

**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 FOURTH DATA REQUEST**

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Dated: **August 21, 2008**

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**RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE
ADMINISTRATIVE LAW JUDGE’S FOURTH DATA REQUEST**

Southern California Edison Company (SCE) files this response pursuant to ALJ Thomas’ email of August 14, 2008, requesting information on how the utilities verify, certify and recertify customer income eligibility in the CARE and LIEE programs.

Question:

“...[P]lease provide me information on when/how your utility verifies/certifies/re-certifies customer income eligibility for CARE and/or LIEE. I seek this information in view of information contained in the DRA brief of 8/1/08 and PG&E’s reply of 8/13/08, quoted below. If you have a pre-existing document that describes the process, it would be my preference to receive that document.”

SCE's Response:

CARE

Enrollment

SCE's individually-metered residential customers can enroll in SCE's CARE program by using the paper application or by using SCE's real-time online enrollment application. SCE's CARE application is available in English, Spanish, Chinese, Korean, Vietnamese, and Cambodian and SCE's real-time online enrollment application is available in English, Spanish, Chinese, Korean, and Vietnamese.¹ Large-font CARE/FERA applications are available both online and in paper form. Additionally, each multilingual application is supported by a dedicated 800 number within SCE's Customer Call Center.

SCE's submetered and Expanded (i.e., non-profit group living facilities, homeless and women's shelters, and migrant farm worker housing) CARE customers can enroll in SCE's CARE program by requesting the CARE/FERA application from SCE's Customer Call Center or by downloading the CARE/FERA application via www.sce.com/careandfera.

Customers may also be enrolled in CARE through datashare agreements established with Southern California Gas Company (SoCalGas), Pacific Gas & Electric (PG&E), Southwest Gas, and the Department of Community Services and Development (DCSD). Customers enrolled through the datashare process are sent an "Opt-out" letter informing them that they have been enrolled on CARE but can elect not to participate by contacting SCE.

Recertification

Individually-metered CARE customers are required to recertify their eligibility every two years unless they are fixed income customers. Fixed income customers, both individually metered and submetered, are required to recertify their eligibility every four years. Expanded

¹ SCE tracks customers' language preference, where known, and communicates to customers regarding the CARE program in their preferred language.

CARE customers and non-fixed income, submetered tenants are required to recertify their eligibility once a year in June. In SCE's 2009-2011 Application, A.08-05-026, SCE is proposing to modify the recertification requirement for submetered tenants and Expanded CARE customers to match the requirements for individually-metered CARE customers, so that non-fixed income submetered tenants and Expanded CARE customers can recertify their eligibility every two years on the anniversary date of their latest enrollment.

When an individually-metered CARE customer is due to recertify their eligibility, SCE sends a system-generated recertification letter with a CARE application requesting that the customer recertify their eligibility via the real-time online recertification application; SCE's Voice Recognition Unit ("VRU"); or by returning the enclosed application. Written communications are available in English, Spanish, Chinese, Korean, Vietnamese, and Cambodian. The online recertification application is available in English, Spanish, Chinese, Korean, and Vietnamese, and the VRU communication is available in English and Spanish.

If the customer does not respond within 30 days, a reminder letter is mailed. If the customer does not respond within 60 days, the customer is dropped from the rate and is sent a "Rate Removal Letter" along with an application asking them to reenroll if they still qualify.

Additionally, twice a year, SCE sends those customers who have fallen off the CARE rate within the previous 12 months for failing to respond to a recertification request, a direct mail solicitation accompanied by a CARE/FERA application asking the customers to either reapply online, by telephone through the VRU, or by returning the CARE/FERA application if they are still eligible.

Currently, submetered tenants, master-metered account holders, and Expanded CARE customers are sent a recertification letter each year requesting that the submetered tenants and Expanded CARE facilities recertify their eligibility for the CARE program. Submetered tenants and Expanded CARE facilities have 60 days to respond to the recertification request. If the customer does not respond within 60 days, the CARE customer is removed from the rate and sent a "Rate Removal" letter. Currently, submetered tenants and Expanded CARE customers

cannot recertify their eligibility through the online application or the VRU. However, this capability is a planned enhancement for the 2009-2011 Program Year, and funding has been requested for this enhancement in SCE's Application.

SCE currently has a project underway to extend the response deadline for recertification requests to 90 days for all CARE customers (individually-metered, submetered, and Expanded CARE).

Verification

One percent, or approximately 10,000 customers based on current CARE enrollment of more than 1 million customers in SCE's service territory, is randomly selected to verify their eligibility for SCE's CARE program. A verification request asks customers to provide proof of income or proof of enrollment in one or more of the Categorical Eligibility programs and proof of the number of members in the household.

An "Initial Verification Request Letter" is mailed to the customer. All customer communications are available in English, Spanish, Chinese, Korean, Vietnamese, and Cambodian.

If the customer does not respond to the verification request after 30 days, a "Reminder Letter" is mailed. If the customer does not respond to the verification request within 60 days, the customer is coded as non-responsive, removed from the CARE rate, and sent a "Rate Removal Letter."

If documentation demonstrating the customer's eligibility is returned within 60 days, the verification is completed and the customer is exempted from verifying their income for 24 months. If the request is returned within 60 days but is found not to demonstrate eligibility, the customer will be removed from the CARE rate, coded as ineligible, and sent a "Rate Removal Letter."

If a customer coded as either ineligible or non-responsive through the verification process reapplies for CARE within 12 months, SCE sends that customer another letter requesting proof of income prior to enrolling the customer in CARE. If the customer returns the income

documentation and is deemed eligible, the customer is enrolled on the CARE rate. If the customer's documentation demonstrates ineligibility or the customer does not respond to the verification request, the customer's application is rejected and the customer is not enrolled in CARE. A "Rejected Application Letter" is mailed to the customer.

LIEE

Enrollment

SCE's Low Income Energy Efficiency Program (LIEE) follows Section 2.2.3 of the Statewide Policies and Procedures² adopted by the Commission for the qualification of customers participating in LIEE. All income documentation is obtained and recorded at the time of the initial home assessment and customers are qualified based on established guidelines.

Relevant sections of the Statewide Policies and Procedures read in part:

Section 2.2.3. Verification of Income: "Income documentation must be reviewed, recorded, copied and retained by service providers prior to the installation of measures for all prospective participants. Qualification for other programs cannot be taken as adequate evidence of qualification for the LIEE Program, except in the case where the utility has verified that the customer is CARE-eligible within the past year. CARE self-certification does not automatically qualify a household for LIEE, except in the case of group homes, where it is specifically allowed ..."

Section 2.3.2. Referrals: "...In order to mitigate the duplication of costs that could otherwise be associated with customers participating in two utility programs, two steps shall be taken:

- First, outreach staff in each program will accept customer income qualification documentation already obtained by outreach staff in the other program; and

² 2006 Low Income Energy Efficiency Program Statewide Policy and Procedures Manual. Approved October 25, 2005 and Effective January 1, 2006

- Second, gas and electric utilities will offer common energy education in overlap areas so that customers will need to receive education only under one program.”

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August 21, 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 FOURTH DATA REQUEST 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 **21st day of August, 2008**, at Rosemead, California.

/s/ JENNIFER ALDERETE _____

Jennifer Alderete

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California Public Utilities Commission

CPUC Home

CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

**PROCEEDING: A0805026 - APPLICATION OF SOUTH
FILER: SOUTHERN CALIFORNIA EDISON COMPANY
LIST NAME: LIST
LAST CHANGED: AUGUST 14, 2008**

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