

**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)

Application 12-08-007

(Filed August 3, 2012)

**RESPONSE OF THE GREENLINING INSTITUTE**

**THE GREENLINING INSTITUTE**

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**INTRODUCTION**

Pursuant to Rule 2.6 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, the Greenlining Institute (Greenlining) hereby submits a response in the above-captioned proceeding regarding the applications of the four major-owned utilities in California (utilities) for approval of their statewide marketing, education and outreach (ME&O) program for 2013-2014 (Applications) and associated budget.<sup>1</sup> Notice of the filing of the Applications first appeared in the Commission's Daily Calendar on August 7, 2012; accordingly, this response is timely filed.<sup>2</sup>

Greenlining understands that the utilities have been charged with "transform[ing] the Energy Upgrade California (EUC) program brand into a statewide umbrella brand in order to increase residential and small commercial customer awareness about energy management and to encourage customers to learn more about and take steps to improve energy use management."<sup>3</sup> Greenlining also recognizes that the Commission directed the utilities to encompass various

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<sup>1</sup> While filed only under the caption for A.12-08-007 (PG&E Application), the Application of the lead utility per the Commission, this protest also responds to A.12-08-008 (SCE Application), A.12-08-009 (SDG&E Application) and A.12-08-010 (SoCal Gas Application). On August 29, 2012 ALJ Fitch emailed Bill Nusbaum of the Utility Reform Network authorizing the filing of a single response to the Applications although there has not been a formal ruling consolidating the proceedings. Mr. Nusbaum shared his correspondence with other parties he knew were planning to file protests and responses.

<sup>2</sup> See Rule 2.6(a)

<sup>3</sup> A.12-08-007 (PG&E Application), p. 2.

topics under the ME&O program including “energy efficiency, demand response, distributed generation, the Energy Savings Assistance program (ESAP), dynamic pricing, Smart Grid, climate change, and general energy use education.”<sup>4</sup> The Commission also requires the utilities to migrate relevant assets from the Engage360 website to the EUC web portal for general education and demand-side management (DSM) program information. Greenlining is aware that the stated goal of the ME&O program “is to elevate the importance and benefits of energy use and management concepts in order to create a bridge to local, program-specific outreach and education efforts for DSM programs.”<sup>5</sup>

Greenlining shares the concerns about the need to provide California customers with information to increase their awareness of and interest in energy and energy management. As such, Greenlining is supportive of efforts to reach customers from underserved communities including those that are limited English-proficient (LEP); individuals with low incomes, such as the ones participating in ESAP; and those that do not have access to, cannot afford, or do not know how to navigate the internet. Although Greenlining recognizes the usefulness of traditional advertising, social marketing, and the internet to communicate information, Greenlining urges the development and implementation of translated material, multilingual websites, alternative means of communication, and targeted outreach through community-based organizations (CBOs), local governments, community leaders, and other governmental entities such as consulates.

Greenlining looks forward to working with the diverse stakeholders involved in this application process to formulate concrete plans for meaningful ME&O efforts. For the most part, Greenlining’s response addresses the need to ensure that all marketing, education, and

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<sup>4</sup> A.12-08-007 (PG&E Application), p. 2.

<sup>5</sup> A.12-08-007 (PG&E Application), p. 3.

outreach authorized through this proceeding includes targeted and in-language communications that will reach customers from underserved communities. Greenlining hopes to explore best practices to focus marketing, education, and outreach efforts to these communities. Greenlining will also address procedural issues, including the utilities' plans for governance and oversight, performance metrics and the proposed schedule.

## **RESPONSE**

### **I. The Utilities Must Directly Address the Need to Reach Customers from Underserved Communities Whose Ability to Understand English and to Access Web-Based Forms of Communication is Limited.**

While the Applications indicate that much of the actual communication efforts under consideration for ME&O have not yet been developed, this early stage is the prudent time to consider the need to reach underserved communities. Some of the relevant issues include multilingual websites, alternative means of communication to web access, effectively translated printed information, multilingual audio information, and targeted outreach to underserved communities through CBOs, governmental entities, and other reliable means. The IOUs should clarify that each of these issues will be fully incorporated into any ME&O processes that emerge from this proceeding.

#### **A. Multilingual Web Portal and Alternatives to Web Access.**

The utilities have proposed several objectives to achieve their goals. One objective is to provide customers with information to increase their awareness of, and interest in, energy and energy management.<sup>6</sup> To achieve this, the ME&O program comprises a blend of traditional advertising, direct-to-customer, and social marketing that will provide a visible campaign to

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<sup>6</sup> A.12-08-007 (PG&E Application), p. 3.

educate customers about a variety of energy management concepts and a web portal to provide a gateway to resources.<sup>7</sup>

The utilities must ensure that information provided based on the ME&O applications is available to consumers in languages other than English. The utilities should ensure that a new web portal is fully accessible to LEP customers who may not be able to navigate a website exclusively provided in English. It is not sufficient to require a web designer to comply with all applicable laws, any developer must specifically commit to ensuring that the web portal is accessible to all. Thus, the information and resources provided to customers via the web portal should be made accessible to LEP customers by making the web portal multilingual and effectively translating everything provided through it. The translations should be rendered by professional interpreters and not merely translated verbatim by electronic translating devices or web services.

Additionally, because many low-income Californians cannot afford to have internet services at home, live in areas where high speed broadband is not built out, or otherwise have limited access to the internet, the utilities must ensure that all information provided on the web portal is also available in some other accessible manner. Mobile websites and applications for smart-phones can be a means to reach and provide information to customers without home-based internet access. Printed material that is translated into various languages is also useful for customers who cannot use the internet to obtain information about energy issues along with the options listed below.

#### **B. In-language Printed Information.**

As noted above, printed material is an important form of communication to reach those who cannot access the internet easily or at all. Information should be translated into at least the

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<sup>7</sup> A.12-08-007 (PG&E Application), p. 4.

most frequently spoken languages in California other than English and into languages frequently spoken in particular areas. US Census data can be used to determine this information.

**C. In-language Audio Information.**

Information provided with an audio component, including videos and DVDs, whether played on a computer/personal device or on television, should be captioned and/or be rendered in multiple languages; interpreters should be available for individual communication where such communication is provided to consumers; and any telephone-based communication should be language accessible. This includes capability to initiate and accept calls using telephonic interpreter services or bilingual staff, as well as efforts to ensure that information generally provided via recorded calls is provided in multiple languages.

**D. Targeted Outreach.**

Because customers from underserved communities may be hard to reach, it is necessary to develop a targeted outreach plan to maximize the opportunity for these customers to receive the benefit of the ME&O efforts discussed in the Applications. According to PG&E, the lead utility, the “ME&O program and associated stakeholders will focus on statewide efforts that create awareness and attention, utilities, local governments, CBOs, and other third party organizations will focus on generating interest and inspiring customers to take action at a local level.”<sup>8</sup>

Greenlining supports the two-pronged approach at the state and local level. Relying on entities such as CBOs that serve low-income, immigrant and LEP communities can significantly aid in engaging consumers from these communities and to spread the word about the importance of energy efficiency. Local government, local leaders, and other governmental agencies such as consulates can also be helpful agents of communication because these are entities that customers

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<sup>8</sup> A.12-08-007 (PG&E Application), p. 4.

from underserved communities may already know and trust. Articles and advertisements posted in newspapers popular with particular communities and radio announcements by other-than-English speaking radio stations could be helpful for informing consumers. Other formats that would be beneficial for engaging the community include in-language workshops and focus groups to develop strategies to reach underserved communities, and other efforts to build on any past success in reaching members of these communities.

## **II. Governance and Oversight.**

Greenlining supports governance structures that promote transparency in the decision-making process, create a forum to obtain valuable technical expertise from stakeholders, and foster collaboration amongst stakeholders. Greenlining urges the inclusion of members who are aware of the needs of underserved communities and, preferably, who have worked with underserved communities.

Moreover, PG&E's application indicates that "the program implementer, with oversight from PG&E and in consultation with the other utilities, will hold competitive solicitations for marketing and other subcontracts necessary to implement the SW ME&O program."<sup>9</sup> Greenlining urges the program implementer to make appropriate efforts to identify and establish business partnerships with diverse suppliers.

## **III. This Proceeding Must Address Appropriate Review.**

Greenlining concurs with the comments that the Center for Accessible Technology (CforAT) made in its protest about SCE's lack of justification as to why the expenditures on ME&O activities should not be subject to standard reasonableness review, and also opposes this proposal.<sup>10</sup>

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<sup>9</sup> A.12-08-007 (PG&E Application), p. 3.

<sup>10</sup> See CforAT protest in response to Application 12-08-007, p. 6.

#### **IV. This Proceeding Must Address Appropriate Metrics.**

Greenlining agrees with CforAT's comments that the proposed limited performance metrics are not adequate.<sup>11</sup> The current metrics do not link the proposed campaign with any measurable changes in customer behavior. In order to properly evaluate the effectiveness of the proposed new 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.<sup>12</sup>

#### **V. Procedural Issues.**

##### **A. The Effect of the Application on the Protestants.**

Greenlining is a policy, organizing, and leadership institute working for racial and economic justice. Greenlining's by-laws authorize it to represent the interests of low income communities, minorities and residential ratepayers, including users of electricity and energy services. Greenlining's by-laws also authorize it to represent the interests of small businesses, including their interest in affordable energy. The customers that Greenlining represents are often most in need of the savings energy efficiency can create, more likely to live in the communities most affected by inefficient energy usage (pollution), and least likely to be effectively engaged by mainstream one-size-fits-all outreach approaches. Greenlining is committed to collaborating with the utilities and other stakeholders to ensure that the ME&O efforts reach these underserved communities.

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<sup>11</sup> See CforAT protest in response to Application 12-08-007, p. 6.

<sup>12</sup> See generally "Human Behavior: The Hot Spot in Energy Efficiency"  
<http://www.forbes.com/sites/williampentland/2012/08/31/human-behavior-the-hot-spot-in-energy-efficiency/>



## **B. Proposed Category.**

Greenlining agrees with the utilities' determination that this proceeding should be categorized as ratesetting.<sup>13</sup>

## **C. Need for Hearing.**

Greenlining is optimistic that working with interested stakeholders on a less formal basis will eliminate the need for formal hearings. One of the utilities' objectives of the ME&O program is to "outline strategies that will lead to desire for, and the adoption of, energy management solutions for residential and small commercial customers."<sup>14</sup> These strategies and other issues regarding effective communication with consumers, including consumers from underserved communities and other consumer groups that may be hard to reach, can potentially be addressed effectively in a workshop setting or in direct conversations between consumer representatives and the utilities.

To the extent that the interested parties can reach agreement in either a workshop setting or direct discussions, a proposal regarding effective communication can be presented. If no agreement can be reached, however, Greenlining (and other interested consumer groups) must have an opportunity to offer proposals regarding effective communication through either written comments or expert testimony. Additionally, other parties may identify other relevant issues in this proceeding that would be appropriate for hearing.

## **D. Issues to Be Considered.**

At this early stage, Greenlining believes that all of its issues of interest fall into the issues already identified by the utilities in their applications, but Greenlining expects that when new ideas are presented through collaborative conversation, that have promise to improve the process

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<sup>13</sup> See generally A.12-08-007 (PG&E Application); A.12-08-008 (SCE Application); A.12-08-009 (SDG&E Application) and A.12-08-010 (SoCal Gas Application).

<sup>14</sup> A.12-08-007 (PG&E Application), p. 4.

but have not been previously identified, these new ideas can be considered along with the proposals already set forth.

**E. The Proposed Schedule.**

Greenlining believes that the truncated schedule proposed by the utilities does not provide sufficient time for intervenors to provide input and review all information, among other things. Thus, Greenlining supports CforAT's proposed schedule, which seems like an aggressive but manageable timeline, with a final decision to be issued in May of 2013.

**CONCLUSION**

For the reasons stated above, Greenlining respectfully urges inclusion of communication in multiple languages within the scope of this proceeding, further review of the utilities' proposals regarding governance, metrics and standards of review; and a revised schedule that allots time for reasonable opportunities for parties to provide input and proposals.

Respectfully submitted,

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