

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

Application of Pacific Gas and Electric Company for  
Approval of 2013-2014 Statewide Marketing, Education  
and Outreach Program and Budget. (U39 M).

And Related Matters.

Application 12-08-007

(Filed August 3, 2012)

Application 12-08-008

Application 12-08-009

Application 12-08-010

**COMMENTS OF THE GREENLINING INSTITUTE ON PHASE 1**

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## COMMENTS OF THE GREENLINING INSTITUTE ON PHASE 1

### **I. Introduction.**

In the Decision Providing Guidance on 2013-2014 Energy Efficiency Portfolios and 2012 Marketing Education, and Outreach (Guidance Decision), the California Public Utilities Commission (the Commission) directed the investor-owned utilities (IOUs) to apply for approval of their statewide marketing, education and outreach (ME&O) programs for 2013-2013 and associated budgets by August 3, 2012.<sup>1</sup>

On August 2, 2012, Pacific Gas and Electric Company (PG&E) filed the instant application, proposing its 2013-2014 Statewide ME&O Program and Budget.<sup>2</sup> Southern California Edison (SCE), San Diego Gas & Electric (SDG&E), and Southern California Gas (SCG) also filed 2013-2014 Statewide Marketing, Education and Outreach Program and Budgets on August 2, 2012.<sup>3</sup> These applications were consolidated by a November 8, 2012 Ruling by ALJ Fitch.

On January 18, 2013, the Assigned Commissioner Ferron and Administrative Law Judge Roscow issued a Scoping Memo and Ruling, indicating that comments on Flex Alert Budgets and Activities were to be filed by February 1, 2013.<sup>4</sup> Thus, these comments are timely filed.

### **II. PG&E Must Continue Flex Alert Messaging to Hard to Reach Customers.**

PG&E proposes to continue the Flex Alert program and proposes to take over the contracting responsibilities for Flex Alert previously handled by SCE as the lead utility for the investor owned utilities (IOUs).<sup>5</sup> Greenlining supports PG&E's continued commitment to the Flex Alert program given the critical need for California communities to reduce energy consumption during summer peak periods. As PG&E explains, "the wide scale notification of Flex Alerts

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<sup>1</sup> D.12-05-015

<sup>2</sup> A.12-08-007.

<sup>3</sup> A.12-08-008; A.12-08-009; A.12-08-010.

<sup>4</sup> p. 7.

<sup>5</sup> A.12-08-007, p. 23.

encourages customers to take immediate action on days when Flex Alerts are called.”<sup>6</sup>

To ensure that the greatest number of customers take action, it is imperative that PG&E increase its efforts to ensure that all customers receive Flex Alert Messages. As SCE emphasized, the many energy-related brands “each have a distinct and vital role in a customer’s experience. Brands that demonstrate their transparency, integrity, and authenticity continue to build successful longterm relationships with their customers.”<sup>7</sup> These long-term relationships require the utilities to make purposeful efforts to reach low-income customers, limited English-proficient customers, and customers who either cannot afford or otherwise access the internet. PG&E may be particularly well suited for this lead role, being the first of the three utilities to offer billing in Spanish and Chinese.<sup>8</sup> However, it must continue to lead the way on in-language outreach with respect to Flex Alerts as well.

### **III. PG&E Must Use Both Traditional and Innovative Approaches to Effectively Message Low Income Customers.**

PG&E explains that “The primary goal of Flex Alerts is to reduce peak usage during those targeted summer days when the state has heightened supply/demand balance concerns.”<sup>9</sup> According to PG&E, the “messages are communicated through mass media including radio and television, and engagement with CBOs that supports General Order 156.”<sup>10</sup> Greenlining urges the Commission to seek more substantial explanations about how the utilities intend to allocate Flex Alert resources across the different types of outreach they proposed.

Despite the lack of detail in the Applications, Greenlining applauds the utilities’ success

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<sup>6</sup> A.12-08-007, p. 7.

<sup>7</sup> A.12-08-008, p. 7.

<sup>8</sup> This option, proposed and approved in A.10-03-014, is scheduled to be available this year.

<sup>9</sup> A.12-08-007, p. 7.

<sup>10</sup> A.12-08-007, Prepared Testimony, p. 2-22.

with these traditional efforts, and encourages PG&E to continue using these approaches while also considering innovative approaches which could be more effective.

**a. Leverage Ethnically-Owned Media**

Because Flex Alerts are unpredictable, urgent, and require immediate action, mass media can be a suitable medium to disseminate messages quickly and widely. Leveraging ethnically-owned media who can render messages in the language and cultural norms of the communities they serve ensures that Flex Alerts effectively reach diverse communities. As PG&E explains, ethnically-owned media serve as “a trusted source of information” for the communities they serve.<sup>11</sup>

It is especially important that the messages are at the very least conducted in the most frequently spoken languages, especially Spanish. “It is projected that in July 2013, the non-Hispanic White and the Hispanic population will each represent 39 percent of California’s population. Later in the fiscal year, for the first time since California became a state, the Hispanic population will become the largest group in California.”<sup>12</sup> PG&E must endeavor to determine which ethnic media entities are the most popular among the communities it serves to ensure messages are relayed by those media outlets. Additionally, PG&E should seek guidance from CBOs and other multi-ethnic entities that are aware of which ethnic media outlets are well-connected to their customers.

**b. Expand Local Engagement Beyond CBOs**

Engagement with CBOs is another effective way to reach many customers, especially harder-to-reach customers, at the local level. Because CBOs have existing relationships with the community, they can be critical in helping customers understand the importance of Flex Alerts and educating customers about how to respond to Flex Alerts. As such, PG&E should utilize the

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<sup>11</sup> A.12-08-007, Prepared Testimony, p. 2-20.

<sup>12</sup> Governor’s Budget Summary – 2013-14, Demographic Information, p. 123 (<http://www.ebudget.ca.gov/pdf/BudgetSummary/DemographicInformation.pdf>).

utilities’ “unique and strong associations with community- and faith-based organizations and other CBOs, which fall into categories that include health, education, personal growth and improvement, social welfare and self-help for the disadvantaged.”<sup>13</sup>

PG&E should regularly assess the network of each utility company to determine which CBOs are effectively outreaching to the communities they serve. Additionally, PG&E should consider expanding its network to other entities that are trusted by ethnic communities. Examples of entities include churches, trade or military associations, and Consulates.

Specifically, establishing a relationship with local churches, a trusted stakeholder in most communities, could easily deliver Flex Alert messages to their congregations. Churches that gather on the weekends could remind their constituents to reduce their energy usage, in particular when the action is to be taken that same day or the next. Consulates also tend to be a trusted source of information. Consulates are often open to partnering with other entities to facilitate outreach to and educate their constituents about issues arising in their countries of residence that will impact them, and how to respond.<sup>14</sup> Veterans associations, particularly in areas where military bases are located, could spread the word to their constituents about Flex Alerts.

Moreover, CBOs should be given much flexibility to employ creative methods to engage their constituents. It is easier for them to determine – based on their experience – which messaging and type of engagement will resonate best with the target community. As long as they get the basic facts of the message out clearly, the way in which the messages are framed should be left to the discretion of the CBOs. The CBOs are in the best position to determine what frame, context, and messaging works for their communities.

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<sup>13</sup> A.12-08-007, Prepared Testimony, p. 2-19.

<sup>14</sup> The Mexican Consulate in Calexico established a partnership with the Superior Court of California, Imperial County to ensure they could adequately outreach to the Mexican population living in Imperial County. Go to: <http://www.courts.ca.gov/documents/imperial-man.pdf>.

### **c. Increase Social Media Efforts beyond the Web Portal**

According to PG&E, the SW ME&O program will include a “web portal [to] provide a gateway to resources that expounds on information about DSM programs and directs customers to access additional information from their utility, local governments, or other third parties.”<sup>15</sup>

Including a web portal makes sense because many Californians have internet connections at home.<sup>16</sup>

Because many customers use the Internet, Flex Alert information should be provided in languages other than English to reach as many customers as possible. The utilities should ensure that a new web portal is fully accessible to limited English-proficient customers who may not be able to navigate a website exclusively provided in English. To ensure messages are understood and are culturally sensitive, PG&E should take additional steps to ensure translations are rendered by professional interpreters and not merely translated verbatim by electronic translating devices or web services.

Although California’s digital divide has narrowed in the last few years, PG&E should still aim to reach customers that are not yet connected to the internet. Many low-income Californians cannot afford to have internet services at home, or live in areas where high speed broadband is not built out, or otherwise have limited access to the internet. At 51 percent, broadband penetration rates are very low for low-income, non-citizens.<sup>17</sup> For example, while broadband access among Latinos has increased 24 points since 2008, disparities among Latinos persist. Relatively high rates of access are evident among Latinos who are U.S. born (76%), prefer to speak English (75%), and

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<sup>15</sup> A.12-08-007, p. 4.

<sup>16</sup> Broadband access at home is 7 points higher in California than in the nation as a whole: Nationwide, 62% of adults report having broadband. Kathryn Zickuhr and Aaron Smith, Pew Internet & American Life Project, Digital Differences, pp. 9-10 (April 13, 2012).

([http://pewinternet.org/~media/Files/Reports/2012/PIP\\_Digital\\_differences\\_041312.pdf](http://pewinternet.org/~media/Files/Reports/2012/PIP_Digital_differences_041312.pdf)).

<sup>17</sup> Public Policy Institute of California, Just the Facts, California’s Digital Divide, ([http://www.ppic.org/main/publication\\_show.asp?i=263](http://www.ppic.org/main/publication_show.asp?i=263)).

earn at least \$40,000 per year (75%).<sup>18</sup> But home broadband penetration rates are far lower among Latinos who are foreign born (48%), prefer to speak Spanish (46%), and earn under \$40,000 (50%).<sup>19</sup> For these reasons, PG&E must ensure that all Flex Alert information provided on the web portal is available in another accessible manner.

Mobile websites and applications for smart-phones can be a means to timely reach and provide information to customers without home-based internet access. Sending Flex Alert messages via text or posting messages on blogs, Facebook, and Twitter could be an effective way for customers to receive messages on their smart-phones and know when to reduce their energy usage.

#### **d. Utility Forums**

Greenlining also supports the ideas introduced by the Center for Accessible Technology (CforAT), urging the IOUs to incorporate messages regarding imminent Flex Alerts in their own forums for customer contact. This would include information being provided in languages other than English on the home pages for each IOU and/or on personal sign-in pages. The IOUs could also incorporate a message about a pending Flex Alert in the outgoing information provided to customers who call into their IVR system, as well as the hold information broadcast to the same customers. When Flex Alerts are called, CSRs can also be instructed to advise all customers who call the IOUs contact centers, in the customer's preferred languages, about the Flex Alert and recommend actions for the customers to take.

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<sup>18</sup> Public Policy Institute of California, Just the Facts, California's Digital Divide, ([http://www.ppic.org/main/publication\\_show.asp?i=263](http://www.ppic.org/main/publication_show.asp?i=263)).

<sup>19</sup> *Id.*

**e. Multilingual Mail Inserts or Flyers**

Printed material is still an important form of communication to reach those who cannot access the internet easily or at all and for those without smart-phones. Because of the expense of mail inserts and their adverse impact on the environment, they could be reserved for sending out general information about Flex Alerts before the summer season commences, including notice that Flex Alerts are likely to happen and explaining what to do when a Flex Alert is called. When mail inserts are used information should be translated into at least the most frequently spoken languages in California other than English, and into languages frequently spoken in particular areas (e.g. Hmong in Fresno and Sacramento). US Census data can be used to determine this information.

**IV. Performance Metrics Should be Applied to Adequately Evaluate the Messaging Tools for the Flex Alert Program.**

Performance metrics are helpful tools to determine the success of an initiative. The Flex Alert program should have performance metrics that link the proposed campaign to measurable changes in customer behavior. Specifically, to evaluate the effectiveness of the proposed program, qualitative metrics should be included and more explicit metrics must be developed that are linked to customer behavior and put into place so that the program can be subject to appropriate review.

**V. PG&E Should Provide More Information about Flex Alert Funding for Particular Uses, Such as CBOs.**

The IOUs' proposed expenses for ME&O contains few details.<sup>20</sup> Greenlining will follow up to seek more information through discovery requests to obtain more information about how the

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<sup>20</sup> A.12-08-007, p. 2-28. *See generally* A.12-08-008, A.12-08-009, A.12-08-010.



requested amounts will be spent. However, as a matter of policy, Greenlining urges the Commission to seek more details about the allocations for particular uses – online, outbound calls, television, radio, ethnic media, other in-language sources, and social media, etc. Further, funds should be specifically allocated to CBOs to show that engagement through CBOs is a priority. Outreach and engagement through CBOs has proven to be a successful approach for the utilities and one of the most effective ways to message customers.

## **VI. Conclusion.**

For the reasons stated above, Greenlining respectfully urges the use of successful traditional messaging efforts and the consideration of innovative approaches including local engagement with new entities, leveraging ethnic-media, and expanding social media messaging. Greenlining will continue exploring effective marketing, education, and outreach approaches to low-income customers and communities of color much more extensively in further filings in this matter. During this first phase addressing the Flex Alert program, Greenlining recommends that the Commission support traditional and new approaches that reach diverse communities and consider language and digital access needs. These approaches will ensure that the Flex Alerts reach all customers and in turn succeeds in reducing California's energy usage during critical summer peak periods.

Respectfully submitted,

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