



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Application of Pacific Gas and Electric
Company for Approval of 2013-2014 Statewide
Marketing, Education and Outreach Program and
Budget (U39M)

APPLICATION 12-08-007
(Filed August 3, 2012)

And Related Matters.

APPLICATION 12-08-008
APPLICATION 12-08-009
APPLICATION 12-08-010
(Filed August 3, 2012)

**Reply Comments of
California Center for Sustainable Energy on Scoping Memo and Ruling of
Assigned Commissioner and Administrative Law Judge**

The California Center for Sustainable Energy (CCSE) is pleased to provide these reply comments to parties' opening comments on the January 18, 2013 *Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge* ("Scoping Memo"). As the designated implementer and coordinator of the statewide marketing, education, and outreach (ME&O) program per D.12-05-015, CCSE commends the Commission's understanding of the need to expediently determine the future of the Flex Alert program, as this will be a vital campaign to ensure the reliable provision of energy services to southern California in the likely absence of the San Onofre Nuclear Generating Station (SONGS). We enjoyed reviewing the thoughtful opening comments of parties to this proceeding, and look forward to working with all stakeholders to bring a timely and satisfactory conclusion to this proceeding in the coming months, the end result of which should be a highly effective and efficient statewide ME&O campaign.

To this end, CCSE directs its comments toward brand coordination and budgetary matters raised by parties in their opening comments.

I. Flex Alert and Energy Upgrade California

CCSE appreciates the role that Flex Alerts play in the overall statewide effort to reduce peak demand and avoid the need to increase supply capacity to handle peak demand events. We note that as part of this larger effort to reduce peak and overall demand, it is critical that CAISO and the IOUs closely coordinate Flex Alert activities under the state's umbrella brand for demand side management, Energy Upgrade California. We look forward to further discussions regarding the details of such coordination in the coming months.

II. Flex Alert Budget

In opening comments, CAISO suggests that the proposed funding levels for Flex Alerts may not be adequate, particularly in light of the continuing SONGS outage in Southern California.¹ We trust that the Commission will carefully evaluate the resource needs for the Flex Alert program in 2013-2014 and determine the final budget allocation. We note however, that any budget increase above and beyond what has been proposed in the IOUs' Statewide ME&O applications should come from a source outside of the overall budget for Statewide ME&O. This will ensure that Energy Upgrade California is adequately resourced to fulfill its highly ambitious and important mandate as the state's primary ME&O platform to engage Californians in energy management.

III. Evaluation, Measurement, and Verification

¹ *Motion for Party Status and Comments of the California Independent System Operator Corporation*. p. 2. February 1, 2013.

In its opening comments, SDG&E recommends “that the Commission authorize an EM&V study to estimate the actual load reductions resulting from Flex Alerts.”² CCSE is highly supportive of this idea. In light of the emergence of new and expanded demand response programs becoming available to residential and small business customers, it is important to objectively assess the overall effectiveness of various approaches so that the limited existing resources can be optimally deployed to achieve maximum peak load reductions when and where they are most needed on the grid. We therefore support any efforts to collect data related to the effectiveness of efforts to engage customers to help avoid the need for expensive peaker plants and/or additional electricity imports during peak demand events.

IV. Conclusion

CCSE appreciates the opportunity to provide reply comments regarding Phase 1 of this proceeding. We look forward to ongoing collaboration with other parties as we work to implement and coordinate the 2013-2014 statewide ME&O campaign.

Respectfully submitted,

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² *Comments of San Diego Gas & Electric Company (U-902-M) on Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge.* p. 5. February 1, 2013.

A.12-08-007/A.12-08-008/A.12-08-009/A.12-08-010

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