

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



March 4, 2010

Advice Letter 2140-E/1922-G

Ronald van der Leeden, Director
Rates, Revenues and Tariffs
San Diego Gas and Electric
8330 Century Park Court, CP32C
San Diego, CA 92123-1548

Subject: Request Authorization to Establish a Capitation Fee for Outreach to Potential Low Income Energy Efficiency Program Customers with Limited English Proficiency, Elderly, or Disabled and who are Successfully Enrolled in the Program

Dear Mr. van der Leeden:

Advice Letter 2140-E/1922-G is effective February 25, 2010.

Sincerely,

A handwritten signature in blue ink that reads "Julie A. Fitch".

Julie A. Fitch, Director
Energy Division



Ron van der Leeden
Rates, Revenues & Tariffs
8330 Century Park Court
San Diego, CA 92123-1548

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January 26, 2010

ADVICE LETTER 2140-E/1922-G
(U 902-M)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: REQUEST AUTHORIZATION TO ESTABLISH A CAPITATION FEE FOR OUTREACH TO POTENTIAL LOW INCOME ENERGY EFFICIENCY PROGRAM CUSTOMERS WITH LIMITED ENGLISH PROFICIENCY, ELDERLY, OR DISABLED AND WHO ARE SUCCESSFULLY ENROLLED IN THE PROGRAM

PURPOSE

San Diego Gas & Electric Company (SDG&E) requests California Public Utilities Commission (Commission) authorization to pay Community-based Organizations (CBOs) a capitation fee¹ for conducting outreach and generating referrals on behalf of their clients with Limited English Proficiency (LEP), who have a hearing or visual disability, and/or are elderly to SDG&E's Low Income Energy Efficiency Program (LIEE). SDG&E's request is based on its need to reach potential LIEE-qualified households that do not respond to traditional LIEE outreach efforts, such as direct mail, because they are linguistically isolated or because they require specialized assistance due to a hearing or visual impairment.²

By utilizing CBOs that work with the local immigrant populations, the elderly, and with the hearing and visually impaired SDG&E would be able to reach potential LIEE-eligible households that have low literacy, or who have limited English proficiency. SDG&E requests this additional outreach opportunity to supplement traditional efforts and to: 1) achieve the aggressive goals for treating LIEE-eligible households; 2) meet the Commission's programmatic initiative of treating *100% of LIEE-eligible and willing customers by 2020*³; and, 3) facilitate the achievement of the Commission's goal to increase disabled household enrollments to 15% of the new annual LIEE enrollments.⁴

¹ Decision (D.) 01-05-033, at p.p. 44-45), defines the term "capitation fee" as a fee paid by the energy utilities to reimburse organizations the incremental costs they incur for enrolling eligible CARE participants.

² Linguistic isolation is defined as a household in which no member 14 years or older speaks English "very well".

³ D. 07-12-051

⁴ D.08-11-031, Ordering Paragraph 29.

SDG&E provides the following information to support its request for authorization to pay a “capitation fee” to CBOs for their assistance in facilitating the enrollment of LEP and Disabled customers into the LIEE program.⁵

BACKGROUND

CARE Capitation

In D. 01-05-033, the Commission recognized that organizations that provide low income clients with non-CARE services can also provide valuable outreach services for the CARE program by assisting clients in filling out CARE application forms. Because the funding that these CBOs receive from federal and state agencies must be used for specific purposes, the CBOs cannot use federal and state funding to subsidize other activities for which the funds were not intended. The Commission acknowledged in D. 01-05-033 that CBOs needed to be adequately compensated for the time they spend helping their clients fill out CARE applications in conjunction with their other activities. The Commission concluded that energy utilities should be given the latitude to contract with different entities at varying levels of capitation fees based on the utilities’ assessment of the costs of adding CARE enrollments to the agency’s ongoing delivery of services to low income customers⁶ and authorized the energy utilities to negotiate capitation fees of up to \$12.00 per eligible enrollment in the California Alternate Rates for Energy (CARE) program.⁷

The existing CARE capitation fee is intended to fund the community agency’s incremental costs for helping clients complete the CARE application form, as they assist their clients with other services provided by the agency. D.01-05-033 also held that this fee “would only go to those organizations which are not otherwise or required or reimbursed for such services (e.g., not to LIEE contractors).”⁸ The Commission determined that “organizations that provide low-income clients with non-CARE services can also provide valuable outreach services for the CARE program by assisting clients fill out the CARE application as an adjunct to the organization’s other daily activities.”⁹

Telecommunications Industry Efforts to Assist LEP Telephone Customers

In 2006, Commission Staff issued a report entitled “Challenges Facing Consumers with Limited English Skills in the Rapidly Changing Telecommunications Marketplace” (Telecommunications Report).¹⁰ In relation to LEP and literacy, the Telecommunications Report found that:^{11, 12}

⁵ In Attachment A of Disability Rights Advocates’ Opening Comments on the draft decision in A. 08-05-022, et. al, included its report on Effective Outreach to Persons with Disabilities, updated June 2007 which also provides information on the challenges of communicating with persons with disabilities.

⁶ D.01-05-033, Findings of Fact 22 and 23.

⁷ D.06-12-038 authorized utilities to increase the capitation fee to a maximum of \$15.00 per eligible CARE enrollment.

⁸ D.01-05-033 at 45.

⁹ D. 01-05-033 at 44.

¹⁰ In D.06-03-013, the Commission directed Commission Staff to perform a study of the special needs and challenges faced by California Telecommunications consumers with Limited English proficiency. The Commission contemplated that results from the report would serve as both a “short-term action document with respect to potential new rules and education and enforcement programs, as well as a longer-term reference document.

¹¹ The Report included recommendations on several action items for establish rules to provide appropriate telecommunication consumer protection while allowing flexibility for the varied circumstances for telecommunication carriers (such as size, geographic and demographic characteristics of the population served, and services offered).

- California ranks at the top worldwide with Californians speaking between 179 and 220 languages, according to different popular sources and reports.
- Dialects, regionalisms, and other variations create unique challenges for the delivery of every kind of service in languages other than English.
- Adding to the complexity are issues of literacy levels and cultural aspects within and among different populations and their communities.
- Migrant populations in California are unique in their consumer, educational, and other needs and characteristics and are a population that is highly difficult to measure and track.
- A linguistically isolated household in the U.S. Census refer to spoken English and not to literacy and is a strong predictor of the need for language assistance for adult members of the household.
- One quarter of Asian and Latino households are linguistically isolated in comparison to 10 percent of all households in the state. While younger, school-aged populations are learning English, often their parents, guardians, and families do not learn English for a variety of reasons.
- There may be a correlation in some populations between linguistic isolation and low literacy even in the primary language (though detailed information on literacy levels is not available to document this). If this is the case, it may be appropriate to target linguistically isolated populations using oral outreach such as radio, television, and other means for reaching low literacy populations.

In January 2007, the Commission instituted Rulemaking 07-01-021 (Rulemaking) to consider ways to improve services to California telecommunication consumers who do not read or speak English fluently, and to focus on ways of consumer protection for telecommunications customers who have LEP. Three Commission decisions resulted from the Rulemaking. A Phase I decision, D.07-07-063, addressed the needs of telecommunications consumers who have LEP and adopted several rules to improve services to California's telecommunications consumers who do not speak English fluently. D. 07-07-063 acknowledged that Commission received appropriations earmarked to fund CBOs to assist the Commission and directed Commission Staff to design a program that integrates CBOs in its outreach, education, and compliance resolution process **including a process to compensate CBOs for their efforts.**¹³ (Emphasis added).

A Phase II decision, D. 08-10-016, further developed in-language marketing rules by resolving issues concerning the tracking and reporting LEP consumer complaints and language preference; fraud notification to LEP consumers and fraud reporting to the Commission; and, market trials in non-English languages. D. 08-10-016 acknowledged that its efforts to incorporate CBOs into the Commission's education, complaint resolution, and outreach efforts was well underway and stated that it was encouraged by the telephone carriers continued

¹² Similar data regarding LEP customers served by California's energy utilities can be found in the Commission's Phase II Low Income Needs Assessment Report (Needs Assessment), which was designed to assist the Commission determine whether the CARE and LIEE programs, administered by California's Investor-owned Utilities (IOUs), were meeting the needs of California's low income energy utility customers. The Needs Assessment identified the following barriers to low income customers' willingness to participate in the CARE and LIEE programs: 1) Lack of awareness and misunderstanding of the program eligibility criteria and benefits; 2) Language; 3) Fear (distrust among elderly, immigrant residency issues); 4) Welfare stigma and reluctance to accept aid; and, 5) Customers' misconceptions regarding the application and participation processes.

¹³ D.07-07-043, Ordering Paragraph 13.

commitment to supporting these efforts. D. 08-10-016 also reported that it has issued an Request for Proposal to retain an entity to create, operate, and manage a program to manage a statewide network of CBOs to facilitate outreach and to further telecommunications education and complaint resolution to LEP consumers statewide.¹⁴ Findings of Fact 45 of D. 08-10-016 also determined that “utilizing CBOs that serve LEP consumers, whose primary languages include but are not limited to, Spanish, Chinese, Korean, Vietnamese, Tagalog, Thai, Hmong, Arabic, Farsi, Khmer, Armenian, and Russian, is a more effective way to reach LEP consumers than relying on carriers to educate LEP consumers.”

LEP Among the Deaf Community

The Disability Rights Advocates report on Effective Outreach to Persons with Disabilities states that American Sign Language is the primary language of persons who have been deaf since birth and English is their second language.¹⁵ Consequently, according to the report, illiteracy rates are higher for the deaf population. Also, many people who are born deaf have some difficulty reading English. Therefore, in order to successfully increase LIEE enrollment among the deaf community, SDG&E will need to work with CBOs that serve the deaf and to compensate them for their efforts.

Based on the facts presented above, it is believed that there is sufficient evidence to support SDG&E’s request to compensate organizations who serve LEP low income, seniors, and disabled customers to educate their clients about the LIEE program and refer those clients who appear to be eligible to SDG&E so that they can receive LIEE services. As discussed further below, SDG&E’s request does not circumvent Commission directives from D. 08-12-031 program for conducting LIEE program outreach, such as the *Whole Neighborhood Approach*, and contains provisions for the agency referrals to identify those LEP and disabled clients who would qualify for the LIEE program through categorical enrollment. SDG&E has provided a draft of the form that would be used by agencies to refer their LEP and disabled clients to its LIEE program in Attachment A.

SDG&E respectfully requests authorization to pay a “capitation fee” to outreach organizations/agencies, whose clients have LEP or who are visually or hearing impaired, for their services in: 1) providing information about the LIEE program, 2) explaining the program’s requirements, 3) determining eligibility, and 4) referring them to the LIEE program by completing a “lead sheet.” As proposed, the community agency will explain the LIEE program to their clients to help overcome barriers to enrollment due to their LEP, fear, lack of awareness, welfare stigma, or confusion about the enrollment process. In addition, the community agency will predetermine their clients’ eligibility for LIEE either through categorical eligibility¹⁶ or through income documents provided to the agency used to determine customer eligibility for other

¹⁴ The Telecommunications Education and Assistance Program (TEAM) was developed to address issues identified in the Commission’s Rulemaking 07-01-021 to improve services to customers with limited English proficiency. Self-Help for the Elderly is the lead organization for a statewide coalition of Community-Based Organizations representing diverse populations in California. TEAM consists of 28 CBOs in California serving telecommunications consumers in 23 different languages.

¹⁵ Attachment A. of Disability Rights Advocates’ Opening Comments on the Draft Decision in A. 08-05-022, et. al, included its report on Effective Outreach to Persons with Disabilities, updated June 2007 which also provides information on the challenges of communicating with persons with disabilities.

¹⁶ To be categorically eligible for LIEE, customers must provide proof of enrollment in predetermined state or federally funded means-tested programs such as CalWorks, the Low Income Home Energy Assistance Program, Medi-Cal, Food Stamps, and the Women and Infant Children’s program.

programs offered by the agency. Similar to the CARE capitation requirements, SDG&E will reimburse the community agency for the incremental costs of performing this service, only if the service results in the enrollment of a qualified customer into the LIEE program. For illustrative purposes, SDG&E has provided flow chart depicting the steps necessary to enroll customers in the CARE and LIEE programs. (Attachment B).

BENEFITS

Various CBOs provide a variety of services to low income clients including, but not limited to, emergency food and clothing, shelter and housing, health services, family counseling, and financial counseling. As proposed, the various CBOs, when working with their clients, would also provide information about the LIEE program and the potential benefits that could be realized from participating in the program i.e., increased knowledge about energy usage, replacement/repair of appliances and equipment and reduction in their monthly utility bill. Agency clients who have LEP, who are disabled, or who are elderly may not have heard about the LIEE program until it is discussed with them by the agency. The agency can assist SDG&E to overcome many of the barriers (such as language, trust, and fear) identified in the Needs Assessment Report and the Telecommunications Report to enrollment because they can assist the client to understand the program's eligibility requirements and how the LIEE program can help them better manage their energy bills. Specifically, the agency would be able to prequalify customer eligibility based on the income requirements¹⁷ determined by the Commission, explain the LIEE program to their client, and assist them in completing a lead sheet.

The prime objective for the agency is to establish a familiarity with the LIEE program and increase the likelihood the customer will be receptive to a contractor visiting the customer's home to complete the enrollment and an assessment. The information obtained from the agency will be provided to the contractor participating in SDG&E's LIEE program. The LIEE contractor will schedule an appointment with the income-eligible customer at their home to obtain the required enrollment documentation and to conduct an assessment of the measures that may be installed in the home. If the agency has predetermined that the customer can categorically qualify for LIEE no additional documentation will be sought by the contractor when they are conducting the customer on-site assessment. The activities to be undertaken by the community agency versus the contractor at the customer's residence are separate and distinct and therefore do not represent a duplication of services by either entity.

Once the lead is received from the agency, SDG&E will determine if the customer resides in a neighborhood to be served by the Whole Neighborhood Approach or through a leveraging effort with a LIHEAP agency, energy efficiency program, or with local government programs and will include them to the specific effort for customers to be served through those avenues. SDG&E will then arrange to have its LIEE contractor set up an appointment with the customers to assess their home for LIEE measures and to provide in-home energy education. Other LIEE measures services will be provided, if applicable, once the assessment has been completed.

In some cases, the community agency may also be a capitation contractor under SDG&E's CARE program. Under the CARE program, customers self-certify that they meet the CARE

¹⁷ Customers may be eligible to participate in the LIEE program under categorical eligibility if the Local, State, or Federal means-tested programs are at or below the income guidelines set forth by the Commission. In addition customers may be eligible to participate in the LIEE program through targeted self certification as authorized by the Commission.

program's eligibility criteria and are not required to provide proof of income before they are enrolled in the program. Post-enrollment verification is conducted on a random sample of customers enrolled in CARE including those customer enrolled in the program through a Capitation agency. If the CARE capitation agency determines that the customer qualifies for CARE, they can simultaneously explain all aspects of the LIEE program to their client and, to the extent that the customer expresses an interest in participating in the LIEE program, the community agency can complete the lead sheet. SDG&E will work with existing CARE Capitation agencies to determine if it will be necessary to revise the fee paid to the agency to cover the incremental cost of completing the LIEE referral.¹⁸

In D. 08-11-31, the Commission established a goal for the IOUs to increase their disabled enrollments for the 2009-2011 program cycles, such that customers with disabilities should comprise approximately 15% of the new enrollments. The decision permits the IOUs to count as disabled persons who voluntarily describe themselves as having a disability, persons who have an observed disability such as mobility, vision, or hearing disability, and persons who use a TTY/TDD or request accessible formats of written materials. One of the challenges faced by SDG&E's LIEE contractors when conducting LIEE outreach is determining whether or not there is someone in the home who has a disability because they are unable to ask the customer and must rely on the customer to voluntarily provide the information. However, D. 08-11-031 directs the IOUs to leverage their LIEE program outreach with CBOs that served the disabled community.¹⁹ Because the Commission has already determined that it is appropriate to compensate CBOs for their efforts in helping customers enroll in CARE and for their assistance to telecommunications customers, it is appropriate to also compensate these agencies for their efforts to assist LIEE-eligible clients enroll in the LIEE program.

STATEWIDE MARKETING, EDUCATION, AND OUTREACH

SDG&E's proposal to compensate CBOs to help their LEP, disabled, and elderly clients to enroll in the LIEE program is an effort to overcome the barriers to enrollment identified in the Telecommunication and Needs Assessment, as discussed in detail above. It is intended to work in concert with the objectives of the Commission's Statewide Marketing, Education, and Outreach program which will combine low income and general energy efficiency messages using a single program name, tagline targeted to all eligible communities. SDG&E's proposal will focus on reaching LEP, disabled, and elderly customers, who typically don't respond to mass marketing messages, and will not duplicate or compete with the Statewide ME&O efforts.

¹⁸ SDG&E currently utilizes its CARE database to conduct outreach to potentially LIEE-eligible households. Because a portion of the potentially eligible LIEE customers must provide proof of income to qualify, SDG&E waives LIEE income documentation requirements for those CARE customers who have provided income documentation through SDG&E's post-enrollment verification process.

¹⁹ D. 08-11-031, Ordering Paragraphs 29, 30, and 31.

BUDGET

SDG&E proposes to incorporate the cost of compensating CBOs within its existing LIEE budget and does not request an increase to its 2010 – 2011 budget authorized in D. 08-11-031. During 2009, SDG&E has found that the number of measures installed in low income households has been lower than expected when it prepared its budgets projections for 2009 – 2011. For example, the number of refrigerators being replaced through the LIEE program is significantly less than anticipated primarily due to the number of homes that do not meet the revised pre-2001 installation criteria. As such, SDG&E plans to reallocate a maximum of \$20,000 per year during 2010 and 2011 utilizing a portion of the funds originally targeted for the program measures cost category to its Outreach cost category for this new enrollment effort. The estimated budget is based on an estimated cost of \$10.00 per qualified LIEE enrollment, which is slightly higher than the average fee of \$7.30 currently paid to CARE capitation agencies for each qualified CARE enrollment. The estimated cost of \$10.00 per LIEE enrollment assumes that an incremental fee will be paid to SDG&E's existing capitation agencies who serve LEP, disabled, and elderly clientele for the additional resources the agency utilizes to explain the LIEE program to their clientele and complete the LIEE referral form. SDG&E's goal will be to generate, 2,000 enrollments in 2010 and 2,000 enrollments during 2011.

Estimated Number of LIEE Enrollments Generated Through Agencies Serving LEP, Disabled, and Elderly Clientele

| Existing Capitation Contractors | 2010 | 2011 |
|---------------------------------|----------|----------|
| Number of Enrollments | 1,500 | 1,500 |
| Estimated Incremental Cost | \$15,000 | \$15,000 |

SDG&E will also work to expand its list of Capitation Contractors, especially those that serve LEP, disabled, and senior clients.

| New Capitation Contractors | 2010 | 2011 |
|----------------------------|---------|---------|
| Number of Enrollments | 500 | 500 |
| Estimated Incremental Cost | \$5,000 | \$5,000 |

| Total Costs | 2010 | 2011 |
|----------------------------|----------|----------|
| Number of Enrollments | 2,000 | 2,000 |
| Estimated Incremental Cost | \$20,000 | \$20,000 |

REPORTING

On a monthly basis, SDG&E proposes to report the results of enrollment activity generated by the LIEE capitation CBOs in the narrative section of its Monthly Report.²⁰ The monthly report activity will include the number of enrollments and the incremental cost paid to the CBOs for their efforts to the LIEE program.

EFFECTIVE DATE

SDG&E believes that this filing is subject to Energy Division disposition and should be classified as Tier 2 pursuant to GO 96-B. SDG&E respectfully requests that this filing become effective on February 25, 2010, which is 30 calendar days after the date of this filing.

PROTEST

Anyone may protest this advice letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impacts, and should be submitted expeditiously. The protest must be made in writing and received within 20 days of the date this advice letter was filed with the CPUC. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division
Attention: 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 both Honesto Gatchalian (jni@cpuc.ca.gov) and Maria Salinas (mas@cpuc.ca.gov) of the Energy Division. 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: Megan Caulson
Regulatory Tariff Manager
8330 Century Park Court, Room 32C
San Diego, CA 92123-1548
Facsimile No. (858) 654-1788
E-mail: mcaulson@semprautilities.com

NOTICE

A copy of this filing has been served on the utilities and interested parties shown on the attached list, including interested parties to service list A.08-05-024 by either providing them a copy electronically or by mailing them a copy hereof, properly stamped and addressed.

Address changes should be directed to SDG&E Tariffs by facsimile at (858) 654-1788 or by e-mail at SDG&ETariffs@semprautilities.com.

²⁰ In compliance with D.06-12-038, the CARE and LIEE Monthly Report is submitted in accordance with the reporting requirements set forth by the Commission's Energy Division and are submitted by the 21st of each month.

(cc list enclosed)

RON VAN DER LEEDEN
Director – Rates, Revenues & Tariffs

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

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

Company name/CPUC Utility No. **SAN DIEGO GAS & ELECTRIC (U 902)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Megan Caulson

Phone #: (858) 654-1748

E-mail: MCaulson@SempraUtilities.com

EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2140-E/1922-G

Subject of AL: Request Authorization to Establish a Capitation Fee for Outreach to Potential Low Income Energy Efficiency Program Customers with Limited English Proficiency, Elderly, or Disabled and Who Are Successfully Enrolled in the Program.

Keywords (choose from CPUC listing): Preliminary Statement, CARE, LIEE

AL filing type: Monthly Quarterly Annual One-Time Other

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

D.08-11-031

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL N/A

Summarize differences between the AL and the prior withdrawn or rejected AL¹: N/A

Does AL request confidential treatment? If so, provide explanation:

Resolution Required? Yes No

Tier Designation: 1 2 3

Requested effective date: 2/25/2010

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: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, 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

mas@cpuc.ca.gov and jnj@cpuc.ca.gov

San Diego Gas & Electric

Attention: Megan Caulson

8330 Century Park Ct, Room 32C

San Diego, CA 92123

mcaulson@semprautilities.com

¹ Discuss in AL if more space is needed.

General Order No. 96-B
ADVICE LETTER FILING MAILING LIST

cc: (w/enclosures)

Public Utilities Commission

DRA

D. Appling
S. Cauchois
J. Greig
R. Pocta
W. Scott

Energy Division

P. Clanon
S. Gallagher
H. Gatchalian
D. Lafrenz
M. Salinas

CA. Energy Commission

F. DeLeon
R. Tavares

Alcantar & Kahl LLP

K. Harteloo

American Energy Institute

C. King

APS Energy Services

J. Schenk

BP Energy Company

J. Zaiontz

Barkovich & Yap, Inc.

B. Barkovich

Bartle Wells Associates

R. Schmidt

Braun & Blaising, P.C.

S. Blaising

California Energy Markets

S. O'Donnell
C. Sweet

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

CCSE

S. Freedman
J. Porter

Children's Hospital & Health Center

T. Jacoby

City of Chula Vista

M. Meacham
E. Hull

City of Poway

R. Willcox

City of San Diego

J. Cervantes
G. Lonergan
M. Valerio

Commerce Energy Group

V. Gan

Constellation New Energy

W. Chen

CP Kelco

A. Friedl

Davis Wright Tremaine, LLP

E. O'Neill
J. Pau

Dept. of General Services

H. Nanjo
M. Clark

Douglass & Liddell

D. Douglass
D. Liddell
G. Klatt

Duke Energy North America

M. Gillette

Dynegy, Inc.

J. Paul

Ellison Schneider & Harris LLP

E. Janssen

Energy Policy Initiatives Center (USD)

S. Anders

Energy Price Solutions

A. Scott

Energy Strategies, Inc.

K. Campbell
M. Scanlan

Goodin, MacBride, Squeri, Ritchie & Day

B. Cragg
J. Heather Patrick
J. Squeri

Goodrich Aerostructures Group

M. Harrington

Hanna and Morton LLP

N. Pedersen

Itsa-North America

L. Belew

J.B.S. Energy

J. Nahigian

Luce, Forward, Hamilton & Scripps LLP

J. Leslie

Manatt, Phelps & Phillips LLP

D. Huard
R. Keen

Matthew V. Brady & Associates

M. Brady

Modesto Irrigation District

C. Mayer

Morrison & Foerster LLP

P. Hanschen

MRW & Associates

D. Richardson

OnGrid Solar

Andy Black

Pacific Gas & Electric Co.

J. Clark
M. Huffman
S. Lawrie
E. Lucha

Pacific Utility Audit, Inc.

E. Kelly

R. W. Beck, Inc.

C. Elder

School Project for Utility Rate Reduction

M. Rochman
Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

F. Chiang

Sutherland Asbill & Brennan LLP

K. McCrea

Southern California Edison Co.

M. Alexander
K. Cini
K. Gansecki
H. Romero

TransCanada

R. Hunter
D. White

TURN

M. Florio
M. Hawiger

UCAN

M. Shames

U.S. Dept. of the Navy

K. Davoodi
N. Furuta
L. DeLacruz

Utility Specialists, Southwest, Inc.

D. Koser

Western Manufactured Housing

Communities Association

S. Dey

White & Case LLP

L. Cottle

Interested Parties

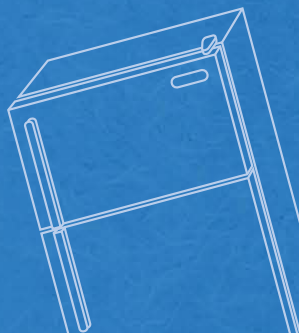
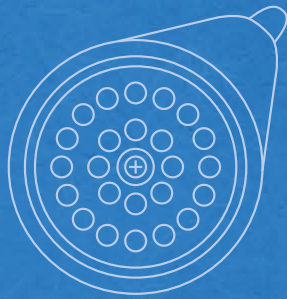
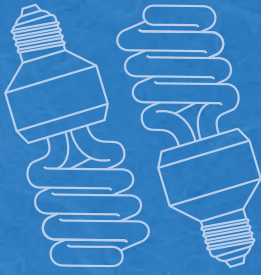
A.08-05-024

SDG&E Advice Letter 2140-E/1922-G

Attachment A

SDG&E Direct Assistance Program Referral Form

EnergyTeam Referral



1. Does the customer participate in CARE?

2. Does the customer qualify for any of these programs?

- Medi-Cal
- TANF/CalWorks
- Healthy Families A&B
- Food Stamps
- WIC
- LIHEAP
- SSI
- NSL Free Lunch Program
- Head Start Income Eligible (Tribal Only)
- Bureau of Indian Affairs General Assistance

3. If not, does the customer qualify based on the income limits?

| MAXIMUM ALLOWABLE ANNUAL INCOME* | | |
|---------------------------------------|----------|---------------------|
| Number of Persons Living in Your Home | CARE | FERA |
| 1 - 2 | \$30,500 | Not Eligible |
| 3 | \$35,800 | \$35,801 - \$44,800 |
| 4 | \$43,200 | \$43,201 - \$54,000 |
| 5 | \$50,600 | \$50,601 - \$63,200 |
| 6 | \$58,000 | \$58,001 - \$72,400 |
| Each Additional Person | +\$7,400 | +\$7,400 - \$9,200 |

*Effective June 1, 2009 through May 31, 2010

4. Has the customer already had home energy efficiency services from SDG&E®?

5. Fill out an Energy Team referral form for the customer and give it to your Market Advisor.

6. Or fill out the referral form for your customer online at www.sdge.com/energyteam.

7. Fill out a reminder card for your client and let them take it home.

What happens next...

SDG&E staff will review both customer and home eligibility. If the customer is eligible based on income or categorical eligibility and the home is eligible based on previous services received, then the following steps will occur:

- A visit will need to be scheduled with the eligible participant to complete the necessary paperwork and determine what measures for which the client may qualify.
- The SDG&E outreach specialist will complete all necessary paperwork with the eligible participant and will gather all required signatures.
- Once all the enrollment and assessment paperwork is completed and it is determined that the home qualifies for weatherization measures, minor home repairs, Natural Gas Appliance Testing and/or refrigerator replacement the customer will be contacted by SDG&E's contractors to schedule the work.
- Depending on the work completed SDG&E may also schedule an inspection of the home.
- Your agency receives funds for each qualified home that is enrolled by SDG&E.



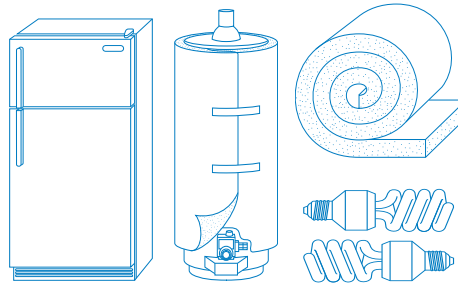
Thank you for your interest in SDG&E's Energy Team. **Free home improvements from the Energy Team can help you save energy and potentially money on your SDG&E bill.**

We received your Energy Team application on _____ and are currently reviewing your eligibility. If approved, you will be contacted by a representative who will schedule the installation of your new home improvements.

EnergyTeam

If you're interested in participating in the Energy Team program, please complete the form below. Please print clearly.

Si está interesado en participar en el programa Energy Team, sírvase llenar el siguiente formulario. Por favor escriba claramente con letra de molde.



Your Name **Su nombre**

Home Address **Su domicilio**

Apartment/Space # **Apartamento/Espacio #**

If mobile home park, provide park name **Si es un parque de casas móviles, proporcione el nombre del parque**

City **Ciudad**

Zip Code **Código postal**

Daytime Telephone **Teléfono durante el día**

Alternate Telephone **Teléfono alterno**

\$

Total Yearly Gross Household Income **Ingreso bruto total anual en el hogar** Number of Persons in Household **Número de personas en el hogar**

I currently receive benefits from the following program(s): **Actualmente recibo beneficios del (de los) siguiente(s) programa(s):**

WIC LIHEAP Food Stamps Medi-Cal Healthy Families A&B TANF SSI NSL Free Lunch Program
Head Start Income Eligible (Tribal Only) Bureau of Indian Affairs General Assistance

SDG&E Account Number **Número de cuenta de SDG&E**

E-mail Address **Correo electrónico**

Primary Language **Lengua primaria**

English

Español

Other _____

By providing the information above and signing this form, you are agreeing that a representative from SDG&E's third party contractor has permission to review the information and contact you to schedule an in-home qualification visit. If your household qualifies, the third party contractor will schedule an appointment to install recommended program measures.

Al proveer la información anterior y firmar este formulario, conviene usted en que un representante de un tercero contratista de SDG&E, tiene permiso de revisar la información y comunicarse con usted para programar una visita domiciliaria con objeto de ver si reúne los requisitos. Si su hogar califica, el tercero contratista hará una cita para instalar las medidas que se recomiendan del programa.

Customer Signature **Firme del cliente**

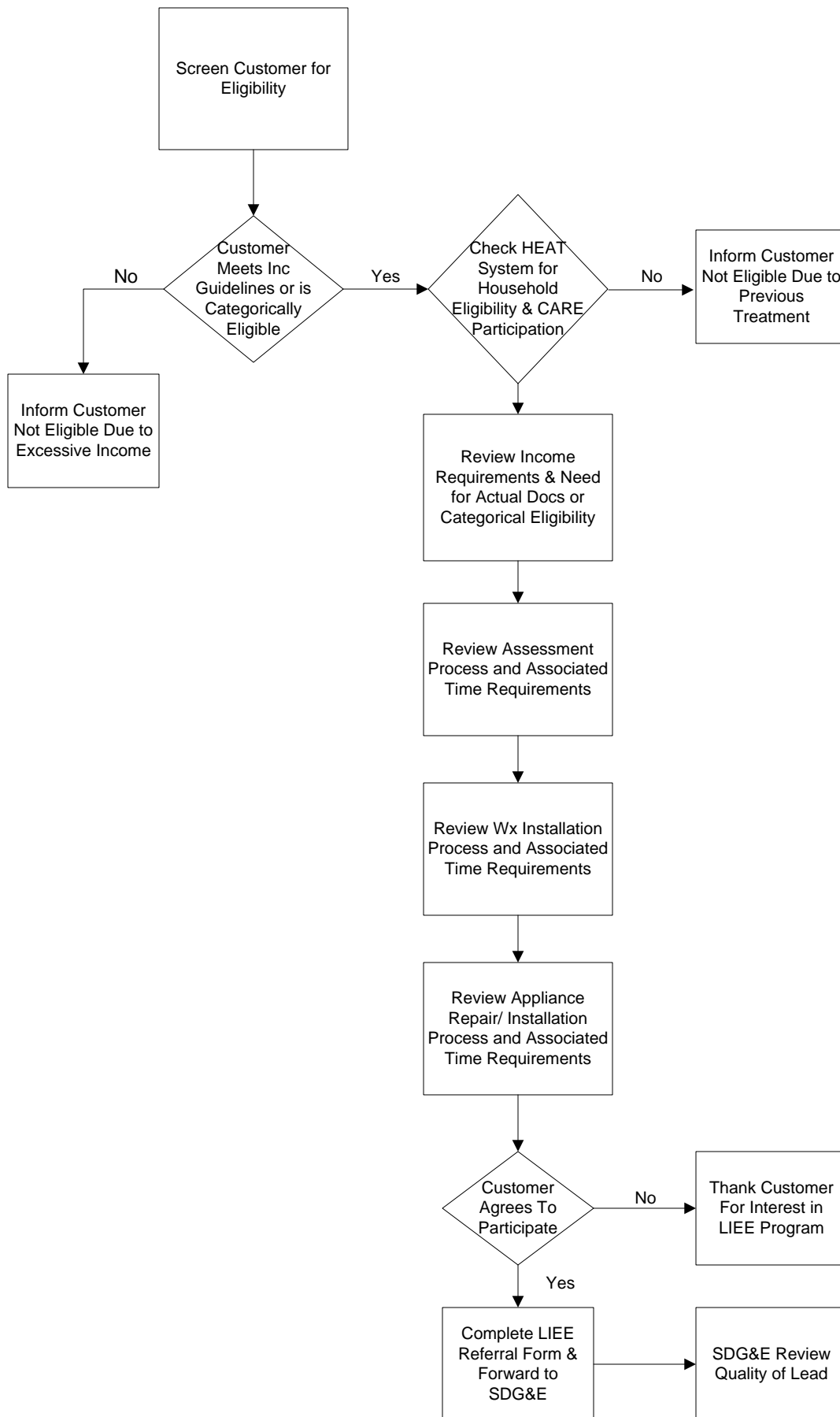
Date **Fecha**

SDG&E Advice Letter 2140-E/1922-G

Attachment B

SDG&E LIEE and CARE Capitation Fee Process Flowcharts

LIEE Capitation Fee Process



CARE Capitation Fee Process

