

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



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Application of Southern California Edison
Company (U338E) for Approval of its 2009-2011
Energy Efficiency Program Plans And Associated
Public Goods Charge (PGC) And Procurement
Funding Requests.

Application 08-07-021
(Filed July 21, 2008)

And Related Matters

Application 08-07-022
Application 08-07-023
Application 08-07-031
(Filed July 21, 2008)

**NOTICE OF EX PARTE COMMUNICATION OF
SOUTHERN CALIFORNIA GAS COMPANY (U904G)**

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May 13, 2010

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OF THE STATE OF CALIFORNIA**

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**NOTICE OF EX PARTE COMMUNICATION OF
SOUTHERN CALIFORNIA GAS COMPANY (U904G)**

Pursuant to Rule 8.3(a) of the Commission’s Rules of Practice and Procedure, the Southern California Gas Company (“SoCalGas”) hereby gives notice of the following *ex parte* communication.

On Monday, May 10, 2010, at 10:00 a.m., Pedro Villegas, Manager of Regulatory Relations for SoCalGas, met with Matthew Tisdale, advisor to Commissioner Dian Grueneich. The meeting lasted 30 minutes and occurred at the Commission’s San Francisco offices. Mr. Villegas initiated the meeting, and the attached written materials were used.

Mr. Villegas stated that SoCalGas is uniquely situated among the utilities as a gas-only utility. Mr. Villegas further stated that calculation of net benefits for SoCalGas’ energy efficiency measures includes only avoided costs for natural gas, as opposed to electric measures

which include avoided costs for both electric and natural gas use. Mr. Villegas noted that D.09-09-047 froze the assumptions upon which the 2010-2012 utilities' cost-effective portfolios are based at the 2008 version of DEER.

Mr. Villegas explained that the recently released 2010 EM&V studies are based on several documented methodological and survey errors that render their conclusions highly unreliable. Mr. Villegas maintained that these questionable studies should in no way be applied to the 2010-2012 portfolios, first because the Commission wisely froze the assumptions underlying those portfolios, and second because the current 2010 EM&V studies constitute a flawed foundation that would likely lead to the errant exclusion of several important strategic programs (i.e. whole house retrofit, HVAC, local government partnerships, residential gas measures) from the 2010-2012 portfolios in order to maintain portfolio cost-effectiveness.

To request a copy of this notice, please contact:

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Dated this 13th day of May, 2010, at San Francisco, California.

Respectfully submitted,

By: /s/ Steven D. Patrick _____
Steven D. Patrick *for*

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ATTACHMENT

Energy Efficiency Evaluation Recommendations

Primary Causes of Reduced Reliability of All the Studies:

1. The largest energy efficiency program evaluation effort in the US made a wholesale discretionary shift halfway through the process from the standard, well-understood program evaluation approach to a completely untested approach called the “High-Impact Measure” approach.
2. The wholesale shift from program evaluation to “high-impact measure evaluation” and a late start due to contracting problems resulted in:
 - a. Inability to collect accurate baseline and net-to-gross data (too much time had elapsed from actual program implementation),
 - b. Too little time to collect complex data with adequate sample sizes, supplemental data collection as needed, and good quality control, and
 - c. Too little time to complete the complex analyses with through assessment and testing of alternative specifications and good quality control.

Parameter Name	ED/Consultant Result	Alternate Result	Rationale for the alternate result, including why alternate result is more reliable than study result
1. Use of Net-to-Gross	Ex post NTG	Use <i>ex ante</i> NTG.	<p>The validity of results from the self-report NTG survey used for most of the mass market (residential and small nonresidential) programs suffered from several issues, rendering them unreliable:</p> <ul style="list-style-type: none"> • Improper NTG ratio construction: A percentage probability of being a free rider was created from respondents’ 1-10 scores on multiple questions that aren’t about whether they would have purchased the product without the program. • Survey often administered years after a customer purchased a product. • In multiple-decision maker (nonresidential) cases, a single respondent does not have sufficient perspective to understand organizational decision-making that occurs over time and involves multiple people and/or departments. In the non-residential new construction study, builders, owners and property managers were interviewed on decisions made

			<p>by decision-makers who had moved-on since the decision or who were only unfamiliar with the overall decision made (.e. given the multi-faceted approaches to meet Title 24). These types of problems make self-report an unreliable method to determine NTG.</p> <p>NTG attribution is limited to program cycle efforts only, resulting in pre-cycle program efforts being attributed to free-ridership and the current program cycles efforts that will bear fruit in later cycles never being credited in this or the later cycle.</p> <ul style="list-style-type: none">• Example: a community college's EE efforts that were partly attributable to pre-2006 conversations with a PG&E program manager led to changes in internal policies to foster move to more EE buildings. When the college finally built a project during the 2006-2008 cycle, the evaluator notices "green policies" but ignores role IOU programs played before current program cycle by classifying entire project as free-ridership. <p>For the large nonresidential programs, it is difficult if not impossible for respondents to tease apart the energy efficiency aspect of a larger project when responding to a long battery of questions posed by an interviewer.</p> <ul style="list-style-type: none">• Responses concerning timing and what "would have happened absent the program" may "lead" responses concerning an entire project, not just the EE portion.• Example: A hospital has to do a major retrofit to meet earthquake safety requirements. They work with the utility to incorporate extensive EE measures. When asked why they did the project, they respond to comply with earthquake safety requirements. Whether or not they would have incorporated EE measures is essentially lost in a response to a much larger project. <p>Selective use of collected data suggests negative bias in the calculation of NTG.</p> <ul style="list-style-type: none">• Clear-cut example is the Fabrication Program evaluation. In 20 of top 60 sites, the evaluator dropped highest score (usually the program influence score). Never were any of the lower scores dropped. In some cases, the average score was further reduced by
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			<p>½. These reductions were applied to largest site evaluated. The reason given was that it was the only project considered. This practice runs contrary to the evolutionary nature of these large projects: although the end result is that only one project is completed and evaluated, the reality is that many variants were considered.</p> <p>The authors of the studies themselves are also, at times, very concerned about the reliability of the NTG estimates.</p> <ul style="list-style-type: none"> On page 82 of the Upstream Lighting impact evaluation for instance, the authors state that “Given the timing of this evaluation we are concerned that none of the NTGR results derived from the various methods can be considered representative of the 2006-2008 program...” and, “In the end, the final recommended NTGR estimates represent our best judgment based on a preponderance of evidence”. Obviously, “judgment” is very difficult to vet and verify. These concerns cast doubt not only on this study but all studies facing either of the same issues: being conducted far too late in time to capture the conditions prevailing throughout the program period or finding vastly different answers from different approaches.
<p>2. Adjustments Made without Final Studies</p>	<p>Changed savings estimates for programs or measures without conducting studies</p>	<p>No changes should be made to program savings estimates unless there are updated studies to justify them.</p> <p>Ex ante savings estimates should be used for programs and measures for which studies were not done.</p>	<ol style="list-style-type: none"> 1) Residential Interactive Effects. There is no study available for the utilities (or anyone else) to review related to the calculation of residential interactive effects. But many of the measures now found in DEER include such “simulated” effects, with no study to support that. No study result using this unstudied DEER data should be accepted, and no Evaluation Report Tool should use it until a study is made available and fully vetted. 2) In large part because of shifting from evaluating programs to high-impact measures, many small measures and small programs were not included in the studies. In these cases, the ex ante estimates should be used, as was understood at the beginning of the program cycle, rather than using new DEER from “similar” programs and measures and subjectively applying new DEER or study results to them, with minimal, poorly-informed analysis to determine whether this can be justified. That is not ex post evaluation. 3) Example: No updated studies were conducted on the SoCalGas

			<p>Local Business EE and SDG&E Energy Savings BID programs, yet DEER updates were arbitrarily applied to these programs based upon SPC updates.</p>
<p>3. Confidence Intervals and Sample Sizes</p>	<p>Many programs with small sample sizes with very large confidence intervals</p>	<p>Ex-ante estimates are based on either engineering estimates or previous reliable studies. These should be used in cases where it is determined that the confidence intervals are very large (for instance encompassing the ex-ante estimate and zero or 1.0) so the results are unreliable.</p>	<p>Many of the studies have extremely wide confidence intervals. Many, in fact, are so large that they include the ex-ante value or a greater value as well as zero. This is generally the result of small sample sizes while estimating large populations, often due to limited funding or limited time to gather data. Whatever the cause, the consequence is unreliable data. There is a strong argument for retaining the ex ante estimates in all such cases.</p> <p>A. "Major Commercial Contract Group Final Impact Evaluation Report": Program SCG3513</p> <p>In the in table 24, the program SCG3513 has a gross savings realization rate of .72. However, the 90% confidence interval for the program is .53. This means that the results of the study indicate that the true realization rate for this program falls somewhere between .19 (.72-.53) and 1.25 (.72+.53), a huge range which could make the program either <i>extremely cost effective or not cost effective at all</i>.</p> <p>When questioned about the size of the confidence intervals, the evaluator response stated that "An analysis of the confidence intervals around the UES estimates shows that, over all 11 combinations of program fuel estimates reported, in 7 of them the confidence interval included the IOU claim; in 9 of them the confidence interval included zero". This result seriously questions the reliability of the study.</p> <p>Ex-ante values are for the most part based upon sound engineering estimates or previously vetted studies. It stands to reason that ex ante values, if they fall within the 90% confidence ranges of the study and the ex post impact studies lack reasonable reliability (or are statistically no more reliable), should be used instead of the mean estimates.</p> <p>The study (and its confidence interval) has not refuted the ex ante values, and in fact provides support for the ex-ante claims.</p>

B. Standard Performance Contract: Program SCE2517

A sample size of 18 for about 1,400 participants in a major savings program. Only 9 of 13 cases in the certainty stratum (the set of largest savings cases that should be sampled at 100%) were completed. For the remaining four other strata, only 2 or 3 were sampled from the remaining 1,384 measures.

The fact is that there are no credible results for the 4 lower strata, leaving the ex ante estimates as the only alternative credible data source.

Because of the small numbers, ex ante results remain the more reliable data source even for the 5 major participants not reviewed. And for all the sampled cases, these cases should be handled in line with the recommendations for the Baseline Issues problem.

C. SCE Industrial and Agricultural Programs, SCE2509 and 2510

For SCE2509 (Industrial) and SCE 2510(Agricultural), Itron states:

“As a result of re-directing resources to the analysis of Steam Traps and Tank Insulation HIMs, the M&V scope for programs SCE2509 and SCE2510 was limited to the samples drawn in March 2008,” - 30 out of a program population of 264 for Industrial and 10 for Agricultural.

There are no signs that the largest sites were sampled at 100%, which could have given the results more reliability. They had plans to continue sampling, so it appears they would have reached a more defensible size except for the forced shift from program evaluation to “high-impact measure evaluation.” This calls into question the impact results of SCE2509. To their credit, the evaluators refused to provide SCE2510 impact estimates due to the sample size of 10.

D. Appliance Recycling Program

This study collected no usage data for refrigerators recycled during the program cycle. Instead, it collected data from a too-small

			<p>sample of 137 refrigerators recycled in 2009. Instead of building on the data collected over several past program cycles and the strong multi-faceted approach developed in the 2004-5 study, this project failed to collect any controlled, lab-metered data at all. It metered two weeks of energy usage of 137 refrigerators whose participant owners agreed to delay the pickup of their refrigerator. This small amount of data from homes recycling their refrigerators was used to project the full-year usage of all 2006-8 program refrigerators in the different locations and different uses they would have gone to if not recycled.</p>
4. CFL Study Errors			<p>In multiple areas, the CFL HIM study made discretionary decisions to select analysis approaches that would yield lower savings estimates than alternative approaches that have equal or stronger justifications for use. In some cases, the selected method is a very indirect and inexact way to produce an estimate. In others, the details of the particular analyses contain significant flaws.</p>
A. Net-to-Gross Ratio	PG&E: 0.48 SCE: 0.64 SDG&E: 0.48	PG&E: 0.71 SCE: 0.80 SDG&E: 0.71	<p>The IOU recommended approach is to use one of the 5 alternative methods explored by the HIM study, namely the one that was also used in the 2004-5 CFL study, instead of the judgmental combination of two other methods recommended by the evaluator (the supplier self-report approach).</p> <p>Rationale for using 2004-5 CFL study:</p> <ol style="list-style-type: none"> 1) That's the NTG approach that the program used for planning, 2) Using it creates a consistent approach over time, which is important for monitoring program performance over time. 3) The other four methods used by the HIM evaluation were good <i>experimental</i> approaches to explore, but they were not well executed. The preferred, self-report based methods do not capture what the suppliers know about how the program changed what was available for the customers to select.
B. Installation Rate	Residential:	Residential:	<p>The HIM study completely ignores any installations during the program cycle beyond those estimated to happen during the first year.</p>

	PG&E: 0.67 SCE: 0.77 SDG&E: 0.67 Nonresidential: All: 0.81	PG&E: 0.80 SCE: 0.89 SDG&E: 0.80 Nonresidential: All: 0.92	<p>In other words, zero savings are counted for the CFLs purchased and held in reserve for more than a year.</p> <p>The alternative is calculated using the study's rate of deferred first year installations and applying it also as a second-year rate for bulbs purchased in 2006 and 2007 (but not for 2008 to limit savings to within the cycle time-frame). The alternate result does not include any CFLs installed post-2008 which is a policy issue still not addressed by the CPUC.</p>
C. Residential/ Nonresidential Split	PG&E: 0.94/0.06 SCE: 0.94/0.06 SDGE: 0.95/0.05	PG&E: 0.92/0.08 SCE: 0.81/0.19 SDG&E: 0.87/0.13 All: 0.80/0.20	<p>The HIM study's estimates are based on the numbers of incandescents and CFLs found in its residential and commercial on-site surveys. The study was done so late that about a quarter of all the program-rebated CFLs installed in commercial facilities would have burned out, having reached their lifetime hours. This strange method of estimating the split could only be justified if no other data was available. But other, better data sources are available.</p> <p>Data from interviews of retailers, with sales-weighted proportions, indicate that about 20% of the sales are for business. When a different study surveyed residential customers, customers reported that 13% of their bulb purchases were going into their businesses. Even this is a lower-bound estimate, because it ignores the business customers who bought their CFLs through their businesses.</p> <p>Despite it being a lower-bound estimate, we recommend using the results of the HIM study, which actually asked CFL users whether they purchased CFLs for the home or a business.</p>
D. Wattage Reduction per CFL Installed	PG&E: 44.2 W SCE: 44.8 W SDG&E: 44.4 W	Retain Energy Star Guidelines and apply them to the actual mix of CFLs rebated through the program	<p>Instead of the obvious and only widely accepted approach (lumen-to-lumen equivalency), the HIM study used a strange method of establishing this parameter.</p> <p>The HIM study takes the difference between the average incandescent wattage and the average CFL wattage, comparing "similar" sockets in the home. The study then reports out a single average wattage difference for all incandescent vs. CFL bulbs in place in 2008. The HIM</p>

			<p>study does not even attempt to compare the wattage differences by lighting level provided, nor does it recognize that these numbers exclude customer choices on which fixtures are most valuable for installing CFLs.</p> <p>The obvious method is to assume that people install CFLs that match the incandescent wattage rating that they want to replace. This will tend to follow the information on the CFL packaging, which relies on the Energy Star Guidelines.</p> <p>The 2004-05 evaluation results, which estimated true delta watts, not just the difference between the averages, agreed with the implied wattage reductions from the Energy Star Guidelines. This is far better justified result.</p>
<p>E. Hours of Use</p>	<p>PG&E 1.9 SCE: 1.9 SDG&E: 1.5</p>	<p>2.34</p>	<p>Because of the combined problems of the data and the analysis in the HIM study, we should go back to the most recent study, as DEER did: the KEMA 2005 CFL metering study.</p> <p>The KEMA 2005 study yields 2.18 hours for interior CFLs and relies on a 1999 HMG study for exterior lighting, yielding a total average of 2.34 hours per day. Note, DEER only includes an estimate for interior CFLs, while the program includes exterior-installed CFLs, so the overall KEMA study average should be used.</p> <p>The HIM study made a major effort to gather new data and do new, complex analysis with it. Unfortunately, the metering data had problems and the complex statistical analysis is unreliable, being very unstable and misspecified.</p> <p>For example, the metering data under-represents the highest-use lighting and there were problems with the metering equipment. The regression analysis from the HIM study produces bizarre results: if a customer moves from San Diego to Los Angeles, their hours of use change dramatically, and it excludes obvious determinants of usage, such as such as dwelling type, fixture type and lamp type.</p>

<p>5. Baseline Issues</p>	<p>Ex post baseline calculations</p>	<p>Use <i>ex ante</i> as the baseline for more savings estimates.</p>	<p>The 2006-8 nonresidential evaluations went too far in developing “more accurate” baselines, with the result that free-ridership was measured (often incorrectly) and subtracted twice in creating the savings estimates for the projects and ultimately the programs.</p> <p>Several evaluations used “What would have happened in the absence of the program?” as the baseline question. But that question simultaneously addresses both the starting situation for the EE retrofit and the free-ridership issue. Unfortunately, these evaluations didn’t recognize this point and also produced Net-to-Gross ratios to apply to the savings estimates based on answers to this question.</p> <p>The long-tested, the traditional method is to keep these two questions separated. For the baseline, the traditional method uses a few simple cases to identify how much of the total change occurring is within the program’s scope to influence: Replace on Burnout; Early Replacement, Discretionary Replacement, or New Construction, with the applicability of codes and standards considered for each project. Then the traditional NTG analysis takes care of the question of whether the customer would have made that amount of change without the program (which is what the “industry standard” concept addresses).</p> <p>The double-counting problem was compounded by wrong identification of the base case, not using the “as-is” condition (Discretionary Replacement) when it was the appropriate one. The study classifies far too many cases, involving industrialized processes and highly costly equipment, as “Replace on Burnout” cases, rather than “Discretionary Replacement” cases.</p> <p>In practice, older equipment is used long after typical estimated life, especially in challenging economic conditions. Common example: Since a customer was contemplating extending the life of equipment through maintenance and repairs (e.g., re-winding motors) rather than replacement, the “as-is” situation should be considered a valid baseline.</p> <p>In certain evaluations, data was not collected early enough in the program cycle to provide a realistic baseline. As noted in the <i>Compact</i></p>
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			<p><i>Fluorescent Lamps Market Effects Draft Final Report</i>, baseline estimate studies were not conducted sufficiently early in the program cycle to identify quantifiable market effects that occurred early in a program's life. The lack of such baseline data, coupled with the rapid increase in CFL sales throughout the U.S. during the first part of the 2006-2008 program cycle and the more recent national downturn in sales, makes it extremely difficult for any program to claim or quantify savings from cumulative market effects induced by these programs alone.</p>
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **NOTICE OF EX PARTE COMMUNICATION OF SOUTHERN CALIFORNIA GAS COMPANY (U904G)** ***(RE-FILED AND RE-SERVED TO INCLUDE TIME OF EXPARTE MEETING AND CORRECT THE PROCEEDING NUMBER ON CAPTION ON THE TITLE PAGE AND PAGE 1 and UPDATE CERTIFICATE OF SERVICE)*** on all known interested parties of record in **A.08-07-021, 022, 023 and 031et.al.** via email to those whose email address is listed in the official service list and via first class mail to those whose email address is not available.

Copies were also delivered to Administrative Law Judge David Gamson and Commissioner Dian Grueneich.

Executed this 14th day of May, 2010, at Los Angeles, California.

 /s/ Marivel Munoz
Marivel Munoz

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists: A.08-07-021,022,023 and 031– Last Changed: May 13, 2010

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