

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



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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
(Filed August 3, 2012)

**OPENING COMMENTS OF THE GREENLINING INSTITUTE
ON THE PROPOSED DECISION ON PHASE I ISSUES**

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OPENING COMMENTS OF THE GREENLINING INSTITUTE ON THE PROPOSED DECISION ON PHASE I ISSUES

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 2013-2014 and associated budgets by August 3, 2012.¹

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.² 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, 2012.³ These applications were consolidated by a November 8, 2012 Ruling by ALJ Fitch.

On January 18, 2013, the Assigned Commissioner Ferron and ALJ Roscow issued a Scoping Memo and Ruling. On March 19, 2013, ALJ Roscow issued the Proposed Decision on Phase I Issues: Utility Budgets for the Flex Alert Program for 2013 and 2014 (Proposed Decision) to which comments are due no later than April 8, 2013. Thus, these comments are timely filed.

II. Flex Alert Activities Should Also Be Conducted in Chinese.

Greenlining is pleased that the Proposed Decision supports and encourages the utilities to consider language needs, ethnic media, and to engage at the local level with new entities.⁴ Greenlining agrees that airing ads in English, Spanish and Vietnamese is extremely beneficial. However, Greenlining also encourages the Commission to focus on all of California's most

¹ D.12-05-015

² A.12-08-007.

³ A.12-08-008; A.12-08-009; A.12-08-010.

⁴ Proposed Decision, p. 15.

frequently spoken languages, in order to ensure more people will receive and understand the message. Chinese is spoken by 6.9 percent of the population followed by Tagalog at 4.9 percent and Vietnamese at 3.4 percent.⁵ Additionally, of those who speak Chinese, California's second most frequently spoken language, over 50 percent do not speak English at all or less than very well, which means they will require messages aired in Chinese to fully understand what action must be taken.⁶

Because Flex Alerts are disseminated widely throughout the state, it would be most useful to ensure that the highest quantity of residents will receive and understand the message which can be done by airing messages in Spanish and Chinese. In terms of cost, it will likely be more cost effective to conduct mass messaging and outreach about Flex Alerts in the top two to three most frequently spoken languages and leave the more targeted outreach in other, less frequently spoken languages to Community Based Organizations (CBOs). CBOs are well-experienced in outreaching to those linguistically harder-to-reach communities, like Hmong communities in the Fresno area.

III. Funds Must be Allocated to Community Based Organizations.

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 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 Flex Alerts and must be paid for that work. 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. CBOs are accustomed to reaching many people and in a manner that is highly cost-effective, since many operate on a

⁵ U.S. Census Bureau, American Community Survey, 2011.

⁶ *Id.*

shoestring budget. As such, the investment will be both the most effective and cost-reducing way of reaching hard to reach communities.

It is Greenlining's understanding that funding for outreach to community- and faith-based organizations was requested in the IOUs Demand Response Applications.⁷ 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.

IV. Conclusion.

For the reasons stated above, Greenlining respectfully urges airing messages in the most frequently spoken languages including Chinese and encourages the consideration of allocating funding of CBOs in future demand applications. These approaches will help ensure that Flex Alerts reach all customers. Greenlining looks forward to working with everyone to achieve these goals.

Respectfully submitted,

Dated: April 8, 2013

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⁷ Proposed Decision, p. 15.