

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

Application of Pacific Gas and Electric Company for Approval of the 2009-2011 Low Income Energy Efficiency and California Alternate Rates for Energy Programs and Budget (U 39 M)	A.08-05-022 (Filed May 15, 2008)
Application of San Diego Gas & Electric Company (U 902 M) for Approval of Low-Income Assistance Programs and Budgets for Program Years 2009-2011	A.08-05-024 (Filed May 15, 2008)
Application of Southern California Gas Company (U 904 G) for Approval of Low-Income Assistance Program and Budgets for Program Years 2009-2011	A.08-05-025 (Filed May 15, 2008)
Application of Southern California Edison Company (U 338-E) for Approval of Low-Income Assistance Programs and Budgets for Program Years 2009, 2010, and 2011	A.08-05-026 (Filed May 15, 2008)

**RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE
ADMINISTRATIVE LAW JUDGE'S SECOND RULING SEEKING FURTHER
INFORMATION ON LARGE INVESTOR-OWNED UTILITIES' 2009-2011 LOW
INCOME ENERGY EFFICIENCY/CARE APPLICATIONS**

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I.

INTRODUCTION

Pursuant to the *Administrative Law Judge's Second Ruling Seeking Further Information on Large Investor-Owned Utilities' 2009-2011 Low Income Energy Efficiency/CARE Applications*, dated June 25, 2008 (June 25 ALJ Ruling), Southern California Edison Company (SCE) responds to the ALJ's questions regarding SCE's 2009-2011 low-income assistance programs application, A.08-05-026.

II.

SCE'S RESPONSE

Question 1: Regarding the electric/gas split in your Low Income Energy Efficiency (LIEE) program budget (if you are an electric/gas utility):

- a) Explain the origins of the split, the justification for it, and whether that justification still exists. See, e.g., Decision (D.) 89-07-062, 1989 Cal PUC LEXIS 829, at *59-60 (commencing low income energy program and directing budget split).
- b) Explain how you calculate the split, and whether it is different from in the past.
- c) Should the calculation of the electric/gas split change, e.g., be based on the number of electric/gas customers of the utility, or some other basis other than that currently used?

SCE's Response:

This question does not apply to SCE as it is an electric only utility.

Question 2: What is the suitable level of California Alternate Rates for Energy (CARE) penetration given the costs of acquiring customers? Is there a "break point" where the cost of acquiring new customers outweighs the benefits of extending the program universally?

- a) For example, an estimated 10% of the eligible population for CARE is not willing to participate in the CARE program according to the KEMA Final Report on Phase 2 Low Income Needs Assessment, <http://docs.cpuc.ca.gov/Published/GRAPHICS/73106.PDF>. Should the Commission therefore assume that maximum possible penetration is 90 percent?
- b) The KEMA Final Report also provided recommended penetration targets of 95% for SCE, 90% for PG&E and SDG&E, and 80% for SCG and recommended that the utilities be encouraged to exceed these targets where possible. What is the likelihood of meeting these targets and should the utilities be encouraged or directed to meet these targets?
- c) According to IOU presentations at the June 2008 Low Income Oversight Board meeting, current CARE penetration levels are 79% (SoCalGas), 71% (SDG&E), 79% (SCE) and 73% (PG&E, but expected to drop to 70% after recertification of Tier 5 users). Why do these levels differ, and what should the Commission do about it?

SCE's Response:

SCE continues to follow the Commission's goal established in D.02-07-033 to reach 100% of low-income customers who are eligible for, and desire to participate in, the CARE program. SCE recognizes that it will be increasingly difficult and costly to enroll the remaining customers that have not responded to prior outreach efforts. SCE has neither defined nor attempted to calculate a break-point where the cost of acquiring new customers outweighs the benefits of extending the program universally, and recognizes that such a point may vary depending on the energy usage and available CARE savings for potential enrollees.

a) Based on the information provided in the KEMA Report, SCE believes 90% is a reasonable estimate of maximum possible CARE penetration at a statewide level, assuming that there would not be ongoing adjustments due to customers terminating service, starting new service, failing to recertify eligibility, or failing to respond to verification requests.

b) SCE, in previous comments to the Commission,¹ sought clarification regarding the KEMA Report recommendation of a 95% CARE penetration rate for SCE. It is unclear how the KEMA Report arrived at a recommendation of a 95% penetration rate and what this percentage actually represents. SCE has not received such clarification, and believes the recommendation is in error and should not be adopted.

c) SCE continuously seeks to enroll 100% of all eligible customers who are willing to participate within SCE's service territory. While each IOU's service territory has its unique challenges with reaching and maintaining eligible customers, the IOUs share best practices for customer enrollment, recertification, and verification processes in an effort to find opportunities for possible inclusion within their CARE programs. However, what may work for one utility may not necessarily work for the other IOUs.

SCE consistently seeks to remove barriers for CARE program participation, recertification, and verification processes; however, there is not "one fix" for all eligible customers. SCE must continue to employ various strategies to enroll all eligible customers willing to participate and maintain eligible customers.

Question 3: The Energy Efficiency program funds "Local Government Partnerships" throughout California. Have the IOUs looked at each of these partnerships as an opportunity to integrate the Energy Efficiency and LIEE programs, and to leverage local government resources in carrying out the LIEE program? Explain.

¹ *Southern California Edison Company's Comments on Administrative Law Judge's Rulings Seeking Comments on Issues Raised in the KEMA Report and on Natural Gas Appliance Testing Issues*, filed October 16, 2007.

SCE's Response:

Yes. SCE discusses integration with Energy Leader Partnerships (ELP) and leveraging with local governments on page 60 of its Testimony. Through the ELP program, SCE partners with local government organizations interested in energy efficiency. Working with local governments, SCE will identify ELPs with concentrations of low-income residences and strive to utilize local resources to educate and enroll eligible customers in energy efficiency, demand side management,, LIEE and CARE programs. This will include activities such as:

- Assigning LIEE staff to each partnership kick-off meeting
- Including LIEE on the agenda and/or in the booth of the many ELP community events
- Co-branding LIEE marketing materials with the city (such as bill inserts, brochures, flyers, special events, radio spots, TV spots)
- Including an "LIEE corner" in partnership newsletters

Question 4: Are there objective metrics by which the Commission can or should analyze the effectiveness of the IOUs' efforts at leveraging (working with outside groups) and integration (combining or synthesizing internal demand side programs)? Some examples might include: money saved, resources shared, consolidation of work efforts, work hours saved, reduction in customer confusion, and/or number of customers served. Explain your position.

SCE's Response:

SCE believes that appropriately determined metrics will help generate greater enrollment, cost savings and move the IOUs toward achieving the Programmatic Initiative. SCE also believes that these metrics must be reliable and credible from the perspective of key stakeholders including community-based organizations, regulators and the larger team of utility demand side management.

To ensure that these metrics for both leveraging and integration are not only objective but reliable and meet the needs of interested parties, SCE proposes that the next Joint Utility Quarterly Public Meeting focus on developing a working group to determine both the best method for generating objective, reliable and credible metrics and the best method for obtaining buy-in from key stakeholders and interested parties including utilities, regulators, and community-based organizations.

While there are indeed multiple avenues to reach these goals of objective, reliable and credible metrics, SCE believes that a research study managed and designed by a study team of interested parties including the IOUs, the Energy Division, the Division of Ratepayer Advocates, community-based organizations, the Department of Community Services and Development, LIEE contractors, the Low Income Oversight Board, and other low income assistance agencies,

is the most direct method of obtaining these metrics and sees the Quarterly Meeting as a venue to examine and further develop this strategy.

While SCE agrees that possible metrics such as money saved, resources shared, consolidation of work efforts, work hours saved, reduction in customer confusion, and/or number of customers served are clear candidates, the exact weighting or feasibility of these metrics is very difficult to determine without either sound data or the input of impacted stakeholders who, for example, may or may not have compatible databases from which to share key information to develop or track metrics.

Question 5: Is the information produced in pilot LIEE programs shared among the IOUs? How are the pilots assessed? How are the results of the pilots communicated to other parties? What information is used to determine if a pilot should become a new program element/measure?

- a) PG&E proposes a pilot to install 1,000 high efficiency clothes washers in single family homes with five people or more whereas SDG&E and SoCalGas propose implementing high efficiency clothes washers as a new measure. Which approach is preferred? Should the measure be treated consistently across utilities?

SCE's Response:

The LIEE program managers meet frequently to discuss operational approaches and opportunities to improve the LIEE program. Information on new measures is also shared. LIEE Impact Evaluations are one means of measuring energy savings for piloted measures. Since the Commission and the IOUs have suspended standardization activities, the IOUs have independently developed proposals to institute new measures on a pilot or permanent basis. While such an approach can lead to inconsistencies in measure offerings across the state, it can foster innovation, and may be appropriate due to climate conditions or housing stock that may be unique to a specific utility.

Question 6: PG&E proposes a change in certification for its CARE sub-metered and expanded programs from one to two years. Currently, PG&E's single-family residential customers are required to recertify their eligibility every two years while customers with fixed-income are required to recertify every four years. Are certification rules consistent among the IOUs? Should CARE certification rules be consistent statewide? Should CARE certification rules be consistent for all types of customers and programs? Explain.

SCE's Response:

Each of the IOUs has proposed the same revision as PG&E to the recertification requirement for its CARE sub-metered and expanded program participants from one to two years. It was previously believed that sub-metered tenants and expanded program participants

were highly migrant populations; however, SCE's experience has been that a large percentage of sub-metered tenants are low-income seniors who are not likely to move frequently.

Currently, SDG&E and SoCalGas utilize a probability model in their recertification processes. SCE plans to implement a probability model within its recertification processes in late 2008 or early 2009. SCE supports standardization of recertification processes among the IOUs.

Question 7: In regard to public housing and Section 8 housing for purposes of LIEE and CARE, D.07-12-051, Ordering Paragraph 4 states: "Propose a process for automatically qualifying all tenants of public housing and tenants of Section 8 housing improving information to public housing authorities." Do all participants in such programs qualify for CARE/LIEE? Is each large IOU treating such participants equally for purposes of eligibility for CARE and LIEE? Should this public housing and Section 8 treatment be consistent statewide? If so, what proposed approach should be followed? Explain.

SCE's Response:

Not all participants in such programs qualify for CARE and LIEE. SCE's proposed approach is detailed on page 90 of its Testimony and could be implemented statewide.

Question 8: Itemize your budgets for marketing/outreach for both CARE and LIEE in the ethnic media in the past two budget cycles and the 2009-2011 cycle. Give type of media (e.g., radio, TV, internet, print) and names of stations, channels/networks, websites, and publications. Should these budgets be increased? Which channels are most effective? Explain.

SCE's Response:

2006 to 2008 budget cycles:

During the 2006-2008 budget cycles (2006 budget cycle and 2007-2008 budget cycle), SCE spent a total of \$380,975 on ethnic media to generate awareness and participation for CARE and LIEE. Ethnic media included African-American and the following in-language efforts: Spanish, Cantonese, Mandarin, Vietnamese and Korean. SCE focused its media purchases on radio and print advertising. Radio allows for maximum penetration of message at both the residential and workplace level. Community print publications in the African-American community are well-read, providing an effective mechanism for targeting urban markets across age groups. Spanish language print, in this case, allowed SCE to distribute actual applications as an insert, complimented by an advertisement directing readers to the insert.

African-American Media:

Radio: KJLH, KDAY

Print: ACC Church, LA Watts Times, CA Crusader, LA Sentinel, Black Voice News, our Weekly, Compton Bulletin

Budget: \$124,986.70

Spanish Language Media:

Radio: KLVE, KSCA

Print: La Opinion (ad + ap insertion)

Budget: \$136,714.38

Asian Languages Media:

Cantonese Radio: KMRB

Mandarin Radio: KAZN, KMNY, KWRM, KUSC

Korean Radio: KIAP, KHZ

Vietnamese Radio: KALI, KNAR, KALI

Budget: \$119,273.70

2009 to 2011 budget cycle:

During the 2009-2011 budget cycle, SCE plans to dedicate \$350,000 annually to ethnic media for CARE and LIEE. These dollars will be divided between the primary ethnic customer bases according to their relative audience size. Ethnic media efforts may include radio, print and/or Internet. Radio will continue as the preferred channel across audiences, as it provides the most cost effective means of reaching low-income second-language speakers. Radio buys may be supplemented by Internet advertising and community and broad-spectrum, in-language publications where appropriate. When possible, actual applications may be inserted into appropriate publications.

SCE does not need to increase its ethnic media budget at this time.

Question 9: How many jobs in communities served by the CARE and LIEE programs have these programs created over the last two program cycles? What kind of jobs were created, and what are the demographics of those employed? (The jobs must have gone to low-income persons, and may involve direct IOU employment, employment as program contractors and subcontractors, and/or employment at community based organizations. The jobs must also be in furtherance of the LIEE and CARE programs.) Will the 2009-2011 programs create similar jobs? If so, answer the foregoing questions about the jobs and employees/contractors.

SCE's Response:

SCE's CARE group does not have a specific means of tracking the types of jobs created by the CARE program over the last two program cycles. However, SCE estimates that approximately 500 jobs have been created utilizing information derived from issuing contractor badges for the CARE Capitation Program over the last two program cycles.

Based on SCE's knowledge, over the last two program cycles, LIEE service providers hired the most qualified individuals to fulfill jobs in the areas of sales, installations, shipping and receiving, quality control, data entry, customer service, and program management. SCE does not

track the detail for all the employees working with its LIEE service providers to determine the actual employee count or demographics. Based on the information SCE does collect, SCE believes the LIEE program has created a minimum of 450 jobs in communities within SCE's service territory. SCE estimates an incremental increase to the LIEE service provider workforce to accommodate the 2009-2011 budget increase. SCE expects that LIEE service providers will continue to offer the same type of employment in the 2009-2011 cycle as they have in the previous two program cycles.

Question 10: What, if any, type of Smart Meter/advanced meter education are the IOUs providing as part of the LIEE program? Should the Commission fund any Smart Meter/advanced meter education programs in advance of broad availability of the meters in homes? Will the education results last if education happens in the 2009-2011 period and the IOUs do not make the meters ubiquitous until 2011 and later? Explain.

SCE's Response:

SCE will likely leverage the LIEE program, as well as other communications opportunities to educate customers about the benefits of Edison SmartConnect.™ For instance, low-income customers may have particular interest in electing time-of-use rates and to move some consumption away from afternoon hours, which could save them money and which they could achieve, as a result of the new meters. SCE is not requesting specific funding in its low income assistance programs application, A.08-05-026, for education related to Edison SmartConnect.™ Targeted customer education programs should begin as relevant product features are made available.

Question 11: SDG&E proposes a light emitting diode nightlight program that costs pennies a year. Given the large electric energy burden represented by lighting, have the other IOUs considered this measure as part of their program? If not, explain why.

SCE's Response:

LED nightlights are presently under evaluation by SCE within its current Upstream Lighting Program. Technically, LED nightlights may offer energy savings over incandescent technologies; however, SCE is further evaluating the baseline attributes tied to LED nightlights and how these factors contribute to economic potential. SCE will complete its internal evaluation in late 2008 and may elect to deploy a LED nightlight measure in the future.

Question 12: Are there other programs that one IOU offers that the Commission should require all IOUs to offer because they are cost-effective, produce high energy savings, or have other positive attributes for LIEE customers? Explain.

SCE's Response:

The IOUs cooperate in the development of measures to serve customers within their distinct regions and several low-income energy efficiency measures are coordinated statewide efforts. At present, SCE does not have suggestions for additional statewide measures for the LIEE program.

Question 13: Do the large IOUs other than PG&E offer a program similar to REACH? How are the program(s), if any, funded?

SCE's Response:

Yes. SCE has a utility bill payment assistance program that is similar to PG&E's REACH program. Since 1982, SCE's Energy Assistance Fund (EAF) program has been available to low-income (CARE-eligible) residential customers to help pay their SCE bill. This non-mandated program has been funded through voluntary donations from SCE customers and employees, as well as contributions from SCE shareholders. United Way of Greater Los Angeles (UWGLA) administers the program for SCE through a network of approximately 90 community-based agencies that provide payment assistance to qualified customers. From 1982 through 2004, EAF was a seasonal program, with assistance available for approximately six weeks during the winter. Realizing that customer need for bill payment assistance was not limited to the winter, SCE shareholders contributed additional funding in 2005 and 2006 to extend assistance into additional months. Historically, the average annual funding for the EAF program is approximately \$650,000 per year, and approximately 7,600 customers received assistance each year.

Significant changes were made to the program funding and eligibility guidelines in September 2006. During the summer of 2006, a number of factors contributed to higher electric bills for SCE customers: a hotter-than-normal June and a record heat wave during July drove up customers' kilowatt-hour usage. Residential customer rates were also increased in 2006. Given the tiered residential rate structure, more customers' usage was billed according to the upper rate tiers, where the price per kWh charges are higher. To assist residential customers hit hard by these summer electric bills, SCE requested Commission approval (Advice Letter 2040-E) to use up to \$10 million of the Energy Resource Recovery Account over-collection to fund an expanded EAF program. The Commission approved this request effective October 8, 2006.

SCE implemented the EAF Rate Relief program in October 2006. The income eligibility guidelines were expanded such that residential customers with household incomes within 400% of 2006 federal poverty guidelines were eligible for assistance. The program allows qualified customers to receive up to \$150.00 in bill payment assistance once in a 12-month period. Pursuant to the approval of Advice Letters 2078-E and 2192-E, the EAF Rate Relief program provided bill payment assistance to customers throughout 2007 and into 2008. As of June 2008, \$1.6 million out of the \$10 million in funds allocated in 2006 is remaining to provide bill payment assistance. Since program inception in October 2006, an increasing number of

customers have sought bill payment assistance. To date, nearly 68,000 customers have received assistance. (Approximately 80% of those customers receiving assistance are also on SCE's CARE program.)

Given the current economic conditions, SCE recognizes that there will continue to be significant customer need for bill payment assistance. Once the \$10 million in Commission-authorized funds is depleted, SCE is planning to return to donation-based funding for the EAF program. In terms of program design, SCE plans to revert back to the traditional income qualifications for customers (CARE eligibility guidelines) as well as to cap the bill payment assistance level at \$100 in a 12-month period. SCE is targeting to collect sufficient funding so that the program can be available to customers on a year-round basis. To collect sufficient funding, customer and employee donations as well as SCE shareholder contributions will need to increase. SCE is developing and implementing plans to seek increased donation levels. As an example, to increase voluntary customer donations, SCE is exploring options to allow SCE customers to provide contributions to EAF through the SCE monthly bill as opposed to the current one-time annual bill solicitation process.

Question 14: The IOUs propose setting the base year for calculating the programmatic initiative to 2002 and eliminating the 10-Year "Go-Back" Rule, citing the inclusion of "Rapid Deployment" measures in the LIEE program as a reason for this modification. How drastically has the program changed since 2002 and are such changes reason enough to justify this modification?

SCE's Response:

D.07-12-051 directs the utilities to "[e]liminate or modify the ten year "go back" rule to permit installations of new measures and technologies in all households while avoiding duplicative installations".² In their applications, the IOUs are not proposing to eliminate the ten year "go-back" rule and instead propose to make the following modifications/exceptions to be added to "Section 2.8 Previous Participation" of the LIEE P&P Manual:

- New cost effective measures or technologies that were not previously available in the LIEE program at the time the utility treated a home shall be made available for those qualifying customers
- In the event a key program eligibility requirement now makes a customer eligible for measures previously not offered at the time the utility treated the home, the utility shall make available those cost effective measures for qualified customers.

In setting the base year for calculating the Programmatic Initiative, the IOUs evaluated a number of issues relative to the goal of the Programmatic Initiative and making low income homes energy efficient. Historically, the IOUs have adhered to the Statewide Policies &

² D.07-12-051, Ordering Paragraph 4.

Procedure Manual’s “10 year rule” and counted all of those homes treated in the last 10 years as homes that had been previously served by the LIEE program, and therefore were not currently eligible for participation. When evaluating this requirement and assessing the levels of service provided to customers over the past 10 years, the IOUs determined that the number of customers who had been served since the end of 2001, when “Rapid Deployment” measures were included in the program, best represented the number of customers who had received “all feasible measures” because only a few new measures have been introduced into the LIEE program since that time. The table below provides a high-level overview of the measures added and removed from the LIEE program between 2001 and 2007.

Program Year	Measure Added	Measure Removed	Utility
Mid-2001 (Rapid Deployment)	Air Conditioning (A/C)		PG&E, SCE, SDG&E
	Duct Testing and Sealing		All
	Gas and electric water heaters		All
	Set-back thermostats		All
	Evaporative Cooler Maintenance		PG&E, SCE, SDG&E
	Whole house fans		PG&E, SCE, SDG&E
	Refrigerator (for renters)		PG&E, SCE, SDG&E
	Hard-wired porch light fixtures (for renters)		PG&E, SCE, SDG&E
	Evaporative Cooler (for renters)		PG&E, SCE, SDG&E
2002	None	None	n/a
2003	None	None	n/a
2004		High Efficiency Water Heaters	All
		High Efficiency Central A/C	PG&E, SCE, SDG&E
		Duct Testing and Sealing	All
		Evaporative Cooler Maintenance	PG&E, SCE, SDG&E
		Set-back thermostats	All
		Whole House Fans	PG&E, SCE, SDG&E
2005	Replacement of water heaters leaking from the tank*		All
	Go-back refrigerator replacement*		PG&E, SCE, SDG&E
2006	Energy Efficient Central A/C (Climate Zones 14 and 15 only)**		All

	Duct Testing and Sealing		All
2007	Interior Hard-Wired Compact Fluorescent Lights		All
	Energy Efficient Central A/C (Climate Zone 13)**		SCE
	Central A/C Tune-Up/Service		All
	Tankless Water Heater		SCG and SDG&E
	Torchiere Replacement		SCE and SDG&E
	Evaporative Cooler Maintenance		SCE

* Introduced during 2005/2006 Winter Initiative and remained in program.

** Go back measures - SCE only

*** Installed on a limited basis, based on the cost of installation.

As illustrated in the table above, many of the measures in today’s LIEE program were introduced in mid-2001 and the IOUs are proposing that homes treated since the end of 2001 be considered energy efficient when determining the basis for total number of eligible LIEE customers to be served between 2009-2011. Homes that were serviced between 1999 and 2001 did not receive the benefits from “Rapid Deployment” measures and for this reason the IOUs are proposing that these homes not be considered energy efficient when determining the basis for total number of eligible LIEE customers to be served between 2009-2011. In fact, homes served by LIEE between 1999 and 2001 will become eligible for services during the 2009-2011 program cycle as the ten-year rule will no longer be a restriction on eligibility.

Question 15: SDG&E and SoCal Gas propose a Customer Rewards Program to provide incentives for energy savings. Will this program be available to all LIEE customers or only new LIEE customers? What is the best type of reward to provide as a component of LIEE to low income populations? Should the Customer Rewards Program be implemented statewide? Explain.

SCE’s Response:

SDG&E and SoCalGas have proposed an innovative approach to reinforce energy education, achieve long-term behavioral changes, and create sustained energy savings. SCE believes it is too early at this time to determine whether this type of program should be implemented statewide. SCE looks forward to receiving information from SDG&E and SoCalGas on their experiences as they implement the program.

Question 16: How did you calculate your energy savings figures?

- a) Are those savings based on average energy savings across all users?

- b) Should the energy savings calculations be different depending on the segment of the population a measure will serve? For example, will energy savings differ among high and low users?
- c) If your answer to b) is yes, should these changes become part of the impact evaluation study you propose in your budget applications?

SCE's Response:

a) For 2009-2011, SCE relied primarily upon savings estimates reported in the 2005 LIEE Impact Evaluation by West Hill (released Dec 19, 2007), with supplementary estimates drawn from other sources (e.g., 2001 LIEE Impact Evaluation by KEMA, DEER, and utility engineering estimates), where appropriate savings were not available in the 2005 Impact Study. For instances in which the savings in the above-note sources were available broken down by housing type and/or climate zone, SCE applied those savings, accordingly.

b) In order to apply different savings to different customer segments, a consistent methodology would need to be developed and validated. The 2005 LIEE Impact Evaluation does not provide the information required to assign different measure energy savings to different customer segments. However, note that the 2005 LIEE Impact Evaluation does provide different measure savings for the different utilities, which may account for differences between some (unspecified) customer attributes, as well as climate/weather conditions, unique to each utility territory. The proposed household segmentation study could contribute to defining customer groups for which separate measure savings figures could be calculated.

c) The utilities could analyze the pros and cons of expanding the scope of the next LIEE impact evaluation to deliver different measure savings for high and low energy users. Issues to consider include the fact that providing analysis at ever smaller segments of the population would require survey data from a significantly larger statewide population in order to maintain a similar margin of error in the estimated savings in the smaller population segments. This may increase the cost and time required to execute the evaluation beyond what was requested in the utilities' May 15 applications.

Question 18: SCE does not propose any new measures, yet continues to rely heavily on CFLs. Why is this?

SCE's Response:

SCE has in fact proposed a decline in CFLs being installed over the application period 2009-11. The actual number of CFLs to be installed per home will decline to 3.7. In 2007, the number of CFLs installed per home averaged 4.1 and in 2008 SCE is authorized to continue to average 4.1 CFLs per home.

SCE's portfolio includes electric measures that provide long-term enduring energy savings. The proportional increase in CFLs lags behind central air conditioners and pool pumps, which are expected to see substantially higher installation rates beginning in 2009. SCE

proposes to install pool pumps and central air conditioners at a much higher rate in 2009 than the increase in homes served from 2008. SCE notes, however, that many customers in temperate climates are likely to only be eligible to receive CFLs in the 2009-2011 period, unless they also have qualifying pre-1993 refrigerators that can be replaced.

Respectfully submitted,

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July 7, 2008

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 RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE ADMINISTRATIVE LAW JUDGE'S SECOND RULING SEEKING FURTHER INFORMATION ON LARGE INVESTOR-OWNED UTILITIES' 2009-2011 LOW INCOME ENERGY EFFICIENCY/CARE APPLICATIONS 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 **7th day of July, 2008**, at Rosemead, California.

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