

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 2, 2012)

And Related Matters.

Application 12-08-008  
Application 12-08-009  
Application 12-08-010

**THE OFFICE OF RATEPAYER ADVOCATES'  
COMMENTS ON THE ASSIGNED COMMISSIONER'S AMENDED  
SCOPING MEMO AND RULING**

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## **I. INTRODUCTION**

The Office of Ratepayer Advocates (“ORA”) hereby submits these comments pursuant to the Assigned Commissioner’s Amended Scoping Memo and Ruling (“Scoping Memo”) on the Application of Pacific Gas and Electric for Approval of 2013-2014 Statewide Marketing, Education, and Outreach Program Budget.

## **II. DISCUSSION**

### **A. Vision of Statewide Marketing, Education and Outreach (“ME&O”)**

Statewide ME&O should serve both as a lead generator, driving consumers to utility and Regional Energy Network (“REN”) programs, as well as driving consumers to directly take actions to reduce or manage energy in other ways. ME&O should provide the information and motivation for consumers to take action. Some actions are small and consumers might take them immediately and without the assistance of outside organizations. ME&O should encourage these types of actions since immediate behavioral change can have a positive feedback in the consumers’ attitudes and awareness of energy usage. However, ME&O should also make consumers aware that there are a host of organizations and programs available to partner with them once customers decide to further reduce their energy usage. Therefore, the message should be “here is what you can do *now*, and when you are ready to take a bigger step, here is an organization or program that can help you.”

### **B. Goals of Statewide Marketing, Education and Outreach**

The goals stated in in D.07-10-032 and D.12-05-015 are still relevant, particularly coordination of efforts, which should be led by whichever entity is chosen as the statewide implementer following competitive solicitations.

The goals from D.07-10-032 that are still appropriate are:

- comprehensive messages that combine the variety of energy reducing/avoiding options available to customers;

- coordination of related ME&O programs;
- coordination of providers with similar or related interests and services, such as local government, community based organizations, firms and municipal utilities;
- comprehensive approach to motivating all types of energy efficiency investments and behaviors;
- cost-effective high impact plan to drive maximum energy savings - both long term and short term—tailored to reflect the values, habits and demographics of different target communities and populations, particularly low income and ethnic groups;
- joint marketing of EE programs with other customer energy technologies, such as demand response and solar installations;
- an up-to-date website directing customers to all possible options and best practices.

The goals from D.12-05-015 that are still appropriate are:

- utilities may conduct targeted marketing in service territory but statewide efforts should be coordinated;
- eliminate duplicative and potentially contradictory spending on separate marketing through a coordinated and leveraged approach and program referrals;
- utilize the existing network of community-based organizations and local and ethnic media such as newspapers, radio, and television;
- target ME&O to small business and residential customers.

### **C. Structure of Statewide Marketing, Education, and Outreach**

As D.12-05-015 states, one goal of ME&O is to eliminate duplicative and potentially contradictory spending on separate marketing by utility or by program type. The various implementers (i.e., investor owned utilities (“IOU”), RENs, Community Choice Aggregators, Publicly Owned Utilities, and Statewide ME&O) should closely coordinate to ensure that efforts are not duplicative and that the messages are similar or at least reflective of the Energy Upgrade brand. Responsibility for this coordination does not simply lie with the organization chosen to lead the effort; all of the organizations involved with energy efficiency (“EE”) in the state need to do their part to make sure that

those efforts are complementary. Given that the IOUs currently see EE as integral to their marketing and customer outreach, one can reasonably foresee some conflict in this area. The division between statewide and local marketing efforts is not easily defined. ORA recommends that the various implementers along with the chosen lead agency negotiate in good faith, carefully define their roles via coordination, devise a plan, and bring that plan to the Commission for authorization.

#### **D. The Request for Proposal (RFP) Process**

While it is reasonable for an IOU to administer the RFP process for a statewide ME&O contractor, Energy Division staff should make the final decision on the chosen entity. In addition, the Commission should allow interested stakeholders (such as ORA) to participate throughout the RFP process in a forum similar to a peer review group to advise Energy Division Staff and monitor the process. Specifically, Energy Division staff should develop the RFP criteria and eligibility requirements and score bids and select an administrator.

#### **E. Budget**

As stated in previous ORA comments: “Results of the ME&O evaluation of statewide, investor-owned utilities and Regional Energy Networks marketing activities will be completed by the end of 2015. It is important to review the findings and recommendations of this evaluation and make mid-course adjustments as appropriate for continuous statewide ME&O improvement at that time.”<sup>1</sup> Therefore, the Commission should review the evaluation before adjusting the annual funding level.

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<sup>1</sup> ORA Opening Comments on the Proposed Decision on Bridge Funding for Post - 2015 Statewide Marketing, Education, and Outreach Activities, filed August 17, 2015, p. 3.

### III. CONCLUSION

ORA respectfully submits these comments in response to the Scoping Memo on the Application of Pacific Gas and Electric for Approval of 2013- 2014 Statewide Marketing, Education, and Outreach Program Budget.

Respectfully submitted,

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