

**SOUTHERN CALIFORNIA GAS COMPANY**  
**ENERGY SAVINGS ASSISTANCE AND CALIFORNIA ALTERNATE RATES FOR**  
**ENERGY PROGRAMS & BUDGETS FOR PROGRAM YEARS 2021-2026**

**(A.19-11-006)**

**(DATA REQUEST CALADVOCATES-ESA-CARE-KS6-SCG05)**

**RECEIVED: MARCH 12, 2020**

**SUBMITTED: MARCH 26, 2020**

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**QUESTION 1:**

Please provide all internal and external complaints made about any aspect of ESA solicitations to either the organization managing the solicitations or to any other part of SoCalGas.

- If any complaints were received by SoCalGas, answer the following:
  - a) What actions did SoCalGas take to address the complaints?
  - b) What was the outcome of SoCalGas' actions to address the complaints?

**RESPONSE 1:**

SoCalGas recently conducted an ESA Program solicitation in 2019, for the purpose of expanding ESA Program enrollment capacity. No complaints were received by SoCalGas for this solicitation.

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**QUESTION 2:**

Please provide a historical average ESA Program-wide ME&O cost per household and the forecasted ME&O cost per household for the previous application cycle:

- Please provide an individual table for each of the ESA, CARE, and FERA Programs, showing the breakdown of ME&O costs per household for each program by marketing tactic. The level of detail should be like that of the list of tactics within the budget categories listed below in the example table, to which you should add rows to accurately reflect all the marketing tactics used/planned.
  - a) As part of the breakdown, provide the average ME&O cost per household for 2016-2020 for each marketing tactic used, as derived from the total number of homes treated as a result of each tactic, divided by that tactic’s total recorded expenditures; and
  - b) As part of the breakdown, also provide the anticipated average ME&O cost per household for 2021-2026 for each marketing tactic used, as derived from the total number of homes forecasted to be treated as a result of each tactic, divided by that tactic’s total proposed budget.

<b>[Program Name (ESA, CARE, or FERA)] ME&amp;O Costs per Household</b>											
Marketing Tactic	Past Cost per Household (\$)					Forecast Cost per Household (\$)					
	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
<b>Direct to Customer Marketing</b>											
Direct mail											
Bill inserts											
Emails											
<b>Media Costs</b>											
Display advertising											
Search engine marketing											
Print advertising											
Radio advertising											
[SoCalGas to insert additional categories and subcategories as additional rows, as appropriate]											

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Please provide a narrative response about any tactic with quantitative or qualitative value SoCalGas believes is not well represented by its cost per household.

**RESPONSE 2:**

For the ESA and CARE Program, SoCalGas does not track marketing, education and outreach (ME&O) cost in the SAP accounting system by marketing tactic. SoCalGas tracks expenditure for ME&O by cost element, by program category. For 2016-2020 historical expenditure information for marketing tactic per household, SoCalGas is providing the information as one-line item under “Total M&O Tactic Costs per Household”. ESA Table 2 from the monthly reports was referenced for total number of homes treated from 2016-2020.

ESA ME&O Cost Per Household											
Marketing Tactic	Past Cost Per Household (\$)					Forecast Cost Per Household (\$)					
	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
<b>Direct To Customer Marketing</b>											
Bill Inserts						0.17	0.18	0.18	0.18	0.18	0.19
Direct Mail						2.90	2.95	2.95	2.95	3.00	3.05
Innovative Outreach						0.82	0.83	0.84	0.86	0.87	0.89
Email Campaign						0.05	0.04	0.04	0.04	0.04	0.05
Collateral						1.44	1.38	1.39	1.39	1.41	1.44
Outreach						1.92	1.85	1.85	1.85	1.88	1.91
Postage & Shipping						0.34	0.34	0.35	0.35	0.36	0.37
Research, Analytics, & Data Purchasing						0.72	0.73	0.74	0.76	0.77	0.78
<b>Media Costs</b>											
Mass & Ethnic Media						6.24	6.33	6.44	6.56	6.67	6.78
<b>Total M&amp;O Tactic Cost Per Household</b>	16.46	9.79	3.64	9.70	18.49						

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CARE ME&O Cost Per Household											
Marketing Tactic	Past Cost Per Household (\$)					Forecast Cost Per Household (\$)					
	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
<b>Direct To Customer Marketing</b>											
Bill Inserts						0.18	0.18	0.18	0.19	0.19	0.19
Direct Mail						0.61	0.61	0.62	0.63	0.63	0.64
Innovative Outreach						0.06	0.07	0.07	0.07	0.07	0.07
Canvassing						0.48	0.49	0.49	0.50	0.50	0.50
E-Mail Campaigns						0.03	0.03	0.03	0.03	0.03	0.03
Collateral						0.52	0.52	0.52	0.53	0.53	0.54
Outreach						0.39	0.39	0.39	0.40	0.40	0.40
Capitation						0.04	0.04	0.04	0.04	0.04	0.04
Research Analytics & Data Purchasing						0.05	0.05	0.05	0.05	0.05	0.05
<b>Media Costs</b>											
Mass & Ethnic Media						0.39	0.39	0.39	0.40	0.40	0.40
<b>Total M&amp;O Tactic Cost Per Household</b>	<b>1.98</b>	<b>1.89</b>	<b>1.91</b>	<b>1.58</b>	<b>0.18</b>						

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**QUESTION 3:**

Please replicate the tables created in response to question 2 but show the past total costs and forecast total budgets, not the costs per household. The column headers should be like those shown in the example below.

[Program Name (ESA, CARE, or FERA)] ME&O Costs											
Marketing Tactic	Past Cost (\$)					Forecast Cost (\$)					
	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026

**RESPONSE 3:**

For the ESA and CARE Program, SoCalGas does not track marketing, education and outreach (ME&O) cost in the SAP accounting system by marketing tactic. SoCalGas tracks expenditure for ME&O by cost element, by program category, and for 2016-2020 historical expenditure information for marketing tactic, SoCalGas is providing the information as one-line item under “Total M&O Tactic Costs”.

ESA ME&O Cost											
Marketing Tactic	Past Cost (\$)					Forecast Cost (\$)					
	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
<b>Direct To Customer Marketing</b>											
Bill Inserts						18,996	19,290	19,623	19,974	20,320	20,661
Direct Mail						319,126	324,078	324,625	324,840	330,469	336,018
Innovative Outreach						89,912	91,308	92,881	94,544	96,182	97,797
Email Campaign						5,023	4,834	4,842	4,845	4,929	5,012
Collateral						158,296	152,328	152,585	152,686	155,332	157,940
Outreach						211,062	203,103	203,446	203,581	207,109	210,587
Postage & Shipping						36,936	37,509	38,155	38,839	39,512	40,175
Research, Analytics, & Data Purchasing						79,148	80,376	81,761	83,225	84,668	86,089
<b>Media Costs</b>											
Mass & Ethnic Media						685,951	696,595	708,599	721,286	733,786	746,107
<b>Total M&amp;O Tactic Cost</b>	\$1,149,024	\$918,351	\$361,690	\$1,183,596	\$251,714						

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CARE ME&O Cost											
Marketing Tactic	Past Cost (\$)					Forecast Cost (\$)					
	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
<b>Direct To Customer Marketing</b>											
Bill Inserts						296,542	301,143	306,333	311,818	317,221	322,548
Direct Mail						997,268	1,012,742	1,030,194	1,048,640	1,066,812	1,084,725
Innovative Outreach						105,531	107,168	109,015	110,967	112,890	114,786
Canvassing						791,482	803,764	817,614	832,254	846,676	860,893
E-Mail Campaigns						42,212	42,867	43,606	44,387	45,156	45,914
Collateral						844,248	857,348	872,122	887,737	903,121	918,286
Outreach						633,186	643,011	654,091	665,803	677,341	688,714
Capitation						58,042	58,943	59,958	61,032	62,090	63,132
Research Analytics & Data Purchasing						79,148	80,376	81,761	83,225	84,668	86,089
<b>Media Costs</b>											
Mass & Ethnic Media						633,186	643,011	654,091	665,803	677,341	688,714
<b>Total M&amp;O Tactic Cost</b>	<b>3,107,288</b>	<b>2,951,819</b>	<b>3,084,833</b>	<b>2,547,910</b>	<b>292,778</b>						

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**QUESTION 4:**

Please provide a detailed breakdown of the actual recorded expenditures for all the ESA, CARE, and FERA program elements and strategies implemented in program years 2015-2020, broken down by activities and labor categories. The budget categories should be broken down to the level of detail illustrated in the table below. Provide your responses in Excel format, amending the row titles and adding rows in the table below as needed to accurately reflect SoCalGas' budgets.

<b>Program /Budget Category</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
<b>General Admin</b>						
Labor						
Customer Application/Rebate and Incentive Processing						
Engineering Services						
IT						
Policy, Strategy, and Regulatory Reporting Compliance						
Portfolio Analytics						
Program Management						
Travel & Employee Expenses						
Non Labor-CSOD Including CW						
CG Services						
Printing						
Procurement Surcharge						
Production of EE Packets						
Discretionary						
<b>Sub-Total Excluding IT Costs</b>						
<b>IT Costs</b>						
Direct Technology Contract						
Internal IT Costs						
New Database						
Database Maintenance						
<b>Sub-Total IT Costs</b>						
<b>Total General Admin Costs</b>						

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**RESPONSE 4:**

See the tables provided below.

PY 2015-2020 SoCalGas Energy Savings Assistance Program Actual Spend						
Program Budget Category	2015	2016	2017	2018	2019	2020
Appliances	\$ 8,164,512	\$ 4,228,488	\$ 5,896,013	\$ 3,735,217	\$ 3,132,956	\$ 813,549
Domestic Hot Water	\$ 11,425,499	\$ 9,242,241	\$ 12,726,839	\$ 13,868,894	\$ 14,302,845	\$ 1,371,497
Enclosure	\$ 21,906,200	\$ 17,242,605	\$ 24,670,314	\$ 30,152,972	\$ 31,915,356	\$ 2,401,882
HVAC	\$ 10,138,763	\$ 7,320,246	\$ 9,853,571	\$ 15,698,772	\$ 17,802,111	\$ 1,676,267
Maintenance	\$ 1,343,216	\$ 1,235,987	\$ 1,562,231	\$ 1,781,776	\$ 1,729,316	\$ 101,759
Customer Enrollment - (NL)	\$ 11,997,873	\$ 10,485,752	\$ 14,579,263	\$ 19,303,035	\$ 28,163,942	\$ 3,359,539
Customer Enrollment - (Labor)	\$ 500,490	\$ 417,119	\$ 365,416	\$ 279,734	\$ 154,157	\$ 17,290
<b>Total Customer Enrollment</b>	<b>\$ 12,498,363</b>	<b>\$ 10,902,871</b>	<b>\$ 14,944,679</b>	<b>\$ 19,582,768</b>	<b>\$ 28,318,099</b>	<b>\$ 3,376,829</b>
In Home Education	\$ 1,247,684	\$ 1,059,480	\$ 1,205,454	\$ 1,383,182	\$ 2,178,553	\$ 163,892
Pilot	\$ -	\$ -	\$ -	\$ -	\$ 155,622	\$ 30,950
<b>Energy Efficiency TOTAL</b>	<b>\$ 66,724,237</b>	<b>\$ 51,231,917</b>	<b>\$ 70,859,101</b>	<b>\$ 86,203,580</b>	<b>\$ 99,534,857</b>	<b>\$ 9,936,626</b>
Training Center - (NL)	\$ 9,181	\$ 19,810	\$ 7,919	\$ 126,447	\$ 92,525	\$ 1,466
Training Center - (Labor)	\$ 288,023	\$ 286,939	\$ 610,410	\$ 605,868	\$ 637,926	\$ 94,401
<b>Total Training Center</b>	<b>\$ 297,204</b>	<b>\$ 306,749</b>	<b>\$ 618,329</b>	<b>\$ 732,315</b>	<b>\$ 730,450</b>	<b>\$ 95,867</b>
Inspections	\$ 1,604,154	\$ 1,118,244	\$ 1,452,338	\$ 1,432,968	\$ 1,585,779	\$ 167,185
Marketing and Outreach - (NL)	\$ 1,381,046	\$ 1,149,024	\$ 918,351	\$ 361,690	\$ 1,183,596	\$ 251,714
Marketing and Outreach - (Labor)	\$ 2,595	\$ 2,229	\$ 72,921	\$ 18,905	\$ 19,982	\$ 3,303
<b>Total Marketing and Outreach</b>	<b>\$ 1,383,640</b>	<b>\$ 1,151,254</b>	<b>\$ 991,272</b>	<b>\$ 380,595</b>	<b>\$ 1,203,578</b>	<b>\$ 255,017</b>
Statewide ME&O	\$ -	\$ 4,889	\$ -	\$ -	\$ -	\$ -
M&E Studies	\$ -	\$ -	\$ 192,970	\$ 100,437	\$ 157,722	\$ (592)
Regulatory Compliance - (NL)	\$ 9,573	\$ 4,102	\$ 47,439	\$ 81,380	\$ 34,904	\$ 304
Regulatory Compliance - (Labor)	\$ 272,002	\$ 289,493	\$ 259,600	\$ 315,154	\$ 372,182	\$ 45,985
<b>Total Regulatory Compliance</b>	<b>\$ 281,575</b>	<b>\$ 293,595</b>	<b>\$ 307,039</b>	<b>\$ 396,534</b>	<b>\$ 407,087</b>	<b>\$ 46,289</b>
General Administration - (NL)	\$ 540,177	\$ 876,640	\$ 1,129,015	\$ 1,008,439	\$ 2,260,759	\$ 422
General Administration - (Labor)	\$ 3,967,823	\$ 3,781,259	\$ 3,761,788	\$ 3,989,694	\$ 4,152,006	\$ 647,467
<b>Total General Administration</b>	<b>\$ 4,508,000</b>	<b>\$ 4,657,898</b>	<b>\$ 4,890,804</b>	<b>\$ 4,998,134</b>	<b>\$ 6,412,766</b>	<b>\$ 647,888</b>
CPUC Energy Division	\$ 18,778	\$ 12,644	\$ 52,352	\$ 24,410	\$ 87,553	\$ 24,003
MF CAM - (NL)			\$ 17,520	\$ 170,845	\$ 1,256,983	\$ 91,536
MF CAM - (Labor)				\$ 52,735	\$ 162,284	\$ 23,363
<b>Total MF CAM</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 17,520</b>	<b>\$ 223,581</b>	<b>\$ 1,419,267</b>	<b>\$ 114,899</b>
<b>TOTAL PROGRAM COSTS</b>	<b>\$ 74,817,588</b>	<b>\$ 58,777,190</b>	<b>\$ 79,381,724</b>	<b>\$ 94,492,552</b>	<b>\$ 111,539,060</b>	<b>\$ 11,287,183</b>

Note: 2020 reflects Feb year-to-date spend.

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PY 2015-2020 SoCalGas CARE Program Actual Spend						
Program Budget Category	2015	2016	2017	2018	2019	2020
Marketing and Outreach - (NL)	\$ 3,337,864	\$ 3,107,288	\$ 2,951,819	\$ 3,084,833	\$ 2,547,910	\$ 292,778
Marketing and Outreach - (Labor)	\$ 544,204	\$ 543,016	\$ 608,947	\$ 628,126	\$ 553,949	\$ 69,500
<b>Total Marketing and Outreach</b>	<b>\$ 3,882,068</b>	<b>\$ 3,650,304</b>	<b>\$ 3,560,766</b>	<b>\$ 3,712,959</b>	<b>\$ 3,101,859</b>	<b>\$ 362,278</b>
Proc Cert & Re-certification - (NL)	\$ 57,835	\$ 62,866	\$ 127,519	\$ 48,374	\$ 62,961	\$ 28,792
Proc Cert & Re-certification - (Labor)	\$ 1,080,975	\$ 1,036,268	\$ 949,384	\$ 1,456,680	\$ 1,339,971	\$ 182,959
<b>Total Proc Cert &amp; Re-certification</b>	<b>\$ 1,138,810</b>	<b>\$ 1,099,134</b>	<b>\$ 1,076,903</b>	<b>\$ 1,505,054</b>	<b>\$ 1,402,932</b>	<b>\$ 211,751</b>
Post Enrollment Verification - (NL)	\$ 573					\$ -
Post Enrollment Verification - (Labor)	\$ 128,455	\$ 176,403	\$ 122,862	\$ 112,060	\$ 90,750	\$ 10,139
<b>Total Post Enrollment Verification</b>	<b>\$ 129,028</b>	<b>\$ 176,403</b>	<b>\$ 122,862</b>	<b>\$ 112,060</b>	<b>\$ 90,750</b>	<b>\$ 10,139</b>
I.T. Programming - (NL)	\$ 170,488	\$ 115,712	\$ 1,244,192	\$ 385,905	\$ 321,569	\$ 31,040
I.T. Programming - (Labor)	\$ 359,871	\$ 299,410	\$ 753,257	\$ 541,142	\$ 358,939	\$ 42,614
<b>Total I.T. Programming</b>	<b>\$ 530,359</b>	<b>\$ 415,122</b>	<b>\$ 1,997,449</b>	<b>\$ 927,047</b>	<b>\$ 680,508</b>	<b>\$ 73,654</b>
<b>Energy Efficiency TOTAL</b>	<b>\$ 5,680,265</b>	<b>\$ 5,340,963</b>	<b>\$ 6,757,980</b>	<b>\$ 6,257,120</b>	<b>\$ 5,276,049</b>	<b>\$ 657,822</b>
Pilots/CHANGES	\$ 167,700	\$ 199,292	\$ 485,007	\$ 336,933	\$ 390,377	\$ 57,177
Measurement and Evaluation		\$ 4,889				\$ -
Regulatory Compliance - (NL)	\$ 27,646	\$ 21,926	\$ 59,377	\$ 71,832	\$ 34,323	\$ 3,162
Regulatory Compliance - (Labor)	\$ 368,903	\$ 336,067	\$ 342,911	\$ 313,009	\$ 343,900	\$ 57,270
<b>Total Regulatory Compliance</b>	<b>\$ 396,549</b>	<b>\$ 357,993</b>	<b>\$ 402,288</b>	<b>\$ 384,841</b>	<b>\$ 378,224</b>	<b>\$ 60,432</b>
M&E Studies						\$ -
General Administration - (NL)	\$ 39,250	\$ 21,394	\$ 27,931	\$ 227,486	\$ 68,287	\$ 4,550
General Administration - (Labor)	\$ 687,247	\$ 708,741	\$ 808,226	\$ 680,202	\$ 720,972	\$ 100,274
<b>Total General Administration</b>	<b>\$ 726,496</b>	<b>\$ 730,135</b>	<b>\$ 836,157</b>	<b>\$ 907,687</b>	<b>\$ 789,258</b>	<b>\$ 104,824</b>
CPUC Energy Division	\$ 43,815	\$ 29,503	\$ 49,359	\$ 24,410	\$ 58,773	\$ 16,002
<b>TOTAL PROGRAM COSTS</b>	<b>\$ 7,014,825</b>	<b>\$ 6,662,775</b>	<b>\$ 8,530,791</b>	<b>\$ 7,910,991</b>	<b>\$ 6,892,681</b>	<b>\$ 896,257</b>

Note: 2020 reflects Feb year-to-date spend.

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**QUESTION 5:**

Using the “ESA Table 2” in your A1411007 et al. Monthly Report as a reference:

- Please provide a breakdown of all measure costs for 2019 by labor and material costs. For any costs that do not fit into labor or materials, please include in the “Other” column and describe.
- Please provide a breakdown of all forecasted measure costs for 2020-2026 by labor and material costs. For any costs that do not fit into labor or materials, please include in the “Other” column and describe.

(Use the following table as an example for formatting):

MEASURE:	COSTS IN YEAR XXXX:			
	material	labor	other (describe)	Total
Water Heater Repair/Replacement				

**This Question will replace Data Request KS6 SCG03 Question 1**

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**RESPONSE 5:**

SoCalGas procures all measures on a per-unit basis with materials and installation cost included. As a result, SoCalGas cannot break down measure costs. In the tables below, SoCalGas provides the requested information to the measure cost level.

For program year 2019, SoCalGas is providing measure costs as published in its December monthly report filed January 21, 2020. The filed December monthly report does not include activities invoiced late in 2019 or in early January 2020, for program year 2019 activity, that will be reflected in SoCalGas' annual report which will be filed May 1, 2020.

Please see attached excel file.



CalAdvocates-ESA-C  
ARE-KS-SoCalGas\_Q5

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**QUESTION 6:**

How did any shortfalls in the 2017-2020 in actual program implementation (e.g., funds spent, and quantities of measures installed versus forecasted quantities and budget) inform your calculation of budgets for the 2021-2026 applications? Please provide answers applicable to:

- ESA
- CARE
- FERA

**RESPONSE 6:**

- ESA

As stated in the testimony of Mark Aguirre and Erin Brooks p.47, “The forecast costs of continuing EE measures are based on the assumption that feasibility for measures will be similar to that experienced in the most recent full recorded program year (2018, or the “base year”), with exceptions note below. Per-measure costs for continuing measures are also developed from the base year.” Thus, to the extent funds spent fell short of forecast in terms of measure quantities per home, or costs per measure, and these shortfalls occurred in 2018, they were implicitly considered in developing SoCalGas’ new unit cost and measure frequency estimates and thus informed the calculation of budgets. SoCalGas also fell short of its treated goals in the 2017-2020 cycle. The reasons for this shortfall, and SoCalGas’ proposal for meeting new proposed treated goals under an adjusted programmatic approach in 2021-2026, are presented at pp.10-17.

- CARE

SoCalGas’ CARE program surpassed its 90% penetration goal in 2018 and 2019. Therefore, much of the 2021-2026 Non-Labor budget was based on historical spend from 2015-2018. In developing its budget for PY 2021-2026, SoCalGas adjusted the Processing, Self-Certification, and Verification categories for incremental enrollment via the Customer Contact Center to be able to manage an increase in call volume. The Outreach budget was augmented to implement new innovative outreach methods, such

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as using technology for enrollment during grassroots events, and an increase in advertising. All other categories were adjusted for inflation.

- FERA

The FERA program is not applicable to SoCalGas.

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**QUESTION 7:**

Please fill out the table below with rows for all measures (including Pilots, Customer Enrollment, Total Savings/Expenditures, and Total Households Weatherized) included in the monthly reports' ESA Table 2. In the columns, include:

- The total forecasted quantity and approved budget for each measure for each year from 2017-2020; and
- The total quantity and actual cost of each measure SoCalGas actually installed in each year 2017-2020.

Measure	Units	2017				2018				2019				2020			
		Forecast Quantity	Approved Budget	Installed Quantity	Actual Expense	Forecast Quantity	Approved Budget	Installed Quantity	Actual Expense	Forecast Quantity	Approved Budget	Installed Quantity	Actual Expense	Forecast Quantity	Approved Budget	Installed Quantity	Actual Expense

**RESPONSE 7:**

Please see attached excel file.



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**QUESTION 8:**

Referencing ESA Table 2 in the monthly reports, please fill out the table below for the number of households planned and actually treated in each year 2017-2020.

Households Treated	Unit	2017		2018		2019		2020	
		Planned	Treated	Planned	Treated	Planned	Treated	Planned	Treated
- Single Family Households Treated	Home								
- Multi-family Households Treated	Home								
- Mobile Homes Treated	Home								
Total Number of Households Treated	Home								
# Eligible Households to be Treated for PY	Home								
% of Households Treated	%								
- Master-Meter Households Treated	Home								

**RESPONSE 8:**

Please see response below.

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Households Treated	Unit	2017		2018		2019		YTD Feb 2020	
		Planned <sup>1</sup>	Treated						
- Single Family Households Treated	Home	110,000	60,716	169,910	67,741	182,265	76,668	191,186	7,422
- Multi-family Households Treated	Home		26,412		24,770		39,043		5,372
- Mobile Homes Treated	Home		6,662		6,946		6,326		822
Total Number of Households Treated	Home		93,790		99,457		122,037		13,616
# Eligible Households to be Treated for PY	Home		110,000		169,910		182,265		191,186
% of Households Treated	%		85%		59%		67%		7%
- Master-Meter Households Treated	Home		13,472		11,819		10,949		1,261

<sup>1</sup> Targets not established based on housing type. PY targets for total households treated established per D. 16-11-022 and AL 5325 Non-Standard Disposition.