

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

**REPLY COMMENTS
OF THE OFFICE OF RATEPAYER ADVOCATES
ON THE POST-DECISION WORKSHOP**

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I. INTRODUCTION

The Office of Ratepayer Advocates (“ORA”) respectfully submits these reply comments pursuant to Administrative Law Judge (“ALJ”) Stephen Roscow’s email to the Service List sent on April 15th, 2016, posing questions to parties regarding the Workshop and Evaluation Reports presented at the April 14th, 2016 workshop. ORA submits the following reply comments.

II. DISCUSSION

A. **Direct Encouragement of Consumer Energy Saving Actions and Lead Generation for IOU Programs are Complementary Goals and Should be Given Equal Weight.**

The reply comments submitted here address the issue of balancing two different goals of Statewide Marketing, Education and Outreach (“ME&O”): lead generation and motivating consumers to directly act to reduce energy consumption. Decision (“D.”)16-03-029 suggested an equal weight for each goal:

All Californians will be engaged as partners in the state’s energy efficiency, demand-side management and clean energy efforts by becoming fully informed of the importance of energy efficiency and their opportunities to act. Statewide marketing, education and outreach should serve as a lead generator for local and regional programs and drive consumers to directly take actions to reduce or manage energy use in other ways.¹

The decision clearly states that the two goals – lead generation and motivating customers to directly take action – are both important. Previously, ORA’s comments on the Scoping Memo explained that these goals are not mutually exclusive, but actually complimentary and supportive of each other. ORA suggested a model of customer behavior in which the motivation to save energy is enforced by the customers having the option to immediately contact their utilities to learn about utility-sponsored programs

¹ D.16-03-029, p. 34

appropriate for the customers' needs.² The message to consumers to directly take actions is empowering and will prime them to participate in utility programs.

Pacific Gas & Electric Company's ("PG&E") comments support the goal of lead generation over the goal of driving consumers to take direct actions. PG&E suggests "clarifying the Long-term Goal to indicate that the primary focus of Statewide ME&O is utility customers, with a broader secondary goal of empowering all Californians."³ On the contrary, it is not productive to consider "empowering all Californians" as a secondary goal. ORA's understanding is more consistent with The Joint Utilities (San Diego Gas & Electric and Southern California Gas), who list five primary objectives, giving equal status to lead generation and customer education.⁴

ORA recommends that the Commission reaffirm the finding in D.16-03-029 and give equal weight to these goals and not privilege one over the other, as PG&E recommends.

B. PG&E's Concerns About the Tracking Size of Surveys Are Based on Erroneous Calculations.

PG&E is concerned that the samples size in the Evaluation Survey tracking study are insufficient:

Second, we are concerned about the significantly smaller sample of wave 2 respondents, compared to wave 1. In wave 1, there are 836 respondents, but in wave 2 there are only 522 respondents. As a result, scores presented as percentages are unlikely to be consistent across both waves. For example, a 10% score in an 836-person sample reflects the views of 8

² See The Office of Ratepayer Advocates' Comments on The Assigned Commissioner's Amended Scoping Memo and Ruling, filed November 20, 2016, p. 2, also cited in D.16-03-029, p. 31.

³ Comments of Pacific Gas And Electric Company on Post-Decision Workshop Decision of ALJ Stephen Roscow On Phase 3 Issues: Post-2016 Statewide Marketing, Education, and Outreach Activities, p. 2.

⁴ Joint Comments of San Diego Gas & Electric Company (U 902 M) and Southern California Gas Company (U 904 G) on Statewide Marketing, Education and Outreach Workshop, p. 8.

respondents, but 10% reflects the views of only 5 respondents in a 533-person sample.⁵

The math in the example provided is incorrect: 10 percent of an 836 person sample represents the views of 83 persons and 10 percent of a 533 person sample represents the views of 53 persons. ORA confirmed with PG&E that this is an error and recommend that they amend the record with the correct calculations.

III. CONCLUSION

ORA appreciates the opportunity to file reply comments and clarify the reasoning for giving equal weight to customer education and lead generation in Statewide ME&O.

Respectfully submitted,

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⁵ Comments of Pacific Gas And Electric Company on Post-Decision Workshop Decision of ALJ Stephen Roscow On Phase 3 Issues: Post-2016 Statewide Marketing, Education, and Outreach Activities, p. 10.