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

Application of Southern California Edison Company (U
338-E) for Approval of its California Alternate Rates for
Energy (CARE), Energy Savings Assistance, and Cool
Center Program and Budget for 2012-2014.

A. 11-05-017
(Filed May 16, 2011)

And related matters.

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**COMMENTS OF THE NATURAL RESOURCES DEFENSE COUNCIL (NRDC)
ON THE DECISION ADOPTING BRIDGE FUNDING TO JUNE 30, 2012
FOR LARGE INVESTOR-OWNED UTILITIES' ENERGY SAVINGS
ASSISTANCE PROGRAM AND CALIFORNIA ALTERNATE RATES FOR
ENERGY PROGRAMS**

October 31, 2011

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ON THE PROPOSED DECISION ADOPTING BRIDGE FUNDING TO
JUNE 30, 2012 FOR LARGE INVESTOR-OWNED UTILITIES’
ENERGY SAVINGS ASSISTANCE PROGRAM AND CALIFORNIA
ALTERNATE RATES FOR ENERGY PROGRAMS**

I. Introduction

Pursuant to Rules 1.9, 1.10, and 14.3 of the California Public Utilities Commission’s (CPUC or Commission) Rules of Practice and Procedure, the Natural Resources Defense Council (NRDC) respectfully submits these comments on the “Proposed Decision Adopting Bridge Funding to June 30, 2012 for Large Investor-Owned Utilities’ Energy Savings Assistance Program and California Alternate Rates for Energy Programs,” (Proposed Decision or PD) issued October 11, 2011. NRDC is a non-profit membership organization, with more than 250,000 California members and activists with an interest in receiving affordable energy services and reducing the environmental impact of California’s energy consumption.

For the reasons described below, we urge the Commission to approve the proposed bridge funding decision, which will afford sufficient time to address outstanding issues in advance of the next ESA and CARE program cycle while preventing any disruption in services for customers and program providers.

II. Discussion

Ensuring continuity in the market

NRDC supports the proposed bridge funding decision as it is imperative to maintain the continuity of the investor owned utilities' (IOUs) Energy Savings Assistance (ESA) and California Alternate Rates for Energy (CARE) Programs until the Commission makes a final decision on the IOUs' respective program budget applications for 2012-2014. The PD ensures program services continue uninterrupted for both low income customers and contractors throughout California while the Commission and stakeholders resolve outstanding policy issues in advance of the 2012-2014 CARE/ESA program cycle.

Timing and scope of the bridge funding period

NRDC agrees that a bridge funding period of six months is sufficient for the Commission to review proposals, strategies, and resolve key issues in advance of the 2012-2014 ESA and CARE Programs. NRDC also supports the Commission's omission of programmatic issues and budget items from the proposed decision. Given the limited purpose of this bridge funding decision, deferring those items allows for the least amount of disruption to the ESA and CARE programs. However, NRDC urges the Commission to maintain the proposed schedule to secure adequate time for the IOUs to meet the Commission's resource objectives and ambitious goals.

Inclusion of new contracts during bridge funding

NRDC supports allowing the IOUs to execute new third party contracts during the bridge funding period while details of their applications are being finalized for the next three-year cycle. It is in the public's interest to continue the activities previously authorized by the Commission for 2009-2011 and to allow additional service providers the opportunity to participate. Any interruption in the utilities' capacity to renew contracts or add new third party providers to implement existing programs within the

established framework would unduly penalize California customers, businesses, and employees that would otherwise benefit from the these projects.

III. Conclusion

NRDC appreciates the opportunity to provide these comments on the Proposed Decision to adopt bridge funding for the ESA and CARE Programs and urges the Commission to adopt the PD. We look forward to working with the Commission, staff, and stakeholders over the next few months to resolve the outstanding questions surrounding the IOUs' budget applications for their 2012-2014 CARE and ESA Programs.

Dated: October 31, 2011

Respectfully submitted,

A handwritten signature in blue ink that reads "Natisha Demko". The signature is written in a cursive, flowing style.

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