



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Examine the )  
Commission's Post-2008 Energy Efficiency )  
Policies, Programs, Evaluation, Measurement, )  
and Verification, and Related Issues. )

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Rulemaking 09-11-014  
(Filed November 20, 2009)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY COMMENTS TO  
ASSIGNED COMMISSIONER'S RULING SOLICITING COMMENTS**

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Dated: **December 10, 2010**

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
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**I.**

**INTRODUCTION**

Pursuant to the Assigned Commissioner's Ruling (ACR) Soliciting Comments on the Energy Division White Paper, and recommendations regarding the schedule for the Commissioner's post-2012 energy efficiency savings goals, issued November 17, 2010, Southern California Edison (SCE) hereby provides these Reply Comments. SCE filed comments on December 3, 2010 that expressed support for the proposal to extend the existing 2010-2012 program cycle by a year, adopt four-year program cycles going forward, and to update the avoided cost methodology, albeit for implementation in the next program cycle. SCE herein responds to comments filed by The Utility Reform Network (TURN), Division of Ratepayer Advocates (DRA), Natural Resources Defense Council (NRDC), Proctor Engineering, California Energy Efficiency Industry Council (Efficiency Council), Pacific Gas & Electric (PG&E), Local Government Sustainable Energy Coalition (LGSEC), and the Joint Comments of San Diego Gas & Electric and Southern California Gas Company (Sempra).

**II.**

**DISCUSSION OF THE DECEMBER 3, 2010 OPENING COMMENTS**

On December 3, 2010, nine parties including SCE filed comments on the ACR. Parties commented on the Energy Division proposal to extend the 2010-2012 cycle by a year to 2010-2013, adopt a four-year program cycle going forward, and update energy efficiency avoided cost inputs to reflect recent updates. SCE is generally supportive of this proposal with some suggestions to strengthen

the proposal. SCE seeks to comment on several points made by other parties in these reply comments, and further clarify its position.

**1. Regarding mid-cycle review, SCE could support an annual stakeholder workshop with IOUs reporting on progress of the energy efficiency portfolios to date.**

NRDC proposes that the Commission “require the IOUs to hold an annual workshop to discuss the progress of the portfolio at a high level to give the CPUC and stakeholders insight into program achievements to-date.”<sup>1</sup> LGSEC also proposes a similar option.<sup>2</sup> SCE could support this proposal for an annual presentation by the IOUs on portfolio performance, however, SCE would seek to ensure that the annual presentations were “informational only” and would follow existing Commission guidance. Additionally, SCE notes that the proposal is reminiscent of the Program Advisory Group (PAG)’s role in previous program cycles which found limited success due to lagging participation from multiple stakeholders.

Stakeholder comments also included other suggestions for mid-cycle review ranging from TURN’s suggestion that the Energy Division “conduct a public process that would focus on how to realign the existing portfolios to increase the prospective cost” during the first half of 2011<sup>3</sup> to NRDC’s proposal that the “IOUs submit a formal interim progress report during the third year that would address party comments submitted during the annual workshops” and allow a rolling solicitations process<sup>4</sup> to LGSEC’s proposal for a secondary workshop with all third-party implementers and local government partners to meet with the Commission staff.<sup>5</sup> These proposals range from being duplicative of existing processes to undermining the role of the IOUs as successful program administrators, and would do nothing more than provide a rehashing of the IOU programs; something the proposed extra year is intended to avoid.

For example, LGSECs proposal cited above suggests that all local governments seek to be highly involved in the regulatory matters of the Commission, while in reality, very few of SCE’s local government partners have the time, interest, or the resources to be involved in the level proposed by LGSEC. Further, they are already involved in the program development and vetting process through the IOUs’ own regulatory applications. Additionally, the suggestion for a formalized mid-cycle review

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<sup>1</sup> NRDC Comments, dated December 3, 2010, p.3.

<sup>2</sup> LGSEC Comments, dated December 3, 2010, p.7. The CPUC “could consider an annual meeting to review overall portfolio status, conducted with input from all third party implementers and local government partners.”

<sup>3</sup> TURN Comments, dated December 3, 2010, p.5.

<sup>4</sup> NRDC, p.4.

<sup>5</sup> LGSEC, p.7.

process makes a marked step away from the “effective use of the EM&V process” whereby timely feedback is provided to “program implementers so that they can make mid-course corrections to poorly performing programs.”<sup>6</sup> SCE supports Efficiency California’s statement that “the administrators must be able to make . . . mid-cycle adjustments with minimal approval requirements.”<sup>7</sup>

Finally, some parties fail to comment on how the newly-developed energy efficiency statewide program performance metrics might fit into this review process, however, SCE notes again that the existing EM&V process evaluation system and new PPM reporting requirements should be considered and integrated into the Commission’s final determination on this ACR.

**2. SCE urges the Commission reach a conclusion quickly to enable the IOUs to successfully plan for the one-year extension of the 2010-2012 cycle and begin long-term planning and project coordination for four-year program cycles going forward.**

TURN, DRA, LGSEC, and Proctor Engineering request additional time to allow for more input and information prior to the Commission making a Decision on the four-year program cycle going forward. The request for a lengthy decision process is not warranted in this case, and SCE urges the Commission to deny the request that would further delay this decision and severely hinder planning and coordination efforts. Given the unprecedented level of coordination statewide and across proceedings and accounting for the fact that the planning process for the new energy efficiency program application is already behind schedule, it would benefit all parties to have a solid understanding of the necessary resource allocation and expectations for the year ahead. Implementation delays for aspects of the 2010 energy efficiency portfolio due to the regulatory process would be further compounded without an extension of this cycle. For example, a resolution for the Local Government Partnership Strategic Plan Solicitation Advice Letter has not yet been issued and the assurance of an extra year for deployment would address concerns by local government partners.

Furthermore, as mentioned by LGSEC and other parties, the demand response application and integrated program sync-up with the energy efficiency portfolio in 2013 or 2014 would benefit greatly from knowing the outcome of this ACR prior to their filing date.<sup>8</sup> The Low Income Energy Efficiency application could also benefit from the same level of coordination to ensure basic coordination has occurred.

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<sup>6</sup> Sempra Comments, dated December 3, 2010, p. 4.

<sup>7</sup> Efficiency California Comments, dated December 3, 2010. p.8.

<sup>8</sup> LGSEC Comments, p.6.

Finally, the California Long-Term Energy Efficiency Strategic Plan update must be coordinated into this schedule. Sempra notes that “prior to any Strategic Plan updates, the Commission must update its cost effectiveness methodologies and subject the plan to a cost-effectiveness analysis.”<sup>9</sup> PG&E suggests that the updates be included in the schedule proposed by Energy Division.<sup>10</sup> SCE would support the incorporating Sempra’s suggestion into a proposal by PG&E and several parties to have a single, coordinated calendar of all efforts to ensure maximum project timeliness for the Strategic Plan update, cost effectiveness update, goals update, policy manual update, EM&V process update, and the energy efficiency application.

**3. The Commission should take care to ensure consistency and coordination across multiple efforts during the efficiency goals and cost-effectiveness update process.**

It is important to ensure that multiple moving parts are coordinated during the goals update to guarantee a fair, workable, and expedient outcome. PG&E believes Option B requires a disproportionate amount of time for updating 2014-2017 goals rather than providing additional time for IOU portfolio development or considering the resources needed for other key priorities<sup>11</sup>. SCE shares PG&E’s concerns regarding the limited time allocated for IOU program planning activities, but contends a more comprehensive project planning approach is necessary.

Shorting the time to complete the goals study alone is not a suitable answer. The last three energy efficiency potential studies<sup>12</sup> each took over twelve months to complete. Moreover, SCE understands that work is not yet underway to update goals<sup>13</sup>, and we are nearly at the end of the fourth quarter of 2010. The delay in starting the goals update project further exacerbates the aforementioned scheduling issues.

SCE requests a project schedule that reflects both a realistic project start date and a Project timeline that reasonably balances the scheduling needs of the goals study, program planning, and the CPUC decision making process.

The aforementioned integrated timeline is one means by which to achieve this level of coordination; however, there are also several ongoing items to be taken into consideration. First, SCE

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<sup>9</sup> Sempra Comments, p.8.

<sup>10</sup> PG&E Comments, dated December 3, p.8.

<sup>11</sup> Opening Comments of Pacific Gas and Electric Company In Response to Assigned Commissioner’s Ruling Soliciting Comments, December 3, 2010 – p. 3

<sup>12</sup> California’s Secret Energy Surplus, Xenergy Inc. September 23, 2002 California Energy Efficiency Potential Study, Itron, Inc. and KEMA, Inc May 24, 2006 California Energy Efficiency Potential Study, Itron Inc. and KEMA, Inc. September 10, 2008

<sup>13</sup> Assigned Commissioner’s Ruling Soliciting Comments – R. 09-11-014 November 17, 2010 – p. 3

restates the relative importance of coordination with the Demand Analysis Working Group (DAWG) as the energy efficiency goals are updated, a concept also expressed by the Efficiency Council in their comments.<sup>14</sup> Second, several parties including NRDC and Sempra took issue with portions of the Energy Division's avoided costs proposal, including incorporation of the Renewable Portfolio Standard. SCE agrees with the Energy Division's proposal; however, it must be implemented in a manner that is collaborative and allows for parties to comment on each proposed modification. Furthermore, the avoided costs updates should be implemented for the 2014-2017 program cycle. SCE suggests that the Energy Division prioritize its work on the potential and goals studies, then address the cost effectiveness and avoided cost structure on a separate but parallel track.

### **III.** **CONCLUSION**

In summary, SCE iterates its support for the Energy Division's proposal to extend the energy efficiency program cycle to four years starting with the 2010-2013 portfolio. SCE appreciates having had the opportunity to comment on this ACR.

Respectfully submitted,

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December 10, 2010

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<sup>14</sup> Efficiency Council, p. 7.

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS** to assigned commissioner's ruling soliciting comments on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address.  
First class mail will be used if electronic service cannot be effectuated.

Executed this **10th day of December, 2010**, at Rosemead, California.

/s/ Norma Perez

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