

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

(A.19-11-006)

(CALADVOCATES-ESA-CARE-APR-SCG-15)

RECEIVED: SEPTEMBER 10, 2020

SUBMITTED: SEPTEMBER 18, 2020

QUESTION 1:

Please provide a detailed description of your policies and regulations on retreatments or “Go-Backs” in your ESA program.

- a. Please include the policy rational and explanation for those policies and regulations.

RESPONSE 1:

The “Go-Back Rule” was eliminated in Decision (D.)16-11-022 Ordering Paragraph (OP) 9 (and as modified in D.17-12-009 OP 9). The Go-Back Rule prohibited the Investor Owned Utilities (IOUs) from providing services to dwellings that had previously been treated since 2002. The Commission modified this rule to allow customers both access to new measures that were introduced into the program since 2002 as well as to replace measures which may have surpassed their useful life. This rule change was also noted in the California Statewide Energy Savings Assistance Program Policy and Procedures Manual to state that, “The “Go-Back” Rule was eliminated.”¹

SoCalGas follows the direction provided in D.16-11-022², regarding which categories to focus on for treatments and re-treatments. In D.16-11-022, the Commission stated:

“We direct the IOUs to treat ESA-eligible households based on income-eligibility. IOUs should focus on and track categories of households treated including, but not limited to:

1. Households that have never received ESA treatment;³
2. Households that have received ESA treatment since 2002, tracking the measures installed and noting the condition and functionality of the previously installed ESA measures;

¹ California Statewide Energy Savings Assistance Program Policy and Procedures Manual (Revised March 16, 2018) at 27.

² D.16-11-022 at 411.

³ Category 1 does not apply to retreatments. Additionally, households treated before 2002 count towards the 2020 first-time treatment goal.

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3. Focus on high energy-using households, including, but not limited to those who often use 300% of monthly energy baseline quantity or more;
 4. Focus on customers with disabilities, or other demonstrated safety and health needs, as well as comfort needs as identified in the 2013 LINA study and this Decision;
 5. Focus on water/energy nexus measures including replacement of Evaporative Coolers with HE air conditioners to increase energy reliability in light of the drought and amount of water and embedded energy in water necessary to run evaporative coolers;
 6. Focus on multi-family households and buildings, particularly where treatment to the multi-family common area would result in significant energy efficiency savings;
 7. For SCE and SoCalGas, focus on the areas affected by the Aliso Canyon State of Emergency, as the geographic area may be adjusted by the Commission's Energy Division;
 8. Focus on areas or communities with a participation rate below the average for the IOU's service territory; and
 9. Conduct tribal consultations for tribal sovereign nations being served in the utility service territory. Tribal consultations may require the use of additional database upgrades for synchronizing utility customer account databases with addressing customs unique to tribes, providing holistic customer access to ESA contractors when treating tribal customers, or other customized actions to deploy ESA measures to eligible tribal customers".⁴

Additionally, SoCalGas participated in the Mid-Cycle Working Group (MCWG), as directed in D.16-11-022,⁵ to address re-treatment prioritization. The MCWG issued its recommendations in *The Mid Cycle Working Group Final Recommendations for Specific Tasks identified in D.16-11-022* where SoCalGas stated, "SoCalGas proposed to target homes with low program enrollment, and prioritized homes treated prior to 2009 based on likelihood of feasibility for recently introduced measures."⁶

⁴ *Id.*

⁵ D.16-11-022, Conclusion of Law (COL) 15.

⁶ Mid Cycle Working Group: Final Recommendations for Specific Tasks Identified in D.16-11-002 at 7 (June 29, 2018).

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Further, as referenced in *The Mid Cycle Working Group Final Recommendations for Specific Tasks Identified in D.16-11-022*, “In the Clear Plan, SoCalGas proposed to adjust its operating parameters to gear contractor efforts towards first-time treatments. Although SoCalGas will continue to prioritize homes treated prior to 2009 in its re-treatment strategy, it will place a greater emphasis on first time treatments by making the necessary program, operating, marketing and outreach adjustments in an effort to meet the 2020 goal.”⁷

As part of SoCalGas’ Clear Plan Advice Letter 5256-A, SoCalGas has made adjustments to its compensation structure to direct contractors towards first time treatment homes, implemented incremental marketing efforts for first-time homes, and targeted outreach for customers highly likely to be first-time participants. SoCalGas also stated that “go-back customers interested in the program must continue to be served, whether they express interest by calling SoCalGas, visit the web site, are encountered in the process of contractor canvassing efforts, are provided to SoCalGas as leads through coordinated enrollment with SCE, or reside within a multifamily building being treated as a whole that includes both first-time and “go-back” tenants.”⁸ The Commission recognized in Resolution G-3532 that “Utilities are directed to treat all eligible households, and must base program eligibility on statutory criteria, not prioritization models” and that “participants will either be in the first time or retreatment categories and will be eligible for service in either case.”⁹

Therefore, SoCalGas has made significant operational adjustments to the program, with the goal of prioritizing first-time treatments (in alignment with the 2020 goal), and still serving all eligible households, including Go Backs.

⁷ Mid Cycle Working Group: Final Recommendations for Specific Tasks Identified in D.16-11-002 at 7, (June 29, 2018).

⁸ SoCalGas Advice Letter 5652-A at 8.

⁹ Res. G-3532 at 20.