

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric Company for
Approval of Statewide Marketing, Education and Outreach
Program and Budget for 2013-2014. (U39M)

And Related Matters.

Application 12-08-007
(Filed August 3, 2012)

Application 12-08-008
Application 12-08-009
Application 12-08-010
(Filed August 3, 2012)

REPLY COMMENTS OF THE GREENLINING INSTITUTE ON PHASE 2

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I. Introduction

In accordance with the April 5, 2013 deadline set by the Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge issued on January 18, 2013, The Greenlining Institute (Greenlining) submits these timely reply comments. These reply comments respond to the comments submitted by various parties regarding the Center for Sustainable Energy's (CCSE) Energy Upgrade California 2013-2014 Marketing Plan (Marketing Plan).

II. Funds Must be Allocated to Community Based Organizations and Other Nonprofit Entities That are Essential in Engaging Many Customers.

Greenlining agrees with the Center for Accessible Technology (CforAT) that it is “unclear” whether compensation will be paid to Community Based Organizations (CBOs) and other similar entities for their roles in the program. As Greenlining and others have previously stated, CBOs play a critical role in helping engage many customers – including low-income, limited English-proficient, and harder-to-reach customers – who the investor owned utilities (IOUs) might not otherwise be able to engage as effectively, or at all, for reasons including language barriers, cultural differences, and lack of trust. CBOs will continue to play a critical role with energy efforts and must be paid for that work.

CCSE has recognized that “A public brand without authentic person-to-person communication in communities could easily take on the negative attributes of propaganda and could be ignored or worse, if considered co-opted by commercial interests, the brand could even be considered coercive and distrusted.”¹ As such, CCSE plans to “work with community and faith-based organizations and ethnic media to foster influencers in a variety of communities . . . and [to] seek the input of those organizations and influencers in designing materials and

¹ CCSE 2013-2014 Energy Upgrade California Marketing Plan, p. 22.

events.”² Because these community organizations and leaders, who often operate on very lean budgets, will be relied upon to engage their communities, it is critical to allocate funds to them.

The Marketing Plan anticipates paying for such things as hiring a public relations firm, a marketing firm, and advertising. Likewise, it makes sense and is fair that CBOs and other nonprofits that conduct similarly valuable activities compared to the firms be paid for their efforts. CBOs are accustomed to reaching many people and in a manner that is highly cost-effective, since many operate on a shoestring budget. As such, the investment will be both the most effective and cost-reducing way of reaching hard to reach communities. Additionally, as Greenlining stated previously in Phase 1, funds should be specifically allocated to CBOs for policy reasons: to show that engagement through CBOs is a priority for the California Public Utilities Commission (CPUC) and the IOUs.³

It is Greenlining’s understanding, based on the Proposed Decision for Phase 1, that funding for outreach to community- and faith-based organizations was requested in the IOUs Demand Response Applications.⁴ While this is the case for 2013 and 2014, if the Commission agrees to support CBOs that conduct effective outreach, funding must be allocated in future demand response applications. Greenlining recommends that the Commission order, in this proceeding, the utilities to include CBO funding sufficient to cover the anticipated work in their future demand response applications. During 2013 and 2014, CCSE’s efforts will begin to identify effective organizations and engagement tactics, and be able to better estimate the cost of these efforts. These findings will help to inform the utilities’ applications.

III. CCSE Should Not Lose Focus on Cost-Savings for the Disconnected.

Focusing on the “disconnected” will help ensure meaningful and realistic options are

² Marketing Plan, p. 61.

³ Greenlining Phase 1 Opening Comments, p. 8.

⁴ Proposed Decision on Phase I Issues: Utility Budgets for the Flex Alert Program for 2013 and 2014, p. 15.

created for all communities, especially low-income customers, to participate in Energy Upgrade California. As such, Greenlining agrees with the comments of The Utility Reform Network (TURN) and CforAT that the “financial concerns of the ‘disconnected’ population should not be lost in the marketing process”⁵ and that the Commission should “be vigilant to ensure that the statewide program is tightly coordinated with the local programs so that the issue of savings does not fall through the proverbial cracks.”⁶ Greenlining also agrees that more details and direct attention are needed to show how the disconnected’s need to save money will be addressed.⁷

IV. Governance and Budget.

Greenlining urges the Commission to continue encouraging CCSE and the IOUs to collaborate in a way that maximizes benefits for the public given this is a statewide program with goals that advances state energy and workforce policy.⁸ Based on the Marketing Plan, it appears CCSE has the capacity, enthusiasm and skill to carry out this statewide program in the lead role. CCSE’s expertise and experience with programs that span the state and that focus on branding could be the key to successfully transitioning Energy Upgrade California into an umbrella brand. However, it is critical for CCSE to seek the IOUs’ expertise about particular programs, share their existing relationships with various entities and their experience with particular firms. Additionally, Greenlining agrees that funding for this program should be broadened by seeking other sources throughout the state.⁹

V. More Performance Metrics Should be Included for the Future.

Greenlining previously approved of and still supports CCSE’s metrics for success as described in the Marketing Plan, but agrees with other parties, including CforAT and TURN, that

⁵ CforAT Opening Comments, pp. 2-3.

⁶ TURN Opening Comments, p. 4.

⁷ *Id.*

⁸ Marketing Plan, p. 31.

⁹ CforAT Opening Comments, p.6 and TURN Opening Comments, p. 3.

it would be beneficial to add tangible numerical goals and metrics for the next cycle and beyond.¹⁰ Performance metrics are helpful tools to determine the success of an initiative and are important to ensure that the program can be subject to appropriate review. Focusing on the long term will be more feasible than setting numerical goals for the current cycle, and focusing on the future by setting benchmarks for future cycles, will help CCSE create an enduring structure for Energy Upgrade California that will provide useful information as the program continues.

VI. Conclusion.

For the aforementioned reasons Greenlining urges the allocation of funding specifically for CBOs asked to engage communities and not losing focus on cost-savings for the disconnected. Greenlining also urges the Commission to continue encouraging CCSE and the IOUs to collaborate in a way that maximizes benefits for the public given this is a statewide program supporting state energy and workforce policy. Additionally, Greenlining agrees that funding for this program should be broadened by seeking other funding sources throughout the state, and that tangible performance metrics should be included, especially for future cycles.

Respectfully submitted,

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¹⁰ CforAT Opening Comments, p. 4 and TURN Opening Comments, p. 6.