

**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 TURN-SOCALGAS-01)

RECEIVED: APRIL 1, 2020

PARTIAL RESPONSE SUBMITTED: APRIL 16, 2020 (EXCEPT QUESTION 3 AND  
QUESTION 6)

SUBMITTED: APRIL 21, 2020 (QUESTIONS 3 AND QUESTIONS 6)

**QUESTION 1:**

Please provide workbooks underlying the Low-Income Application Tables (Attachments) in machine readable excel format with formulae intact.

**RESPONSE 1:**

See attached responses.

  
2021-2026 SCG ESA  
Budget WPs - TURN

  
2021-2026 SCG  
CARE Budget WPs -

  
ESA M&O Calc WP -  
2021-2026 - TURN D

  
CARE M&O Calc WP  
- 2021-2026 - TURN I

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**QUESTION 2:**

Please provide the number of low-income qualified customers in SoCalGas's service area, the number of customers SoCalGas has served through its ESA Program, and the percentage (%) of low-income qualified customers served, for each of the previous 10 years.

**RESPONSE 2:**

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Eligible customers in service area	1,802,661	2,106,758	2,076,738	2,035,756	2,146,897	2,154,960	2,158,123	2,056,446	2,029,455	1,907,875
Number of ESA customers served	121,274	161,020	96,893	106,948	92,967	80,316	69,811	93,790	99,457	122,037
% of low income customers served	6.73%	7.64%	4.67%	5.25%	4.33%	3.73%	3.23%	4.56%	4.90%	6.40%
Note: Data is from the Annual Reports filed May 1st of each year and the December monthly reports										

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**QUESTION 3:**

For each of the previous 10 years, please provide the number of low-income qualified customers in SoCalGas's service area, the number of customers SoCalGas has served through its ESA Program, and the percentage (%) of low income qualified customers served, for each of the following groups:

- A. Eligible single-family homes
- B. Eligible multi-family homes
- C. Eligible mobile homes
- D. Eligible disadvantaged communities
- E. Eligible hard-to-reach customers

**RESPONSE 3:**

SoCalGas does not disaggregate ESA eligibility data by housing type. SoCalGas does not track eligibility data for disadvantaged or hard-to-reach customers. See table below.

	Number of customers served									
	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Treated customers in Hard-to-Reach zip codes	86,261	112,342	65,194	69,755	56,993	42,433	42,185	64,209	66,058	77,682
Treated customers in Disadvantaged Community zip codes	74,799	94,852	56,188	58,627	47,204	36,306	37,288	59,096	59,454	70,973
SF	85,413	121,312	71,081	80,180	68,030	55,044	44,484	60,716	67,741	76,668
MF	26,930	28,588	17,897	22,072	18,305	17,544	20,796	26,412	24,770	39,043
MH	8,015	11,120	7,915	4,696	6,632	7,728	4,531	6,662	6,946	6,326
Total Treated	120,358	161,020	96,893	106,948	92,967	80,316	69,811	93,790	99,457	122,037
Estimated eligible ESA Program customers by year	1,802,661	2,106,758	2,076,738	2,035,756	2,146,897	2,154,960	2,158,123	2,056,446	2,029,455	1,907,875
% of low income customers served	6.68%	7.64%	4.67%	5.25%	4.33%	3.73%	3.23%	4.56%	4.90%	6.40%

Note: Data is from the Annual Reports filed May 1st of each year and the December monthly reports

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**QUESTION 4:**

With respect to SoCalGas's 2021-2026 ESA Program Plan proposal, please answer the following:

- A. What is the planned average spending per home for minor home repairs?
- B. What is the planned average spending per home on energy savings measures?

**RESPONSE 4:**

- A. As shown at Table A-1 of SoCalGas' Application, SoCalGas forecasts a total \$590,034,941 over the six-year cycle for Appliances, Enclosure, Domestic Hot Water, HVAC, and Maintenance (all above-the-line/Energy Efficiency categories other than Customer Enrollment and Energy Education). These budget categories capture the costs of installing all energy efficiency measures listed in the Statewide Energy Savings Assistance Program 2017-2020 Cycle Policy and Procedures (P&P) Manual revised March 16, 2018 at Table 5-1<sup>1</sup>, including minor home repair. Dividing the \$590,034,941 by SoCalGas' total treated goal of 660,000 homes over the six-year cycle will yield \$174.22 average per treated home for minor home repairs.
- B. The budget categories listed in response A above, totaling \$590,034,941 over the six-year cycle, capture the costs of installing all energy efficiency measures listed in the Statewide Energy Savings Assistance Program 2017-2020 Cycle Policy and Procedures Manual revised March 16, 2018 at Table 5-1<sup>2</sup>. Dividing

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<sup>1</sup> Policy and Procedures Manual pp. 36-39.

<sup>2</sup> *Id*

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SoCalGas' total treated goal of 660,000 homes over the cycle yields an average planned spending per home of \$893.99.

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**QUESTION 5:**

Regarding ESA offerings for customers in mobile homes:

- A. Has SoCalGas considered developing offerings specifically for mobile homes? Why or why not?
- B. What measures does SoCalGas offer to this segment?
- C. Please provide a distribution of age of the mobile homes in SoCalGas's service area.

**RESPONSE 5:**

- A. SoCalGas has not considered developing offerings specifically for mobile homes. SoCalGas considers measure offerings broadly to address as many low-income housing types as possible.
- B. SoCalGas offers all currently available measures in the ESA Program to the mobile homes segment except attic insulation. All newly proposed measures will be offered to mobile homes with the exception of the high-efficiency wall furnace. These measures are not offered to the mobile homes segment because they are not technically feasible for installation. For example, mobile homes do not have attics, and wall furnaces are not designed for use in mobile homes.
- C. SoCalGas does not maintain data regarding the age of mobile homes in SoCalGas' service area.

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**QUESTION 6:**

Please describe the impacts of the coronavirus on the ESA program and the ESA contractor network. Does SoCalGas have contingency plans to address disruptions to ESA programs due to the coronavirus? If the answer is yes, please provide a description of those plans. If not, why not?

**RESPONSE 6:**

On March 18, 2020, SoCalGas informed its ESA program contractors that due to the State of Emergency in California declared by Governor Newsom on March 4, 2020 and the national emergency declared by President Trump on March 13, 2020 as a result of the COVID-19 epidemic and guidance from local, state and federal health and emergency response agencies, SoCalGas is implementing the following operational changes for the Energy Efficiency and Energy Savings Assistance (ESA) programs:

- All face-to-face interaction including customer outreach, enrollment, installation and inspection work is to be suspended effective March 18 through March 31, with the following exceptions:
  - ESA program in-process repairs and replacements of water heaters and furnaces which are critical for customer health and safety.
  - ESA program pending work to mitigate hazardous inspection fails.
  - ESA program pending inspections of attic insulation and furnace repairs and replacements.
  - ESA program enrollment of customers identified by SoCalGas as having a critical health and safety related need for appliance work.
- In addition to any previously employed safety protocols, contractors willing and able to perform critical work in customer homes and businesses must follow safety protocols and guidelines that are consistent with or sometimes exceed CDC guidance until further notice.

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- Other than the critical exceptions listed above, customer visits and any other face-to-face program interaction will be rescheduled to be conducted after the suspension period.
  - Because it is possible the suspension period will be extended beyond March 31, implementers and contractors are encouraged to schedule deferred appointments for May or later to avoid needing to process a second round of rescheduling.
- All outreach through canvassing, e-mail, phone, text, and direct mail, including efforts associated with SoCalGas' ESA Clear Plan, is to be suspended through March 31.
- All contractor invoices for completed work continue to be processed and paid during this time.

Although SoCalGas initiated a suspension to ESA Program services on March 18th, prior to that time, ESA Program contractors were already experiencing customer unwillingness to participate due to COVID-19 concerns. Contractors communicated examples of apartment owners prohibiting access to their multifamily property due to health concerns. In addition, the contractor workforce was also beginning to be impacted with a canvassing contractor losing staff that refused to go door-to-door over fears of exposure.

On March 19, SoCalGas met with Energy Division staff and representatives from the other Investor Owned Utilities (IOUs) via phone to discuss the various ESA program adjustments each IOU is making in response to COVID-19.

On March 23, 2020, Executive Director Stebbins issued a letter to the IOUs requesting that the IOUs offer Energy Savings Assistance (ESA) contractors assistance during the work pause arising from the COVID-19 pandemic. Per Executive Director Stebbins' guidance, the IOUs are to offer ESA contractors a 30-day advance payment loan to cover labor costs, repayable over a minimum of 6 months once the ESA program resumes. If the ESA contractor has a "practicable

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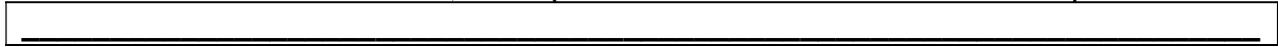
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solution as an alternative” the IOUs were instructed to provide the proposal to Ed Randolph by March 26.

SoCalGas received 8 alternative proposals to the offer of a 30-day advance payment. Seven proposals seek loan forgiveness, or in effect, payment for labor and overhead during the suspension without providing services to customers. One proposal seeks advance payment for appliance inventory that cannot be installed in this timeframe as a result of the program suspension. SoCalGas provided the alternative proposals to the Energy Division on March 26. SoCalGas includes the following data on the offers:

Status Table for first 30 day advance payment offer	Number of Primes	Number reporting (i.e., you've received a response)	Number accepting	Number proposing alternative and declined	Number proposing alternative and neither accepted nor/declined (keeping offer open)	Number declining
<b>SoCalGas</b>	<b>38</b>	<b>38</b>	<b>21</b>	<b>8</b>	<b>3</b>	<b>6</b>

On March 31, SoCalGas informed its contractors and the Energy Division that consistent with federal, state and local guidelines, SoCalGas has extended the suspension on in-person program activity through April 30, 2020.

On April 7, SoCalGas received a second letter from Executive Director Stebbins requesting the IOUs to extend an additional 30-day advance payment loan to cover labor costs and overhead costs, repayable over a minimum of 6 months once the ESA program resumes. SoCalGas sent these offers to its 38 contractors on April 14.

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In alignment with SoCalGas company directives and the Stay at Home orders currently in place, SoCalGas is implementing a contingency process to virtually enroll customers into the ESA Program. SoCalGas proposed virtual enrollment in its 2021-2026 application, and looks forward to testing this delivery method during the program suspension in order to continue to serve its customers in a safe manner.

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**QUESTION 7:**

Did SoCalGas evaluate any new measures or technologies in the preparation of the 2021-2026 ESA Plan that it did not ultimately include? If the answer is yes, please provide a list of those measures and why they were not included in the Plan.

**RESPONSE 7:**

SoCalGas evaluated the installation of range hoods as a measure where there was no existing range hood to improve indoor air quality. Based on the evaluation, it was determined that this technology would not be considered for inclusion as a measure due to the installation complexities and potential costs associated with installing ventilation to the exterior of the home and establishing an electrical connection when necessary.

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**QUESTION 8:**

Has SoCalGas screened whole house fans, clothes dryers, doors, and windows for inclusion as eligible measures in its ESA program? Why or why not?

**RESPONSE 8:**

Whole House Fans: SoCalGas did not consider whole house fans for inclusion as an eligible measure in the ESA Program since there are no gas savings with this technology. They are generally used to cool the home during warmer days resulting in electric savings only.

Clothes Dryers: Savings for the replacement of a clothes dryer is minimal when combined with the installation of a high efficiency washer. A key benefit of the high efficiency washer is the extraction of more water from wet clothes thereby reducing drying time. SoCalGas has offered the high efficiency washer as a measure in its ESA Program for over ten years.

Doors & Windows: SoCalGas currently replaces doors and windows as part of minor home repair in its ESA Program.

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**QUESTION 9:**

Does SoCalGas have information on the changes in disconnections, arrearages, and bills for customers after they participate in the ESA program? If yes, please summarize the observed changes that customers realize.

**RESPONSE 9:**

No, SoCalGas does not have any information responsive to this request.

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**QUESTION 10:**

How are recipients of CARE discounts currently channeled into the SoCalGas ESA program?

- A. Please describe the criteria/conditions under which a CARE recipient is referred to the ESA program.
- B. Clearly describe the referral and application processes, including the typical sequence of steps and the actions that the CARE recipient takes and actions that SoCalGas takes.
- C. Please describe the typical timeline, including when a customer starts to receive CARE discounts, when the referral to ESA is made, and completion of ESA services.

**RESPONSE 10:**

SoCalGas leverages multiple channels to promote the ESA Program to CARE customers. They are as follows:

- All customers hear information over the telephone to the Customer Contact Center on Customer Assistance Programs, including the ESA Program while on hold to speak to a Customer Service Representative (CSR).
- Customers who call to establish service or payment arrangements can enroll in CARE with a CSR. Once the CSR completes the CARE enrollment over the telephone with the customer, the CSR states, "We also offer no-cost home weatherization to help you save energy and money on your bills. For more information and to see if you qualify, please call our Energy Savings Assistance Program at (800) 331-7593."

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- Upon the customer's successful completion of the CARE enrollment application on the web or through My Account, the confirmation page promotes the ESA Program with an image linked to the ESA Program webpage. In addition to the confirmation page, the customer automatically receives a CARE enrollment confirmation email which also promotes the ESA Program.
  - ESA Program messaging is on all CARE brochures and self-certification applications.
- A. All CARE customers are identified as ESA-eligible customers and targeted as part of the Advice Letter 5256 (Clear Plan). As part of the Clear Plan, eligible customers receive a direct mail letter, email, and text message with ESA Program information.
- B. SoCalGas does not have a referral process in which a CARE customer is automatically enrolled in the ESA Program. Instead, CARE customers are targeted through the Clear Plan. The Clear Plan reaches out to customers based on targeted geographic areas. As part of the Clear Plan, customers receive a direct mail letter, email, and text message informing them of the ESA Program and their assigned contractor visit. It is then up to the customer to reach out to the assigned contractor to make an appointment to begin the enrollment process.
- C. Since there is no referral made to the ESA Program, there is no typical timeline from when a customer starts to receive CARE discounts to the completion of ESA Program services. For a typical timeline of engagement with an ESA-eligible customer to the delivery of services, see SoCalGas' response to question 12 below.

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**QUESTION 11:**

How will SoCalGas channel recipients of CARE discounts into the ESA program in the 2021-2026 period?

- A. Please describe the criteria/conditions under which a CARE recipient will be referred to the ESA program.
- B. Clearly describe the referral and application processes, including the typical sequence of steps and the actions that the CARE recipient will take and actions that SoCalGas will take.
- C. How is the typical timeline likely to change under SoCalGas's proposed approach to the 2021-2026 programs?

**RESPONSE 11:**

In its 2021 – 2026 Application, SoCalGas proposed several methods to channel CARE participants into the ESA Program. The testimony of Mark Aguirre and Erin Brooks outlines the following:

- Send a video to CARE customers who show an interest in the ESA Program geared toward program awareness, participation timeline, frequently asked questions, the benefits of energy education and how they can make a positive environmental impact. (pg 69)
- Provide the CSR with more in-depth knowledge of the ESA Program so they can identify potentially eligible customers and recommend the program. (pg 85)
- Send text messages to eligible customers with an active link to the ESA Program home page and on-line form. (pg 88)
- Leverage CARE program success rates in rural areas with high CARE penetration rates using multiple touch points. (pg 97)

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- Leverage high CARE penetration rates in high poverty areas using Spanish language media and local community events as well as inviting ESA Program contractors to set up “lobby days” in high-trafficked branch payment offices in high poverty areas. (pg 98)
  - Automatically qualify customers for the ESA Program following CARE post enrollment verification.
- A. The CARE recipient will be targeted for the ESA Program following successful enrollment in the CARE Program.
- B. SoCalGas has not proposed a new referral or application process but remains open to making changes to streamline the process and encourage ESA Program enrollments. Once its 2021 – 2026 application is approved, these changes will be more fully developed.
- C. Any changes to the referral and/or application process will be developed with the expectation of shortening the timeline. As mentioned above, those changes will be developed once the 2021 – 2026 application is approved.

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**QUESTION 12:**

For a customer that does not enter the ESA program via CARE:

- A. Please describe the current application process, including the typical sequence of steps and the actions that the applicant takes and actions that SoCalGas takes.
- B. Please describe the typical timeline, including when the application for ESA is made and when ESA services are completed.
- C. How will the current application process change under SoCalGas's proposed approach to the 2021-2026 programs?
- D. How is the typical timeline likely to change under SoCalGas's proposed approach to the 2021-2026 programs?

**RESPONSE 12:**

- A. SoCalGas' ESA Program enrollment services are provided by local Community Based Organizations (CBO) and contractors. Once a customer has been referred to a contractor, whether the referral was made via an on-line interest form from SoCalGas' ESA Program website, a customer phone call received by a SoCalGas ESA Program CSR, or by contractor canvassing efforts, the customer will be provided with the contractor name and phone number for enrollment communications and questions. All program contractors providing enrollment, assessment and energy education services have developed their own internal business processes and steps for enrolling customers into the program. SoCalGas requires contractors to adhere to customer enrollments practices on policies and

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procedures delineated in the Statewide Energy Savings Assistance Program 2017-2020 Cycle P&P Manual revised March 16, 2018.

B. SoCalGas' ESA Program services are provided through local CBOs and contractors. It can take up to 12 weeks for all services to be delivered to the home. Below is the typical timeline that lists the steps in the ESA Program:

1. Initial home visit – As part of the enrollment process, the customer representative completes a Customer Agreement form, and performs a Home Assessment by completing a list of all feasible measures and provides enrollment measures when feasible. During the enrollment process, the customer receives In-Home Energy Education and is offered enrollment into both CARE and My Account.
2. Work begins in the home – Approximately 2 - 4 weeks after the initial home visit, an ESA Program contractor schedules an appointment with the customer for weatherization installation services. The contractor will also inspect and test the natural gas appliances in the home. At the end of this visit, the customer receives a list of the measures installed in the home.
3. Work Inspection – After work has been completed, the customer may be contacted for an inspection of the installed measures. Shortly after the final inspection, the customer may be selected to participate in a Customer Satisfaction Survey which is completed by a third party.

In instances where the customer owns their home and their gas furnace or water heater needs repair or replacement, an ESA Program contractor will schedule an appointment approximately 3 to 4 weeks after they receive weatherization measures. If these services require a city inspection, the ESA Program contractor will notify the appropriate agency and schedule the appointment with the customer. In some instances, these appliance services may be performed by

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a different contractor than the one who originally installed the weatherization measures.

- C. Based on SoCalGas' ESA Program Testimony on new technology platforms for enrollment and assessment,<sup>3</sup> SoCalGas intends to explore options to allow customers to immediately apply or schedule an on-line appointment for enrollment, assessment and measure installation. In some cases, direct installation of simple measures by customers may be feasible as well for those customers whom this option is preferred. Although the detailed processes for SoCalGas' proposed approach for enrollments in the 2021-2026 programs have not yet been fully developed, SoCalGas expects that the current SoCalGas ESA Program application process may change for customers who prefer these self-service methods for enrollment. For example, if approved, a customer who opts to enroll and self-certify for simple enrollment measures that may be sent to them for self-installation as well as on-line energy education, may not have any face-to-face or verbal interaction with SoCalGas or its contractors. Customers who opt to engage the program on-line but prefer a face-to-face interaction or a virtual enrollment may have the option to select the contractor and schedule a time and date for the enrollment rather than have a contractor randomly assigned to them. These customers may also have the option of receiving on-line energy education. Lastly, customers who are directly engaged by contractors may follow the current process if preferred, which will remain available for customers who prefer face-to-face contact for enrollment, assessment and energy education.
- D. SoCalGas expects the typical timeline to be shortened for on-line enrollments as this process may provide a more streamlined approach to customer enrollments into the Program. Customers who prefer face-to-face interactions may not see a change in the typical timeline. However, SoCalGas continually strives for efficiency in all

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<sup>3</sup> SoCalGas describes its Customer Enrollment & Assessment in its proposal for 2021-2026 program years for the ESA Program in pp. 22-23 of the prepared direct testimony of Mr. Aguirre and Erin Brooks.

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customer interactions and will continue this approach for program enrollments in the next program cycle.

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**QUESTION 13:**

Please refer to the Application, p. 14. How did SoCalGas select measures?

**RESPONSE 13:**

SoCalGas evaluated its measure mix in the current cycle, Impact Evaluation results, and studied the measure list from Energy Efficiency programs to select measures to address health, comfort, and safety; generate deep energy savings intended to reduce energy consumption; and promote innovation.

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**QUESTION 14:**

Referring to the testimony of Mark Aguirre and Erin Brooks on p. 5, please answer the following questions:

- A. Which smart thermostats are eligible? Describe the eligibility criteria for smart thermostats.
- B. Why is SoCalGas proposing to retire duct testing and sealing?
- C. What “simple” measures does SoCalGas propose to provide based on self-certified income level?

**RESPONSE 14:**

- A. SoCalGas does not promote nor require specific manufacturer brand(s) of smart thermostats. Its eligibility requirements are as follows: a smart thermostat eligible for the ESA Program is a device that controls heating, ventilation, and air-conditioning (HVAC) equipment to regulate the temperature of the room or space in which it is installed, has the ability to make automated adjustments to the set point of the HVAC system to drive energy savings (electric and gas), and has the ability to communicate with sources external to the HVAC system. For connection, the smart thermostat may rely on a home area network (e.g. Wi-Fi) and an internet connection that is independent of the smart thermostat. The smart thermostat must be in full compliance with the ENERGYSTAR® Program Requirements and Product Specification for Connected Thermostats products Version 1.0 or later.

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- B. D.16-11-022 ordered SoCalGas to adopt Prescriptive Duct Sealing.<sup>4</sup> SoCalGas implemented this approach in the 2017-2020 cycle and has found it to be effective. As a result, SoCalGas will no longer need to use the traditional duct testing and sealing approach, except in instances where that approach is required for Title 24 compliance.
- C. SoCalGas proposed in its application “simple” measures that include faucet aerator, showerhead, and thermostatic shower valve.<sup>5</sup>

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<sup>4</sup> D.16-11-022 Ordering Paragraph 17: “Southern California Gas Company shall adopt San Diego Gas & Electric Company’s Prescriptive Duct Sealing approach, which maintains duct sealing as a measure but reduces costs associated with duct testing.”

<sup>5</sup> SoCalGas ESA Testimony p. 23.

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**QUESTION 15:**

Please refer to the testimony of Mark Aguirre and Erin Brooks, p. 6. Please provide the full reference to the “all feasible measures” rule.

**RESPONSE 15:**

Please see Statewide Energy Savings Assistance Program 2017-2020 Cycle Policy and Procedures Manual revised March 16, 2018 as follows:

p.27 “A home must receive all feasible measures offered under the ESA Program.”

p.45 “It is the policy of the CPUC that ESA Program Service Providers must install all feasible measures unless after communicating the benefits of installing the new measure(s), the customer specifically refuses the measure(s). If the installer determines that a measure cannot be installed, the reason shall be recorded and made available to the utility or its designee.”

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**QUESTION 16:**

Please refer to the testimony of Mark Aguirre and Erin Brooks, p. 16. How does SoCalGas define high energy users, disadvantaged communities, tribal customers, and those at risk of disconnection?

**RESPONSE 16:**

*High Energy Users*

SoCalGas defines high energy users as customers with high annual natural gas consumption (greater than 500 therms/year).<sup>6</sup>

*Disadvantaged Communities*

As described in its ESA testimony,<sup>7</sup> SoCalGas uses the CPUC Disadvantaged Communities Advisory Group's definition of disadvantaged communities which includes those disproportionately burdened by pollution and socio-economic challenges including the following:

- California Environmental Protection Agency, pursuant to Health and Safety Code Section 39711, defines disadvantaged communities as those census tracts scoring in the top 25 percent of census tracts statewide on the set of 20 different indicators in CalEnviroScreen
- As part of its definition of disadvantaged communities, CalEPA also finds that an additional 22 census tracts that score in the highest five percent of CalEnviroScreen's Pollution Burden indicator, but that do not have an overall CalEnviroScreen score in the top 25 percent because of unreliable socioeconomic or health data, are also defined as disadvantaged communities

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<sup>6</sup> D.08-11-031/A. 08-05-022 (November 6, 2008)

<sup>7</sup> ESA Testimony, p. 94

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- Tribal Lands
- Census tracts with area median household income/state median income, less than 80%, and
- Households with median household income less than 80% of Area Median Income (AMI)

*Tribal Customers*

SoCalGas defines tribal customers as those living on tribal land as well as those of Native American heritage living outside tribal land.

In its ESA Program testimony,<sup>8</sup> SoCalGas provided a map that identified and defined the Native American Tribal Entities in its service territory.<sup>9</sup>

*Customers at Risk of Disconnection*

SoCalGas defines customers at risk of disconnection as customers that have bills that are past due and have received a 48-hour disconnection notice. Please see SoCalGas' rule 9, Discontinuance of Service<sup>10</sup>.

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<sup>8</sup> ESA Testimony, pp. 91-92

<sup>9</sup> Tribal Map from: <http://www.courts.ca.gov/3066.htm>.

<sup>10</sup> <https://www2.socalgas.com/regulatory/tariffs/tm2/pdf/09.pdf>

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**QUESTION 17:**

Please refer to the testimony of Mark Aguirre and Erin Brooks, line 16, p. 20.  
How was the specific percentage of household income, 2 %, selected as a threshold for targeting low income customers?

**RESPONSE 17:**

In developing its 2021 – 2026 Application, SoCalGas performed preliminary research into energy burden for the low- income population. One source of information, [\*Lifting the High Energy Burdens in America's Largest Cities: How Energy Efficiency Can Improve Low-Income and Underserved Communities\*](#) suggests that non-low-income households have a median energy burden between 1.5% and 2.3%. It was not SoCalGas' intention to set 2% as an absolute threshold, but rather to use as a starting point for further analysis. Once SoCalGas' 2021-2026 application is approved, and based on Commission directive, this calculation will be further developed and refined to address the needs of SoCalGas' low-income customer base.

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**QUESTION 18:**

Referring to the testimony of Mark Aguirre and Erin Brooks on p. 26, what does it mean that the low-income total density ratio is the same (75%) for manual thermostats, programmable thermostats, and smart thermostats?

**RESPONSE 18:**

SoCalGas referred to the 2019 Potential and Goals study<sup>11</sup> to define the low-income total density ratio. A total density ratio of 75% for manual, programmable and smart thermostats means that compared to the general population, low-income customers are 25% less likely to have a thermostat in their home, regardless of what type of thermostat.

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<sup>11</sup> [ftp://ftp.cpuc.ca.gov/gopher-data/energy\\_division/EnergyEfficiency/DAWG/2019%20PG%20Study%20Report\\_Final%20Public\\_PDFA.pdf](ftp://ftp.cpuc.ca.gov/gopher-data/energy_division/EnergyEfficiency/DAWG/2019%20PG%20Study%20Report_Final%20Public_PDFA.pdf)

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**QUESTION 19:**

Referring to the testimony of Mark Aguirre and Erin Brooks on p. 38, why is SoCalGas proposing an Average Energy Savings per Household goal that is lower than the baseline values for 2016 to 2018?

**RESPONSE 19:**

SoCalGas is proposing a lower Average Energy Savings per Household goal because the baseline value of savings reported in 2016 to 2018 was at 16 therms per household annually, and was the average therm savings provided in the Impact Evaluation results completed in 2015. For 2019 and beyond, SoCalGas has adopted the new results from the Impact Evaluation completed in 2019, which yielded an average of 7 therms per household annually. However, SoCalGas has added new measures such as High Efficiency Wall Furnace for 2021-2026 that replaced the Furnace Repair/Replacement measure which increased the *ex-ante* average annual therm savings value to 13 therms per household annually.

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**QUESTION 20:**

Referring to the testimony of Mark Aguirre and Erin Brooks on p. 42, why is SoCalGas proposing a Portfolio Energy Savings goal that is lower than the baseline values for 2017 and 2018? What total annual energy savings does SoCalGas expect for the following groups during the 2021 to 2026 period:

- A. single family homes
- B. multi-family homes
- C. mobile homes
- D. disadvantaged communities
- E. hard-to-reach customers

**RESPONSE 20:**

SoCalGas is proposing a Portfolio Energy Savings goal that is lower than the baseline values for 2017 and 2018 due to lower average therm savings values per household, resulted from the Impact Evaluation completed in 2019. This is explained in the response to Question 19 above.

Below are total annual energy savings goals for each group during the 2021- 2026 program cycle.

- A. single family homes: 1,041,284 therms
- B. multi-family homes: 160,021 therms
- C. mobile homes: 54,288 therms
- D. disadvantaged communities: 682,730 therms (includes tribal and California Air Resources Board (CARB) identified communities; disadvantaged communities are not mutually exclusive and are subsets of A, B, and C).
- E. hard-to-reach customers: 81,051 therms (hard-to-reach customers are not mutually exclusive and are subsets of A, B, and C).

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**QUESTION 21:**

Referring to the testimony of Mark Aguirre and Erin Brooks on p. 45, regarding SoCalGas's efforts to engage customers over an extended period of time, please describe what actions are taken to engage customers after measures are installed to help them continue managing energy usage, and to ensure participants understand how to operate the technologies.

**RESPONSE 21:**

In its ESA testimony, SoCalGas proposed an approach to seek customer engagement over an extended period of time offering more opportunities to assess and respond to customer needs and allowing for the possibility of targeting delivery on a measure-by-measure basis. SoCalGas proposes to achieve this through its proposed new technology platform. As further stated in its ESA testimony in the Energy Education Design and Delivery section<sup>12</sup>, during or after measure installation, the customer will receive a follow-up educational module based on the measures received describing the measure benefits and will receive additional tips on increasing savings based on conservation practices. SoCalGas proposes to implement continuous post-treatment energy education follow-up by providing customers the opportunity to opt-in to continued energy education. This will be in the format of multiple channels including emails, videos, and a perhaps gamification of the process whereby after viewing a certain number of videos, customers are rewarded (e.g., badges, points, etc). The post treatment educational modules will be designed to emphasize and clarify the long-term savings of increasing energy efficiency and will be tailored to the customer's needs based on services and measures provided.

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<sup>12</sup> ESA Testimony, pp. 69-70

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**QUESTION 22:**

Please refer to the testimony of Mark Aguirre and Erin Brooks on p. 59, which states, "Installation rates below forecast have resulted from some newer measures taking longer than anticipated to fully deploy, as well as from conservative forecasting in which SoCalGas sought to avoid the need to deny measures to qualifying customers due to budget constraints." Please answer the following:

- A. Did SoCalGas use conservative forecasting for the 2021-2026 period?
- B. If SoCalGas is not granted its request for budget flexibility, will SoCalGas be able to meet its goals?
- C. Beyond the request for budget flexibility, what changes does SoCalGas plan to make in the current funding cycle to spend its entire budget?

**RESPONSE 22:**

- A. SoCalGas believes its approach is realistic as opposed to conservative. SoCalGas' per-unit frequency forecasting methods are described in Mark Aguirre and Erin Brooks testimony.<sup>13</sup>:

"SoCalGas' starting point for forecasting above-the-line costs, with respect to continuing activities, is the relative frequency of measure installations per home treated in program year 2018. However, SoCalGas is proposing some fundamental changes to its program delivery approach, specifically in terms of the way the program engages with customers, in order to better target deep energy savings and hardship reduction for prioritized households. Whereas

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<sup>13</sup> ESA Testimony pp. 45-46.

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under the existing ESA Program, customers could be targeted via marketing and outreach tactics but, once enrolled, would automatically receive all feasible measures, SoCalGas' proposed approach seeks to engage customers over an extended period of time offering more opportunities to assess and respond to customer needs, and allowing for the possibility of targeting delivery on a measure-by-measure basis. SoCalGas acknowledges the limitations of its historical program data in predicting the likely frequency of measure installations under this approach, and has made adjustments to the expected frequency of measures to reflect the impact of a more customer-driven program presentation, the opportunity for customers to self-serve some measures, and SoCalGas' planned targeting of measures to customers with specific usage criteria or priority status."

- B. SoCalGas expects to achieve the goals it has proposed, based on its forecast budget requirements and measure mix, even under status quo budget flexibility. The additional flexibility SoCalGas is seeking will make it more likely that, if unanticipated developments and trends occur over the six-year cycle period, SoCalGas would be able to adjust to optimize performance against goals.
- C. In the current program cycle (2017-2020) SoCalGas views budget expenditures as a means of striving to reach treated unit and energy savings goals and may or may not result in the expenditure of its entire budget. SoCalGas has also implemented its Clear Plan in an effort to treat all willing and eligible households.

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**QUESTION 23:**

Please refer to the testimony of Mark Aguirre and Erin Brooks on p. 107, regarding coordination with CSD on low income energy efficiency services. Does SoCalGas refer single family or mobile home customers to the LIWP? If so:

- A. Please describe the criteria/conditions under which a customer is referred to LIWP.
- B. Does SoCalGas consider whether treatment by LIWP would offer more benefits to a customer than ESA in determining whether to refer a customer to LIWP? If not, why not?
- C. Clearly describe the referral process, including the typical sequence of steps and the actions that the customer takes and actions that SoCalGas takes.
- D. Please describe the typical timeline, including SoCalGas's initial contact with the customer and when the referral to LIWP is made.

**RESPONSE 23:**

SoCalGas does not have a formal referral pipeline between the ESA Program and LIWP.

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**QUESTION 24:**

Please refer to the testimony of Mark Aguirre and Erin Brooks on p. 154. Please describe current data sharing and coordination with SCE, CSD, LADWP, and SoCalGas's other IOU and utility agency partners, and problems with current processes. Please also describe efforts to improve data sharing and coordination with these partners, and anticipated challenges with making these improvements

**RESPONSE 24:**

SoCalGas exchanges data with Southern California Edison (SCE) on its ESA Program enrollments and installed measures through a joint data sharing tool which allows contractors of each utility to understand whether a home has been enrolled, received energy education, and if a home has received measures from the other utility. SoCalGas' system automatically assigns leads to its contractors if a home not previously treated by SoCalGas is enrolled by SCE. In addition, SoCalGas uses a joint mobile environment in partnership with SCE to allow joint enrollment contractors to perform and document the in-home process for both IOUs simultaneously. SCE and SoCalGas are parties to an inter-utility agreement that includes bilateral nondisclosure provisions.

SoCalGas provides data to CSD on an ad-hoc basis through the Energy Data Release Program (EDRP). The data is released through a Non-Disclosure Agreement between SoCalGas and CSD.

As the administrator of the joint programs with LADWP and other non-IOU utility partners, SoCalGas coordinates the non-gas measures that will be provided via the SoCalGas contractor network under the guidance of the partner. This coordination includes contractor agreements, measures and a seamless customer experience to ensure comprehensive energy savings via gas, electric and water.

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SoCalGas has not identified any problems with data sharing and coordination with its partners and has not proposed any improvements.

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**QUESTION 25:**

Referring to the testimony of Mark Aguirre and Erin Brooks on p. 163, please provide rate and bill impacts associated with the following:

- A. ESA participants
- B. ESA non-participants
- C. CARE participants
- D. CARE non-participants
- E. ESA and CARE participants
- F. ESA and CARE non-participants

**RESPONSE 25:**

Both the ESA Program and CARE are funded by the Public Purpose Program (PPP) surcharge, therefore SoCalGas does not separate its customer rates for ESA and CARE. Additionally, CARE customer rates are separate from non-CARE customer rates. Please see file that includes SoCalGas' PPP surcharge rates and rate impacts for both CARE and non-CARE customers.



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**QUESTION 26:**

Please refer to the testimony of Mark Aguirre and Erin Brooks, regarding efforts to enroll and engage customers through online interfaces.

- A. What share of ESA-eligible customers in SoCalGas's service area have access to broadband or internet?
- B. What percentage of ESA-eligible customers currently access and utilize online services from SoCalGas?

**RESPONSE 26:**

- A. SoCalGas does not have specific data on each ESA-eligible customers with access to broadband or the internet in its service territory. As stated in its ESA Program testimony, SoCalGas used CARE enrollment as an indicator that a customer may also be ESA-eligible. SoCalGas referenced the number of current CARE customers with cell phone numbers listed to estimate how many have mobile internet access.<sup>14</sup> Approximately 75% of CARE customers have a cell phone listed and one-third of CARE participants are receptive to being contacted through text messaging.<sup>15</sup>
- B. SoCalGas does not have specific data on how each ESA-eligible customer currently accesses and utilizes its online services. However, in SoCalGas' Low Income December 2019 monthly report, SoCalGas reported approximately 64,500 customers enrolled in CARE using the online application.<sup>16</sup> In addition, as reported in SoCalGas' Low Income February 2020 monthly report, since September 2017, when

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<sup>14</sup> ESA Testimony, p. 88

<sup>15</sup> 2018 CARE Customer Satisfaction Tracking Study.

<sup>16</sup> SoCalGas Low Income December 2019 Monthly Report.

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the CARE Program was integrated with MyAccount, 152,858 CARE customers have successfully enrolled in MyAccount.

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**QUESTION 27:**

Please refer to the testimony of Mark Aguirre and Erin Brooks regarding focus groups and materials/program information provided in non-English languages. Please provide information on the primary and secondary languages of ESA eligible customers in SoCalGas's service area.

**RESPONSE 27:**

The non-English languages selected for the focus groups and materials/program information provided was based on "Primary Language" data collected by the ESA Program at the time of enrollment.<sup>17</sup> The three primary languages after English, were Spanish, Vietnamese, and Chinese.

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<sup>17</sup> 2018 SoCalGas ESA Program Enrollment Data

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LanguageName	Total
English	67,156
Spanish	52,632
Vietnamese	996
Chinese	855
Korean	443
Armenian	350
Other	126
Declined	124
Russian	81
Tagalog	69
Arabic	67
Farsi/Pashto	53
Samoan	29
Khmer/Cambodian	28
Thai	19
Laotian	15
Hmoob	6

**QUESTION 28:**

Referring to the Testimony of Daniel Render, p. 8, please provide responses to the following:

- A. Please describe the proposed process to add or remove measures.
- B. When does SoCalGas intend to make changes to its program offerings or budgets: when the ED and stakeholders are notified, when the CPUC has accepted the proposed change, or at some other point in time?

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C. What are the criteria for adding or removing measures?

**RESPONSE 28:**

- A. SoCalGas' ESA Program proposes to move from the one-time mid-cycle update method to a nimbler monthly reporting process to add and remove measures for the 2021-2026 program cycle. Documenting the adoption or removal of measures via the Low Income monthly report is comparable to that of the current Energy Efficiency portfolio process where the Implementation Plan is utilized for updating of measures on an as-needed basis.
- B. SoCalGas' ESA Program intends to make changes to its program offerings and/or budget on an ad hoc basis based on regulatory and programmatic needs. SoCalGas proposed in its application to make flexible changes without requiring CPUC approval akin to the Energy Efficiency process.
- C. SoCalGas' criteria for adding or removing measures depends on the following: addressing health, comfort, and safety; generate deep energy savings intended to reduce energy consumption.

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**QUESTION 29:**

Please refer to the testimony of Daniel Rendler, p. 15, regarding the overlap of SoCalGas' service territory with other investor-owned and publicly owned utilities. Please describe SoCalGas's arrangements with these other utilities on energy efficiency and ESA program administration, funding, marketing, planning, program design, and other relevant functions.

**RESPONSE 29:**

Program Design: The program partnership with other utilities or agencies is predicated on lowering the overall costs of providing customers with energy and water-saving measures and maximizing customer convenience where customers will not need to receive energy and water efficiency services and products from multiple entities. SoCalGas' ESA Program identifies participating partners into two categories: 1) Water agencies / Providers and 2) Municipal electric providers. In the first category, the water agencies focus on water measures such as high efficiency clothes washers, faucet aerators, low flow shower headers, thermostatic shower valves, tub spouts and low flow toilets. For measures that SoCalGas is already implementing as part of the ESA Program (e.g. low-flow showerheads and aerators), the water agencies/providers pay a portion of the cost of the measures. For measures not already offered by SoCalGas' ESA Program (e.g. high efficiency toilets, and high-efficiency clothes washers not qualified for ESA Program), the water providers pay in full for the costs to install these measures by ESA Contractors. In program year (PY) 2019, the following agencies participated in leveraging water measures: Anaheim Public Utilities, California American Water, Eastern Municipal Water District, Elsinore Valley Municipal Water District, Fontana Water Company, Liberty Utilities, Metropolitan Water District, Moulton Niguel Water District, San Gabriel Valley Water Company, and Western Municipal Water District.

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The other category for leveraging opportunities through the ESA Program involves municipal electric providers. SoCalGas' partnership with the municipal electric utilities allows customers to receive electricity-saving measures at no cost via the ESA Program, and these measures are installed by ESA Program contractors. Such measures include LED bulbs, Smart Power Strips, LED Torchiere Lamps, and A/C Tune-ups. Qualifying measures vary by electric provider, and they are usually dependent on the availability of funding. The municipal electric utility pays for the cost of installing these electric measures in full. The electric municipals that partnered with SoCalGas in PY 2019 include: Anaheim Public Utilities, Los Angeles Department of Water & Power, Pasadena Water and Power, and Riverside Public Utilities.

**Funding:** For measures that SoCalGas is already installing through the ESA Program, the partner pays for a portion of the measure cost. The amount varies depending on the partner and the measure(s). This funding is used to lower the cost of ESA Program measures incurred by SoCalGas ratepayers; therefore, potentially enabling more customers to participate in the SoCalGas ESA Program. For measures not already offered by the ESA Program, the partner pays 100% of the measure cost. In addition to the measure costs, SoCalGas also collects a fee from the partners to offset the internal costs incurred by SoCalGas to manage, track, invoice, and report projects to the partners.

**Marketing:** The majority of the partners rely on SoCalGas' existing marketing efforts. SoCalGas does not incur costs for the partner's marketing efforts. In limited cases where the partner supplements SoCalGas' ESA Program marketing, such efforts are being coordinated carefully with SoCalGas, and the partner is responsible for all the marketing costs incremental to the usual marketing costs that SoCalGas' ESA Program incurs without the partnership.

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**QUESTION 30:**

Please refer to the testimony of Daniel Rendler, p. 15.

- A. Has SoCalGas considered any design and delivery elements for single family and mobile home elements to be administered as a statewide program with a single third-party program implementer for all IOU regions? If not, why not?
- B. Have the IOUs discussed standardizing offerings, and if so, why aren't they standardizing offerings more?

**RESPONSE 30:**

- A. SoCalGas has not considered a single statewide program whether it be administered by an IOU or a 3rd party. SoCalGas believes local administration of the ESA Program ensures fair and equitable attention to contractors and its customers and is critical given the uniqueness of its territory.
- B. The four IOUs adhere to the same standards from the Statewide Energy Savings Assistance Program 2017-2020 Cycle Policy and Procedures Manual revised March 16, 2018 manual and the Installation Standards manual in administering and implementing their respective ESA Programs.

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**QUESTION 31:**

Please refer to Attachment Table A-5.

- A. Please provide the name and full citation of any evaluations, studies, or reports SoCalGas relied upon in determining the planned savings and participation goals for each year of the plan.
- B. Please describe how SoCalGas developed the therm savings goal for each year of the plan.
- C. Please describe how SoCalGas developed the participation goal for each year of the plan.

**RESPONSE 31:**

- A. Planned savings goal for each year is set to be the same for all years in the application cycle, 2021-2026, as described below:
  - 1. SoCalGas leveraged ex-ante savings values from the 2015-2017 Impact Evaluation for the following existing measures: Air sealing, attic insulation, furnace repair, furnace clean and tune, prescriptive duct and seal, HE clothes washer, tank and pipe insulation, water heater repair/replace, other hot water, tub spout, and thermostatic shower valve.
  - 2. SoCalGas developed the therm savings goals for each year of the plan by using deemed savings values from work papers, which are specified in parentheses, were used for the following new measures: Multi-Family Common Area Domestic Hot Water (SWWH011-01, SWWH010-01, SWWH016-01, SWHC004-01, SWWH015-01, SWWH017-001), High Efficiency FAU Early Replace (SWHC031-01), High Efficiency FAU Replace On Burnout (SWHC031-01), High Efficiency

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Wall Furnace Early Replace (SWHC001-01), HE Wall Furnace Replace On Burnout (SWHC001-01), and Smart Thermostat (SWHC039-02).

3. SoCalGas developed the participation goal for each year of the plan by using solar water heating savings values were taken from those estimated by the California Solar Initiative (CSI) thermal program.
  4. Forecasted savings for the MF whole building program are based on historical savings data.
  5. Use zero savings value for these maintenance measures: CO and Smoke Alarms, and comprehensive home health and safety checkup.
- B. Therm savings goal for each year of the plan were developed by applying the average therm savings value by measure (described in part A), to the measures forecasted to be installed (described in participation goal in part A and part C). Therm savings goal is simply the product of quantity of measures forecasted and the average therm savings of each measure unit (house or equipment).
- C. SoCalGas' proposal to treat 110,000 dwellings per year is the same treatment goal proposed by SoCalGas and adopted by the Commission for program year 2017. SoCalGas has treated on average of 115,000 customers per year over the five-year period 2010 through 2014. SoCalGas references this timeframe, as there was a larger population of untreated customers at that time than in recent years. In the new program cycle, SoCalGas has proposed that all customers be considered untreated, so this timeframe is more representative of the 2021-2026 period.

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**QUESTION 32:**

Please provide information on how participants in SoCalGas's ESA learn about the program, in terms of percent by type of source. Also please describe the current and projected costs for each type of marketing.

**RESPONSE 32:**

SoCalGas' customers self-report "lead source" information by category when they are enrolled in the ESA program. Since there can be a bias with self-reported information, SoCalGas does not solely depend on this information when planning marketing and outreach activities. Below are the 2019 lead source categories by percentage.

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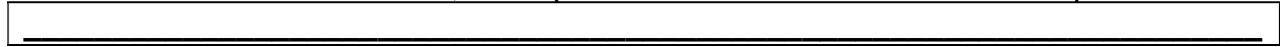
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Lead Source Category	
Outreacher - Canvassing	69.82%
CARE Referral	5.17%
HEAT Canvassing List	4.17%
CPUC 2020 Clear Plan	3.19%
Telemarketing - Telephone	3.16%
Other Utility or Municipality Referral	2.29%
SCG Referral	1.92%
Whole Neighborhood Approach	1.92%
Neighbor/Friend/Relative Referral	1.91%
Campaign	1.87%
ESA Mobile_ESAP SCE	0.80%
SoCalGas Email	0.76%
Energy Efficiency Referral	0.67%
Direct Mail	0.59%
SCG - Internet	0.53%
Gas Bill Insert	0.35%
Joint Utility_Datasharing	0.17%
CARs Referral	0.13%
Capitation	0.09%
InfoLine 211	0.08%
LI-HEAP	0.07%
Newspaper/Radio/Television	0.07%
Received services at another location	0.07%
Media/Leveraging Dept./Event	0.05%
Muni	0.04%
Joint Utility_ESAP SCE	0.04%
Master Agreement	0.02%
Univision - Telethon	0.02%
REN Referral	0.02%
SCG - GAF/Medical Baseline	0.00%
WNA Census Self Cert	0.00%

SoCalGas does not track current marketing, education and outreach (ME&O) cost in the SAP accounting system by 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".

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The 2021-2026 projected budget of each marketing and outreach tactic is in the table below.

Marketing Tactic	ESA ME&O Cost										
	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						

SoCalGas would like to clarify that the lead source category is self-identified by a customer at enrollment and does not directly correlate to the success of that single tactic. To enroll a customer in the program, it takes several “impressions” from multiple marketing and outreach tactics to successfully inform, educate and eventually convert that customer. Further, customers typically only remember the last communication they received. SoCalGas’ current and planned M&O strategy incorporates a mix of integrated tactics to consistently deliver a cohesive message to potential customers.