BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company (U39E) for Approval of Demand Response Programs, Pilots and Budgets for Program Years 2018 – 2022.

And Related Matters.

Application 17-01-012
(Filed January 17, 2017)

Application 17-01-018
Application 17-01-019

REPLY COMMENTS OF ROBERT BOSCH LLC
ON STAFF PROPOSAL TO INTEGRATE ENERGY EFFICIENCY AND DEMAND RESPONSE ACTIVITIES

Sheridan Pauker
Partner
Keyes & Fox LLP
436 14th St., Ste. 1305
Oakland, California 94612
(510) 314-8202
spauker@kfwlaw.com

Attorney for Robert Bosch LLC

July 31, 2017
REPLY COMMENTS OF ROBERT BOSCH LLC
ON STAFF PROPOSAL TO INTEGRATE
ENERGY EFFICIENCY AND DEMAND RESPONSE ACTIVITIES


Bosch supports the Energy Division’s proposal to focus on integrating energy efficiency (“EE”) and demand response (“DR”) activities of the Commission and the utilities, and in particular Element # 2 regarding HVAC and lighting controls and incentives in the non-residential sector. Bosch agrees with parties’ comments in their opening briefs that any integration plans

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\(^1\) Bosch’s Motion for Party Status was filed on July 24, 2017, and is currently pending before the Administrative Law Judges in these consolidated dockets. Bosch has styled this reply to other parties’ opening briefs as reply comments, rather than as a reply brief, per the guidance of ALJ Hymes, because Bosch is not otherwise filing a brief in these consolidated dockets.
should not be overly prescriptive or technology-specific, and also asserts that proceedings A.17-01-012 et al. and A.17-01-013 et al. are the appropriate home for these integration efforts.

I. **The Staff Proposal Offers an Important Opportunity to Integrate EE and DR Activities that Should be Embraced by the Commission.**

Bosch echoes the comments of the Office of Ratepayer Advocates (“ORA”) and PG&E in support of the Staff Proposal and Element # 2 in particular. There is a critical need to incentivize DR-ready lighting controls in non-residential buildings in order to meet the state’s DR goals, and Bosch strongly endorses the Energy Division’s proposal to incentivize ADR-enabled lighting controls through this integration effort. As ORA noted, “Limited integration can help leverage technologies and implementation techniques within each area to maximize the activation of flexible energy resources.”² Bosch agrees. And, as PG&E recommend, “a pilot using IDSM DR funds to incentivize vendors to enable and program equipment to be OpenADR ready” should be explored very soon “so that it makes it easier for customer[s] to enroll in DR programs using the already installed enabling technologies.”³ We recommend moving forward with a pilot integration project along the lines suggested in the Staff Proposal as soon as possible.

II. **Any Directives Adopted by the Commission with respect to Integration of EE and DR Activities Should Be Technology Neutral.**

Bosch agrees with the points raised by PG&E and SDG&E that any directives that emerge from the Staff Proposal should be technology-neutral and not overly prescriptive.⁴ While Bosch supports the broad and general categories of technologies proposed in the non-residential Element # 2 of the Staff Proposal (e.g., automated DR-ready management systems, automated DR-ready air conditioning, DR-readiness in new construction, ADR-enabled lighting controls, efficient fan, and

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² ORA Opening Brief at 30.
³ PG&E Opening Brief at 77.
⁴ PG&E Opening Brief at 69, 75; SDG&E Opening Brief at 111, 119.
VFD pumps and drive controls), we agree that there may be other worthwhile categories of measures to integrate EE and DR, and so any orders that result from this Staff Proposal should allow for industry innovation. Also, as noted in our opening comments, any incentives developed by the Commission, EE Program Administrators’ (e.g., IOUs, RENs or Community Choice Aggregators (“CCA”), the “PAs”), Regional Energy Networks (“REns”), third parties or others in the EE and DR portfolios should be crafted in a way that is AC/DC agnostic, so that DC-based technologies can participate in this integration effort.

III. The EE and DR Portfolio Proceedings Are the Correct Venue for This Discussion.

In opening briefs, PG&E, SCE, and SDG&E suggested that the EE and DR portfolios dockets are not the proper venue for the Commission to work to integrate EE and DR activities. Bosch disagrees. As the Staff Proposal discussed, “Although EE/DR program integration objectives were envisioned in the IDER OIR, the proceeding took a different direction (to pursue [Distributed Energy Resources (“DER”)] competitive solicitations and other sourcing mechanisms in concert with the Distributed Resource Plans proceeding, R.14-08-003).”⁵ The scope of the IDER docket (R.14-10-003) is now focused on DERs, including development of a competitive solicitation framework, development of cost-effectiveness protocols, and “utility role, business models, and financial interests with respect to distributed energy resources deployment.”⁶ The scope of the DRPs docket (R.14-08-013 et al.) is focused on the investor owned utilities’ (“IOU”) Distribution Resource Plans, Integration Capacity Analysis, Locational Net Benefits Analysis, grid modernization, related policy issues and demonstration projects regarding the integration of DERs

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⁵ Staff Proposal at 6.
⁶ R.14-10-003 Amended Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge (September 1, 2016).
into distribution planning and operation. The scope of the IRP docket (R.16-02-007) is focused on the Load-Serving Entities’ integrated resource plans, along with SB 350 implementation, portfolio optimization, renewables integration, procurement, reliability and other broad resource planning issues. The specific and important task of attempting to coordinate and integrate the goals and activities within the PAs’ EE business plans and DR portfolios does not fit within the scope of these other proceedings.

By contrast, the scope of these consolidated proceedings is focused on the IOUs’ DR programs and budgets for years 2018 through 2022. These dockets specifically scoped in the question of whether the Commission should explore “joint activities in demand response and energy efficiency by integrating funding and program implementation in a limited-manner, e.g. targeting specific controls, conducting necessary studies.” The scope of A.17-01-013 et al. is focused on the PAs’ EE business plans, and “[c]oordination between energy efficiency and demand response portfolios” is explicitly within the scope of that consolidated docket. Bosch asserts that it is most logical and reasonable to address potential ways of coordinating and integrating EE and DR activities at the product level in A.17-01-012 et al. and A.17-01-013 et al., as suggested by staff.

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10 Id. at 4.
12 Staff Proposal at 6.
IV. CONCLUSION

Bosch appreciates the Energy Division’s initiative to integrate EE and DR activities as well as this opportunity to provide comments on the Staff Proposal.

Respectfully Submitted,

/s/ Sheridan Pauker
Sheridan Pauker
Partner
Keyes & Fox LLP
436 14th St., Ste. 1305
Oakland, California 94612
(510)-314-8202
spauker@kfwlaw.com

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