

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**

8-08-16  
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Order Instituting Rulemaking  
Concerning Energy Efficiency Rolling  
Portfolios, Policies, Programs,  
Evaluation, and Related Issues.

Rulemaking 13-11-005  
(Filed November 14, 2013)

**THE OFFICE OF RATEPAYER ADVOCATES’  
NOTICE OF EX PARTE COMMUNICATION**

Pursuant to Rule 8.4 of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, the Office of Ratepayer Advocates (“ORA”) respectfully submits the following notice of ex parte communication in the above referenced docket. Rule 8.3 (d) provides that ex parte notices are not required in a ratesetting proceeding where hearings have been determined to be unnecessary, as was determined in the above referenced docket.<sup>1</sup> In the interest of full transparency, ORA submits the notice of oral ex parte communication, which occurred at the Commission’s offices in San Francisco.

The meeting was held on Wednesday, August 3, 2016 at 10:15 a.m. with David Gamson and Jennifer Kalafut, Advisors to Commissioner Carla Peterman. The meeting was initiated by ORA to discuss the Proposed Decision on 2016 Energy Efficiency Policy

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<sup>1</sup> Assigned Commissioner’s Ruling and Scoping Memorandum Regarding 2015 Portfolios (Phase I of Rulemaking 13-11-005), p. 3 (Jan. 22, 2014 ); Assigned Commissioner and Administrative Law Judge’s Ruling and Scoping Memorandum Regarding Implementation of Energy Efficiency “Rolling Portfolios” (Phase II of Rulemaking 13-11-005), p. 13 (Feb. 24, 2015); *see generally* Assigned Commissioner and Administrative Law Judge’s Ruling and Amended Scoping Memorandum Regarding Implementation of Energy Efficiency “Rolling Portfolios” (Phases IIB and IIIA of R.13-11-005) (Oct. 30, 2015).

Guidance (“PD”). ORA representatives present were Program Manager Mike Campbell and Analyst Daniel Buch.

ORA, David Gamson, and Jennifer Kalafut discussed the following:

- ORA supports the PD’s direction on statewide and third party programs in order to ensure greater statewide consistency and cost-effectiveness.
- The PD should be modified to require Investor Owned Utilities (“IOUs”) to bid out their entire portfolios to third parties unless an IOU can demonstrate it can implement a program more cost-effectively than all other implementers.
- ORA supports the PD determination that energy efficiency goals should be set net of free ridership.
- ORA supports the removal of codes and standards savings from IOU goals.
- The PD’s baseline policy is reasonable, but should be modified to incorporate the Energy Division White Paper proposal on baselines for major alterations.
- The PD should be modified to increase accountability for Evaluation, Measurement, and Verification funding.

ORA’s presentation was accompanied by a handout outlining ORA’s positions. A copy of the handout is attached.

Respectfully submitted,

ZHEN ZHANG

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