

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-02)

RECEIVED: MAY 11, 2020

PARTIAL SUBMITTED: MAY 26, 2020 (EXCEPT RESPONSES TO Q2, Q4, Q10, Q12)

REMAINDER SUBMITTED: JUNE 12, 2020

QUESTION 1:

Please refer to SoCalGas response to TURN DR 1 - Question 2.

- a. Why is SoCalGas reaching only a small percentage of eligible customers? What strategies has SoCalGas tried to increase this percentage? What strategies does SoCalGas plan to use in the future to increase this percentage?
- b. Are there customers that are not CARE eligible that could qualify for the ESA program?
- c. For each year, please confirm whether the “% of low income customers served” is “first touch” only or if it includes re-treatments.
- d. Please describe how the number of eligible customers were estimated. Please indicate assumptions, formulas, and data sources.

RESPONSE 1:

- a. As noted in the testimony of Mark Aguirre and Erin Brooks, SoCalGas' ESA Program has treated over 65% of all low-income households in the service territory over the period from 2002-2020.¹ However, as SoCalGas has previously reported in its annual reports, reaching the goals the Commission has adopted has proved challenging. SoCalGas has described its challenges in reaching eligible and willing customers and its strategy to address these challenges in its 2019 ESA-CARE Annual Report filed May 1, 2020 at pages .31-33 as follows:

1.4.3 If the IOU has failed to meet its annual goal of number of households served, please provide an explanation of why the goal was not met. Explain the programmatic modifications that will be implemented in

¹ ESA Testimony p. 14

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order to accomplish future annual goals of number of households served.

SoCalGas' treated total of 122,037 in PY2019 was its highest yearly total since 2011.

This total exceeded the goal of 121,275 established in D.16-11-022, but was short of the adjusted goal of 182,265 adopted in the Non-Standard Disposition of AL 5325

issued December 19, 2018.

Furthermore, SoCalGas treated 65,157 "first-time" homes in PY2019.

This was a significant increase from the 2018 level of 40,998, but was short of the 153,659 target for first-time treatments set in the Disposition of AL 5325. SoCalGas exceeded its "go-back" unit target, delivering 56,880 go-backs compared with a target of 28,606.

The relatively high number of unwilling customers reported by SoCalGas in 2019 reflects not only improved efforts to ensure customer encounters are documented when they occur, but also the fact that the pool of willing first-time treatment homes continues to become more scarce as the ESA Program approaches the final year of the 2020 goal. The increase in first-time treatments that SoCalGas delivered in 2019, while significant, came as the result of very aggressive policies and contractor efforts to target this shrinking population. Reaching even higher levels in 2020 will require

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even more focus on the target segment, further reduction in go-back activities that might otherwise divert resources from first-time homes, and more focused reliance on systematic targeting of customers according to Clear Plan Lists, recognizing that free canvassing is no longer an effective tactic considering the challenges the program faces. SoCalGas continues to work to position its program to address these challenges.

In 2020, SoCalGas will continue to position its program for success. Clear Plan outreach efforts, having been tested and developed over the course of 2019, will be SoCalGas' central approach throughout 2020. Additional contractors identified through a solicitation in 2019, and on-boarded in late 2019 and early 2020, are expected to deliver a significant contribution in 2020. Common Area Measure delivery will continue to be developed and integrated into SoCalGas' multifamily offerings. Other tactics found to be effective in penetrating multifamily homes, including delivering Simple Measures at the time of enrollment, prior to obtaining owner authorization, will continue to be used and further streamlined. Smart thermostats, which have been found to enhance program appeal to customers, will be

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fully integrated into the program throughout 2020, providing an additional boost.

Also in 2020, SoCalGas will engage a specialized canvassing contractor to help execute the Clear Plan approach to reach all willing and eligible first-time customers. The canvasser is expected to knock on as many as 600,000 doors during the year, thus augmenting the outreach approach that also includes phone, direct mail, and email. When the canvasser identifies a customer willing to enroll in the ESA Program, the customer will be connected with an ESA Program contractor to enroll and ultimately weatherize the customer's home. SoCalGas is also exploring the use of third-party technology to orchestrate a targeted, automated, and multi-channel marketing campaign to first-time eligible customers in support of the 2020 first-time treatment goals. The pilot project is targeted at approximately 800,000 customers to drive awareness and solicit interest in participating in the ESA Program. The outreach will be delivered via email and text/SMS. The outreach will also allow for recording other off-line customer communication attempts such as direct mail, phone calls, and in-person visits. This will allow for tracking/dispositioning of customer

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responses for enrollment or later outreach via offline channels as well as customer refusals.

Through these approaches, SoCalGas expects to be able to identify and treat all remaining willing customers in its service territory during program year 2020.

SoCalGas addressed proposed future strategies to reach its goals in the testimony of Mark Aguirre and Erin Brooks, as summarized at p.15:

SoCalGas proposes to treat – meaning, install energy saving measures – in 110,000 dwellings per year in PYs 2021-2026. SoCalGas anticipates that treating 110,000 units per year is an achievable goal given that there are approximately 1.9 million income eligible households in SoCalGas' service territory. SoCalGas proposes to accomplish this objective by modernizing the program and broadening its reach, adjusting outreach, enrollment, and energy education processes and leveraging on-line engagement in ways that address the customer trust barrier and turn over more control to the customer, by redesigning program delivery to accommodate a more modular and flexible approach and by updating the measure mix to achieve increased energy savings.

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- b. Yes. Customers who may have more than one account can only receive the CARE discount on their main account. However, the other accounts may be eligible for the ESA Program and would be provided as potential leads to the appropriate ESA Program contractor. Master metered customers do not qualify for CARE, but could be considered eligible for the ESA Program if they meet the income eligibility requirements.
- c. The percent of low income customers served include only first-time treatments from 2010 through 2015. From 2016, the figures include both first-time and go-backs treatments.
- d. SoCalGas uses the joint utility methodology adopted by the Commission in D.01-03-028 for developing monthly penetration estimates. The method entails annual estimation of eligibility for the CARE and ESA Programs, and other income by household-size parameters at the small area level (e.g., block group, census tract, and ZIP+2) for each IOU territory and for the state. Sources for the estimation include the current U.S. Department of Health & Human Services (“HHS”) guidelines, current year small area vendor marginal distributions on household characteristics, Census 2010 SF3 data, Census American Community Survey 2012-2016 Public Use Microdata Sample (“PUMS”) data, utility meter and master meter household counts, Department of Finance Consumer Price Index series, and various Geographic Information System sources.

SoCalGas applies the county and utility level eligibility factors to its current set of residential meter counts. For CARE, this includes both individually metered and sub metered housing units. Once the factors are applied, an estimate for the number of low-income eligible customers is generated. For future years 2021-2026, SoCalGas also applied the meter growth rate to forecast the total residential meter counts.

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QUESTION 2:

Please refer to SoCalGas response to TURN DR 1 - Question 3. By zip code, town, census block group, or similar geographic grouping, please provide the number of customers, number of ESA-eligible customers, and number of customers that have participated in the ESA program for each of the previous 10 years for each of these housing types separately: MH, SF, and MF. If the requested data are not available, please provide the data that most closely matches that requested.

RESPONSE 2:

The attached file contains the following information:

- Treated units by zip code and housing type for each year, 2010-2019.
- Total homes by zip code, based on a current count of SoCalGas residential meters, with adjustments made to account for multiple homes behind a master meter. SoCalGas does not have similar data for historical years, nor is SoCalGas able to distinguish homes by housing type.
- Estimated income eligible homes, by zip code. SoCalGas does not have similar data for historical years, and does not conduct any eligibility estimates on a housing type basis.



TURN Data Request
02_Q2_2.xlsx

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QUESTION 3:

Please refer to SoCalGas response to TURN DR 1 – Question 4.

- a. In both Part A and Part B of this response, SoCalGas divides \$590 million by 660,000 homes treated, but arrives at different values for cost per home treated. Please explain.
- b. Please provide average spending per home for non-resource measures in each of the previous 10 program years.
- c. Please provide average spending per home for resource measures in each of the previous 10 program years.

RESPONSE 3:

- a. SoCalGas' response to part A contained an error. A revised version is provided below:

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 in the Statewide Energy Savings Assistance Program 2017-2020 Cycle Policy and Procedures (P&P) Manual revised March 16, 2018 at Table 5-1, including minor home repair. In 2018, minor home repair expenditures contributed \$12,232,164 or 19.5% of all installation expenditures in the same group of categories. SoCalGas anticipates minor home repair will contribute a similar proportion in the forecast cycle, yielding a total of \$114,983,569 or \$174.22 average per treated home for minor home repairs.

- b. The table below provides SoCalGas' average spending per home for "resource" and "non-resource" measures for 2016-2019. It uses the "less than one therm" definition of "non-resource" adopted from the Cost Effectiveness Working Group

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(CEWG) recommendations submitted on June 13, 2018.² SoCalGas notes that prior to resource TRC cost effectiveness metrics being presented as part of the 2015-2017 application, a distinction between “resource” and “non-resource” measures had not yet been established.

Program Year	Measure Installation Costs Per Home	
	Resource	Non-Resource
2016	\$282	\$290
2017	\$269	\$296
2018	\$271	\$360
2019	\$242	\$324

c. See response to b above.

² CEWG was authorized in D. 16-11-022 to provide proposals and recommendations.

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QUESTION 4:

Please refer to SoCalGas response to TURN DR 1 - Question 5 regarding mobile homes.

- a. How many mobile homes have received Air Sealing/Envelope measures in each of the previous 10 years?
- b. What percentage of treated mobile homes have received Air Sealing/Envelope measures in each of the previous 10 years?
- c. What are the main barriers to treating mobile homes through the ESA program?
- d. Has SoCalGas considered offering belly wraps, insulated skirting, wall insulation, roof insulation, or roof caps for mobile homes? If not, why not? If so, please provide SoCalGas's rationale for not including these measures. Please be specific about challenges anticipated with each of these measures.
- e. Does SoCalGas have estimates of costs and savings associated with the measures listed in (d) above? Please provide.

RESPONSE 4:

a. and b.

The table below provides the number of mobile homes receiving air sealing and envelope measures annually from 2010 to 2019.

Program Year	Mobile Homes Treated	Mobile Homes Receiving Air Sealing / Envelope Measures	% of Treated Mobile Homes Receiving Air Sealing / Envelope Measures
2010	8,015	3,355	42%
2011	11,122	3,760	34%
2012	7,914	3,820	48%
2013	4,696	3,640	78%

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2014	6,632	4,583	69%
2015	7,728	5,345	69%
2016	4,531	3,390	75%
2017	6,662	4,979	75%
2018	6,946	5,742	83%
2019	6,326	5,030	80%

c.

Barriers to treating mobile homes, based on how they differ from multifamily and single family homes, include the following:

- **Permitting Challenges**
 - Permitted Building - Permits for mobile homes are obtained through the state, which can be more challenging than the process to obtain permits through the county for single family homes.
 - Non-Permitted Building – The mobile home was placed on a parcel of land, often with another home, but was never legally established as a dwelling via the Department of Housing and Community Development (HCD) permitting process. These dwellings often are not individually metered, rather, they share a meter with another building on the lot. They may also have improper electrical and equipment grounding to support requirements for multiple measures.³

- **Resident Challenges**
 - Trust levels tend to be lower at mobile home parks because of the large number of senior tenants who are often wary of scams. This increases the likelihood of an unwilling customer.
 - Takes time to build the necessary relationships with mobile home community managers and homeowners' associations in order to gain access to the community.
 - Establishing Ownership – In many cases, the original owners have either abandoned the home or moved out and the home has been transferred to

³ This is more prevalent in small towns and rural California.

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someone else without formal documentation. Alternatively, the home has been deemed unsuitable for occupancy by HCD but someone still occupies the home (e.g., squatters). In any case, by the time a weatherization program reaches them, the dwelling has gone through multiple occupants who are not the legal owners and the utility bill is not in their name.⁴

- State-of-Decay – Many mobile homes have lacked proper upkeep and maintenance. Since the original owners may not be present and occupants may only be living there for a short period of time, the dwelling is not maintained. Often extensive repair is required to mitigate infiltration issues before weatherization can occur.⁵
 - Water and Sewer Hazards – In instances where the home is a non-permitted building, often the site lacks the approved water and sewer hook-ups, posing a hazard that must be corrected before weatherization can occur.
 - Mobile Home Listed Appliances – Most appliances to be installed in mobile homes must be listed for use in a mobile home. This poses a challenge when creating and storing inventory as special products must be in place specifically for mobile homes as they may not be able to use the same inventory as site-built homes.
- d. Based on initial research, SoCalGas determined that the following measures have significant challenges with installation, are cost prohibitive, and produce minimal energy savings:
- Belly Wraps/Belly Board - Offers minimal energy savings and is not cost effective in California's mild climate areas. The underside of the floor joist is usually covered with a fibrous board, creating a cavity between the floor and belly board. This cavity is often not insulated and prone to animal infestation.
 - Insulated Skirting – It is required that venting be installed on mobile home skirting. Since venting is required, insulated skirting has shown minimal energy savings in mild climate zones and is not cost effective. This measure has been

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⁵ This is more prevalent in small towns and rural California.

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included in some weatherization programs in colder climates but, the savings are still minimal.

- Wall Insulation - Difficult, labor intensive, and often requires an insulation crew with training that specializes in installing mobile home wall insulation. The wall cavity is typically narrower than site-built homes making installing insulation challenging. The two most common insulating techniques is blowing loose fill and packing with fiberglass batts. Regardless of what insulation method is used, the dew point is transferred to the interior wall which could result in a mold/mildew issue.⁶
- Roof Insulation - Insulating mobile home roofs is more difficult and labor intensive in comparison to a site-built home. Often requires an insulation crew with training that specialized in mobile homes.
- Roof Cap – See roof insulation above. Roof caps are a layer of rigid insulation over the existing roof, with additional insulation if space exists between the ceiling and existing roof.

e. SoCalGas, at this time, has not considered the measures mentioned above and therefore has not developed cost or savings estimates.

⁶ Energy Efficient Manufactured Housing: <https://www.energy.gov/energysaver/types-homes/energy-efficient-manufactured-homes>

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QUESTION 5:

Please refer to SoCalGas response to TURN DR 1 - Question 9 and the Excel tables supporting SoCalGas's 2018 and 2019 Annual Reports.

- a. Has SoCalGas has ever tracked the data in CARE Table 13A in its 2018 and 2019 annual reports or otherwise analyzed the near-term impact on energy usage following ESA treatment? If so, please provide that data and analysis.

RESPONSE 5:

No, SoCalGas does not track energy usage post ESA treatment. SoCalGas has never reported data in CARE Table 13A in its annual reports. SoCalGas does not track energy usage post ESA treatment.

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QUESTION 6:

Please refer to SoCalGas response to TURN DR 1 - Question 12. Who are the CBOs, and where do they operate?

RESPONSE 6:

The list of CBOs and places of operations are provided in SoCalGas' 2019 ESA-CARE Programs Annual Report at Table 5. See attached.



2019 ESA Annual
Report Table 5.xlsx

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QUESTION 7:

Please refer to SoCalGas response to TURN DR 1 - Question 21. Why does SoCalGas use an opt-in model rather than an opt-out model for post-treatment education?

RESPONSE 7:

SoCalGas believes that using an opt-in model for post-treatment education allows the customer to choose the level of information that they want to receive.

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QUESTION 8:

Please refer to SoCalGas response to TURN DR 1 - Question 23. Why is there no formal referral pipeline between ESA and LIWP?

RESPONSE 8:

SoCalGas does not have a formal referral pipeline between ESA and the Low Income Weatherization (LIWP) because SoCalGas has been working with the Department of Community Services and Development (CSD) to leverage ESA Program measures in its LIWP in compliance with D.16-11-022 and has not initiated discussions regarding a formal referral process. Nevertheless, SoCalGas makes customers aware of other assistance programs including CARE, California Lifeline and CSD's Low Income Home Energy Assistance Program as part of its in-home energy education service.

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QUESTION 9:

Please refer to SoCalGas response to TURN DR 1 - Question 24, which states "SoCalGas' system automatically assigns leads to its contractors if a home not previously treated by SoCalGas is enrolled by SCE." Does this mean that some customers go through two utilities to receive energy efficiency services? How does this impact the depth of services provided to these customers?

RESPONSE 9:

Customers in overlapping SoCalGas and SCE service territories that are enrolled by a contractor providing program services for only one utility will need to go through the additional utility to receive all energy efficiency services for which they qualify. The benefit of SoCalGas' system ensures that the customer does not have to provide income documentation twice. It automatically assigns the lead to a contractor when a home, not previously treated by SoCalGas, is enrolled by SCE. The customer's enrollment for SCE's ESA Program is leveraged to qualify the customer for SoCalGas' ESA Program allowing the customer to receive the benefit of having additional measures including gas only measures installed in the home with less paperwork.

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QUESTION 10:

Please refer to SoCalGas response to TURN DR 1 - Question 24, which states "SoCalGas has not identified any problems with data sharing and coordination with its partners and has not proposed any improvements."

- a. How does SoCalGas ensure that customer data are secure?
- b. Do SoCalGas' partners provide all types of data that SoCalGas needs in order to provide ESA services? If not, how does SoCalGas collect these data?
- c. Please describe how customer records are matched for referrals to SoCalGas from other entities.
- d. Please describe how customer records are matched for referrals by SoCalGas to other entities.

RESPONSE 10:

- a. Relative to the data sharing tool referenced in TURN DR 1 – Question 24, SoCalGas uses encrypted, secure connections to transfer data between SoCalGas and SCE's systems. A non-disclosure agreement requires that ESA Program customer data received by either utility from the other be used only for specific purposes related to operations and required reporting of the ESA Program.

Users accessing customer information through the joint mobile platform referenced in TURN DR 1 – Question 24, as well as through SoCalGas' legacy Home Energy Assistance Tracking (HEAT) interface, are required to log in through a unique user Identification (ID) and password, which must meet complexity requirements and be changed frequently in keeping with cybersecurity best practices. User groups and roles are created to designate the users with access to customer information. User accounts are reviewed on a quarterly basis to ensure access is still appropriately assigned. Contractors and their personnel are contractually required to protect customer data and to inform SoCalGas of potential data breaches. The joint mobile platform is also designed

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to operate only while connected to the network so that customer information can be stored in secured servers, rather than on the program representative's device. This reduces the likelihood of customer data being exposed if a device is lost or stolen.

- b. When operating through the joint mobile environment, a joint contractor does provide all data needed to provide ESA services. The joint contractor providing service for both SCE and SoCalGas enters information into the system that is transmitted to both the SCE and SoCalGas servers. In addition, there is specific information collected for SoCalGas that is stored only on SoCalGas' servers.

When exchanging data between SCE and SoCalGas through the data sharing tool, information delivered from SCE provides information needed by SoCalGas to identify enrolled customers and to determine whether services including energy education have been provided by SCE to the customer. However, not all information needed by SoCalGas to provide services is collected by SCE. SoCalGas also requires information specific to SoCalGas' process, including the configuration and condition of gas appliances and feasibility of gas-related energy efficiency measures. In order to enroll a customer identified as a lead through the data sharing tool, a SoCalGas contractor must visit the customer to collect this additional information.

- c. An address normalization procedure is used to match SCE and SoCalGas customer records based on their street number, street name, unit, city, and zip code. The data sharing tool uses this process to build and maintain a mapping of SCE account numbers to SoCalGas account numbers. This information can be securely accessed by authorized users to pass leads from the SCE system to the SoCalGas system. By using the joint mobile environment, a program representative in the field can simultaneously reference the same customer in both the SCE and SoCalGas systems.
- d. The process described in c. above also works conversely. The process maps SoCalGas account numbers to SCE account numbers in order to pass leads from SoCalGas to SCE.

**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-02)

RECEIVED: MAY 11, 2020

PARTIAL SUBMITTED: MAY 26, 2020 (EXCEPT RESPONSES TO Q2, Q4, Q10, Q12)

REMAINDER SUBMITTED: JUNE 12, 2020

QUESTION 11:

Please refer to SoCalGas response to TURN DR 1 - Question 32. Please describe "Outreacher – Canvassing." Who performs the canvassing--SoCalGas, a CBO, or a different group? Who funds the canvassing?

RESPONSE 11:

SoCalGas' enrollment contractors (including CBOs) perform canvassing as part of their efforts to identify customers to enroll. Canvassing is not directly compensated; contractors undertake this activity in order to be in position to earn fees for enrolling customers and providing energy education. SoCalGas pays enrollment and energy education fees to contractors using ESA "Customer Enrollment" and "In-Home Energy Education" authorized budgets.

SOUTHERN CALIFORNIA GAS COMPANY
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REMAINDER SUBMITTED: JUNE 12, 2020

QUESTION 12:

Regarding the indicators provided on p. 37-43 of the Testimony of Mark Aguirre and Erin Brooks, please provide the baseline values for each of the previous 10 years.

RESPONSE 12:

See attached file for all indicators from 2010 to 2019.



TURN Data Request
02 Q12.xlsx