

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 19, 2018

**Advice Letter SCG 5325**

**To:**

Mr. Ray B. Ortiz  
Southern California Gas Company  
555 West 5<sup>th</sup> Street, GT14D6  
Los Angeles, CA 90013-1011

**Subject: Disposition partially approving Southern California Gas Company's (SCG) Advice Letter (AL) 5325, requesting approval of the Mid-Cycle Update.**

Dear Mr. Ortiz:

**Summary**

On July 16, 2018, SCG filed AL 5325 as directed in D.16-11-022, detailing out the Mid-Cycle Update. The SCG AL provides updated budgets, new measures, recalculations of cost-effectiveness and energy savings, leveraging plans and other program elements pursuant to D.16-11-022 for the 2018-2020 ESA and CARE program years.

The Energy Division (ED) approves SCG Advice Letter (AL) 5325 filed in pursuant to authority granted<sup>1</sup> in Decision (D.) 16-11-022<sup>2</sup> and D.17-12-009<sup>3</sup>, in part, with the modifications to home treatment goals, program budgets and energy savings targets specified in Attachment 1, effective today.

**Background**

On November 21, 2016, the Commission issued D. 16-11-022, which approved the IOUs Energy Savings Assistance Program (ESA) and California Alternate Rates for Energy (CARE) Program Plans and Budgets for Program Years 2017-2020. On December 14, 2017, the Commission issued D. 17-12-009 (The Decision), which modified D.16-11-022 and directed the IOUs to file Tier 2 Advice Letters by July 16, 2018 proposing any Mid-Cycle updates, adjusting budgets, energy savings targets, and other administrative components of the program.<sup>4</sup>

<sup>1</sup> D.16-11-022 p.439, OP 3 and p.441, OP 6

<sup>2</sup> D.16-11-022 Clean Copy referenced thru out document, 2/2/2018  
<http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M208/K640/208640753.PDF>

<sup>3</sup> On December 14, 2017, the Commission issued D.17-12-009 to replace D.16-11-022 in its entirety.

<sup>4</sup> D.17-12-009, p.31, Attachment 1

The Advice Letter 5325 was timely filed on July 16, 2018. The National Consumer Law Center (NCLC), Natural Resources Defense Council (NRDC), California Housing Partnership Corporation (CHPC), Association for Energy Affordability (AEA), and the Greenlining Institute (Joint Parties), filed a response on August 6, 2018, and the four Investor-owned utilities (IOUs) (San Diego Gas & Electric Company, Southern California Edison, Southern California Gas Company and Pacific Gas & Electric Company), filed replies to the Joint Parties' response on August 13, 2018.

### **Response**

The Joint Parties' response expressed dissatisfaction with the lack of discussion by the IOUs of deed-restricted multifamily programs and support for Common Area ("CAM") Measures. The Joint Parties acknowledge the decision did not specifically direct the IOUs to include discussion of this activity in the Mid-Cycle Advice Letters but believe the IOUs should have merited some discussion since their budgets in this sector are virtually unspent and, consequently, their savings must be falling far short of target.

SCG and SDG&E in their joint response filed August 13, 2018, counter that the Decision did not direct the IOUs to discuss their multifamily CAM programs or progress in their Mid-Cycle advice letter. The IOUs state they are in the process of making the multifamily CAM program available to deed-restricted multifamily properties and have made sufficient progress per their multifamily CAM implementation plans.<sup>5</sup>

### **Discussion**

Per General Order 96-B section 7.4.1, any person (including individuals, groups, or organizations) may protest or respond to an advice letter. Energy Division acknowledges the Joint Parties' response and agrees with both the Joint Parties and SCG regarding the Decision not specifically directing the IOUs to include discussion of this activity in the Mid-Cycle Advice Letters. The Multifamily Working Group established in the Decision is currently addressing and facilitating this activity. The Multifamily Working Group consists of the Energy Division, IOUs and interested stakeholders who host public quarterly and ad-hoc meetings to implement the CAM directives in the Decision.

Please contact Rian Troth of Energy Division staff at (916) 713-4137 or at [rian.troth@cpuc.ca.gov](mailto:rian.troth@cpuc.ca.gov) if you have any questions.

Sincerely,



Edward Randolph  
Director, Energy Division  
California Public Utilities Commission

cc: Charlie Harak, NCLC

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<sup>5</sup> SCG's implementation plan was approved March 31, 2018

Maria Stamas, NRDC  
Isaac Sevier, NRDC  
Stephanie Wang, CHPC  
Carmelita Miller, Greenlining  
Andrew Brooks, AEA  
Pete Skala, Energy Division  
Robert Strauss, Energy Division  
Alison LaBonte, Energy Division  
Rian Troth, Energy Division

## Attachment 1

### Disposition

The program updates of SCG's Mid-Cycle Advice Letter described below are determined to be in compliance with the Decision and are approved in part, with the modifications specified below, effective today.

#### A. SCG ESA Energy Savings Targets

The Decision gave guidance to the IOUs to increase their energy savings targets for the ESA Program for 2019 and 2020 by five percent higher than the 2017-2018 targets.<sup>6</sup> SCG Advice Letters 5256/5256A disposition adopted ESA saving targets in conformance with Decision directives. In June 2018, Energy Division (ED) directed the IOUs to incorporate the preliminary results of the 2015-2016 ESA Impact Evaluation<sup>7</sup> in this Mid-Cycle update. SCG proposes the revised Portfolio-Wide savings based on savings projections by measure group category.

These energy savings targets can be adjusted during the 2018 Mid-Cycle update process, and the Energy Division has delegated authority to adjust energy savings targets up to 5% based on information submitted during the Mid-Cycle update.<sup>8</sup> Accordingly, we have modified SCG's previously approved savings target by a decrease of 5% as outlined below in Table 1 due to results of the 2015-2016 ESA Impact Evaluation which showed lower gas measure savings. These targets should be considered as minimum thresholds, therefore we expect SCG to achieve the highest energy savings possible.

**Table 1**  
**ESA Savings Targets**

<b>Program Year</b>	<b>Advice Letter 5256/5256A (MM Therms)</b>	<b>Proposed Advice Letter 5325 Savings Target (MM Therms)</b>	<b>Authorized Advice Letter 5325 (MM Therms)</b>
2018	6.54	4.8	6.21
2019	6.87	4.8	6.53
2020	6.87	4.8	6.53

#### B. New ESA Measures<sup>9</sup>

SCG proposes to add one new measure and implement an initiative to expand its furnace and water heater repair and replacement offerings to its ESA Portfolio.<sup>10</sup>

- 1) SCG proposes to repair or replace a furnace or water heater in the absence of natural gas appliance testing (NGAT). Currently NGAT is performed only when infiltration reduction

<sup>6</sup> D.16-11-022 p.441, OP 6

<sup>7</sup> 2015-2016 ESA Impact Evaluation, Phase 1 Results. DNV-GL (June 6<sup>th</sup>, 2018)

<sup>8</sup> D.16-11-022 p.50

<sup>9</sup> 2015-2016 ESA Impact Evaluation, Phase 1 Results. DNV-GL (June 6<sup>th</sup>, 2018)

<sup>10</sup> D.16-11-022 p.459-460, OP 57, 58.

measures are performed. If a home has infiltration measures in place NGAT is not performed, making the customer not eligible for repair or replacement. SCG proposes a modification to the current rule to repair or replace a furnace or water heater in the absence of NGAT if the following conditions are met; home must be owner-occupied, combustion ventilation air must be adequate, appliance must be inoperative, there is no unresolved "Condition Requiring Correction" that would make infiltration measures non-feasible, and infiltration reduction measures were not feasible because they are already in place and functional. SCG anticipates this scenario will arise in fewer than 2% of homes treated and is able to implement within its existing budget.

Energy Division accepts this change on a pilot basis for the remainder of the 2018-2020 program cycle. We direct SCG to track the number of homes and report the associated metrics impacted by this change, in their monthly and annual reports. We find this proposed initiative would reasonably provide equal opportunity to ESA eligible customers and therefore acceptable. We approve this request with the intention to revisit in the upcoming budget application process.

- 2) SCG proposes to include a Smart Thermostat measure to enable low income customers to have better control over their energy use, potentially lowering energy bills and improving health and comfort. Smart Thermostats may also provide customers with tools via Wi-Fi enabled control function for cell phones or tablets that will help them to take advantage of different rates and offerings, such as Time of Use rates to optimize HVAC system use. This measure also aligns with California State Assembly Bill (AB) 793, which addresses energy management technologies. SCG reports a Total Resource Cost<sup>11</sup> (TRC) for this measure of 1.47.

The Decision authorizes the addition of new program measures Mid-Cycle with a measure ESA cost effectiveness test TRC of 0.5 or above<sup>12</sup>, therefore we approve the Smart Thermostats for SCG for the remainder of the 2018-2020 program cycle. Evaluation results from the Smart Thermostat pilot authorized in Advice Letter 5311 will be used to determine the value of the measure for the next application cycle.

### C. ESA Penetration Goals

SCG updated its estimate of ESA customers remaining to be treated by 2020 using the Athens Research estimate of income eligible households.<sup>13</sup> We find use of the latest Athens research data reasonable as we approach the 2020 statutory deadline<sup>14</sup> and make additional refinements to align with the methodology outlined in the Decision<sup>15</sup> to correct the calculation order<sup>16</sup> shown below in

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<sup>11</sup> ESA has its own cost effectiveness tests, ESACET and Resource TRC further mentioned in Section D.

<sup>12</sup> D.16-11-022 p.235

<sup>13</sup> SCG updated its penetration goals in its AL 5256/5256-A (May 2018) in compliance with D.16-11-022, Conclusion of Law 122.

<sup>14</sup> California Public Utilities Code Section 382(e)

<sup>15</sup> D.16-11-022 p.271

<sup>16</sup> CSD treatments were calculated in a different order than the requirements of the decision.

Table 2. As a result of this adjustment, the number of SCG's First-Time treatment households increased.

**Table 2  
SCG ESA Penetration Goals**

1	2,029,455	Estimated ESA Program eligible customers for 2018 <sup>17</sup>
2	2,090,950	Estimated eligible customers for 2020 (escalated by 1 percent per year)
3	1,170,999	Customers served by ESA Program 2002 through 2017
4	203,234	Customers served/projected by LIHEAP 2002-2020
6	716,717	Subtract #2-#3-#4-#5: Remaining Untreated Customers (or "Adjusted Eligibility") used for calculating the 2018-2020 programmatic initiative
7	430,030	Remaining Eligible Customers: 60% of Untreated Customers are Willing and Feasible To Participate (WFTP)

SCG's total proposed, and authorized homes treated projections for 2018-2020 are provided below in Table 3. Relative to SCG's proposed treatment goals, the authorized total First Time treatments represents an additional 62,474 households through 2020. In order to increase the budget needed to treat the additional First Time treatments a decrease of 54,754 Retreatment households is applied (see section H. Adjusted ESA Program Budget).

**Table 3  
2018-2020 Household Treatment Goals**

	Proposed				Authorized			
	2018	2019	2020	Total	2018	2019	2020	Total
<b>First-time Treatment</b>	116,592	122,422	128,543	367,557	116,592	153,659	159,780	430,031
<b>Retreatment</b>	53,318	55,983	58,783	168,084	53,318	28,606	31,406	113,330

<sup>17</sup> Athens Research estimate of income eligible households filed 2/9/2018

<b>Total Households Treated</b>	169,910	178,405	187,325	535,640	169,910	182,265	191,186	543,361
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**D. Updated ESA Cost-Effectiveness Test Results**

In compliance with D.16-11-022<sup>18</sup>, SCG performed the Energy Savings Assistance Cost Effectiveness Test (ESACET) the primary cost effectiveness test for the ESA program that includes all measures and all known benefits and costs (including non-energy benefits and administrative costs).

The Resource Measure Total Resources Cost (Resource TRC) cost-effectiveness test includes the avoided cost benefits and the installation costs for the resource measures. The non-energy benefits and administrative costs are not included in the Resource TRC test. SCG’s updated ESA Program Cost Effectiveness values are shown in Table 4. These values are used for information purposes only at this time.

**Table 4  
ESA Cost Effectiveness Test Results 2018-2020**

	Authorized R. G3532			AL 5325		
	2018	2019	2020	2018	2019	2020
<b>ESACET</b>	.76	.81	.86	.69	.69	.69
<b>Resource TRC</b>	.30	.31	.33	.21	.21	.24

**E. California State Department of Community Services and Development (CSD) Coordination, Data Sharing, and Low-Income Weatherization Program Leveraging**

In D.16-11-022<sup>19</sup> SCG was directed to provide a process to refer customers to the Department of Community Services and Development Weatherization Assistance program and provide CSD customer usage data for households treated through CSD programs. SCG was further directed by Decision to leverage ESA measures with CSD Low-Income Weatherization Program and enter a contract with CSD to do so. SCG data sharing and Low-Income Weatherization Program leveraging efforts with CSD is compliant with the Decision.

**F. Updated Water Leveraging Plans**

The Decision directed SCG to develop collaboration programs with the water agencies within its service territory<sup>20</sup>. SCG has complied with the Decision and has jointly entered into a

<sup>18</sup> D.16-11-022 p.459, OP 58

<sup>19</sup> D.16-11-022 p.488, OP 144 and p.437, Finding of Fact (FOF) 184

<sup>20</sup> D.16-11-022 p.460, OP 59

Memorandum of Understanding (MOU) with the Los Angeles Department of Water and Power, Anaheim Public Utilities, and Pasadena Water and Power to implement leveraging plans and ESA program collaboration. The MOU allows the water agencies to provide funding to SCG for water measures, while leveraging outreach opportunities, educational materials and promote awareness of their respective programs. Energy Division finds SCG’s water leveraging plan is compliant with the Decision.

**G. Tribal Penetration and Consultation Plans**

Decision 16-11-022<sup>21</sup> directed SCG to reach out to all federally-recognized tribal communities in their service territory by 2020 and be prepared to update ESA penetration levels to reflect any areas of concern arising from the tribal consultation, including addressing updates, during its Mid-Cycle update. SCG engages with American Indian Chamber which represents all the federally recognized tribes in SCG’s territory. SCG provides onsite-training, education and help on enrollment processing with the tribal agencies. SCG’s tribal outreach plan is compliant with the Decision.

**H. Adjusted ESA Program budget**

SCG proposes in their mid-cycle advice letter a budget of \$622,734,256 for PYs 2018-2020 previously approved in Advice Letter 5256/5256-A. We reject this request and instead modify SCG’s ESA 2018-2020 proposed program budget by 5% to accommodate and align with the increase in First Time treatments adopted above in Table 3. Decision 16-11-022<sup>22</sup> authorizes Energy Division the authority to adjust budgets by 5%. Budget adjustments are based on previously authorized costs of approximately \$1175 for First Time Treatments per home and \$772 for Retreatments for SCG.<sup>23</sup>

\$73,406,950	needed to accommodate 15% increase from SCG’s proposed First Time treatments
-\$42,270,088	available from 33% decrease from SCG’s proposed Retreatments <sup>24</sup>
\$31,136,862	net additional budget needed

\$622,734,256	SCG proposed budget in their mid-cycle advice letter for PYs 2018-2020
+\$31,136,712	net additional budget authorized based on 5% budget increase max
\$653,870,968	total amount authorized in Advice Letter 5325 for PYs 2018-2020

The additional \$31,136,712 budget authorized is to come from 2009-2016 unspent funds<sup>25</sup> to accommodate the additional First-Time treatments authorized in Table 3 above for PYs 2018-2020. This amount will be sufficient to accommodate the adjustments made to treatments goals.

<sup>21</sup> D.16-11-022 at p.467, OP 79

<sup>22</sup> D.16-11.022 at p.439, OP 3

<sup>23</sup> Treatment amounts approved in AL. 5256/5256-A.

<sup>24</sup> \$42,270,088 is the amount needed to stay within the 5% budget adjustment authorized by Decision.

<sup>25</sup> SCG thru program year 2017 has \$59,779,311 in unspent funds.



Table 5 below contains revised budgets to accommodate this activity through the remainder of this program cycle.

**Table 5**  
**Authorized ESA 2018-2020 ESA Budgets**

	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2018-2020</b>
Proposed Advice Letter 5325	\$198,805,588	\$207,583,362	\$216,345,306	\$622,734,256
Approved via Non Standard Disposition AL 5325	\$198,805,588	\$223,151,718	\$231,913,662	\$653,870,968

**I. Adding Common Area Meters of Deed-Restricted Multifamily Properties to the CARE Expansion Program**

Decision 16-11-022<sup>26</sup> directed the Multifamily Working Group (MFWG) to assess whether the common area meters of deed-restricted properties should be granted access to the CARE rate. SCG does not recommend adding common area meters for multifamily deed restricted properties to the CARE Expansion Program at this time. We support SCG’s recommendation not to include deed restricted multifamily properties on the CARE expansion program at this time. The MFWG will make a recommendation on the merits of adding common area meters of deed-restricted properties during the next program cycle.

**J. Data Sharing Plans with the California LifeLine Administrator to Generate Leads Between LifeLine and the CARE and ESA Programs**

Decision 16-11-022<sup>27</sup> required SCG to share its data sharing plan with California Lifeline Program to generate leads between LifeLine, CARE and ESA programs. SCG successfully reached a data share plan which will occur biannually, beginning in January 2019.

To facilitate the data transfer, SCG Advice Letter listed Energy Division as performing this task, but Communications Division will establish a secure folder for the IOUs to upload the data in Excel or .csv file format, marked confidential and accompanied by the required confidential affidavit. SCG will provide the data as requested where the data is available and will continue to collaborate with IOUs and LifeLine Administrator to make required refinements to the data file process and discuss additional leveraging effort. SCG’s LifeLine data-sharing plan is consistent with Decision directives and therefore approved with this one modification.

<sup>26</sup> D.16-11-022 p. 461, OP 62.

<sup>27</sup> D.16-11-022 at p.470, OP 90.



**Ronald van der Leeden**  
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July 16, 2018

Advice No. 5325  
(U 904 G)

Public Utilities Commission of the State of California

**Subject: Low-Income Program Mid-Cycle Advice Letter Pursuant to Decision  
(D.) 17-12-009**

Southern California Gas Company (SoCalGas) hereby submits this Advice Letter (AL) as directed by the California Public Utilities Commission (Commission or CPUC) in D.17-12-009.

**Purpose:**

D.17-12-009 orders the Investor Owned Utilities (IOUs) to submit a Tier 2 AL by July 16, 2018 proposing any mid-cycle updates “adjusting budgets, energy savings targets, program issues consistent with this Decision, and other administrative components of the program.”<sup>1</sup>

This AL provides proposed mid-cycle updates for SoCalGas’ Energy Savings Assistance (ESA) Program’s energy savings target, cost-effectiveness, new measures including expanding furnace and water heater offerings, and eligibility calculations resulting in adjustments to SoCalGas’ treated goals. Additionally, this AL provides an update to other components of SoCalGas’ Low-Income Program efforts in water leveraging plans, tribal outreach, Lifeline data sharing, Midcycle Working Group (MCWG) and Community Services Department (CSD) data sharing, and Low-Income Weatherization Program (LIWP) leveraging.

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<sup>1</sup> D.17-12-009, Attachment 1 at 31.

The following attachments are included:

- Attachment A: ESA Program Budget Summary Tables and Cost Effectiveness Tables.
- Attachment B: ESA Program Budget by Category based on the budget proposed in Supplemental Conforming AL 5111-B plus the increment provided in the disposition of AL 5256-A.

### **Background**

To comply with D.16-11-022, SoCalGas submitted its conforming AL (AL 5111-A) on April 4, 2017, and to address additional questions by Energy Division (ED) staff, SoCalGas submitted its supplemental conforming AL (AL 5111-B) on June 20, 2017.

On December 14, 2017, the Commission issued Resolution (Res.) G-3532 approving AL 5111-A and 5111-B with a requirement for SoCalGas to file another Tier 2 AL to lay out its “clear plan” to meet its 2020 goal.<sup>2</sup>

On February 12, 2018, SoCalGas submitted its ESA Program Clear Plan (AL 5256) and proposed budget to use remaining unspent funds to treat the remaining population and propose new retreatment estimates.<sup>3</sup> The SoCalGas ESA Program Clear Plan laid out program energy savings goals and budgets per the directives in D.17-12-009 including program costs for approved measures, penetration goals, marketing and outreach, and other related factors. On March 14, 2018, SoCalGas submitted AL 5256-A to provide updates on the budget and treatment goals.

AL 5256-A was approved by ED on May 18, 2018, with modifications on the ESA Program budget for additional treated units.

### **Discussion**

The following issues are presented in this Low-Income Program Mid-Cycle AL:

#### **A. Updated 2018-2020 ESA Program Budget as Approved in SoCalGas AL 5256-A**

The disposition approving AL 5256-A provides incremental funding of \$152,045,710, allocated from 2009-2016 unspent funds, to:

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<sup>2</sup> Public Utilities Code 382 (e) states: “the commission shall, by not later than December 31, 2020, ensure that all eligible low-income electricity and gas customers are given the opportunity to participate in low-income energy efficiency programs, including customers occupying apartments or similar multiunit residential structures.”

<sup>3</sup> SoCalGas Res. G-3532 at 19.

- Augment SoCalGas' budget for enrolling and treating homes;
- Implement program operating adjustments designed to drive the focus on 2020 goal/first-time customers as part of the Clear Plan;
- Implement a smart thermostat pilot; and
- Conduct marketing and outreach associated with the Clear Plan.

AL 5256-A had proposed to increase funding to treat units to be able to achieve the 2020 goal while also reaching 115,379 go-back units over 2018-2020. The reduction in remaining untreated, willing, and eligible homes to treat by 2020 described in Section B below results in a corresponding increase in budget available to treat go-back units. The budget adopted in the disposition of AL 5256-A is adequate to fund this adjustment.

The table below provides SoCalGas' 2018-2020 budget by category, based on the budget proposed in Supplemental Conforming AL 5111-B plus the increment provided in the disposition of AL 5256-A.<sup>4</sup>

SoCalGas Total Midcycle AL Revised Budget					
	2017	2018	2019	2020	TOTAL
<i>Appliances</i>	\$16,450,664	\$19,554,664	\$20,503,516	\$21,499,370	\$78,008,214
<i>Domestic Hot Water</i>	\$25,541,417	\$30,442,914	\$31,920,096	\$33,470,453	\$121,374,880
<i>Enclosure</i>	\$31,356,733	\$48,946,975	\$51,322,031	\$53,814,739	\$185,440,478
<i>HVAC</i>	\$23,190,540	\$35,098,163	\$36,801,233	\$38,588,666	\$133,678,603
<i>Maintenance</i>	\$1,922,439	\$3,090,591	\$3,240,556	\$3,397,949	\$11,651,535
<i>Customer Enrollment</i>	\$17,994,859	\$34,346,560	\$36,013,160	\$37,762,317	\$126,116,896
<i>In Home Education</i>	\$5,021,521	\$8,040,128	\$8,430,259	\$8,839,716	\$30,331,624
Pilot		\$500,000	\$500,000		\$1,000,000
<b>EE Total</b>	<b>\$121,478,173</b>	<b>\$180,019,995</b>	<b>\$188,730,851</b>	<b>\$197,373,210</b>	<b>\$687,602,230</b>
Training Center	\$901,998	\$926,681	\$952,114	\$977,059	\$3,757,852
<i>Inspections</i>	\$2,509,088	\$3,453,222	\$3,620,783	\$3,796,644	\$13,379,736
Marketing and Outreach	\$1,450,000	\$2,200,000	\$2,200,000	\$1,950,000	\$7,800,000
Measurement and Evaluation Studies	\$115,625	\$153,125	\$115,625	\$115,625	\$500,000
Regulatory Compliance	\$471,807	\$405,114	\$416,882	\$428,364	\$1,722,167
General Administration	\$6,356,574	\$6,800,414	\$6,961,106	\$7,118,403	\$27,236,497
CPUC Energy Division	\$86,000	\$86,000	\$86,000	\$86,000	\$344,000
Multifamily Common Area	\$4,500,000	\$4,500,000	\$4,500,000	\$4,500,000	\$18,000,000
CSD Leveraging	\$261,036	\$261,036	\$0	\$0	\$522,072
<b>TOTAL PROGRAM COSTS</b>	<b>\$138,130,301</b>	<b>\$198,805,587</b>	<b>\$207,583,361</b>	<b>\$216,345,305</b>	<b>\$760,864,554</b>

<sup>4</sup> See Attachment B.

## B. Proposal to Update Treated Unit Goals Using Updated Information and Factors

SoCalGas submitted a new eligibility estimate for the remaining years of the program cycle in 2017 with the Conforming AL Res. G-3532 required that SoCalGas set forth in that AL a “clear plan” to “treat the remaining untreated population.” The willing members of the “remaining untreated population” numbered 442,184 as of the end of 2016, as calculated in AL 5111-B and adopted in Res. G-3532.

With the 2018 Athens population update and SoCalGas’ 2017 treated actuals, SoCalGas estimates that, as of the start of 2018, there are 367,556 customers willing and feasible to participate that have not been treated since 2002 and remain to be treated as part of the 2020 goal. The inputs to this revised treatment goal are as follows:

- SoCalGas’ eligible population is 2,029,455;<sup>5</sup>
- At 1% annual growth over the 3-year period from 2018-2020, this figure will increase by 61,495 to reach 2,090,950 by the end of 2020;
- SoCalGas has treated 1,170,999 customers from 2002-2017;
- As mentioned in AL 5111-B, assuming CSD continues to treat customers at a rate of 90% of their historical level over the period of 2002-2017, CSD should treat a total of 203,234 by 2020; and
- Total remaining customers to be treated by ESA Program results from subtracting those unwilling as of 2020, ESA Program treated through 2017, and LIHEAP treated through 2020 from the total projected 2020 eligible population.

The result is a decrease of the remaining willing, eligible customers to reach the 2020 goal to 367,556 from the 402,184 relied upon in the disposition of AL 5256-A. This calculation is shown in the following table:

Eligible 2020 (Latest Athens; 1% annual Growth)	2,090,950
Minus Unwilling (60% WFTP)	(349,161)
Minus ESAP Already Treated through 2017 (Excluding Go-Backs)	(1,170,999)
<u>Minus LIHEAP Treated Through 2020</u>	<u>(203,234)</u>
<b>Total Remaining to Treat 2018-2020</b>	<b>367,556</b>

In the disposition, the Commission approved an average budget of \$1,175 per household for first-time enrollments, and \$772 per household for retreatments.<sup>6</sup> Reducing the first-time treatment goal by 34,628 customers results in approximately \$40,687,900 (34,628 x \$1,175) being available in the budget for treating customers, which will increase SoCalGas’ ability to perform go-backs. Based on the approved assumption of \$772 per household for go-backs, SoCalGas can treat an incremental

<sup>5</sup> 2018 Athens Research Estimate of Eligible Households, filed February 9, 2018.

<sup>6</sup> *Disposition partially approving Southern California Gas Company’s Low-Income Energy Savings Assistance Program Clear Plan and Budget, pursuant to Resolution G-3532 at 3.*

52,705 go-backs (\$40,687,900 / \$772) over the three-year period. The table below shows the proposed adjustment to SoCalGas' treated unit goal by year:

**SoCalGas Proposed Adjustment for Treated Unit Goal**

	2018	2019	2020	TOTAL
<b>Disposition Adopted</b>				
First-time target	128,190	133,965	140,029	402,184
<u>Go-back target</u>	<u>35,985</u>	<u>38,419</u>	<u>40,974</u>	<u>115,379</u>
Total adopted annual treated goal	164,175	172,384	181,003	517,563
<b>Proposed</b>				
First-time target	116,592	122,422	128,543	367,556
<u>Go-back target</u>	<u>53,318</u>	<u>55,983</u>	<u>58,783</u>	<u>168,084</u>
Total proposed annual treated goal	169,910	178,405	187,325	535,640
<b>Increase/(Decrease)</b>				
First-time target	(11,598)	(11,544)	(11,486)	(34,628)
<u>Go-back target</u>	<u>17,332</u>	<u>17,564</u>	<u>17,808</u>	<u>52,705</u>
Change to annual treated goal	5,734	6,021	6,322	18,077

**C. Updated Calculations for Energy Savings and Cost-Effectiveness Using Initial Draft Results of 2015-2017 Impact Evaluation Study**

In 2016, the IOUs awarded DNVGL the ESA Program impact evaluation study project via a competitive bidding process, with a study budget of \$550,000, per D.16-11-022.<sup>7</sup> For this 2015-2017 impact evaluation study, the IOUs requested a more "routinized" approach for the impact evaluation study, to provide net savings from participating and comparison groups over time, to provide insights for whole house and measure level results, and to provide support for ESA filing and program improvements. The study was also expected to determine annual weather-adjusted energy savings disaggregated to IOU service area, fuel type, measure/measure group, climate zone, and housing type. The project is divided into two phases: (1) Phase 1 due Mid-2018: deliver 2014 to 2016 energy savings at measure-group level, and (2) Phase 2 due Mid-2019: further deliver 2017 energy savings at measure level, plus additional investigation in cases of data anomalies.

The 2015-2017 ESA impact evaluation study was designed with the benefits of a large population and a multi-year data set. From Phase 1 results, interim savings of 25-30% were estimated over the years versus comparison groups. Given the inclusive reach of ESA Program implementation for all measures in eligible homes, the model yields modest first year energy savings for some measures, and in some cases, negative

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<sup>7</sup> D.16-11-022 at 229.

savings. Measures with negative savings (i.e., furnace repair/replace and clean/tune-up) that may improve program participants' comfort, health, and safety will need to maintain program cost-effectiveness requirements and other policy objectives against energy saving goals. As a result, some measures and/or measure bundles may be reduced as a part of program planning for 2019 and beyond program years.

For this ESA Mid-Cycle program forecast update, the IOUs are using the 2014-2016 Phase 1 Interim first-year estimate for the life cycle of the measures.

SoCalGas provides its Energy Savings Goals and Portfolio Cost-Effectiveness in the table below:

### **2018-2020 ESA Program Energy Savings Goals and Portfolio Cost-Effectiveness**

	Goal	Cost-Effectiveness	
	(1 <sup>st</sup> Yr. Therms)	ESACET	TRC
2018-2020 Budget Filing Targets	4,794,422	0.69	0.21
2018 Goal per Disposition of AL 5256-A	6,540,000	N/A	N/A
% Forecast of Goal	73%	N/A	N/A

#### **D. Proposal to Implement an Initiative to Expand its Furnace and Water Heater Repair and Replacement Offerings**

Based on recent discussions during the MCWG meeting held on June 21, 2018, SoCalGas proposes to address certain situations when a customer in need of gas appliance repair or replacement work is not deemed eligible because natural gas appliance testing (NGAT) has not or cannot be performed. Currently, gas appliances are inspected, and repair or replacement is considered only when NGAT is performed (with an exception for leaking water heater tanks). However, NGAT is performed only when infiltration reduction measures are performed. If a home already has infiltration measures in place NGAT is not performed, and therefore, the customer is not eligible for repair or replacement of the appliance even if there is a problem with the appliance. Such instances are uncommon, but they are confusing and frustrating for both the customer and contractor.

Therefore, SoCalGas proposes an initiative to repair or replace a furnace or water heater in the absence of NGAT if the following conditions are met:

- Home must be owner-occupied;
- Combustion Ventilation Air (CVA) must be adequate;
- Appliance must be inoperative;
- There is no unresolved "Condition Requiring Correction" that would make infiltration measures non-feasible; and

- Infiltration reduction measures were not feasible because they are already in place and functional.

SoCalGas expects that this scenario will arise in fewer than 2% of treated homes. Because this procedure represents a departure from the way the program has operated in the past, systems and workflow adjustments will be needed. Such adjustments can be implemented using existing budget and undertaken following approval.

### **E. Plan for SoCalGas' Smart Thermostat Pilot**

On June 18, 2018, SoCalGas submitted AL 5311 providing a plan for SoCalGas' Smart Thermostat Pilot. The purpose of SoCalGas' Smart Thermostat Pilot is to analyze the value of the measure as part of SoCalGas' wider ESA Program portfolio, and specifically to determine whether the Smart Thermostat measure will increase the appeal of the program and likelihood of enrollment. SoCalGas' cost for this Pilot in 2018-2020 is \$1.0 million.

The Smart Thermostat Pilot seeks to address a gap for low-income customers as documented in the 2013 Low-Income Needs Assessment (LINA) study. The 2013 LINA study showed that many of the reasons identified by potential customers for nonparticipation in the ESA Program involve the belief that program offerings are not of value to the customer. SoCalGas believes the Smart Thermostat Pilot presents an opportunity to increase appeal and enrollment in the ESA Program and proposes to include this energy saving measure for its 2018-2020 program years with a renewed focus on reaching all willing and eligible customers by 2020.

### **F. Support for Recommendations from the MCWG**

The MCWG was directed to make recommendations for specific tasks identified in D.17-12-009 as follows:<sup>8</sup>

1. ESA Program Statewide Policy and Procedures Manual (P&P) Updates.
2. Provide recommendations on the adoption of on-line data reporting systems (ODRS) for the ESA Program to help the IOUs and Commission better understand how these systems collect and report workforce data. This assessment should help determine the value of adopting ODRS for the ESA Program into IOU operations, its cost-benefits, and identify any administrative burdens to implement by either contractor or utility.
3. Make recommendations for the household retreatment prioritization models, implementation and outreach strategies, and other aspects of the ESA Program.
4. Investigate and make recommendations on how the ESA Program may be used to deploy tools to enable greater Energy Efficiency and Demand

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<sup>8</sup> D.17-12-009, Attachment 1 at 245-246.



Response participation by California Alternate Rates for Energy (CARE) and ESA participants in recognition of the increased State goals detailed in California State Senate Bill 350.

The MCWG submitted initial recommendations on April 3, 2017. The MCWG Interim Report was submitted on March 19, 2018, providing the MCWG's recommendations for updates to the ESA Program Statewide P&P Manual, California Installation Standards Manual, and monthly and annual reporting criteria to align it with D.16-11-022, as modified by D.17-12-009 at page 245. These changes were adopted in Administrative Law Judge Colbert's Ruling on May 8, 2018.

The MCWG's Final Recommendations were submitted on June 28, 2018, pursuant to D.17-12-009. The MCWG's recommendations addressed its remaining directives: the adoption of ODRS for the ESA Program; updated IOU house strategies hold retreatment prioritization models, implementation, and outreach; and ESA Program deployment of tools to enable greater Energy Efficiency and Demand Response participation by CARE and ESA Program participants in recognition of the increased State goals detailed in Senate Bill 350. SoCalGas concurs with the MCWG final recommendations on these issues.

The Statewide ESA Program 2017-2020 Cycle P&P Manual (2017-2020 P&P Manual), revised March 16, 2018, was approved by the Commission on May 7, 2018.

Recommendations for further enhancements to the ESA Program Statewide Policy and Procedures Manual were made at MCWG meeting on June 21, 2018. SoCalGas agrees with the recommendations made including increasing the Minor Home Repair cap from \$750 to \$1,000 and making it applicable to all customers enrolled in the ESA Program.

### **G. Update on Collaboration with Water Agencies and Companies Operating in their Service Territories**

Per D.17-12-009,<sup>9</sup> SoCalGas continues to develop collaboration programs with the water agencies within its service territory. For the past five years, SoCalGas has actively engaged in leveraging partnerships with water agencies through its ESA Program and proposes expanding leveraging plans with identified water wholesalers and retailers.

These collaborative efforts demonstrate SoCalGas' commitment to provide comprehensive energy savings for natural gas and water. SoCalGas engagement is illustrated by being an active member of Metropolitan Water District's (MWD) monthly water efficiency meeting with its member agencies. These meetings provide the opportunity to learn and engage with water retailers and water wholesalers.

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<sup>9</sup> D.17-12-009, Attachment 1, Ordering Paragraph (OP) 59 at 414.

This year alone, SoCalGas is in discussion with several water agencies to expand the current portfolio of water agency participants:

- Eastern Municipal Water District
- Fontana Water Company
- Irvine Ranch Water District
- Liberty Utilities
- Metropolitan Water District
- San Gabriel Valley Water District

In Program Year (PY) 2017, SoCalGas collaborated with Los Angeles Department of Water & Power (LADWP), Anaheim Public Utilities, and Pasadena Water & Power to create leveraging opportunities that augment Southern California Edison Company (SCE) and SoCalGas programs in areas where SCE is not the electric provider. These inter-utility collaborative efforts maximize energy savings and highlight water saving devices, develop combined marketing materials, and help focus efforts on high potential customers plus those in disadvantaged communities. The customer targeting element is accomplished by locating the oldest dwelling units coupled with marketing tactics and is the differentiating factor of this initiative. This approach allowed for the installation of the new devices by the same installer for both water and energy savings.

Leveraging with water utilities and districts provides over 8,000 gallons per High Efficiency (HE) clothes washer per year savings. HE clothes washer costs may otherwise limit low-income customers from realizing the water and energy savings, and with the combined effort of the ESA Programs along with the water utilities, they provide an opportunity to reach low-income customers that would otherwise not be able to afford the difference between the appliance cost and available water utility rebate offers.

SoCalGas has offered two general approaches for collaborating with water agencies:

1. Co-funded Water Measures

Each water agency pre-selects the ESA Program Water Coordination measures and service options to fund. This approach focuses on water agencies that have limited water conservation resources and budgets.

Measures:

- HE Clothes Washer
- Faucet Aerators
- Low Flow Showerhead
- Thermostatic Shower or Tub Valve

## 2. Water / Energy Nexus

Offering an expanded program approach integrating a comprehensive water/energy direct install program for joint customers. This program approach offers water, natural gas, and electric measures under the umbrella of one program. Offering a customer a one-stop-shop to upgrade multiple measures at no cost increases program participation rates and overcoming the most common participation barriers to enrollment – time and money.

These collaborative efforts include the water agencies, SoCalGas, and SCE, and is implemented by a common third-party contractor. Each IOU and the water agency implement their own program elements through a single contractor. This seamless approach allows each program to focus on their respective measures while making it easier for a customer to participate in the program. It also provides the joint customer with comprehensive water, gas, and electricity savings.

As part of water-energy leveraging programs, the D. 17-12-009 also directed the IOUs to consider proposing cold-water measures as an ESA Program measure.<sup>10</sup> SoCalGas is leveraging several cold-water measures with water agencies as part of its ESA Program Water Coordination effort as described above. At this time, SoCalGas does not propose adding additional cold-water measures to the ESA Program.

The water leveraging efforts noted here showcase SoCalGas' commitment to support the statewide conservation efforts regarding water drought issues. SoCalGas is hopeful that these efforts will serve as model for future direct-install partnerships between SoCalGas, SCE, and other water retailers and municipalities for their low-income customers.

### **H. Update on Leveraging Efforts in Developing Data Exchange Procedures and Collaboration on Multi-family Properties with CSD**

Throughout 2017, Pacific Gas & Electric Company (PG&E), SCE, San Diego Gas & Electric Company (SDG&E) and SoCalGas met with CSD staff to discuss data sharing, CSD's Low-Income Weatherization Program for multi-family properties (MF LIWP) leveraging, and other opportunities, in compliance with D.17-12-009.<sup>11</sup> The IOUs and CSD began working to implement leveraging requirements to share IOU data usage information for CSD clients, and to fund ESA Program measures currently offered by the ESA Program for multi-family customer households participating in CSD's MF LIWP Program.

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<sup>10</sup> D.17-12-009, Attachment 1, OP 28 at 410.

<sup>11</sup> D.17-12-009, Attachment 1, OP 144 at 505-506.

In D.17-12-009,<sup>12</sup> SoCalGas and CSD were ordered to enter into a non-disclosure agreement (NDA) for data sharing purposes. SoCalGas' first data share included CSD-requested customer-specific usage data. SoCalGas, CSD, and the other IOUs are in discussions to determine frequency of future data sharing efforts, along with other possible technological mechanisms to make this data sharing more seamless. D.17-12-009 also requires SoCalGas to fund ESA Program measures currently offered by the ESA Program for multi-family customer households participating in CSD's MF LIWP Program.<sup>13</sup> SoCalGas worked with CSD to project installation rates for these measures, including SoCalGas costs for both labor and the measures themselves. The funding level was projected for this effort, with the goal of funding the CSD's MF LIWP efforts for those in-unit measures provided by the ESA Program, thereby preserving the remaining CSD's funding for use to install central systems and common area measures not currently provided by the ESA Program. Since working with CSD to develop a budget for LIWP leveraging efforts, SoCalGas' ESA Program Management, Legal, and Supply Management have been working with CSD to complete contract and agreement terms necessary to begin leveraging funds. SoCalGas anticipates beginning implementation in the 4th Quarter of 2018.

### **I. Update on Tribal Community Outreach**

As directed in D.17-12-009,<sup>14</sup> SoCalGas continued to use both traditional communication and grassroots tactics to extend awareness and participation of the CARE and ESA Program. SoCalGas' Community Based Organizations (CBO) serve specialized markets and help SoCalGas enhance awareness of the Low-Income Program to the tribal communities. As an example, last year SoCalGas worked with the Native American Indian Commission and provided an information booth at its annual Pow Wow event and Customer Assistance Program information was distributed.

SoCalGas seeks to work with federally-recognized tribal communities that manage multi-family housing for low-income Californians to leverage programs and encourage ESA Program participation. Additional meetings are planned for this year with the various tribal contacts to discuss further coordination and involvement with the tribal communities. SoCalGas has been working with the American Indian Chamber to gather insight into the needs of the community and network with community leaders to gain knowledge and build relationships in the community. SoCalGas also met with CPUC Tribal Liaison Stephanie Green to gather additional insight regarding the American Indian Tribal Community and will continue to be in contact for further directions.

Planned outreach activity for 2018 involves participation in events including: 18th Annual Hawaiian Gardens Pow Wow, 28th Annual Morongo Thunder and Lightning Pow

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<sup>12</sup> D.17-12-009, Attachment 1, Conclusion of Law 183 at 451.

<sup>13</sup> D.17-12-009, Attachment 1, OP 144 at 505-506.

<sup>14</sup> D.17-12-009, Attachment 1, OP 79 at 483.

Wow, Celebrate Indigenous People Day In Los Angeles, Indigenous Pride LA, and 17th Annual Native American and Veterans Event in South Gate.

Further, the D.17-12-009 required the IOUs to conduct a preliminary tribal consultation with all federally-recognized tribal communities by 2020 and to update their 2020 penetration goals as required.<sup>15</sup> SoCalGas has identified 20 tribal communities in its service territory and is currently conducting initial assessments to identify possible ESA Program participation. This analysis will help SoCalGas to recognize and address practices unique to tribes, as well as utilizing tribal consultations for coordinated ESA deployment. SoCalGas also partners with the other IOUs to designate priority areas to begin developing specific coordination plans targeting tribal customers.

### **J. Update on the Data Sharing Process with LifeLine**

On May 1, 2018, SoCalGas, along with the other IOUs, had a conference call with the CPUC's LifeLine Administrator, as specified in D.17-12-009, to implement a data exchange process to provide customer-specific usage data and information for CARE Program participation.<sup>16</sup>

The IOUs along with the LifeLine Administrator addressed specific CARE Program data points and timelines to support Lifeline participation. The following data points would be shared by the IOUs with the LifeLine Administrator:

- Customer Name
- Customer Address (service and mailing address if different)
- Household income
- Household size
- Customer Phone Number (home and cell)
- Categorical Program identified for enrollment

The frequency of the data share was suggested to be bi-annual, specifically on January 15 and July 15 of each year. The first CARE data is due to the LifeLine Administrator on January 15, 2019. The data transfer will be facilitated via Secure File Transfer Protocol (FTP). The ED will establish a secure folder for the IOUs to upload the data in Excel or .csv file format, marked confidential and accompanied by the required confidential affidavit, following a cybersecurity screening for sharing of confidential data. Each data file shared will include the IOUs' total CARE Program participants as of December 31 of the previous year for the January 15 data file, and as of June 30 for the July 15 data file.

The IOUs and the LifeLine Administrator will continue to collaborate to refine the data exchange process and to discuss additional leveraging efforts in the future.

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<sup>15</sup> D.17-12-009, Attachment 1, OP 79 at 483.

<sup>16</sup> D.17-12-009, Attachment 1, OP 90 at 486-487.

**K. Update on Multi-Family Working Group (MFWG) Assessment to Address Merit of CARE Expansion Program Inclusion in ESA Program Common Area Measures (CAM) Initiative in the next CARE Program Application.**

The MFWG held an ad-hoc meeting on May 9, 2018 to discuss whether the common area meters of deed-restricted properties should be granted access to the CARE rate under modifications to the CARE Expansion program. The meeting was attended by the IOUs, ED, and third-party stakeholders. The discussion was regarding the inclusion of CARE Expansion Program into the ESA Program Multi-Family Common Area Measure Initiative (MF CAM).

Following this discussion with the MFWG, the IOUs would like to learn from the MF CAM implementation and evaluation. This includes developing an estimate of the population eligible, verifying alignment of ESA Program CAM Initiative and CARE Program eligibility requirements, and conducting a review and analysis of the related CARE Program Expansion legislation. The IOUs plan to address the merits of whether the common area meters of deeded-restricted properties should be granted access to the CARE rate in the next CARE Application.

**Conclusion**

Based on the information provided herein, including the attachments, SoCalGas requests approval of its proposed mid-cycle updates.

**Protests**

Anyone may protest this AL to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and received within 20 days of the date of this AL, which is August 5, 2018. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division  
Attn: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of Energy Division Tariff Unit ([EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)). A copy of the protest should also be sent via both e-mail and facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Ray B. Ortiz  
Tariff Manager - GT14D6  
555 West Fifth Street  
Los Angeles, CA 90013-1011  
Facsimile No.: (213) 244-4957  
E-mail: [ROrtiz@SempraUtilities.com](mailto:ROrtiz@SempraUtilities.com)

**Effective Date**

SoCalGas believes that this submittal is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to General Order (GO) 96-B. Therefore, SoCalGas respectfully requests that this AL be approved August 15, 2018, which is 30 calendar days from the date submitted.

**Notice**

A copy of this AL is being sent to SoCalGas' GO 96-B service list and the Commission's service list in A.14-11-011. Address change requests to the GO 96-B service list should be directed by e-mail to [tariffs@socalgas.com](mailto:tariffs@socalgas.com) or call 213-244-2837. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or by e-mail at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov).

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Ronald van der Leeden  
Director - Regulatory Affairs

Attachments

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER SUBMITTAL SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **SOUTHERN CALIFORNIA GAS COMPANY (U 904G)**

Utility type:

ELC     GAS  
 PLC     HEAT     WATER

Contact Person: Ray B. Ortiz

Phone #: (213) 244-3837

E-mail: [ROrtiz@semprautilities.com](mailto:ROrtiz@semprautilities.com)

### EXPLANATION OF UTILITY TYPE

ELC = Electric    GAS = Gas  
PLC = Pipeline    HEAT = Heat    WATER = Water

(Date Submitted/ Received Stamp by CPUC)

Advice Letter (AL) #: 5325

Subject of AL: Low-Income Program Mid-Cycle Advice Letter Pursuant to Decision (D.) 17-12-009

Keywords (choose from CPUC listing): Energy Efficiency

AL type:  Monthly  Quarterly  Annual  One-Time  Other

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

D.17-12-009

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL<sup>1</sup>: N/A

Does AL request confidential treatment? If so, provide explanation: No

Resolution Required?  Yes  No

Tier Designation:  1  2  3

Requested effective date: 8/15/18

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: None

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: None

**Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Ave.,  
San Francisco, CA 94102  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Southern California Gas Company  
Attention: Ray B. Ortiz  
555 West 5<sup>th</sup> Street, GT14D6  
Los Angeles, CA 90013-1011  
[ROrtiz@semprautilities.com](mailto:ROrtiz@semprautilities.com)  
[Tariffs@socalgas.com](mailto:Tariffs@socalgas.com)

<sup>1</sup> Discuss in AL if more space is needed.



**ATTACHMENT A**

**Advice No. 5325**

**ESA Program Budget and Cost Effectiveness Tables**

Southern California Gas Company  
Energy Savings Assistance Program Table 1 - Expenses

ESA Program:	PY 2017 Authorized Budget <sup>1,2</sup>			PY 2018 Authorized Budget <sup>1,3</sup>			PY 2019 Budget Projected <sup>1,4</sup>			PY 2020 Budget Projected <sup>1,5</sup>		
	Electric	Gas	Total	Electric	Gas	Total	Electric	Gas	Total	Electric	Gas	Total
<b>Energy Efficiency</b>												
Appliances		\$ 16,450,664	\$ 16,450,664		\$ 19,554,664	\$ 19,554,664		\$ 20,503,516	\$ 20,503,516		\$ 21,499,370	\$ 21,499,370
Domestic Hot Water		\$ 25,541,417	\$ 25,541,417		\$ 30,442,914	\$ 30,442,914		\$ 31,920,096	\$ 31,920,096		\$ 33,470,453	\$ 33,470,453
Enclosure		\$ 31,356,733	\$ 31,356,733		\$ 48,946,975	\$ 48,946,975		\$ 51,322,031	\$ 51,322,031		\$ 53,814,739	\$ 53,814,739
HVAC		\$ 23,190,540	\$ 23,190,540		\$ 35,098,163	\$ 35,098,163		\$ 36,801,233	\$ 36,801,233		\$ 38,588,666	\$ 38,588,666
Maintenance		\$ 1,922,439	\$ 1,922,439		\$ 3,090,591	\$ 3,090,591		\$ 3,240,556	\$ 3,240,556		\$ 3,397,949	\$ 3,397,949
Lighting		\$ -	\$ -		\$ -	\$ -		\$ -	\$ -		\$ -	\$ -
Miscellaneous		\$ -	\$ -		\$ -	\$ -		\$ -	\$ -		\$ -	\$ -
Customer Enrollment		\$ 17,994,859	\$ 17,994,859		\$ 34,346,560	\$ 34,346,560		\$ 36,013,160	\$ 36,013,160		\$ 37,762,317	\$ 37,762,317
In Home Education		\$ 5,021,521	\$ 5,021,521		\$ 8,040,128	\$ 8,040,128		\$ 8,430,259	\$ 8,430,259		\$ 8,839,716	\$ 8,839,716
Pilot			\$ -		\$ 500,000	\$ 500,000		\$ 500,000	\$ 500,000		\$ -	\$ -
<b>Energy Efficiency TOTAL</b>	<b>\$ -</b>	<b>\$ 121,478,173</b>	<b>\$ 121,478,173</b>	<b>\$ -</b>	<b>\$ 180,019,995</b>	<b>\$ 180,019,995</b>	<b>\$ -</b>	<b>\$ 188,730,851</b>	<b>\$ 188,730,851</b>	<b>\$ -</b>	<b>\$ 197,373,210</b>	<b>\$ 197,373,210</b>
Training Center		\$ 901,998	\$ 901,998		\$ 926,681	\$ 926,681		\$ 952,114	\$ 952,114		\$ 977,059	\$ 977,059
Inspections		\$ 2,509,088	\$ 2,509,088		\$ 3,453,222	\$ 3,453,222		\$ 3,620,783	\$ 3,620,783		\$ 3,796,644	\$ 3,796,644
Marketing and Outreach		\$ 1,450,000	\$ 1,450,000		\$ 2,200,000	\$ 2,200,000		\$ 2,200,000	\$ 2,200,000		\$ 1,950,000	\$ 1,950,000
Statewide Marketing Education and Outreach		\$ -	\$ -		\$ -	\$ -		\$ -	\$ -		\$ -	\$ -
Measurement and Evaluation Studies		\$ 115,625	\$ 115,625		\$ 153,125	\$ 153,125		\$ 115,625	\$ 115,625		\$ 115,625	\$ 115,625
Regulatory Compliance		\$ 471,807	\$ 471,807		\$ 405,114	\$ 405,114		\$ 416,882	\$ 416,882		\$ 428,364	\$ 428,364
General Administration		\$ 6,356,574	\$ 6,356,574		\$ 6,800,414	\$ 6,800,414		\$ 6,961,106	\$ 6,961,106		\$ 7,118,403	\$ 7,118,403
CPUC Energy Division		\$ 86,000	\$ 86,000		\$ 86,000	\$ 86,000		\$ 86,000	\$ 86,000		\$ 86,000	\$ 86,000
<b>TOTAL PROGRAM COSTS</b>	<b>\$ -</b>	<b>\$ 133,369,265</b>	<b>\$ 133,369,265</b>	<b>\$ -</b>	<b>\$ 194,044,551</b>	<b>\$ 194,044,551</b>	<b>\$ -</b>	<b>\$ 203,083,361</b>	<b>\$ 203,083,361</b>	<b>\$ -</b>	<b>\$ 211,845,305</b>	<b>\$ 211,845,305</b>
<b>Funded Outside of ESA Program Budget</b>												
Indirect Costs						\$ -			\$ -			
NGAT Costs						\$ -			\$ -			

<sup>[1]</sup> Reflects the authorized funding per year in D.16-11-022 and updated via Resolution G-3532 addressing conforming Advice Letters 5111-A and 5111-B, and finally authorized ESA Program Clear Plan budget per Disposition Letter issued 05/18/18.

<sup>[2]</sup> 2017 budget table does not reflect Multi-Family budget for \$4,500,000 and CSD budget for \$261,036K related to and utilizing unspent funds from previous budget cycles for a total annual authorized budget of \$138,130,301.

<sup>[3]</sup> 2018 budget table does not reflect Multi-Family budget for \$4,500,000 and CSD budget for \$261,036K related to and utilizing unspent funds from previous budget cycles for a total annual authorized budget of \$198,805,587.

<sup>[4]</sup> 2019 budget table does not reflect Multi-Family budget for \$4,500,000 related to and utilizing unspent funds from previous budget cycles for a total annual authorized budget of \$207,583,361.

<sup>[5]</sup> 2020 budget table does not reflect Multi-Family budget for \$4,500,000 related to and utilizing unspent funds from previous budget cycles for a total annual authorized budget of \$216,345,305.

Southern California Gas Company  
 Energy Savings Assistance Program Table 1A - Expenses Funded From 2009-2016 Unspent ESA Program Funds

ESA Program:	PY 2017 Authorized Budget <sup>1</sup>			PY 2018 Authorized Budget <sup>1</sup>			PY 2019 Budget Projected <sup>1</sup>			PY 2019 Budget Projected <sup>1</sup>		
	Electric	Gas	Total	Electric	Gas	Total	Electric	Gas	Total	Electric	Gas	Total
<b>Energy Efficiency</b>												
Multi-Family Common Area Measures			\$ -			\$ -			\$ -			\$ -
In-Home Education			\$ -			\$ -			\$ -			\$ -
Leveraging - CSD			\$ -			\$ -			\$ -			\$ -
Pilot			\$ -			\$ -			\$ -			\$ -
Measurement and Evaluation Studies			\$ -			\$ -			\$ -			\$ -
Regulatory Compliance			\$ -			\$ -			\$ -			\$ -
General Administration			\$ -			\$ -			\$ -			\$ -
<b>TOTAL UNSPENT PROGRAM COSTS</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

<sup>[1]</sup> Note: ESA Table 1 incorporates the "unspent funds" from previous budget cycles (PY 2009-2016) and is committed in the fulfillment of ESA Program treated goals.

PY 2017-2020 Energy Savings Assistance Program Planning Assumptions  
Southern California Gas Company

Measures*	Units	PY 2017 Planned					PY 2018 Planned					PY 2019 Planned					PY 2020 Planned				
		Quantity Installed	kWh (Annual)	kW (Annual)	Therms (Annual)	Projected Expenses	Quantity Installed	kWh (Annual)	kW (Annual)	Therms (Annual)	Proposed Expenses	Quantity Installed	kWh (Annual)	kW (Annual)	Therms (Annual)	Proposed Expenses	Quantity Installed	kWh (Annual)	kW (Annual)	Therms (Annual)	Proposed Expenses
<b>Appliances</b>																					
High Efficiency Clothes Washer	Each						24,664					19,554,664	23,193				20,503,516	25,803			21,499,370
Refrigerators	Each																				
Microwaves	Each																				
<b>Domestic Hot Water</b>																					
Water Heater Blanket	Home						4,126					240,697	4,225				252,377	4,324			264,434
Low Flow Shower Head	Home						176,360					7,960,080	180,587				8,346,328	184,784			8,745,089
Water Heater Pipe Insulation	Home						4,112					92,861	4,211				97,367	4,309			102,019
Faucet Aerator	Home						169,193					2,496,898	173,248				2,618,055	177,274			2,743,138
Water Heater Repair/Replacement	Each						3,084					4,715,058	3,158				4,943,846	3,231			5,191,973
Thermostatic Shower Valve	Each						151,106					9,643,834	154,727				10,111,782	158,323			10,594,892
Combined Showerhead/TSV	Each																				
Heat Pump Water Heater	Each																				
Tub Diverter/ Tub Spout	Each						46,289					5,293,485	47,398				5,550,341	48,500			5,828,907
Thermostat-controlled Shower Valve	Each																				
<b>Enclosure</b>																					
<b>30,442,914</b>																					
<b>31,920,096</b>																					
<b>33,470,453</b>																					
Air Sealing / Envelope <sup>1</sup>	Home						160,092					36,265,760	146,807				38,025,484	149,987			39,872,380
Attic Insulation	Home						10,401					12,681,215	9,538				13,296,546	9,745			13,942,359
<b>HVAC</b>																					
<b>48,946,975</b>																					
<b>51,322,031</b>																					
<b>53,814,739</b>																					
FAU Standing Pilot Conversion	Each						25					8,394	26				8,802	26			9,229
Furnace Repair/Replacement	Each						23,066					15,509,202	23,619				16,261,755	24,131			17,051,588
Room A/C Replacement	Each																				
Central A/C replacement	Each																				
Heat Pump Replacement	Each																				
Evaporative Cooler (Replacement)	Each																				
Evaporative Cooler (Installation)	Each																				
Duct Testing and Sealing	Home																				
Energy Efficient Fan Control	Home																				
Prescriptive Duct Sealing	Home						2,473					725,790	2,532				761,008	2,587			797,970
High Efficiency Forced Air Unit (HE FAU)	Home						3,396					18,854,777	3,883				19,769,688	3,967			20,729,879
A/C Time Delay	Home																				
<b>Maintenance</b>																					
<b>35,098,163</b>																					
<b>36,801,233</b>																					
<b>38,588,666</b>																					
Furnace Clean and Tune	Home						54,374					3,090,591	55,678				3,240,556	56,884			3,397,949
Central A/C Tune-up	Home																				
Evaporative Cooler Maintenance	Home																				
<b>Lighting</b>																					
Interior Hard wired LED fixtures	Each																				
Exterior Hard wired LED fixtures	Each																				
Torchiere LED	Each																				
Occupancy Sensor	Each																				
LED Night Lights	Each																				
LED Diffuse Bulb (60W Replacement)	Each																				
LED Reflector Bulb	Each																				
LED Reflector Downlight Retrofit Kits	Each																				
LED A-Lamps	Each																				
<b>Miscellaneous</b>																					
Pool Pumps	Each																				
Smart Strip Tier I	Each																				
Smart Strip Tier II	Each																				
<b>Pilots</b>																					
<b>Each</b>																					
<b>Customer Enrollment</b>																					
Outreach & Assessment	Home						193,992					34,346,560	198,641				36,013,160	202,945			37,762,317
In-Home Education	Home						146,203					8,040,128	149,707				8,430,259	152,950			8,839,716
<b>Total</b>																					
<b>179,519,996</b>																					
<b>188,230,851</b>																					
<b>197,373,210</b>																					

\* Include all proposed new measures, where appropriate.

<sup>(1)</sup> The Air Sealing measures are bundled. Air Sealing measures include: Caulking, Weatherstripping, Utility Gaskets, Attic Access Weatherstripping, Evaporative Cooler Cover, AC Vent Cover, and Minor Home Repair.

**Energy Savings Assistance Program Penetration  
Southern California Gas Company**

<b>Program Year</b>	<b>Number of Customers in Utility Service Area<sup>1</sup></b>	<b>Number of Eligible Low Income Customers<sup>2</sup></b>	<b>Number of Customers Served by ESAP in Past 10 Years<sup>3</sup></b>	<b>Number of Customers Enrolled in CARE</b>	<b>Number of Eligible and Willing ESAP Customers<sup>4</sup></b>	<b>Customers to be Treated by ESAP Program<sup>5</sup></b>	<b>Percent of ESAP Programmatic Initiative Achieved</b>
<b>PY 2007</b>	5,399,093	1,948,291	282,761	1,332,614	1,396,477	44,048	21.36%
<b>PY 2008</b>	5,445,205	2,024,477	341,534	1,435,398	1,342,946	58,773	24.65%
<b>PY 2009</b>	5,476,875	1,802,661	425,027	1,560,543	1,018,848	83,493	34.03%
<b>PY 2010</b>	5,502,509	2,106,758	545,385	1,714,044	1,144,500	120,358	36.59%
<b>PY 2011</b>	5,519,646	2,076,738	706,405	1,716,495	943,237	161,020	46.99%
<b>PY 2012</b>	5,536,157	2,035,756	753,834	1,649,360	796,710	96,893	54.32%
<b>PY 2013</b>	5,556,673	2,146,897	803,603	1,604,411	770,458	106,948	58.11%
<b>PY 2014</b>	5,582,778	2,154,960	841,893	1,593,140	677,586	92,967	63.30%
<b>PY 2015</b>	5,611,319	2,158,123	881,686	1,707,088	593,618	80,316	67.89%
<b>PY 2016</b>	5,641,340	2,056,446	914,628	1,724,159	442,184	69,812	75.59%
<b>PY 2017</b>	5,677,225	2,029,455	980,580	1,608,025	331,115	93,790	85.26%
<b>PY 2018</b>	5,721,110	2,049,750	1,074,370	1,632,997	367,556	169,910	89.25%
<b>PY 2019</b>	5,768,351	2,070,247	1,252,775	1,645,483	197,646	178,405	95.52%
<b>PY 2020</b>	5,818,654	2,090,950	1,440,100	1,657,969	27,736	187,325	101.78%

<sup>1</sup> Source of data: 2018 SCG California Gas Report.

<sup>2</sup> Number of eligible low income customers to be based on customers at or below 200 percent of the Federal Poverty Line. The figures are escalated by 1% annually 2018-2020. Source of data: Annual Update of Athens Research Estimate of Eligible Households

<sup>3</sup> Includes customers served by SCG's ESA Program from January 2002. Data for 2018-2020 is forecasted.

<sup>4</sup> Number of eligible, willing and feasible ESAP customers based on utility's proposed standard means of deriving the number of Willing and Feasible to Participate (WFTP) as discussed in this Advice Letter in the section Willingness to Participate.

**Southern California Gas Company**  
**Summary of Energy Savings Assistance Program Cost Effectiveness**

Ratio of Benefits Over Costs			Net Benefits \$	
ProgramYear	ESACET	ResourceTRC	ESACET	ResourceTRC
2018	0.67	0.21	-55,171,937	-77,411,886
2019	0.70	0.21	-49,902,309	-76,686,753
2020	0.71	0.22	-49,752,775	-76,178,022

## Southern California Gas Company

### Energy Savings Assistance Program Cost-Effectiveness - Weather Sensitive Measures

Measure	Year	Measure Group	Type of Measure	Type of Home	Electric or Gas	Climate Zone	Benefit Cost Ratios	
							ESACET	Resource TRC
Enclosure	2018	Enclosure	Resource	All	Gas	All	1.04	0.13
Prescriptive Duct Sealing	2018	HVAC	Resource	All	Gas	All	1.05	0.58
Furnace repair & replace	2018	HVAC	Non-Resource	All	Gas	All	(2.07)	N/A
High Efficiency Forced Air Unit	2018	HVAC	Resource	All	Gas	All	1.26	0.23
Furnace maintenance	2018	Maintenance	Non-Resource	All	Gas	All	(0.74)	N/A
Enclosure	2019	Enclosure	Resource	All	Gas	All	1.08	0.12
Prescriptive Duct Sealing	2019	HVAC	Resource	All	Gas	All	1.18	0.61
Furnace repair & replace	2019	HVAC	Non-Resource	All	Gas	All	(2.43)	N/A
High Efficiency Forced Air Unit	2019	HVAC	Resource	All	Gas	All	1.46	0.24
Furnace maintenance	2019	Maintenance	Non-Resource	All	Gas	All	(0.87)	N/A
Enclosure	2020	Enclosure	Resource	All	Gas	All	1.14	0.13
Prescriptive Duct Sealing	2020	HVAC	Resource	All	Gas	All	1.23	0.64
Furnace repair & replace	2020	HVAC	Non-Resource	All	Gas	All	(2.59)	N/A
High Efficiency Forced Air Unit	2020	HVAC	Resource	All	Gas	All	1.56	0.25
Furnace maintenance	2020	Maintenance	Non-Resource	All	Gas	All	(0.94)	N/A

## Southern California Gas Company

### Energy Savings Assistance Program Cost-Effectiveness - Non Weather Sensitive Measures

Measure	Year	Measure Group	Type of Measure	Type of Home	Electric or Gas	Benefit Cost Ratios	
						ESACET	Resource TRC
High Efficiency Clothes Washer	2018	Appliances	Resource	All	Gas	0.68	0.24
Domestic Hot Water	2018	Domestic Hot Water	Resource	All	Gas	0.93	0.30
Water Heater Repair & Replace	2018	Domestic Hot Water	Resource	All	Gas	0.12	0.03
Thermostatic Tub Spout	2018	Domestic Hot Water	Resource	All	Gas	1.32	0.61
High Efficiency Clothes Washer	2019	Appliances	Resource	All	Gas	0.77	0.25
Domestic Hot Water	2019	Domestic Hot Water	Resource	All	Gas	1.05	0.32
Water Heater Repair & Replace	2019	Domestic Hot Water	Resource	All	Gas	0.14	0.03
Thermostatic Tub Spout	2019	Domestic Hot Water	Resource	All	Gas	1.48	0.65
High Efficiency Clothes Washer	2020	Appliances	Resource	All	Gas	0.81	0.27
Domestic Hot Water	2020	Domestic Hot Water	Resource	All	Gas	1.10	0.34
Water Heater Repair & Replace	2020	Domestic Hot Water	Resource	All	Gas	0.15	0.03
Thermostatic Tub Spout	2020	Domestic Hot Water	Resource	All	Gas	1.53	0.69



**Southern California Gas Company  
 PY 2017 - 2020 Energy Savings Assistance Program Pilots and Studies**

<b>Line No.</b>	<b>Statewide Study</b>	<b>Total Cost</b>	<b>Percent paid by Utility</b>	<b>Total Cost paid by Utility</b>
1	Impact Evaluation Study	\$550,000	25%	\$137,500
2	Low Income Needs Assessment	\$500,000	25%	\$125,000
3	Non Energy Benefits Study	\$150,000	25%	\$37,500
4	Potential Study	\$200,000	100%	\$200,000
	<b>Total Statewide</b>	\$1,400,000	15%	\$500,000
<b>Line No.</b>	<b>Local Study</b>	<b>Total Cost</b>	<b>Percent paid by Utility</b>	<b>Total Cost paid by Utility</b>
	<b>Total Statewide and Local</b>	\$1,400,000		\$500,000

<b>Line No.</b>	<b>Pilots</b>	<b>Total Cost</b>	<b>Percent paid by Utility</b>	<b>Total Cost paid by Utility</b>
1	Smart Thermostat Pilot	\$1,000,000	100%	\$1,000,000
	<b>Total Pilots</b>		100%	\$1,000,000

**ATTACHMENT B**

**Advice No. 5325**

**2018-2020 ESA Program Budget by Category**

SoCalGas Total Midcycle AL Revised Budget

	Approved AL 5111-B					+	Approved AL 5256-A					=	Total				
	2017	2018	2019	2020	TOTAL		2017	2018	2019	2020	TOTAL		2017	2018	2019	2020	TOTAL
<i>Appliances</i>	\$16,450,664	\$17,652,411	\$18,947,099	\$20,328,173	\$73,378,346	-	\$1,902,253	\$1,556,417	\$1,171,197	\$4,629,868	\$16,450,664	\$19,554,664	\$20,503,516	\$21,499,370	\$78,008,214		
<i>Domestic Hot Water</i>	\$25,541,417	\$27,407,259	\$29,417,400	\$31,561,665	\$113,927,741	-	\$3,035,655	\$2,502,696	\$1,908,789	\$7,447,140	\$25,541,417	\$30,442,914	\$31,920,096	\$33,470,453	\$121,374,880		
<i>Enclosure</i>	\$31,356,733	\$33,647,394	\$36,115,208	\$38,747,683	\$139,867,018	-	\$15,299,581	\$15,206,824	\$15,067,056	\$45,573,461	\$31,356,733	\$48,946,975	\$51,322,031	\$53,814,739	\$185,440,478		
<i>HVAC</i>	\$23,190,540	\$24,884,646	\$26,709,771	\$28,656,674	\$103,441,631	-	\$10,213,517	\$10,091,462	\$9,931,992	\$30,236,972	\$23,190,540	\$35,098,163	\$36,801,233	\$38,588,666	\$133,678,603		
<i>Maintenance</i>	\$1,922,439	\$2,062,876	\$2,214,175	\$2,375,568	\$8,575,058	-	\$1,027,715	\$1,026,381	\$1,022,381	\$3,076,477	\$1,922,439	\$3,090,591	\$3,240,556	\$3,397,949	\$11,651,535		
<i>Customer Enrollment</i>	\$17,994,859	\$19,307,970	\$20,722,568	\$22,231,468	\$80,256,865	-	\$15,038,590	\$15,290,592	\$15,530,849	\$45,860,031	\$17,994,859	\$34,346,560	\$36,013,160	\$37,762,317	\$126,116,896		
<i>In Home Education</i>	\$5,021,521	\$5,257,030	\$5,507,114	\$5,770,914	\$21,556,579	-	\$2,783,098	\$2,923,145	\$3,068,802	\$8,775,045	\$5,021,521	\$8,040,128	\$8,430,259	\$8,839,716	\$30,331,624		
<i>Pilot</i>						-	\$500,000	\$500,000		\$1,000,000		\$500,000	\$500,000	\$1,000,000			
<b>EE Total</b>	<b>\$121,478,173</b>	<b>\$130,219,586</b>	<b>\$139,633,334</b>	<b>\$149,672,144</b>	<b>\$541,003,237</b>	-	<b>\$49,800,409</b>	<b>\$49,097,517</b>	<b>\$47,701,066</b>	<b>\$146,598,993</b>	<b>\$121,478,173</b>	<b>\$180,019,995</b>	<b>\$188,730,851</b>	<b>\$197,373,210</b>	<b>\$687,602,230</b>		
<i>Training Center</i>	\$901,998	\$926,681	\$952,114	\$977,059	\$3,757,852	-					\$901,998	\$926,681	\$952,114	\$977,059	\$3,757,852		
<i>Inspections</i>	\$2,509,088	\$2,646,697	\$2,773,816	\$2,903,418	\$10,833,019	-	\$806,525	\$846,967	\$893,226	\$2,546,717	\$2,509,088	\$3,453,222	\$3,620,783	\$3,796,644	\$13,379,736		
<i>Marketing and Outreach</i>	\$1,450,000	\$1,450,000	\$1,450,000	\$1,450,000	\$5,800,000	-	\$750,000	\$750,000	\$500,000	\$2,000,000	\$1,450,000	\$2,200,000	\$2,200,000	\$1,950,000	\$7,800,000		
<i>Measurement and Evaluation Studies</i>	\$115,625	\$153,125	\$115,625	\$115,625	\$500,000	-					\$115,625	\$153,125	\$115,625	\$115,625	\$500,000		
<i>Regulatory Compliance</i>	\$471,807	\$405,114	\$416,882	\$428,364	\$1,722,167	-					\$471,807	\$405,114	\$416,882	\$428,364	\$1,722,167		
<i>General Administration</i>	\$6,356,574	\$6,500,414	\$6,661,106	\$6,818,403	\$26,336,497	-	\$300,000	\$300,000	\$300,000	\$900,000	\$6,356,574	\$6,800,414	\$6,961,106	\$7,118,403	\$27,236,497		
<i>CPUC Energy Division</i>	\$86,000	\$86,000	\$86,000	\$86,000	\$344,000	-					\$86,000	\$86,000	\$86,000	\$86,000	\$344,000		
<i>Multifamily Common Area</i>	\$4,500,000	\$4,500,000	\$4,500,000	\$4,500,000	\$18,000,000	-					\$4,500,000	\$4,500,000	\$4,500,000	\$4,500,000	\$18,000,000		
<i>CSD Leveraging</i>	\$261,036	\$261,036	\$0	\$0	\$522,072	-					\$261,036	\$261,036	\$0	\$0	\$522,072		
<b>TOTAL PROGRAM COSTS</b>	<b>\$138,130,301</b>	<b>\$147,148,653</b>	<b>\$156,588,877</b>	<b>\$166,951,013</b>	<b>\$608,818,844</b>	-	<b>\$51,656,934</b>	<b>\$50,994,484</b>	<b>\$49,394,292</b>	<b>\$152,045,710</b>	<b>\$138,130,301</b>	<b>\$198,805,587</b>	<b>\$207,583,361</b>	<b>\$216,345,305</b>	<b>\$760,864,554</b>		