utility keep track of sub-metered tenants?**

When an application for a sub-metered tenant is received, the information provided on the application (including the tenant's name, address, telephone number and the master-meter account number and associated name and address) is entered in SCE's customer tracking system.

**3. How does the utility renew sub-metered tenants' participation in CARE?**

SCE currently renews sub-metered tenants annually by mailing the master-metered account holder a list of the tenants on CARE accompanied by blank sub-metered tenant applications for dissemination to all sub-metered tenants.

Starting in July 2007, pursuant to AB 2104, SCE will also mail sub-metered tenant applications directly to currently-enrolled sub-metered tenants during this annual solicitation. SCE will continue to annually provide the master-metered account holder with a list of its tenants currently enrolled in CARE (in addition to the monthly tenant lists showing enrolled, recertified and unenrolled tenants) accompanied by blank sub-metered tenant applications for dissemination to all sub-metered tenants.

- 4. Does the utility provide master-metered customers with the names of sub-metered tenants who are approved to receive the CARE discount? If so, how often does that occur? What other types of information does the list provide, if any? Who receives this list? How does the utility handle the turnover of mobile home park management or owner? Would a monthly list sent to the master metered customer that request notification of change of ownership assist the utility company in managing ownership turnover?**

Currently, master-metered account holders receive a list of active participants each month in which a new enrollment or recertification occurs. In accordance with AB 2104, this process will be revised, and each month every master-metered account holder will receive a list of active and unenrolled tenants. The new list will provide a summary of changes since the master-meter account's last billing statement (e.g., new enrollments, recertifications, unenrollments) and a summary of all active sub-metered tenants on CARE. The list is sent to the master-meter customer of record. Upon request, a second copy may be sent to the site-manager or to the owner's home address. If there is turnover of the mobile home park management or owner, the new customer of record places a request to start service in their name through SCE's phone center, and the reports will be sent to the new name on the record. SCE is exploring the option of including a change of ownership section on the monthly tenant list.

- 5. How many master-metered tenants does each utility serve?**

As of March 31, 2007, 1,890 service accounts were on a DMS rate (master-metered with sub-metered accommodations). 121,510 sub-metered units are associated with those 1,890 master-metered accounts.

- 6. How many sub-metered tenants are eligible for the CARE program in California?**

As described in the response to Question I.E. of SCE's *Annual Progress Report for the California Alternate Rates for Energy Program for the Period January – December 2006*, submitted to the Commission on or about May 1, 2007, SCE estimated

that 38,817 sub-metered tenants were eligible for CARE in SCE's service territory at year-end 2006.

**7. How many sub-metered tenants are enrolled in CARE?**

As described in the response to Question I.F. of SCE's *Annual Progress Report for the California Alternate Rates for Energy Program for the Period January – December 2006*, submitted to the Commission on or about May 1, 2007, as of December 31, 2006, 19,389 sub-metered tenants were enrolled in CARE.

**8. How do the utilities contact sub-metered customers or tenants to inform and enroll them in the CARE program?**

As a point of clarification, sub-metered tenants are not SCE's "customers" or SCE "account holders." Only the master-meter account holder is an SCE customer.

SCE currently communicates with the sub-metered tenants regarding the CARE program through the master-metered account holder. Annually, SCE mails the master-metered account holder a list of the sub-metered tenants currently on CARE accompanied by blank sub-metered tenant applications for dissemination to all sub-metered tenants.

Starting in July 2007, pursuant to AB 2104, SCE will also mail sub-metered tenant applications directly to currently-enrolled sub-metered tenants during this annual solicitation. SCE will continue to annually provide the master-metered account holder with a list of its tenants currently enrolled in CARE (in addition to the monthly tenant lists showing enrolled, recertified and unenrolled tenants) accompanied by blank sub-metered tenant applications for dissemination to all sub-metered tenants.

- 9. How do utilities communicate with sub-metered customers/tenants when following up with customer service requests? If utilities do not provide this information [CARE enrollment status; Enrollment assistance; Verification that the CARE discount is given to the Master-Metered Account; Verification that the CARE discount has been given to the sub-metered tenant if the bill is provided], please explain why and possible methods to address these issues which may improve customer service to CARE recipients.**

SCE provides enrollment education to all customers calling in with an inquiry, including sub-metered tenants of master-metered customers. When a tenant calls regarding their participation in the CARE program, SCE is able to provide enrollment status (including their enrollment date). Due to customer confidentiality issues, however, SCE is not able to provide verification of the CARE discount given to the master-metered account, and as described in more detail below, SCE does not (and cannot) verify that a discount has been provided to the sub-metered tenant.

The requirements of AB 2104 to mail enrollment and recertification materials directly to sub-metered tenants, as well as providing master-metered accounts with a monthly participating tenant list, should help to ensure that the eligible tenants receive the appropriate discount from their landlords.

- 10. How do utilities provide education and outreach to master-metered customers about billing and CARE discounts?**

SCE currently provides education and outreach to master-metered customers about billing and CARE discounts through direct mail campaigns, SCE's website, marketing promotions via radio, newspapers, and other mass media, and through the annual recertification mailing. SCE also offers the master-metered customer a service where SCE will calculate a tenant's bill for a nominal fee. This service is identified on SCE's website as the "Tenant Bill Calculation Service."

- 11. Do the utilities coordinate the outreach conducted under the LIEE program?**

As a point of clarification, AB 2104 does not relate to the LIEE program. AB 2104 involves the CARE program only.

Customers served under SCE’s LIEE program are automatically enrolled in CARE. In addition, SCE uses CARE customers for referrals to LIEE. SCE and SoCalGas have, for the most part, the same contractors throughout their shared service territory. These shared contractors will enroll customers for both utility programs while outreaching/assessing for either SCE or SoCalGas. For those areas where SCE and SoCalGas have different contractors, the utilities provide each other with a list of customers enrolled by those contractors on a monthly basis.

**12. What remedial actions do the utilities take if it learns that the CARE discount has not been passed to the sub-metered tenant? Does the utility work with County Weights and Measures agencies to assure tenants receive the CARE discount owed to them?**

The County Weights & Measures contacts SCE to confirm whether a particular sub-metered tenant is enrolled in the CARE program. If the County Weights & Measures provides SCE with the tenant-specific information (e.g., address of master meter or the master-metered customer’s account number, tenant’s name and unit/space number), SCE can confirm whether the tenant is enrolled in CARE and the effective date of enrollment. SCE, however, cannot confirm whether the master-meter customer is passing along the CARE discount to the tenant. Pursuant to California Public Utilities Code section 739.5 and California Civil Code section 798.43.1, it is the master-metered customer’s responsibility to pass on the benefits of the CARE discount to the applicable sub-metered tenants.<sup>3</sup> Moreover, SCE does not have jurisdiction over the tenant’s sub-meter, so is

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<sup>3</sup> Cal. Pub. Util. Code § 739.5(a) (“... the master-meter customer shall charge each user of the service at the same rate which would be applicable if the user were receiving gas or electricity, or both, directly from the gas or electrical corporation.”); *Id.*, § 739.5(b) (“Every master-meter customer of a gas or electrical corporation subject to subdivision (a) who ... receives any rebate from the corporation shall distribute to, or credit the account of, each current user served by the master-meter customer that portion of the rebate which the amount of the gas or electricity, or both, consumed by the user during the last billing period bears to the total amount furnished by the corporation to the master-meter customer during that period.”) Cal. Civ. Code § 798.43.1(c) (“The management of a master-meter park shall pass through the full amount of the CARE program discount in monthly utility billings to homeowners and residents who have qualified for the CARE rate schedule, as defined in the serving utility’s applicable rate schedule. The management shall notice the discount on the billing statement of any homeowner or resident who has qualified for the CARE rate schedule as either the itemized amount of the discount or a notation on the statement that the homeowner or resident is receiving the CARE discount on the electric bill, a the gas bill, or both the electric and gas bills.”)

unable to determine how much electricity is being used by that tenant or the amount of the CARE discount that tenant should receive.<sup>4</sup>

The County Weights & Measures, however, can confirm whether the discount is being applied to the sub-metered tenant's bill. The County Weights & Measures responds to sub-metered tenant complaints, and if a complaint involves a billing dispute where the master-meter customer is not providing the correct electric rate(s) or is not passing along a billing provision (e.g., Medical Baseline, CARE, or Family Electric Rate Assistance (FERA)), the County Weights & Measures or the sub-metered tenant can contact SCE directly for mediation. Working in tandem with the County Weights & Measures, SCE often provides the master-meter customer a letter to remind the customer of his/her responsibility to bill the sub-metered tenant at the same rate which would be applicable if the tenant was receiving electricity directly from SCE. Within each letter provided to a master-meter customer, SCE cites specific tariff references that must be complied with, as well as a telephone number for questions or additional information. SCE's Rule 11<sup>5</sup> gives SCE the authority to discontinue service to the master-meter customer if noncompliance with SCE's tariffs continues. However, involvement and communication provided by both the County Weights & Measures and SCE usually mitigates any remote possibility of discontinuance of service. SCE will continue to work with the County Weights & Measures for the benefit of sub-metered tenants.

**13. What can or should the Commission do to promote the CARE program among sub-metered tenants?**

SCE believes that the Commission should consider a broad brush approach that would include CARE as one of several promotions to sub-metered tenants. Funding outreach efforts to sub-metered complexes would not only promote CARE, but could

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<sup>4</sup> See e.g., Cal. Pub. Util. Code § 739.5(d) (“ . . . nothing in this section requires and electrical or gas corporation to make repairs to or perform maintenance on the submeter system.”)

<sup>5</sup> See Rule 11 for specific criterion.

educate sub-metered tenants on their rights, the proper process for resolving disputes and engage all sub-metered tenants in considering installation of energy efficient measures, thereby producing bill savings and decreasing greenhouse gases. Since sub-metered tenants are confined to mobile home parks or apartment complexes, the outreach efforts can be conducted cost-effectively and in a timely manner.

**14. What can or should the Commission do to assure sub-metered tenants receive the CARE discount the utility provides?**

SCE understands that a good portion of the complaints the County Weights & Measures receive from sub-metered tenants center around billing. Furthermore, the majority of billing complaints usually stem from a tenant not receiving the CARE discount when applicable.

Pursuant to California Public Utilities Code section 739.5(e), the Commission already has a role in assuring that sub-metered tenants receive the CARE discount and are properly billed:

The commission shall accept and respond to complaints concerning the requirements of this section through the consumer affairs branch, in addition to any other staff that the commission deems necessary to assist the complainant. In responding to the complaint, the commission shall consider the role that the office of the county sealer in the complainant's county of residence may have in helping to resolve the complaint, and, where appropriate, coordinate with that office.

To the extent any improvements can be made to this process or further clarification can be made regarding the powers granted to the Commission and/or the County Weights & Measures pursuant to Section 739.5(e), this may help assure that sub-metered tenants receive their CARE discounts.

Additionally, the ability to streamline the overall process of verifying to the County Weights & Measures whether a sub-metered tenant is receiving the CARE discount may assist in assuring that sub-metered tenants receive the appropriate discount. For example, a possibility may be to provide the County Weights & Measures with a

listing of sub-metered tenants on the CARE rate. AB 2104 requires SCE to provide master-meter customers with a list of tenants approved to receive the CARE discount. In addition to the park owner/manager receiving this information, perhaps the appropriate county office of the County Weights & Measures could also receive this information. This would ensure that the County Weights & Measures would receive timely, as well as accurate, tenant eligibility information. However, there may be confidentiality issues implicated in this approach that SCE has not yet had the opportunity to fully investigate. Such confidentiality issues, to the extent they exist, must first be resolved.

Education is also a key component to assuring that sub-metered tenants receive their CARE discounts. SCE believes that communicating directly with sub-metered tenants pursuant to AB 2104 is a step in the right direction.

**15. What can or should the Commission do to improve the communication between master-meter account holders and the utility company?**

SCE believes that AB 2104, which seeks to improve the CARE application process for tenants of a mobilehome park, apartment building, or similar residential complex receiving electric or gas service from a master-meter customer through a sub-metered system, is a start in the right direction for improving communication between SCE and its master-meter account holders and their sub-metered tenants.

**16. What can or should the Commission do to improve the communication between the submetered account holder and the utility company?**

SCE believes that AB 2104 is a start in the right direction for improving communication between SCE and its master-meter account holders and their sub-metered tenants.

**III.**

**CONCLUSION**

SCE appreciates the opportunity to submit these comments.

Respectfully submitted,

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June 1, 2007

**Appendix A**



# **CARE Program AB2104 Workshop**

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**Presenting on Behalf of**

**PG&E**

**SCE**

**SDG&E**

**SoCalGas**

**April 17, 2007**



# Agenda

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- **Target Population**
- **Application Processing**
- **Regulatory Mandate**
- **AB2104 Impact & Compliance Status**

# Target Population

	Submeter Accounts	Submeter Units	Submeter Units on CARE
<b>Electric</b>	1,787	103,914	23,402
<b>PG&amp;E</b>			
<b>Gas</b>	1,107	84,453	21,271
<b>Electric</b>	800 - 900	37,674	9,267
<b>SDG&amp;E</b>			
<b>Gas</b>	800 - 900	32,489	8,375
<b>SoCalGas</b>	1,826	144,632	32,927
<b>SCE</b>	1,800	n/a	22,000



## **Step 1: Submeter Tenant Receives Application**

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- **Direct from Utility (i.e. Website, Call Center, etc)**
- **Utility-sponsored Outreach Programs**
- **From Landlord**

## **Step 2: Submeter Application Processing**

- Applications from submeter tenants are accepted from tenants and park management
- Submeter account located and verified
- Submeter tenant added to CARE
- Enrollment Notification Issued to Tenant
- Enrollment Notification Issued to Landlord



## Regulatory Mandate

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- **California Civil Code Section 798.43.1.**
  - **Management of a master-meter park shall give written notice to tenants on or before February 1 of each year regarding CARE**
  - **The management of a master-meter park shall pass through the full amount of the CARE program discount in monthly utility billings to tenants**

# AB2104 Requirements – New Enrollments

<b>Requirements</b>	Developing processes whereby electrical corporations and gas corporations are able to directly accept CARE applications from tenants of a mobile home park, apartment building, or similar residential complex.
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Utility	Currently meet AB2104 Requirements?
<b>PG&amp;E</b>	Yes
<b>SDG&amp;E</b>	Yes
<b>SoCalGas</b>	Yes
<b>SCE</b>	Yes

# AB2104 Requirements – Recertifications

<b>Requirement</b>	Developing processes whereby electrical corporations and gas corporations are able to directly notify and provide renewal applications to tenants of a mobile home park, apartment building, or similar residential complex, that are existing CARE customers.	
<b>Utility</b>	<b>Current Process</b>	<b>Currently meet AB2104 Requirements?</b>
<b>PG&amp;E</b>	Notifies Enrollees on Anniversary Date	Yes
<b>SDG&amp;E</b>	Notifies Enrollees Annually	Yes
<b>SoCalGas</b>	Notifies Enrollees Annually	Yes
<b>SCE</b>	Notifies Landlords	Will notify tenants starting July 2007

# AB2104 Requirements – Tenant Reports

<b>Requirements</b>	<p>This bill would require the commission, by December 31, 2007, to improve the CARE program by developing processes whereby every electrical corporation and gas corporation is required to timely provide each master-meter customer with a list of tenants who are approved to receive discounts pursuant to the CARE program, which list specifically identifies those tenants added to or deleted from CARE program eligibility since the previous billing cycle.</p>
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Utility	Currently meet AB2104 Requirements?
PG&E	Yes
SDG&E	Yes
SoCalGas	Yes
SCE	To be in effect 4 <sup>th</sup> quarter 2007

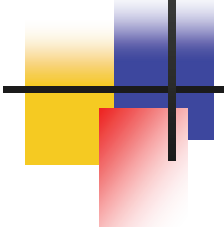


# Low-Income Energy Efficiency Renters Access Workshop

May 10, 2007  
San Francisco

Pacific Gas and Electric Company  
San Diego Gas and Electric Company  
Southern California Edison Company  
Southern California Gas Company

# Household Occupancy – Owner vs. Renter



## Distribution of California Households by Home Ownership

(Source: RASS 2003, HENS 2004)

	Percent of All California Households	Percent of Low Income Households	Percent of Low Income Households by Utility				
			PG&E	SCE	SCE/ SCG	SCG	SDG&E
Own	63%	35%	44%	28%	35%	21%	32%
Rent (individually metered)	36%	62%	53%	68%	64%	72%	65%
Rent (master metered)	1%	3%	3%	4%	0%	7%	3%



# Household Dwelling Type

## Distribution of California Households by Dwelling Type

(Source: RASS 2003, HENS 2004)

Dwelling Type	Percent of All California Households	Percent of Low Income Households	Percent of Low Income Households by Utility				
			PG&E	SCE	SCE/ SCG	SCG	SDG&E
Single family	64%	43%	55%	21%	52%	28%	38%
Multi-family (2-4 Units)	8%	7%	10%	6%	6%	4%	6%
Multi-family (5+ Units)	23%	43%	28%	54%	41%	66%	50%
Mobile home	6%	6%	6%	18%	1%	0%	6%

# LIEE Program Measures – Owner vs. Renter

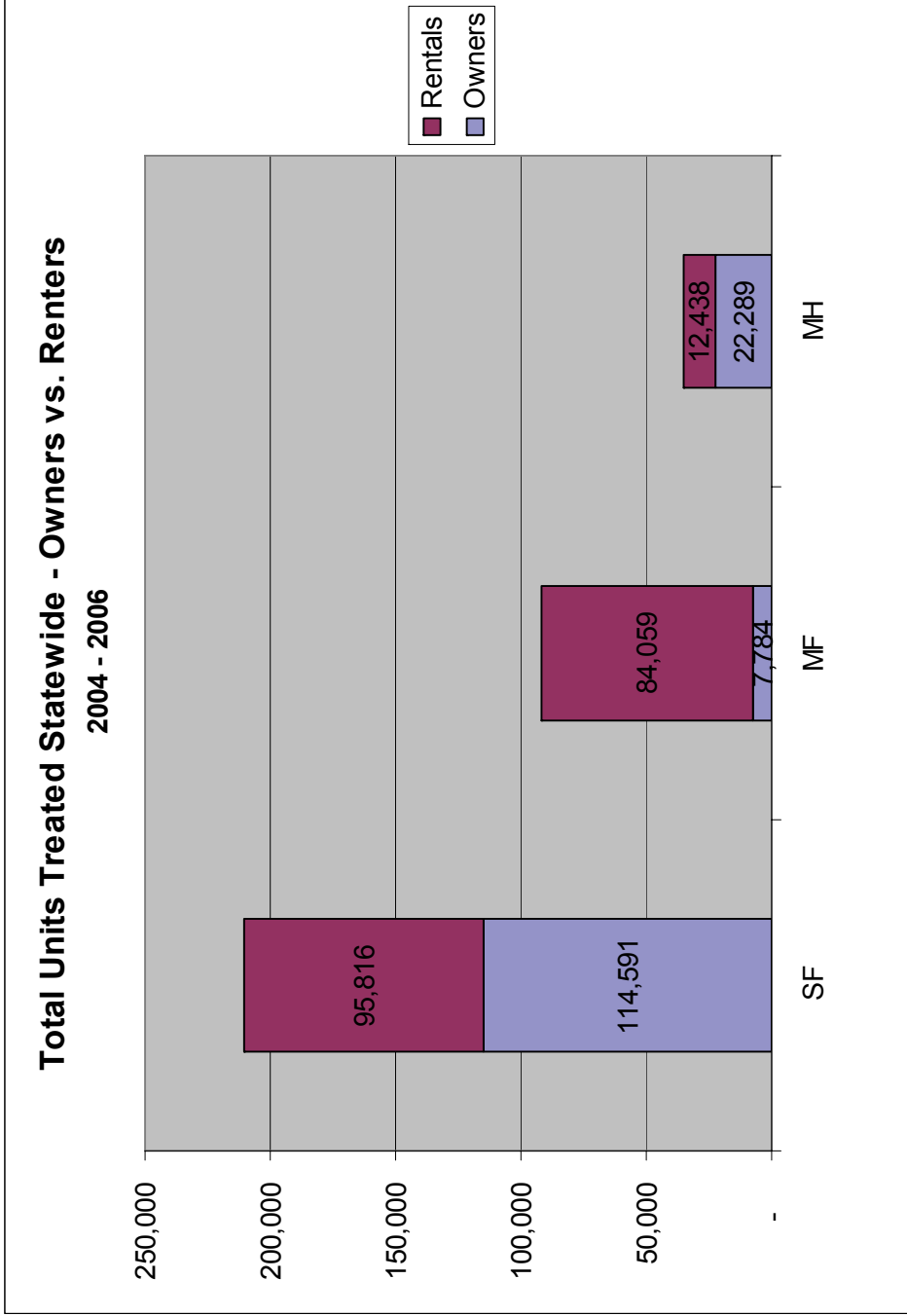
Measure	Climate Zone	Housing Type	Homeowners	Renters
<b>Lighting</b>				
Thread-based compact fluorescent light lamp	All	All	SCE, SDG&E, PG&E	SCE, SDG&E, PG&E
Interior hard-wired compact fluorescent lamp fixture	All	All	SDG&E, PG&E	SDG&E, PG&E
Exterior hard-wired compact fluorescent lamp fixture	All	SF	SCE, SDG&E, PG&E	SCE, SDG&E, PG&E
Energy Efficient torchiere lamp	All	All	SCE, SDG&E	SCE, SDG&E
<b>HVAC</b>				
Central air conditioner	13 (SCE only), 14 & 15	All	SCE, SDG&E, PG&E	<b>SCE</b>
Heat pump	13, 14, 15	All	SCE	SCE
Room air conditioner	10-15	All	SCE, SDG&E, PG&E	SCE, SDG&E, PG&E
Evaporative cooler	10-16	SF, MH	SCE, SDG&E, PG&E	SCE, SDG&E, PG&E
Evaporative cooler maintenance	All	All	SCE	SCE
Central air conditioner Tune-up	All	SF	SDG&E, PG&E	SDG&E, PG&E
Central air conditioner Service	All	All	SCE	SCE
Duct testing & sealing (electric space heating)	10-16	SF, MH	SCE, SDG&E, PG&E	SCE, SDG&E, PG&E
Duct testing & sealing (gas space heating)	All	SF, MH	SCE, SDG&E, PG&E	SCE, SDG&E, PG&E

# LIEE Program Measures – Owner vs. Renter (continued)

Measure	Climate Zone	Housing Type	Homeowners	Renters
<b>Weatherization Measures</b>				
Attic insulation	All	SF, MF	SCE, SDG&E, PG&E, SCG	SCE, SDG&E, PG&E, SCG
Low Flow Showerheads	All	All	SCE, SDG&E, PG&E, SCG	SCE, SDG&E, PG&E, SCG
Water Heater Blanket	All	All	SCE, SDG&E, PG&E, SCG	SCE, SDG&E, PG&E, SCG
Weather-Stripping Doors	All	All	SCE, SDG&E, PG&E, SCG	SCE, SDG&E, PG&E, SCG
Caulking	All	All	SCE, SDG&E, PG&E, SCG	SCE, SDG&E, PG&E, SCG
Outlet Cover Plate Gaskets	All	All	SCE, SDG&E, PG&E, SCG	SCE, SDG&E, PG&E, SCG
Faucet Aerators	All	All	SCE, SDG&E, PG&E, SCG	SCE, SDG&E, PG&E, SCG
Water Heater Pipe Insulation	All	All	SCE, SDG&E, PG&E, SCG	SCE, SDG&E, PG&E, SCG
<b>Additional Measures</b>				
Refrigerator Replacements	All	All	SCE, SDG&E, PG&E	SCE, SDG&E, PG&E
Minor Home Repairs*	All	All	SCE, SDG&E, PG&E, SCG	SCE, SDG&E, PG&E, SCG

\* There are multiple sub-measures included under minor home repairs. *Furnace repair and replacement and water heater repair and replacement* are not offered to rental units.

# Units Treated – Owner vs. Renter



# Units Treated – Owner vs. Renter

## 3-Year Total

## 2004-2006 3- Year Totals\*

	SDG&E		SCG		SCE		PGE	
	#	%	#	%	#	%	#	%
Own								
SF	7,236	66.8%	55,853	85.7%	47,926	83.2%	59,429	78.0%
MF	2,969	27.4%	1,566	2.4%	3,098	5.4%	1,717	2.3%
MH	627	5.8%	7,744	11.9%	6,608	11.5%	15,054	19.8%
<b>Total Owners</b>	<b>10,832</b>		<b>65,163</b>		<b>57,632</b>		<b>76,200</b>	
<b>% Owners</b>	<b>27.6%</b>		<b>49.3%</b>		<b>45.5%</b>		<b>44.6%</b>	
Rent								
SF	14,937	52.6%	25,034	37.4%	36,425	52.7%	44,454	46.9%
MF	12,700	44.7%	41,389	61.9%	22,819	33.0%	48,540	51.2%
MH	773	2.7%	484	0.7%	9,909	14.3%	1,756	1.9%
<b>Total Renters</b>	<b>28,410</b>		<b>66,907</b>		<b>69,153</b>		<b>94,750</b>	
<b>% Renters</b>	<b>72.4%</b>		<b>50.7%</b>		<b>54.5%</b>		<b>55.4%</b>	
<b>Total Units Treated</b>	<b>39,242</b>		<b>132,070</b>		<b>126,785</b>		<b>170,950</b>	

\*Source: IOU annual reports table TA3

# Expenditures – Owner vs. Renter

3-Year Total		2004-2006 3- Year Totals*									
		SDG&E		SCG		SCE		PGE			
		\$\$	%	\$\$	%	\$\$	%	\$\$	%	\$\$	%
Own	SF	\$ 7,226,824	65.8%	\$ 39,250,688	89.3%	\$ 28,387,881	82.0%	\$ 71,900,102	78.3%		
	MF	\$ 3,102,822	28.3%	\$ 871,437	2.0%	\$ 523,625	1.5%	\$ 2,108,316	2.3%		
	MH	\$ 650,764	5.9%	\$ 3,836,855	8.7%	\$ 5,689,879	16.4%	\$ 17,785,902	19.4%		
<b>Total Owners</b>		<b>\$ 10,980,410</b>		<b>\$ 43,958,980</b>		<b>\$ 34,601,385</b>		<b>\$ 91,794,320</b>			
% Owners		27.9%		52.7%		49.4%		44.7%			
Rent	SF	\$ 15,048,599	53.0%	\$ 17,752,597	45.0%	\$ 19,900,862	56.2%	\$ 53,306,690	46.9%		
	MF	\$ 12,517,560	44.1%	\$ 21,464,788	54.4%	\$ 14,707,996	41.6%	\$ 58,313,566	51.3%		
	MH	\$ 805,257	2.8%	\$ 230,569	0.6%	\$ 779,616	2.2%	\$ 2,087,410	1.8%		
<b>Total Renters</b>		<b>\$ 28,371,416</b>		<b>\$ 39,447,954</b>		<b>\$ 35,388,474</b>		<b>\$ 113,707,666</b>			
% Renters		72.1%		47.3%		50.6%		55.3%			
<b>Total Units Treated</b>		<b>\$ 39,351,826</b>		<b>\$ 83,406,934</b>		<b>\$ 69,989,859</b>		<b>\$ 205,501,986</b>			

\*Source: IOU annual reports table TA3

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS REGARDING AB 2104 IMPLEMENTATION AND RENTER ACCESS TO LOW INCOME ENERGY EFFICIENCY PROGRAMS on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address.  
First class mail will be used if electronic service cannot be effectuated.

Executed this **1st day of June, 2007**, at Rosemead, California.

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Robin Taylor  
Project Analyst  
SOUTHERN CALIFORNIA EDISON COMPANY

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Rosemead, California 91770