

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

Application of Pacific Gas and Electric Company  
for Approval of Energy Savings Assistance and  
California Alternate Rates for Energy Programs  
and Budgets for 2021-2026 Program Years  
(U39M).

And Related Matters.

Application 19-11-003  
(Filed November 4, 2019)

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Application 19-11-007

**ANNUAL REPORT ACTIVITY OF SAN DIEGO GAS & ELECTRIC COMPANY  
(U 902 M) ON FAMILY ELECTRIC RATE ASSISTANCE PROGRAM FOR 2024**

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March 3, 2025

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This report presents the 2024 program year results and expenditures for San Diego Gas & Electric Company's (SDG&E or Company) Family Electric Rate Assistance (FERA) Program. This report provides the California Public Utilities Commission (Commission or CPUC) with the requested narrative of SDG&E efforts to enroll customers in the FERA program pursuant to Senate Bill (SB) 1130. SDG&E notes that its FERA data tables will be included in the Low Income Annual Report.

Respectfully Submitted,

By: /s/ Cameron H. Biscay

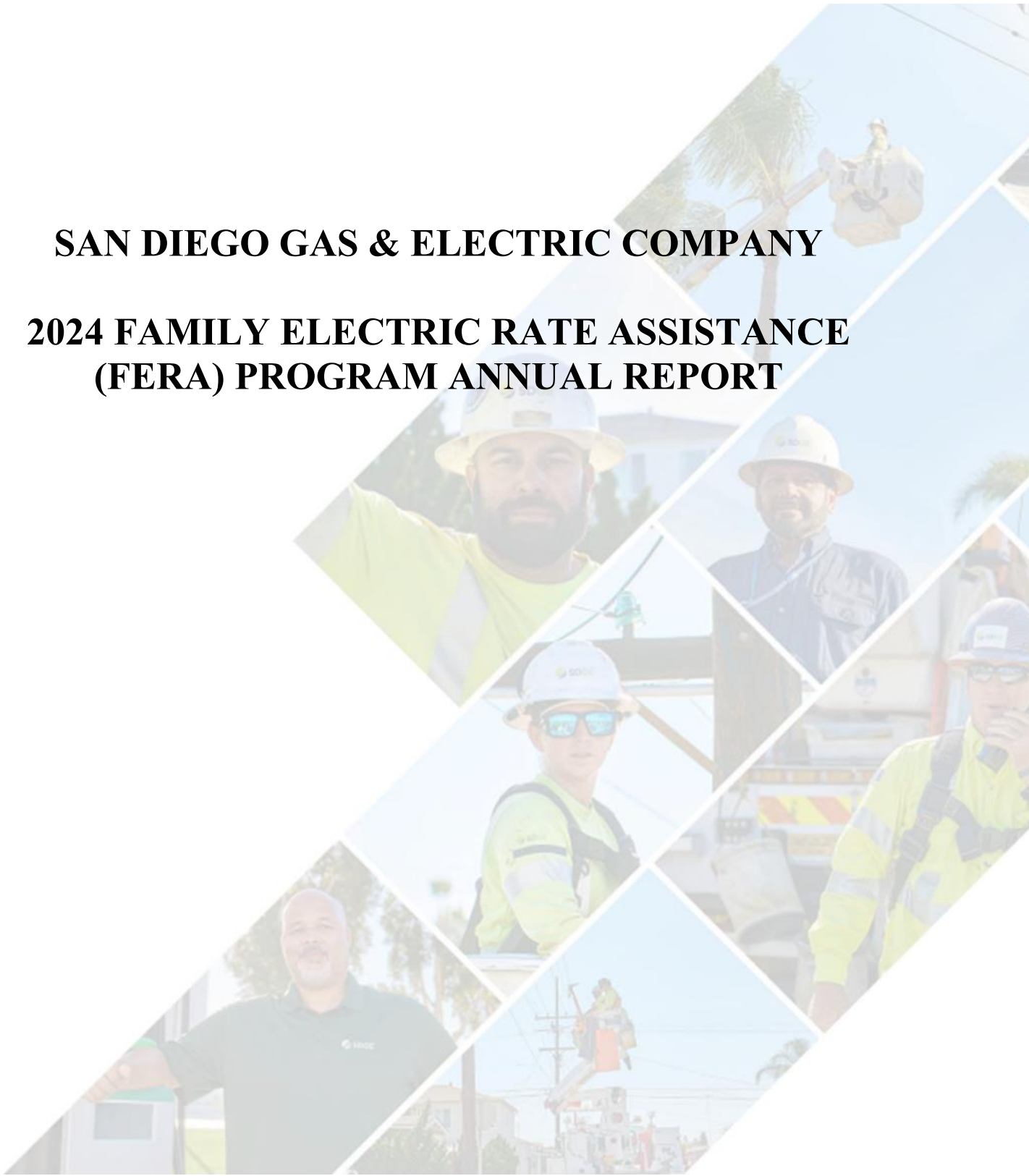
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**SAN DIEGO GAS & ELECTRIC COMPANY**

**2024 FAMILY ELECTRIC RATE ASSISTANCE  
(FERA) PROGRAM ANNUAL REPORT**



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# 1 PROCEDURAL BACKGROUND

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Prompt: Each IOU will provide a summary of the FERA program and purpose of this report.

The FERA Program is statutorily mandated by California P.U. Code Sections 739.1 and 739.12 to assist low- to middle-income-eligible households with a monthly average effective discount of 18% on their electric bills.<sup>1</sup> In Decision (“D.”) 21-06-015, the Commission authorized the FERA program to be consolidated with the low income proceeding.<sup>2</sup> As such, IOU FERA goals, budgets and program design elements will be scoped into the IOUs’ low-income applications moving forward. The Decision also approved FERA Administrative and Subsidy Budgets separate from CARE budgets.<sup>3</sup>

Senate Bill 1130 (SB 1130), approved in September 2024, introduced significant changes to the FERA program to enhance accessibility and promote participation. SDG&E intends to implement SB 1130 following receipt of Commission guidance on compliance, which is forthcoming. Key impacts of SB 1130 on the FERA Program are as follows:

1. **Expanded Eligibility:** Previously, FERA was limited to households of three or more individuals with total annual household gross income between 200% (plus \$1) and 250% of the Federal Poverty Guidelines (FPG). SB 1130 removes the household size requirement, allowing households of any size to qualify, provided they meet the income criteria of 200% (plus \$1) to 250% FPG.

2. **Enhanced Oversight and Reporting:** The bill requires that by March 1, 2025, and annually thereafter, the IOUs must report their efforts to enroll customers in the FERA program. The CPUC is required to review these reports by June 1 each year to ensure reasonable enrollment efforts were made to enroll eligible households commensurate with the proportion of eligible households within the IOU’s territory. If the Commission determines that an IOU has not made reasonable efforts to enroll eligible households in the FERA program, the CPUC will

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<sup>1</sup> The FERA Program was implemented by the Commission in D.04-02-057.

<sup>2</sup> OP 26 of D.21-06-015 states, “The Family Electric Rate Assistance program proceeding will be consolidated with the California Alternate Rates for Energy and the Energy Savings program proceeding.”

<sup>3</sup> OP 35 of D.21-06-015 states, “San Diego Gas & Electric Company must track all Family Electric Rate Assistance (FERA) related costs in a separate FERA balancing account.”

require the IOU to develop a strategy and plan to sufficiently enroll eligible households within three years of the adoption of the strategy and plan.

Commission staff developed the four criteria below by which to assess whether the IOUs have made “reasonable efforts” to increase enrollment.

Enrollment Rate	Marketing & Outreach Efforts	Enrollment Process	Enrollment Strategies
<ul style="list-style-type: none"><li>•Proportion of eligible households enrolled</li><li>•Attrition</li></ul>	<ul style="list-style-type: none"><li>•Public Awareness</li><li>•Targeted Outreach</li><li>•Language &amp; Accessibility</li></ul>	<ul style="list-style-type: none"><li>•Barriers to Enrollment</li><li>•Participant Feedback</li></ul>	<ul style="list-style-type: none"><li>•New initiatives &amp; strategies based on lessons learned</li><li>•New opportunities to reach eligible households</li><li>•Leveraging approaches from other programs</li></ul>

3. **Separate Marketing and Application Processes:** SB 1130 authorizes the IOUs to market FERA independently from the California Alternate Rates for Energy (CARE) program and provide a separate FERA-specific application form. This aims to streamline the enrollment process, while giving the IOUs flexibility on how to market and promote FERA and reduce potential confusion between the two programs.<sup>4</sup>

In this report, SDG&E details marketing and outreach efforts and activities, expenditures associated with eligible enrollments for program year 2024, and planned strategies to increase enrollment in the future.

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<sup>4</sup> Public Utilities Code Section 739.12 as amended by SB 1130 effective January 1, 2025.

## 2 EXECUTIVE SUMMARY

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Prompt: Provide a summary of reasonable efforts made to enroll eligible households; may include

- Annual enrollment goal
- PY enrollment outcome
- Description of efforts made to enroll eligible households (as further detailed in ME&O section)
- Note: Visuals to support narrative that summarizes the status of the program are encouraged; may point to charts/graphics in the other sections of the report
- Planned changes for forthcoming year

In 2024, SDG&E aimed for a 60% FERA enrollment rate pursuant to D.21-06-015.<sup>5</sup> By the end of the program year, SDG&E enrolled 12,768 FERA participants out of an estimated 41,374 eligible FERA households<sup>6</sup>, reaching an enrollment rate of 31%. This marks a significant improvement from the previous year's 24% enrollment rate. SDG&E achieved this through customer marketing and increased outreach activities targeted at FERA-eligible households in low income and hard-to-reach areas. As a result of efforts to boost FERA enrollment, SDG&E spent approximately 107 percent of its FERA Administrative Budget as shown below in Table 3.1 Summary of Program Costs.

Building on insights from 2023, SDG&E refined its targeting strategy and prioritized tactics that generated direct engagement over general awareness. High-performing conversion tactics, such as digital display advertising, multicultural display and streaming audio that were previously dedicated to CARE were strategically reallocated to FERA to enhance program participation. SDG&E also added high-impact ad units promoting FERA bill discounts to capture attention and engage online users and implemented an incentive plan for the existing FERA outbound call campaign, which proved to be very successful garnering significant growth in enrollments.

To continue building on the customer experience with the FERA enrollment process and program, a customer satisfaction survey was conducted, which revealed that 82% of participants are satisfied with the FERA program. Further details regarding the results of the customer satisfaction survey can be found under Section 6 of this report.

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<sup>5</sup> D.21-06-015, Attachment 1 at 3.

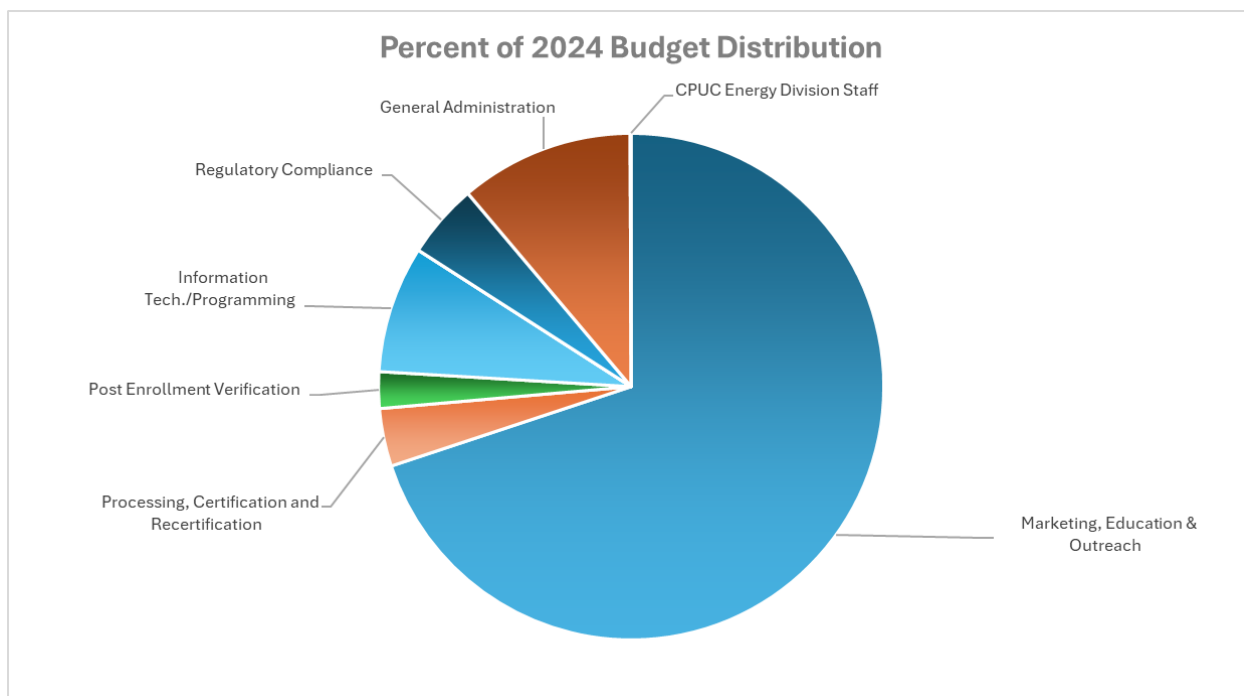
<sup>6</sup> Per D.21-06-015, OP 189, annual estimates of CARE and FERA eligible households and related information filed April 15, 2024

SDG&E is continuously refining and exploring new marketing and outreach strategies to engage customers via multiple touch points and leveraging lessons learned to increase FERA program participation. For direct communications, SDG&E will continue using its FERA propensity model to target eligible households and implement personalized messaging to inform them of new eligibility changes due to SB 1130. The outbound call campaign should also continue to boost enrollment. Furthermore, SDG&E will develop a dedicated FERA application to enhance the customer experience and track conversions more precisely.

Additional detail on the marketing and outreach efforts for 2024 is included in Section 5 of this report, and Section 8 further expands on potential strategies and initiatives for 2025 and beyond.

### 3 FERA PROGRAM BUDGET AND EXPENDITURES

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### 3.1 Summary of Program Costs

<b>Table 3.1.1: FERA Program Costs</b>			
<b>FERA Budget Categories</b>	<b>2024 Authorized Budget <sup>7</sup></b>	<b>2024 Actual Expenses <sup>8</sup></b>	<b>% of Budget Spent</b>
Marketing, Education & Outreach	\$421,421	\$465,894	111%
Processing, Certification and Recertification	\$24,570	\$24,570	100%
Post Enrollment Verification	\$15,558	\$15,558	100%
Information Tech./Programming	\$54,051	\$54,051	100%
Pilots	\$0	\$0	0%
Measurement and Evaluation	\$0	\$0	0%
Regulatory Compliance	\$31,696	\$31,696	100%
General Administration	\$74,106	\$74,106	100%
CPUC Energy Division Staff	\$413	\$413	100%
<b>Total Costs</b>	<b>\$621,815</b>	<b>\$666,288</b>	<b>107%</b>
FERA Rate Discount	\$4,444,713	\$3,827,641	86%
<b>Total Program Costs and Discounts</b>	<b>\$5,066,528</b>	<b>\$4,493,929</b>	<b>89%</b>

#### 3.1.1 Explain what is included in each administrative cost category.

##### Outreach

Costs in this category include:

- Marketing and outreach campaigns, advertising, email notifications, direct mail, telephone campaigns;
- Printing of bill inserts, brochures and flyers;
- Printing and mailing of FERA applications and correspondence, including postage;
- Marketing and outreach staff labor;
- CBO partnership fees;
- Capitation fees; and
- Creative and media agency fees

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<sup>7</sup> Reflects total authorized budget approved in D.21-06-015, Attachment 1, Table 4, adjusted for program year 2024 fund shifts. D.21-06-015 granted the IOUs authority to shift funds between the FERA program categories.

<sup>8</sup> The actual expenses may differ upon the final completion and issuance of the of the 2024 Low Income Annual Report.

### **Processing, Certification, and Recertification**

Costs in this category include staff labor related to processing applications and customer contact center activities, including, but not limited to the following:

- Scanning and indexing applications;
- Processing FERA applications;
- Initiating and responding to customer inquiries regarding FERA applications/program;
- Fielding telephone calls related to FERA Program participation; and
- Resolving disputes related to FERA Program enrollment.

### **Post Enrollment Verification (PEV)**

Costs in this category include staff labor related to FERA PEV processing and other costs including but not limited to the following:

- Processing FERA income verification;
- Responding to customer inquiries regarding FERA income verification documents; and
- Resolving customer issues related to income verification.

### **Information Technology (IT)/Programming**

Costs include IT system support related to maintenance of program systems such as staff and contractor labor, updating FERA documents, system reports, and system enhancements to comply with Commission mandates and to improve operational efficiencies.

### **Measurement and Evaluation**

Costs include studies and customer satisfaction surveys associated with the FERA Program.

### **Regulatory Compliance**

Costs include staff labor and non-labor costs related to the preparation of various regulatory filings, including program applications, advice letter filings, audits, regulatory reports, filing comments, responding to data requests, tariff revisions, attendance at working groups and joint utility meetings, public input meetings, and other Commission hearings or meetings.

### **General Administration**

Costs include but are not limited to office supplies, facilities, training and development, as well as staff labor associated with program management and daily operations.

## **Commission Energy Division Staff Funding**

Costs incurred by the Commission's Energy Division staff in support of FERA.

## **Customer Benefits**

Costs associated with customer benefits, including the value of the FERA discounts provided to customers.

### **3.1.2 Explain how costs of joint CARE/FERA activities are charged to each program.**

The costs of distinct CARE and FERA activities are charged separately to each program using separate source codes. To the extent possible, the costs of joint CARE and FERA activities are allocated in proportion to the work that was attributable to either CARE or FERA.

## **3.2 FERA Discount Cost**

### **3.2.1 State the average monthly FERA discount received, in dollars, per FERA customer.**

The average monthly FERA discount per customer in program year 2024 was \$24.13.

### **3.2.2 State the annual subsidy (discount) for all FERA customers by energy source.**

The total annual subsidy (discount) for all FERA customers in 2024 was \$3,827,641.

### **3.3 Report FERA Program fund shifting activity that falls within rules laid out in Section 10.5.8.2 of D.21-06-015.**

During 2024, SDG&E shifted FERA funds in accordance with the rules set forth in D.21-06-015, which granted the IOUs authority to shift funds between FERA Program categories within the program year. SDG&E used excess funds from the Measurement & Evaluation, Regulatory Compliance, General Administration, IT Programming and CPUC Energy Division categories to cover a total of \$78,268 in overages in the Marketing, Education & Outreach; Processing, Certification, and Recertification; and Post Enrollment Verification categories.

**3.4 Report FERA Program fund shifting activity that occurred that falls OUTSIDE the rules laid out in Section 10.5.8.2 of D.21-06-015.**

No FERA Program fund shifting activity occurred in 2024 that falls outside the rules laid out in Section 10.5.8.2 of D.21-06-015.

**3.5 Provide the year-end December 31 balances for the FERA balancing account for both the current and prior reporting periods.**

	<b>2023</b>	<b>2024</b>
FERA Balancing Account (FERABA) - Under / (Over) collection	\$221,449	(\$533,294)

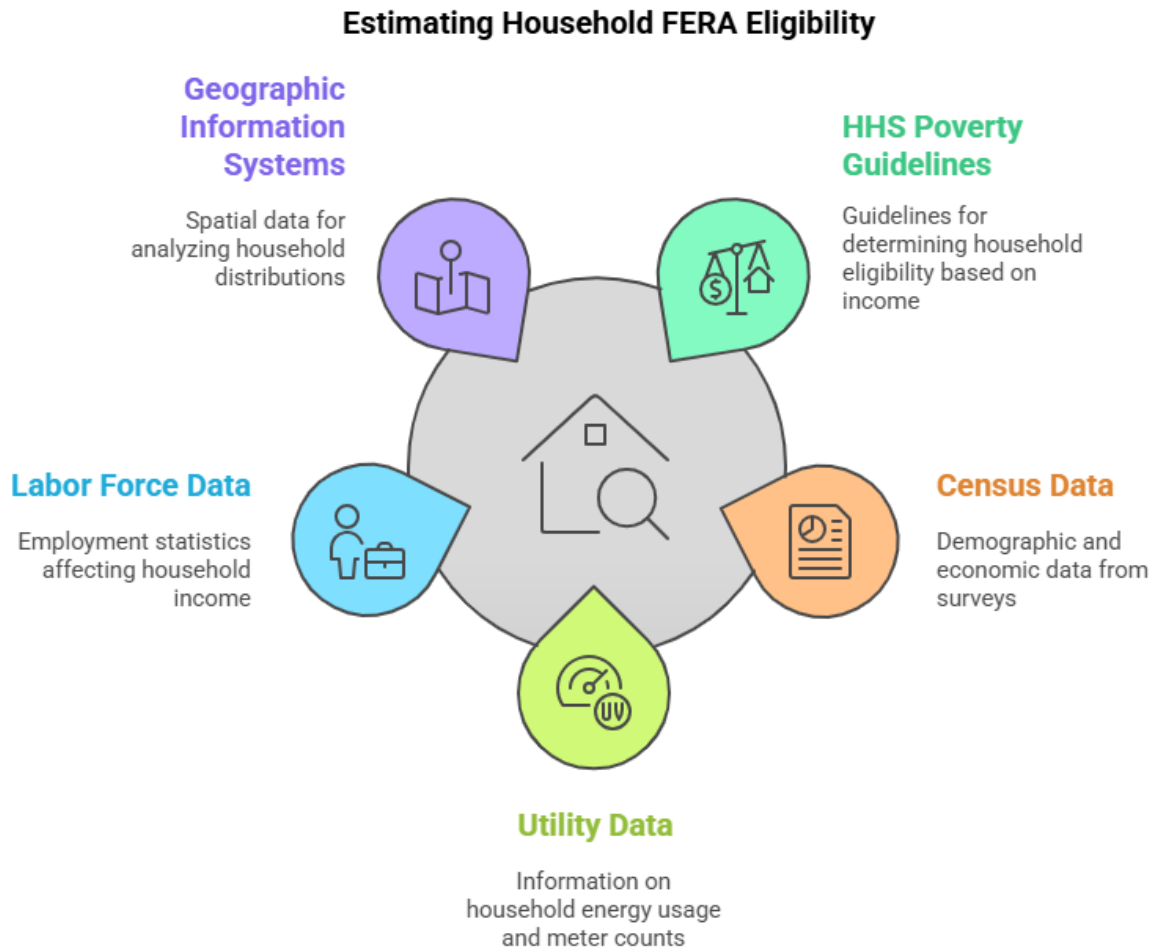
## **4 FERA PROGRAM ENROLLMENT PROGRESS**

### **4.1 Program Outcomes**

<b>Table 4.1.1: FERA Program Enrollment and Discount by Month</b>				
<b>2024</b>	<b>FERA Enrolled<sup>9</sup></b>	<b>FERA Eligible Households</b>	<b>FERA Enrollment Rate</b>	<b>Subsidy (Discount) Provided to FERA-Enrolled Customers</b>
January	10,506	41,374	25%	\$384,307
February	10,308	41,374	25%	\$294,012
March	10,115	41,374	24%	\$261,071
April	9,858	41,374	24%	\$253,523
May	9,457	41,374	23%	\$226,678
June	9,343	41,374	23%	\$224,155
July	9,718	41,374	23%	\$342,247
August	9,931	41,374	24%	\$414,403
September	10,553	41,374	26%	\$420,515
October	11,464	41,374	28%	\$374,711
November	12,344	41,374	30%	\$279,764
December	12,768	41,374	31%	\$352,254
<b>Total</b>	<b>12,768</b>	<b>41,374</b>	<b>31%</b>	<b>\$3,827,641</b>

<sup>9</sup> The “FERA Enrolled” column reflects the cumulative number of customers in the relevant month that received the discount and includes sub-meter accounts.

#### 4.1.1 Discuss How the Estimates of Current FERA-Eligible Households Were Developed.



Since 2022, SDG&E has continued to employ the joint utility methodology adopted by the Commission in D.01-03-028 to develop both monthly and annual enrollment estimates. This methodology ensures accurate estimation of program eligibility by analyzing income and household size parameters at a granular level, including small-area geographies such as block groups, census tracts, ZIP+2 areas, and statewide assessments.

#### **2024 Eligibility Estimation Sources and Methodology**

To determine 2024 eligibility estimates, SDG&E utilized a variety of data sources, including:

- Health and Human Services (HHS) Poverty Guidelines, incorporating bundling of one- and two-person households at the 200% FPG limit, as mandated by AB 327.
- Current-year small-area vendor marginal distributions on household characteristics.
- Census Data, including the 2010 Census Summary File 3 (SF3) and the 2015-2022 American Community Survey (ACS) Public Use Microdata Sample (PUMS).
- Utility Data, including utility meter and master meter household counts.
- Economic Indicators, such as the Department of Finance Consumer Price Index (CPI) series.
- Geographic Information System (GIS) sources to refine locational estimates.

The methodology leverages ACS microdata to establish relationships between income eligibility (above/below 200% FPG), housing tenure, and fuel payment behaviors. These relationships are fitted to small-area (block-group level) marginal distributions to generate payer type-specific distributions, which can then be aggregated at higher geographical levels, including county, utility, and state-wide assessments.

### **Incorporation of Labor Market Changes**

A critical component of the methodology involves adjusting block-group income distributions based on labor market dynamics. The methodology incorporates data from:

- Current Population Survey (CPS)
- Integrated Public Use Microdata Series (IPUMS)
- ACS Data
- California Employment Development Department (EDD) labor force series at county and Metropolitan Statistical Area (MSA) levels

These labor force indicators account for shifts in unemployment, job separation, and positive employment trends. The resulting adjustments ensure that small-area income estimates reflect real-time economic conditions, thereby improving the accuracy of eligibility assessments.

## Estimation and Enrollment Tracking

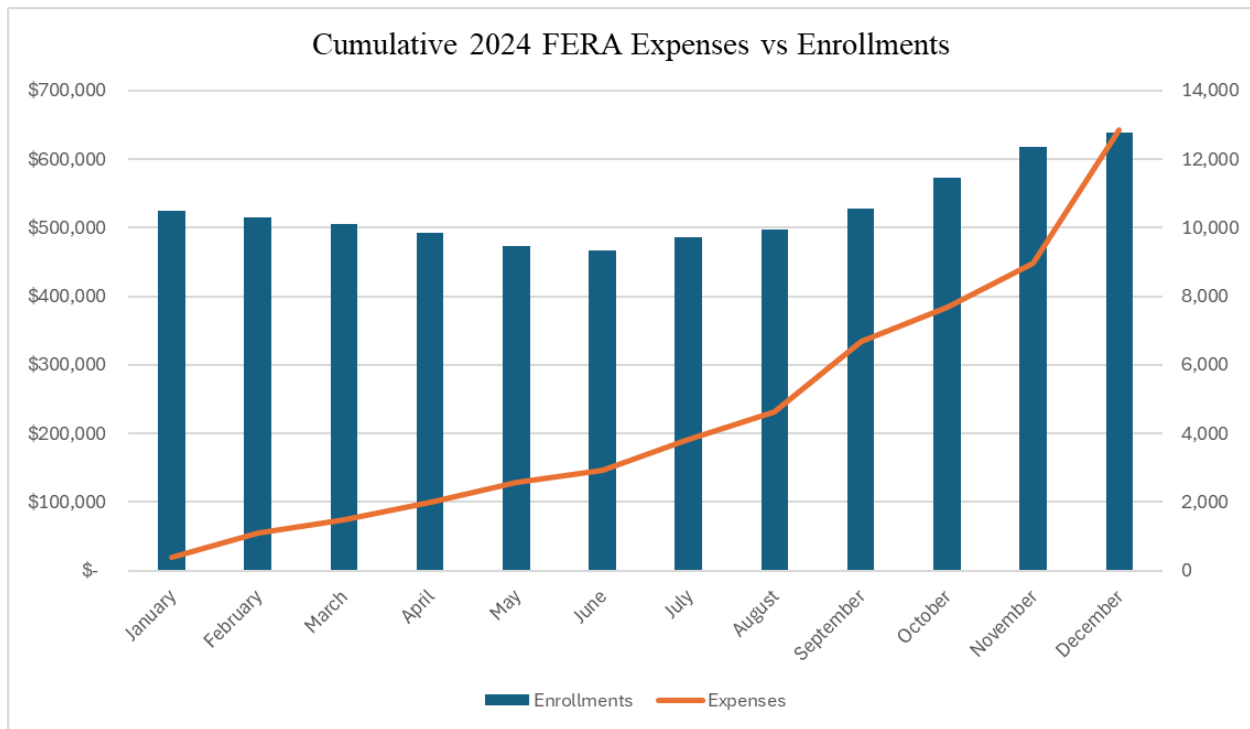
At the block-group level, estimates are aggregated into county, utility, and whole-utility levels. Annually, SDG&E applies county/utility-level eligibility fractions to a new set of technical eligibility counts—such as metered and sub-metered occupied housing units for the FERA program—to obtain household-level income and demographic eligibility estimates.

For the Family Electric Rate Assistance (FERA) program, SDG&E tracks enrollment by counting the number of households enrolled at different geographic levels. The total number of FERA-enrolled households, including individually metered and sub-metered occupied units, is divided by the total estimated income/demographic eligibility to assess program penetration and effectiveness.

By maintaining a rigorous and data-driven approach, SDG&E ensures that enrollment estimates align with actual eligibility patterns, compliant with regulatory guidelines.

### 4.1.2 FERA Expenses vs Enrollment Rate (by month)

**Figure 4.1.2.1: FERA Cumulative 2024 Expenses vs Enrollment Rate**



## 4.2 Recertification

Prompt: Describe efforts made during the year to improve FERA recertification process and/outcome. Include FERA Table 4A and Table 6, which provides the total number of utility and third-party FERA self-certification and self-recertification applications provided, received, approved, denied, pending/never completed, or duplicates for the reporting period, and the reasons for de-enrollment.

In 2024, SDG&E continued its automation efforts for processing FERA paper recertification forms. This effort began in 2023 and continued to prove successful in 2024, reducing the amount of time spent manually to process recertification forms. Automation has also resulted in the ability to leverage one recertification form for both single family and sub-meter customers, resulting in cost savings in printing and paper. Additionally, SDG&E anticipates the launch of recertification text notifications in 2025. The recertification text notifications will be added as an additional layer to remind customers to renew their eligibility in FERA.

Table 4.2.1: Self-Certification and Self-Recertification Applications <sup>10</sup>						
	Provided <sup>11</sup>	Received	Approved	Denied	Pending/Never Completed	Duplicates
<b>Total</b>	<b>6,700</b>	<b>11,836</b>	<b>8,093</b>	<b>1,774</b>	<b>509</b>	<b>1,460</b>
<b>Percentage</b>		100%	68%	15%	4%	12%

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<sup>10</sup> Includes sub-metered accounts.

<sup>11</sup> Includes paper applications only. The “Provided” value is a combination of both CARE and FERA applications sent to customers.



**Table 4.2.2: FERA Recertification Results**

<b>2024</b>	<b>Total FERA Households</b>	<b>Households Requested to Recertify<sup>12</sup></b>	<b>% of Households Total</b>	<b>Households Recertified<sup>13</sup></b>	<b>Households De-enrolled<sup>14</sup></b>	<b>Recertification Rate %<sup>15</sup></b>	<b>% of Total Households De-enrolled</b>
January	10,506	774	7.4%	42	649	5%	6.18%
February	10,308	444	4.3%	26	341	6%	3.31%
March	10,115	464	4.6%	35	385	8%	3.81%
April	9,858	451	4.6%	50	339	11%	3.44%
May	9,457	443	4.7%	42	341	9%	3.61%
June	9,343	518	5.5%	48	410	9%	4.39%
July	9,718	538	5.5%	62	407	12%	4.19%
August	9,931	503	5.1%	27	375	5%	3.78%
September	10,553	388	3.7%	21	288	5%	2.73%
October	11,464	291	2.5%	33	84	11%	0.73%
November	12,344	302	2.4%	13	75	4%	0.61%
December	12,768	313	2.5%	8	31	3%	0.24%
<b>YTD</b>	<b>12,768</b>	<b>5,429</b>	<b>42.52%</b>	<b>407</b>	<b>3,725</b>	<b>7%</b>	<b>29.17%</b>

### 4.3 Post-Enrollment Verification

Prompt: Describe efforts made during the year to improve FERA PEV process and/outcome. Include FERA Tables 3A and 3B which provides the total number of verifications requested, received, approved, denied, pending/never completed, or duplicates, for the reporting period, and the reasons for de-enrollment.

In 2024, SDG&E continued making outbound calls to customers who may need additional assistance with the Post Enrollment Verification (PEV) process. SDG&E initiates a phone call to customers who have responded to the PEV notification with either incomplete information or incorrect documentation. Customer service representatives review and walk through the PEV process with the customer over the phone and address any questions. By doing so, customers can complete the PEV process on time and maintain their enrollment in FERA.

<sup>12</sup> Excludes count of customers recertified through the probability model.

<sup>13</sup> Recertification results are tied to the month initiated and the recertification process allows customers 120 days (3 or 4 bill cycles) to respond to the recertification request. Results may be pending due to the time permitted for a participant to respond.

<sup>14</sup> Includes customers who did not respond or who requested to be de-enrolled.

<sup>15</sup> Percentage of customers recertified compared to the total participants requested to recertify in that month.

**Table 4.3.1: Post-Enrollment Verification Results (Model)**

Month	Total FERA Households Enrolled	Households Requested to Verify <sup>16</sup>	% of FERA Enrolled Requested to Verify Total	FERA Households De-enrolled (Due to no response)	FERA Households De-enrolled (Verified as Ineligible) <sup>17</sup>	Total Households De-enrolled <sup>18</sup>	% De-enrolled through Post Enrollment Verification <sup>19</sup>	% of Total FERA Households De-enrolled
January	10,506	69	0.66%	49	1	50	72%	0.48%
February	10,308	72	0.70%	55	1	56	78%	0.54%
March	10,115	74	0.73%	51	0	60	69%	0.61%
April	9,858	92	0.93%	57	3	28	65%	0.30%
May	9,457	36	0.38%	27	1	2	78%	0.02%
June	9,343	8	0.09%	2	0	0	25%	0.00%
July	9,718	8	0.04%	0	0	0	0%	0.00%
August	9,931	9	0.09%	0	0	0	0%	0.00%
September	10,553	4	0.04%	0	0	0	0%	0.00%
October	11,464	0	0.00%	0	0	0	0%	0.00%
November	12,344	32	0.26%	0	0	0	0%	0.00%
December	12,768	17	0.17%	0	0	0	0%	0.00%
<b>YTD Total</b>	<b>12,768</b>	<b>421</b>	<b>3.30%</b>	<b>241</b>	<b>6</b>	<b>247</b>	<b>59%</b>	<b>1.93%</b>

<sup>16</sup> Includes all customers who failed SDG&E's FERA eligibility probability model.

<sup>17</sup> Includes customers verified as over income or who requested to be de-enrolled.

<sup>18</sup> Verification results are tied to the month initiated and the verification process allows customers 90 days to respond to the verification request. Results may be pending due to the time permitted for a participant to respond.

<sup>19</sup> Percentage of customers dropped compared to the total participants requested to provide verification in that month.

**Table 4.3.2: Post-Enrollment Verification Results (High Usage, Electric Only)<sup>20</sup>**

Month	Total FERA Households Enrolled	Households Requested to Verify <sup>21</sup>	% of FERA Enrolled Requested to Verify Total	FERA Households De-enrolled (Due to no response)	FERA Households De-enrolled (Verified as Ineligible) <sup>22</sup>	Total Households De-enrolled <sup>23</sup>	% De-enrolled through Post Enrollment Verification	% of Total FERA Households De-enrolled
January	10,506	-	-	-	-	-	-	-
February	10,308	-	-	-	-	-	-	-
March	10,115	-	-	-	-	-	-	-
April	9,858	-	-	-	-	-	-	-
May	9,457	-	-	-	-	-	-	-
June	9,343	-	-	-	-	-	-	-
July	9,718	-	-	-	-	-	-	-
August	9,931	-	-	-	-	-	-	-
September	10,553	-	-	-	-	-	-	-
October	11,464	-	-	-	-	-	-	-
November	12,344	-	-	-	-	-	-	-
December	12,768	-	-	-	-	-	-	-
YTD Total	12,768	-	-	-	-	-	-	-

**Table 4.3.3: FERA Post-Enrollment Verification <sup>24</sup>**

	Requested	Received	Approved	Denied	Pending/Never Completed	Duplicates
Total	421	180	174	6	241	0

<sup>20</sup> SDG&E notes that the requirement to implement the high usage post-enrollment verification policy for the FERA program, pursuant to OP 28 of D.21-06-015, will be completed by the end of the program cycle.

<sup>21</sup> Includes all participants who were selected for high usage verification process.

<sup>22</sup> Includes customers verified as over income, who requested to be de-enrolled, did not reduce usage, or did not agree to be weatherized.

<sup>23</sup> Medium (400%) and high usage (600%) customers are dropped at 60 days (2 or 3 bill cycles) for non-response to HUV (high usage income verification request). Additionally, 600% + users that have not reduced usage within the 60-day window (2 or 3 bill cycles) are removed from the program. Results may be pending due to the time permitted for a participant to respond.

<sup>24</sup> Includes sub-metered accounts.

#### **4.4 Complaints**

There were no formal or informal customer complaints about the FERA program in 2024.

#### **4.5 Sub-metered Tenants**

##### **4.5.1 Provide the current FERA sub-metered tenant counts at year-end.**

At year-end 2024, SDG&E had 13 sub-metered tenants participating in FERA.

##### **4.5.2 Discuss any problems encountered during the reporting period administering the FERA program for sub-metered tenants and/or master-meter customers.**

SDG&E is assessing a potential issue regarding the administration of the FERA rate discount to certain sub-meter tenants. SDG&E will continue to monitor the issue and keep the Commission apprised of its findings and proposed resolution.

## **5 PROGRAM MARKETING, EDUCATION AND OUTREACH**

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Prompt: Describe ME&O efforts and targeting strategies to enroll households and specific groups. Highlight efforts to increase enrollment in specific geographic areas and specific communities with low enrollment rates, including what approaches were used to target those customers and enrollment rates for those groups. May include efforts to streamline customer enrollment strategies, including potential plans to separate CARE and FERA applications, efforts to incorporate categorical eligibility.

SDG&E remains committed to ensuring equitable access to information by tailoring outreach efforts to diverse customer needs and linguistic preferences. In 2024, SDG&E implemented targeted marketing initiatives to engage specific customer groups based on demographic and geographic characteristics. These efforts focused on reaching low-income households, renters, families with elderly members, and minority communities, including Spanish speaking customers.

- *Out-of-Home Advertising:* SDG&E deployed targeted signage in high-traffic locations within urban areas and the eastern and southern portions of the county that have communities with a higher concentration of low-income residents. Signage was placed at convenience stores, barbershops/salons, laundromats, and at Metropolitan Transit System

(MTS) trolley stops along the Blue Line (connecting downtown San Diego to the U.S.-Mexico border and extending east to El Cajon).

- *Digital Advertising:* SDG&E focused its social media advertising campaigns and Google Display Network ads on targeted low-income audiences.
- *Print Media:* SDG&E utilized print advertisements in publications geared towards Black, Hispanic, and Asian communities, and in community-specific publications reaching rural and East County residents.
- *Language and Accessibility:* SDG&E offered content in multiple languages and formats suitable for individuals that require information in a different language or have disabilities or special needs to ensure inclusivity in its marketing and outreach efforts.
- *Multilingual Digital Campaigns:* Language-specific creative messaging was deployed across digital channels, including display ads on Google Display Network and Meta platforms in Spanish and Vietnamese (Vietnamese language inclusion began in 2024).
- *Spanish-Language Impact Research Units:* High-impact research campaigns included Spanish-language creative assets developed alongside English versions.
- *Multilingual Print Advertising:* Print advertisements were published in Spanish, Vietnamese, and Filipino-focused publications
- *Broadcast Media:* Streaming audio advertisements were broadcast in Spanish on streaming services.

### **General Awareness**

In 2024, SDG&E's FERA marketing campaign sought to connect with low-income customers across a diverse population, including hard-to-reach customers, seniors, customers with access and functional needs, and multilingual/multicultural demographics. The campaign included print, streaming TV, digital media, audio, bill inserts, ethnic marketing, email, out-of-home ads, and direct mail. These initiatives generated over 750,000 page views, representing a 30% year-over-year increase in traffic to [sdge.com/FERA](https://sdge.com/FERA). Due to a Google Analytics tracking issue, data from July 2024 was not captured or reported. In 2024, FERA was mentioned in local news articles six times. These mentions were unpaid and resulted from communication outreach efforts. SDG&E will continue to leverage earned media in 2025.

### **Outbound Calls**

SDG&E's third-party contractor, The Harris Group (THG) calls targeted customers to encourage enrollment in the FERA Program. If eligible, THG directly contacts the prospective FERA customer and walks them through the enrollment process. THG provides education about the CARE, FERA, and ESA Programs. In 2024, THG enrolled more than 5,460 customers in FERA via the outbound call campaign. This is the largest number of new enrollments SDG&E has seen in years and represents an increase of 55% compared to new enrollments in 2023.

The Harris Group Performance		
Applications	Enrollments	Recertifications
6,691	5,469	142

### **Direct Communications**

Leveraging a propensity model and Claritas data, SDG&E identified and targeted potentially eligible FERA customers based on household income and size. To ensure compliance with the CCA agreement, SDG&E distributed over 459,000 generic emails to CCA customers, achieving an average open rate of 47.8% and a click-through rate (CTR) of 3.1%. Non-CCA customers received bill comparison communications illustrating potential savings had they participated in FERA, with over 112,000 bill comparison emails sent, generating an 54.4% open rate and 3.3% CTR. In this reporting year, 9,588 direct mail pieces were sent in December 2024 to customers without an email address on file.

While an email-first approach was prioritized throughout the year to optimize budget efficiency, SDG&E deployed a year-end postcard campaign to all 53,368 FERA-eligible households to ensure broader program awareness.

## **Digital**

SDG&E implemented an integrated digital strategy to enhance awareness and drive online submissions through paid search, display advertising, and pre-roll video ads. Targeting efforts were refined, and tactics were carefully selected to minimize overlap between FERA and CARE customer segments. High-performing conversion tactics, such as display, multicultural display and streaming audio that were previously dedicated to CARE were strategically reallocated to FERA to enhance program participation. SDG&E also added high-impact ad units that promoted FERA bill discounts. Throughout the year, SDG&E's digital campaigns generated over 13.6 million impressions, resulting in more than 2,000 customer engagements with the FERA online application.

Channel	Impressions	Clicks	CTR	Conversions
Display	4,127,959	4,502	0.11%	989
Display Linear RT	218,309	530	0.24%	-
Email	122,449	2,594	2.12%	-
GDN	1,513,177	20,495	1.35%	20
Meta	2,258,146	12,691	0.56%	6
Multicultural Display	1,737,801	2,197	.13%	371
Netsertive Research Unit	306,703	321	0.10%	119
Nextdoor	682,314	2,360	0.35%	-
OOH	664,272	-	-	-
Print	1,237,823	-	-	-
Reddit	562,786	2,400	0.43%	-
Search	29,415	4,081	13.87%	554
Streaming Audio	204,500	5	-	16
YouTube	32,660	44	0.13%	-
<b>Totals</b>	<b>13,698,314</b>	<b>52,220</b>	<b>0.45%</b>	<b>2,075</b>

## Social Media

SDG&E leveraged low-cost awareness strategies by utilizing organic social media to promote FERA, reaching a collective audience of over 1.3 million followers across multiple platforms, including Facebook, Instagram, and Nextdoor. In 2024, a total of nine FERA-focused posts were published across the aforementioned social platforms to drive engagement and program awareness.



	Impressions	Engagements	Engagement Rate
Facebook	6,405	97	1.4%
Instagram	5,482	182	3.4%
Nextdoor <sup>25</sup>	548,151	104	N/A

In 2024, SDG&E observed these trends in the performance of its targeted initiatives

- Digital Display and Nextdoor Performance: A budget increase was allocated to Digital Display and Nextdoor in late November 2024, leading to a significant spike in conversions. In December alone, 877 conversions were recorded. Prior to this increase, the campaign had achieved 1,198 total conversions over five months, bringing the overall total to 2,075.
- Google Advertising Performance: An increase in Google ad spend resulted in a 31% increase in conversions during the final two months of the campaign (November and December). Click volume on the platform also surged by 360% within the same period.
- Meta Advertising Performance: SDG&E increased Meta advertising in November and December. Although direct conversion tracking was unavailable due to platform limitations, other key performance indicators improved significantly, including:
  - 159% increase in clicks
  - 415% increase in impression delivery
  - 104% increase in audience reach
- Print Advertising Expansion: The additional budget enabled the placement of 11 additional print insertions, generating 834,465 additional impressions in Black, Spanish-language, and General Market publications.

**Key Takeaways and Recommendations:** The late-year budget increases demonstrated a clear correlation with improved campaign performance. These results underscore the potential for even greater efficiency and impact if incremental budgets are allocated earlier in the

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<sup>25</sup> Nextdoor does not allow business accounts to enable comments.

campaign cycle. In 2025, SDG&E will explore adjusting budget distribution timelines to maximize reach and conversion performance throughout the entire campaign duration.

### **Partner Education & Outreach**

SDG&E strategically identified CBOs within and outside of its Energy Solutions Partner Network to further reach areas and various pockets within low-income populations throughout its service territory. These areas include hard-to-reach, rural, multicultural, multi-lingual, and Access and Functional Needs (AFN) communities. SDG&E also coordinated outreach tactics with CBOs to promote the FERA program to customers, which can deepen customer trust in the utility and create more enrollment opportunities. These outreach tactics included presentations, events, and messaging to increase awareness and drive enrollments. SDG&E also educates partners with training materials on the FERA Program, including how to utilize the FERA programs' online application to streamline the enrollment process for their organization. SDG&E also collaborated with these partners to provide education and engagement opportunities throughout its service territory. To further support customers at events in multicultural/multilingual communities, SDG&E secured bilingual representatives to communicate effectively with non-English speaking customers, who are often part of SDG&E's hardest-to-reach populations. The ability for CBOs to penetrate these harder-to-reach customer segments continues to be valuable in generating program enrollments.

SDG&E works along these external groups to connect customers with programs and solutions related to program offerings. These engagement efforts included over 700 events and presentations in 2024.

The County of San Diego HHSA is also part of the Energy Solutions Partner Network and enrolled seven customers in FERA throughout the year.

### **CARE Capitation Agencies**

SDG&E partners with 24 social service agencies to help reach and enroll the hardest-to-reach customers. The partnering organizations are in diverse low-income communities serving multicultural/multilingual, access and functional needs, and Limited English Proficient (LEP) audiences. These partners include 211 San Diego, American Red Cross, Scripps Health, and San

Diego State (University) WIC offices, and many others. These partners contributed to 23 FERA program enrollments and no recertifications in 2024.

### **Energy Solutions Partner Network**

SDG&E works closely with a network of approximately 200 CBOs to connect customers with programs and solutions related to Customer Assistance, Energy Efficiency and Conservation, Public Safety Power Shutoffs, resiliency, wildfire preparedness, and bill debt repayment. These organizations represent the diversity of SDG&E's customers within its service territory. Many of these CBOs are small, grassroots agencies serving customers with access and functional needs, including those that are multicultural, multilingual, low income, seniors, and LEP audiences in communities of concern. These partners help educate and enroll customers in low-income programs utilizing a variety of tactics, including messaging through email, social media channels such as Facebook, X, and Instagram, posting information on their websites, providing booth space at events, and hosting program enrollment days. In 2024, over 1,700 activities were coordinated through this partner network to promote SDG&E's Customer Assistance Programs, resulting in over 1,300 social media messages by SDG&E's Energy Solutions Partner network, and reaching over three million impressions. The Energy Solutions Partner Network's activities generated nine enrollments for FERA, and there were no recertifications from this group in 2024.

### **Community Engagement**

SDG&E has established relationships with non-profit organizations to deliver presentations, workshops, trainings, and participate at community events to assist SDG&E in securing enrollments in its energy saving programs through an organization that customers trust. With these groups and the Energy Solutions Partner Network mentioned above, SDG&E participated in over 700 events, including more than 45 multicultural events, presentations, and workshops to educate and reach over 96,000 people in the community.

## **Branch Offices and Customer Care Centers**

SDG&E's Customer Care Centers (CCC) assist customers with a variety of energy inquiries each year via phone and chat. Customers are provided information about the FERA Program in both English and Spanish while waiting to speak with an Energy Service Specialist (ESS) via the Interactive Voice Recognition (IVR) System. If a customer states that they are not qualified for the CARE or ESA Programs, the ESS will offer the FERA program and explain the income guidelines and current certification requirements. There were no FERA enrollments or recertifications in 2024 through the CCC or chat.

Prior to SDG&E receiving authorization from the CPUC to close its remaining branch offices, effective September 6, 2024, SDG&E's branch payment offices promoted and enrolled eligible customers in FERA programs, collaborating with outreach teams to provide education and application assistance during peak periods.

Before closing the branch offices, SDG&E conducted 35 My Energy Center workshops to inform customers about the transition, educate them on alternative payment options such as APLs, My Energy Center, and Bill Matrix, and promote paperless billing and assistance programs, including FERA. In 2024, the branch offices facilitated six new FERA enrollments and zero recertifications. Non-FERA customers contacting the CCC receive eligibility screening and enrollment support.

### **5.1 Discuss how FERA customer data and other relevant program information is shared within the utility and other appropriate low-income programs.**

FERA customer data is shared within SDG&E for prospective ESA leads. When an online enrollment or recertification for the FERA Program is received, an ESA lead is automatically created if the customer is determined to be eligible based on the prior treated date. Upon eligible income verification for the FERA Program, an ESA lead is automatically created labeled as "FERA Income Certified," to notify the ESA implementer that the income eligibility process is not required during the in-home assessment. Similarly, the ESA eligibility information is sent to the FERA Program system once an ESA enrollment is received. The FERA Program system determines if the customer will be auto-enrolled, income certified or recertified based on their current FERA status.

## 5.2 Breakdown of Marketing, Education and Outreach by Spending Category

Prompt: Each IOU to insert own table

Table 5.2.1: FERA Marketing, Education, and Outreach Costs			
FERA Spending Category	2024 Authorized Budget <sup>26</sup>	2024 Actual Expenses	% of Budget Spent
Direct Communications	N/A	\$190,556	45%
Media / General Awareness	N/A	\$159,262	38%
Customer Satisfaction Survey	N/A	\$29,379	7%
Miscellaneous	N/A	\$86,697	21%
<b>Total Costs</b>	<b>\$421,421</b>	<b>\$465,894</b>	<b>111%</b>

## 6 OTHER EFFORTS

Prompt: May include studies, pilots, and/or efforts to streamline customer enrollment strategies, including potential plans to separate CARE and FERA applications or incorporate categorical programs

With the enactment of Senate Bill 1130, and to facilitate enrollment in the FERA program, efforts are underway to develop a FERA-only customer enrollment application. SB 1130 authorizes the utilities to utilize a FERA-only customer enrollment application, which SDG&E intends to test in its effectiveness to drive more FERA enrollments versus a CARE/FERA combined enrollment application.

In 2024, SDG&E conducted its second FERA participant survey to learn more about SDG&E customers' experience with the FERA program and to gain a better understanding of barriers to FERA enrollment. SDG&E surveyed 189 program participants. The survey revealed that most participants are satisfied with the FERA program (82%), but it also revealed a few areas that could be improved. A few key insights from the survey results include:

- Nearly half of the surveyed participants said the program is good the way it is, while roughly one in three have suggestions for improvement;

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<sup>26</sup> Reflects total authorized budget approved in D.21-06-015, Attachment 1, Table 4, adjusted for program year 2024 fund shifts. D.21-06-015 granted the IOUs authority to shift funds between the FERA program categories. The 2024 authorized budget was not itemized by FERA Administrative Budget sub-categories. SDG&E allocates expenses based on the most productive FERA ME&O sub-categories.

- The top method by which participants say they learned about the FERA program is from a phone call from SDG&E;
- Email is the preferred method for receiving program information;
- A majority say the enrollment process is easy (87%);
- A vast majority say they would submit income verification if needed (92%);
- The top suggestion for improvement is to provide a larger discount.

These insights will inform future marketing and outreach initiatives and consider customer communication preferences and other opportunities for improvements.

## **7 DISCUSSION OF BARRIERS AND/OR CHALLENGES**

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Prompt: Discuss barriers, challenges, and lessons learned of enrollment strategies. Discuss issues and/or events that significantly affected program management in the reporting period and how these were addressed. Describe corrective plans taken during this reporting period to address barriers and challenges.

SDG&E continues to experience the identification of FERA-eligible households as a challenge. Although SDG&E receives estimated eligible population counts annually, it has been challenging to find FERA-eligible customers to apply for the program due to its narrow income eligibility requirements.

To address challenges with FERA participation, SDG&E implemented an incentive-based approach to its existing outbound call campaign led by THG, as mentioned in Section 5. The campaign provides SDG&E with a way to directly connect with customers in low income and hard-to-reach areas. Targeted customers also include those who are up for recertification. This year, THG successfully enrolled 5,460 customers into the FERA program. SDG&E plans to continue this initiative through the end of the existing program cycle as funding permits.

Lastly, SDG&E identified a billing issue that caused a total of 169 FERA customers to not receive their billing discount at the start of their enrollment period. SDG&E has since corrected the billing issue and applied a credit for the loss of discount to all impacted customers.

## 8 STRATEGIES TO INCREASE ENROLLMENT IN FUTURE YEARS

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Prompt: Describe planned activities in the next program year to enroll eligible households. May include:

- Planned marketing changes due to eligibility change in 2025
- Forecasted or interim enrollment targets
- Marketing and outreach, pilots, studies, and other planned activities to increase enrollment

The Outreach team will continue leveraging its Energy Solutions Partner network to collaborate with select CBOs and other community partners in an effort to broaden FERA messaging and education through targeted campaigns in conjunction with existing community outreach events and their respective social media platforms. Targeted FERA presentations will be conducted to educate CBO staff and their constituents on the differences between FERA and CARE programs, while also providing enrollment support. Additionally, Outreach will implement the stand-alone application and push education and enrollments to eligible households.

In 2025, SDG&E will continue to build upon these outreach efforts, assess its outreach strategies to increase engagement, and analyze their effectiveness.

SDG&E will maintain an integrated marketing strategy designed to engage customers with multiple touch points and continue to optimize campaigns refining successful marketing tactics and phasing out less effective ones. SDG&E will also explore emerging opportunities within the media landscape, including:

- Potential advertising placements in the Propel App, which serves California's EBT program.
- Strategic partnerships with local tax organizations that provide free or discounted tax preparation services for low-income households.
- Expand event-based collaborations to further promote awareness of the FERA program

In an effort to enhance direct customer communications, SDG&E will continue leveraging its propensity model to identify and target eligible households, including those with one to two occupants. While these customers have previously received bill comparisons and general outreach, SDG&E is evaluating the implementation of personalized messaging specifically for smaller households. This initiative aims to inform them of recent eligibility

changes driven by SB 1130, ensuring that those who may not have qualified in the past are aware of potential new opportunities for enrollment.

Lastly, as mentioned previously, due to the success of THG's outbound campaign, SDG&E will continue this initiative. SDG&E will develop a dedicated FERA application, enhancing the customer experience by directing users who engage with FERA advertisements to a program-specific application. This approach will introduce a streamlined customer journey and enable more precise tracking of conversions directly associated to FERA.



## 9 COMMONLY USED ACRONYMS

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CAM	Common Area Measures
CARE	California Alternate Rates for Energy
CBO	Community-Based Organization
CPUC	California Public Utilities Commission
D.	Decision
EE	Energy Efficiency
ESA	Energy Savings Assistance
FERA	Family Electric Rate Assistance
IOU	Investor-Owned Utilities
OP	Ordering Paragraph
PEV	Post Enrollment Verification
PY	Program Year
SCE	Southern California Edison Company
SDG&E	San Diego Gas & Electric Company
SoCalGas	Southern California Gas Company

## **Appendix A: SDG&E 2024 FERA Program Tables**

Data will be available in the 2024 Low Income Annual Report, Appendix – FERA Tables.

## Appendix B: SDG&E 2024 FERA Marketing Materials



### Digital Display




### Facebook



## Google Display Network

 **San Diego Gas & Electric**  
Sponsored - 

FERA offers 18% off every month to qualified households of three or more.



**Save 18% off** your electric bill.

SDGE.COM/  
**See if you qualify to save.** [Learn More](#)

## Print



**Ve si calificas  
para descuentos.**

## Out-of-home (Laundromat Banner)



**¿18% menos en tu factura eléctrica?**  
**Es una manera fácil de ahorrar.**

El programa FERA de SDG&E podría ser para ti, para recibir un descuento de 18% en tu factura de electricidad cada mes. Los hogares de tres o más personas pueden calificar. Aplicar es rápido, fácil y confidencial. Para ver si calificas, visita [sdge.com/FEAesp](https://sdge.com/FEAesp).



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**Customer Assistance** | 

**18% off your electric bill?**  
**It's an easy way to save.**

It could be easier than you think to save money on your electric bill. The FERA program from SDG&E offers an 18% discount every month to qualified households of three or more. Applying is quick, easy, and confidential.

See if you're eligible at [sdge.com/FEA](https://sdge.com/FEA).



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Postcard (front)



Postcard (back)

### Family Electric Rate Assistance (FERA) Program

If you have three or more people in your household and are struggling to pay your electric bill, you may be eligible for an 18% discount on your monthly electric bill.

**Eligibility:**

Number in Household	Total Annual Household Income*
1-2	Not eligible
3	\$51,641 - \$64,550
4	\$62,401 - \$78,000
5	\$73,161 - \$91,450
6	\$83,921 - \$104,900
7	\$94,681 - \$118,350
8	\$105,441 - \$131,800
Each additional person, add	\$10,760 - \$13,450

\*Effective June 1, 2024 - May 31, 2025.

**How to apply:**

- Online: Visit [sdge.com/FERA](https://sdge.com/FERA) and apply online.
- Phone: Call **1-877-646-5525**.

Questions? Email us at [BillDiscount@sdge.com](mailto:BillDiscount@sdge.com)

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