PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Item #16 (Rev. 1)
Agenda ID 13481

ENERGY DIVISION **RESOLUTION G-3497**
December 18, 2014

R E S O L U T I O N

Resolution G-3497. Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric Company (SDG&E), and Southern California Gas Company (SoCalGas) requesting approval of program year 2012 and partial 2013 energy efficiency incentive awards.

PROPOSED OUTCOME:

- Approve PG&E energy efficiency shareholder incentives for program year 2012 and partial program year 2013. Program year 2012 shareholder incentives can be approved as calculated by PG&E. Program year 2013 shareholder incentives should be approved as calculated by Commission staff.
- Approve SDG&E energy efficiency shareholder incentives for program year 2012 and partial program year 2013. Program year 2012 shareholder incentives can be approved as calculated by SDG&E. Program year 2013 shareholder incentives should be approved as calculated by Commission staff.
- Approve SoCalGas energy efficiency shareholder incentives for program year 2012 and partial program year 2013. Program year 2012 shareholder incentives can be approved as calculated by SoCalGas. Program year 2013 shareholder incentives should be approved as calculated by Commission staff.

SAFETY CONSIDERATIONS:

- This Resolution approves incentive awards to PG&E, SDG&E, and SoCalGas and thus is not expected to have an impact on public safety.

ESTIMATED COST:

- This Resolution approves energy efficiency shareholder incentives in the following amounts:
  - PG&E: $36,253,755
  - SDG&E: $7,545,709
  - SoCalGas: $5,874,452

By PG&E Advice Letter 3492-G/4451-E (U 39M) filed on June 30, 2014.

By SDG&E Advice Letter 2620-E (U 902E) filed on June 30, 2014.

By SoCalGas Advice Letter 4661-G (U 904G) filed on June 30, 2014.

SUMMARY

This Resolution addresses Pacific Gas and Electric Company (PG&E) Advice Letter 3492-G/4451-E, San Diego Gas and Electric (SDG&E) Advice Letter 2620-E, and Southern California Gas Company Advice Letter 4661 seeking approval of program year 2012 and partial 2013 energy efficiency incentive awards in compliance with Ordering Paragraph (OP) 8 of D.12-12-032 and OPs 4 and 6 of D.13-09-023. This resolution modifies PG&E, SDG&E, and SoCalGas' Advice Letters and approves the incentives, as calculated herein.

BACKGROUND

2010-12 Incentive Mechanism

The California Public Utilities Commission (CPUC) adopted a shareholder incentive mechanism for energy efficiency programs beginning with the 2006-08 portfolio to motivate IOU management to pursue energy efficiency as a core business strategy. Significant controversy over the 2006-08 incentive mechanism, however, caused the CPUC to reconsider the incentive mechanism structure. The Commission opened a proceeding (R.12-01-005) to consider reforms to the original mechanism. R.12-01-005 was split to address an incentive policy for the 2010-12 cycle separate from an incentive policy for the 2013-14 cycle and beyond.

As the 2010-12 cycle was drawing to a close, the Commission had not yet completed its deliberations on the appropriate reforms. The Commission recognized that the mechanism reforms would not influence the IOUs' 2010-12

portfolio implementation activities, but found it reasonable to continue to disburse shareholder incentives for energy efficiency to send the proper investment signal to the market place and affirm that state's commitment to energy efficiency.[1] On December 20, 2012, the CPUC adopted Decision (D.) 12-12-032, which implements a simplified shareholder mechanism for the 2010-12 portfolio that consists of a management fee equal to 5% of audited annual utility programmatic expenditures, plus up to 1% for ex ante review performance (all excluding evaluation, measurement, and verification or EM&V costs). Ex ante review performance was scored using a set of 11 metrics covering the following four categories:

- Category 1: IOUs' efforts to implement the Commission's ex ante review process within their organizations
- Category 2: Level of due diligence the IOUs applied to their ex ante activities
- Category 3: Progress toward ex ante activity that is more self-policing
- Category 4: Efforts to implement Commission adopted policy regarding the use of the Database of Energy Efficient Resources (DEER)

Each IOUs' score for the ex ante process conformance was directly translated to the performance bonus (i.e., the score was equal to the proportion of the 1% performance bonus awarded to each IOU). In the Decision, the CPUC adopted the following scores to determine the performance bonus earnings rate for each IOU for the 2010-12 cycle:

- PG&E: 68/100
- SDG&E: 31/100
- SoCalGas: 36/100

[1] D.12-12-023 at page 43.

The IOUs' incentive award earnings rates for the 2010-12 program cycle were the combination of the performance scores and the management fee, and were adopted in D.12-12-032 as follows:

- PG&E: 5.68%
- SDG&E: 5.31%
- SoCalGas: 5.36%

Per D.12-12-032, the IOUs will rely on public versions of the CPUC Utility, Audit, Finance, and Compliance Branch (UAFCB or Audit Branch) reports to determine the actual expenditures to calculate their respective incentive awards. Final UAFCB reports for program activities in 2012 for PG&E, SDG&E, and SoCalGas were made public on June 27, 2014.[2] The service list for R.12-01-005 was notified of the availability of the UAFCB audits on June 27, 2014. D.12-12-032 directs PG&E, SDG&E, and SoCalGas to each file a Tier 3 Advice Letter seeking incentive awards for 2012 program activities using the adopted earnings rates and their verified expenditure amounts.

2013-14 Incentives – ESPI Mechanism

The Efficiency Savings and Performance Incentive (ESPI) mechanism was adopted by the Commission on September 5, 2013, in D.13-09-023. The ESPI mechanism is a multi-component incentive structure intended to motivate IOUs to invest not only in energy efficiency savings (i.e., resource programs), but also in non-resource programs where energy efficiency is marketed and promoted but energy savings are not quantified at this time (e.g., workforce, education, and training and marketing, education, and outreach). The ESPI's four components are:

[2] Financial, Management, and Regulatory Compliance Examination Reports for Energy Efficiency Programs available at: http://www.cpuc.ca.gov/PUC/Water/Available+Documents/Downloadable+Reports/Utility_Audit_Finance_and_Compliance_Reports.htm

1. Component 1: A performance award for energy savings of up to 9% of the resource program[3] budget (excluding codes and standards program budgets),
2. Component 2: A performance award for ex ante review activities of up to 3% of resource program budget (excluding codes and standards program budgets),
3. Component 3: A management fee for codes and standards programs of up to 12% of codes and standards program budgets, and
4. Component 4: A management fee for non-resource[4] programs of up to 3% of non-resource program budgets.

Component 1

The energy savings performance award is split between ex ante (i.e., estimated savings pre-implementation) and ex post (i.e., evaluated savings post implementation) savings values. For the 2013-14 cycle, ex post savings values will apply to custom measures and the deemed measures on the "ESPI Uncertain List" proposed in Attachment 3 of D.13-09-023 and finalized by Commission staff. The final 2013-14 ESPI Uncertain List is posted to the CPUC's Shareholder Incentive Mechanism website.[5] In accordance with D.13-09-023, the IOUs are to file for incentive payments for ex ante savings in the year following the program year (i.e., in 2014 for program year 2013) and for ex post savings two years following the program year (i.e., in 2015 for program year 2013). This is to allow time to complete EM&V activities for measures on the ESPI Uncertain List.

[3] A resource program is defined as an energy efficiency program that is intended to achieve and report quantified energy savings.

[4] A non-resource program is defined as an energy efficiency program where energy savings are not directly attributed but the program supports the energy efficiency portfolio through activities such as marketing or improved access to training and education.

[5] Shareholder Incentive Mechanism website available at: http://www.cpuc.ca.gov/PUC/energy/Energy+Efficiency/Shareholder+Incentive+Mechanism.htm

For all energy savings, the incentive award is calculated using the statewide earnings rates adopted in D.13-09-023. The use of statewide earnings rates allows each unit of energy saved to earn an incentive award. The adopted statewide earnings rates are:

- Electricity: $2,525/GWh
- Peak Demand: $6,200/MW-Yr
- Natural Gas: $21,331/MMth

Component 2

The ex ante performance award adopted in D.13-09-023, bases the awards to the IOUs on their respective ex ante review activities in accordance with a set of 10 metrics that generally cover four common themes:

1. Timeliness in adopting policies (metrics 1a, 1b, and 2)
2. Quality of submittals (metrics 3, 5, 6a, 6b, and 7)
3. Consideration of existing DEER guidance and previous feedback in the development of workpapers and custom project deliverables (metrics 8, 9, and 10)
4. Collaboration with Commission staff/Proactiveness (metrics 1a and 4)[6]

For 2013, each IOU was assessed based on the metrics adopted in D.13-09-023. In accordance with the decision, Commission staff first developed a preliminary qualitative assessment to provide the IOUs interim feedback on their respective ex ante activities. The interim feedback was delivered to the IOUs in December 2013. Commission staff then developed final ex ante performance scores for each IOU that were delivered to the IOUs and posted to

[6] *ESPI Ex Ante Review Metrics – Overlapping Metric and Actions to Improve Scores*; memo from Katie Wu, Commission staff, to all Investor Owned Utilities, dated February 3, 2014.

deeresources.com on March 28, 2014.[7] The final scores for each IOU are as follows:

- PG&E: 63.5/100
- SDG&E: 64.5/100
- SoCalGas: 66.5/100

D.13-09-023 prescribes that the IOUs' incentive award for the ex ante review component of the ESPI is the product of the final score and the earnings cap for the component.

Components 3 and 4

The management fees for codes and standards programs and non-resource programs are calculated as a percentage of the IOUs' program expenditures, less administrative expenditures, for each program type.

Incentive Earnings Cap Calculations

The incentive earnings caps for each component and each IOU were adopted in D.13-09-023 as follows:

[7] ESPI – EAR Performance Scoring website available at: http://deeresources.com/index.php/espi-ear-performance-scoring

Table 1: Award Caps by Component and IOU (in millions)

Component	**Cap**	**PG&E**	**SDG&E**	**SoCalGas**
Energy savings performance award	9% of resource program budget (minus C&S)	$ 58.9	$ 14.5	$ 12.5
Ex ante review performance award	3% of resource program budget (minus C&S)	$ 19.6	$ 4.8	$4.2
Codes & Standards (C&S) program management fee	12% of C&S program budget	$ 1.4	$ 0.23	$ 0.18
Non-resource program management fee	3% of non-resource program budget	$ 2.8	$ 0.47	$ 0.26
Total Cap Value	11% of EE portfolio budget	**$ 82.7**	**$ 20.0**	**$ 17.1**

Per D.13-09-023, the IOUs are to rely on public versions of the CPUC UAFCB reports to determine the actual expenditures to calculate their respective incentive awards. The UAFCB reports for 2013, however, will not be complete until sometime in 2015. As such, Commission staff directed the IOUs to calculate the 2013 awards using their respective reported data and any differences between reported and verified expenditures will be trued up in the advice letter filing for the second installment of 2013 payments made in 2015.[8] This second installment is built into the ESPI mechanism to provide sufficient time to obtain EM&V results required to calculate shareholder incentives for the ex post savings portion of the savings incentive for custom projects and deemed measures on the measure uncertainty list, and to true up any differences in ex ante deemed savings for installed measure "counts" based on EM&V results.

The staff-issued memo describing this process is included in Attachment 1 to this Resolution. In accordance with D.13-09-023 and the staff-issued memo, PG&E,

[8] *Additional Detail on Implementation of the Efficiency Savings and Performance Incentive (ESPI) Mechanism*; memo from Katie Wu, Commission staff, to all parties in R.13-11-005 and R.12-01-005; sent June 9, 2014.

SDG&E, and SoCalGas filed their advice letters for 2013 energy efficiency incentive awards for the following:

- Energy savings with ex ante parameter estimates: Equal to the utility's net lifecycle reported savings and installation rates multiplied by the adopted earnings rates coefficients, determined in accordance with Attachment 1 of D.13-09-023. Only savings from deemed measures not included on the ESPI Uncertain List are included in this calculation.
- Ex ante review performance: Equal to 3% of the utility's reported expenditures on resource programs (excluding administrative costs) during the previous program year multiplied by the utility's ex ante review score determined in accordance with Attachment 5 of D.13-09-023.
- Codes and standards advocacy management fee: Equal to 12% of the utility's reported expenditures on codes and standards advocacy during the previous program year.
- Non-resource management fee: Equal to 3% of the utility's reported expenditures on non-resource programs during the previous program year.

NOTICE

Notice of PG&E AL 3492-G/4451-E, SDG&E AL 2620-E, SoCalGas AL 4661 was made by publication in the Commission's Daily Calendar. PG&E, SDG&E, and SoCalGas state that a copy of the Advice Letter was mailed and distributed in accordance with Section 4 of General Order 96-B.

PROTESTS

No protests were filed in response to PG&E AL 3492-G/4451-E, SDG&E AL 2620-E, or SoCalGas AL 4661.

On July 21, 2014 PG&E and SDG&E filed a joint response to SoCalGas' AL 4661. The response notes support for SoCalGas' requests for clarification made in AL 4661 regarding the timing of the 2013 final audit results and the true-up mechanism to be used to reconcile any differences between utility-reported and audit-verified expenditures. These issues are addressed in the discussion section below.

DISCUSSION

Energy Division has reviewed the Advice Letters and finds that the calculated incentive awards for 2012 are in compliance with the directives of D.12-12-032 and consistent with the results of the UAFCB reports, as explained below.

In reviewing the 2013 incentive awards, Commission staff found inconsistencies between the expenditure and savings values filed in the IOUs' advice letters and the data submitted in their quarterly and monthly reports.[9] Monthly reports are available publicly via the CPUC's California Energy Efficiency Statistics website (http://eestats.cpuc.ca.gov/Views/Documents.aspx). Quarterly reports contain some confidential customer data and, therefore, are not publicly available at this time. The quarterly reports contain the same data as monthly reports but in a more detailed format and are presumably sourced from the same utility databases as the monthly reports.

Given the discrepancies between the quarterly reports and the expenditure data filed in each of the IOUs' advice letters, without the benefit of the final 2013 UAFCB audit to assist staff in reconciling them, the initial payments awarded this Resolution for the expenditure-based components of the ESPI mechanism rely on the lower value between the two sources of expenditure-related data (the quarterly reports or the utility-filed expenditures). As stated in the Background section, the utilities' expenditures will be trued up with the UAFCB audit results when the audits are completed in 2015.

Also during review, Commission staff noted that each IOU categorized resource and non-resource program expenditures somewhat differently. The list of programs and associated expenditures categorized as "resource" or "non-resource" used for staff's calculations in this Resolution is included as Attachment 2. PG&E's approach was the most detailed as PG&E elected to categorize all expenditures as resource or non-resource, regardless of whether the funds were spent in a resource or non-resource program. While this

[9] Appendix D of the Energy Efficiency Policy Manual (Version 5) describes program administrators' reporting requirements. Program administrators are required to submit monthly reports on expenditures and program-level savings and quarterly reports on budgets and expenditure caps. Quarterly reports also contain measure level energy savings data.

categorization may be technically correct, verification of the non-resource versus resource expenditures is challenging for staff because the IOUs do not report expenditures as resource or non-resource in their quarterly or monthly reports. SDG&E and SoCalGas elected to categorize expenditures in accordance with the categorization used to calculate the earnings caps in D.13-09-023. Staff notes that, in order to maintain consistency with D.13-09-023, some non-resource program expenditures were categorized as resource program expenditures.

Commission staff recognizes that the ESPI mechanism is new and that policy improvements may be warranted to facilitate the advice letter filing and review in the future, specifically with regard to reported versus filed data and the resource versus non-resource program expenditures. Staff recommends that prior to next year's ESPI advice letter filing, Commission staff meet with the IOUs to discuss the data sources to be used in the ESPI advice letters and to develop a resource versus non-resource expenditure categorization approach that is consistent with the intent of the ESPI decision.

Beyond identifying differences between the savings filed in the IOUs' advice letters and quarterly report data, staff conducted a high level review of the quarterly energy savings data to validate the energy savings. A summary of the reviewed energy savings values, the details of the review, and a link to the review spreadsheet are included as Attachment 3 of this Resolution.

This Resolution makes the following adjustments to energy savings values used to verify the ESPI awards:

1. Addition of a 5% market effects adder, consistent with the Commission's current market effects policy, which neither the IOUs' quarterly reports nor their Advice Letter filings included in the savings estimate,
2. Removal of any Uncertain Measures from the advice letter filings,
3. Proper application of installation rates, and
4. Proper application of the Hard-to-Reach and Emerging Technology net-to-gross (NTG) values.

Staff notes that adjustments 3 and 4 (in addition to several others not included in this high level review of 2013 ex ante savings estimates) were also included in the memo staff recently provided to program administrators to make corrections in

their 2015 portfolio funding compliance filings, as directed by the Commission in Decision D.14-10-046.[10]

Overall, this Resolution increases savings to account for market effects (5%increase for all IOUs) and to reduce savings to account for Uncertain Measures that should be included in the IOUs' 2015 advice letters, incorrect application of installation rates, and incorrect use of hard-to-reach or emerging technology NTG values for PG&E and SDG&E (SoCalGas did not misapply the NTG values).

For PG&E and SDG&E's NTG adjustments, staff elected to apply three-quarters of the NTG adjustment, rather than the entire adjustment (i.e., all of the changes made to NTG values) as a conservative application of the findings of the high level review conducted, to acknowledge the fact that there may be justifiable reasons why the utilities applied hard-to-reach or emerging technology NTG values for measures in programs that our high level review identified as inappropriate. Staff considers it highly unlikely that the number of instances this would be the case could exceed one in four, though, so the 75% application of these adjustments is likely to be liberal (in the sense of the resulting incentive award).

If the utilities believe that staff over-corrected NTG values, they are directed to provide the requisite supporting documentation, consistent with existing Commission policy, for the measures for which the higher NTG is believed warranted in their 2015 advice letter for the second installment of the 2013 program year ESPI payments.

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[10] Specifically, at the direction of the Commission, staff released the "Required Corrections to Measure Level Input Parameters Identified by Commission Staff per D.14-10-046 Ordering Paragraph 16" in relation to the utilities' 2015 energy efficiency filings. The table on page 4 of that document identifies thousands of measure counts for which corrections to the 2015 application filings are needed. Some of these corrections address measure costs, which would not impact the savings estimates used to calculate the ESPI payment, but many other corrections did impact savings parameters (e.g., corrections to NTG, UES, and early retirement values) and would likely apply to 2013 savings values.

Also during review, staff identified a number of measures for which staff believes the utilities are claiming early retirement with incorrect remaining useful life values. Staff did not have time to fully assess the extent of this issue; however, moving forward, staff intends to perform a more detailed review the utilities' ex ante data to ensure that early retirement and NTG claims, in particular, are correctly reflected in the data used to verify ESPI awards.
For incentive calculations based on energy savings, because there is currently no true-up method planned, staff uses the data from the Energy Division Central Server (i.e., the reviewed quarterly report data) to verify the IOUs' savings claims. As such, this Resolution modifies the requested 2013 awards, where appropriate, to be consistent with the reviewed data on file with the CPUC.

PG&E Advice Letter 3492-G/4451-E

PG&E requests $23,355,268 for the 2012 incentive award. This calculation is based up on the UAFCB final report,[11] which verified PG&E's actual 2012 energy efficiency expenditures. In the final report, UAFCB recommends that PG&E exclude the On-Bill Financing loan pool receivables of $7,521,956 from PG&E's direct implementation expenditures before calculating the incentive.[12] PG&E applied the recommendation and calculated the incentive as 5.68% of $411,184,295, which is equal to $23,355,268.

On August 20, 2014, PG&E filed a supplemental advice letter for AL 3492-G/4451-E to make revisions to the energy savings performance award. PG&E's original filing inadvertently claimed a savings award for a few deemed measures on the Uncertain List. In the supplemental AL, PG&E maintains the 2012 shareholder incentive claim, revises the 2013 claim, and requests a total of $13,983,172 for the initial 2013 award. In accordance with D.13-09-023 and the staff-issued memo, the award is comprised of four components:

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[11] *Financial, Management, and Regulatory Compliance Examination Report of Pacific Gas and Electric Company's (PG&E's) Energy Efficiency (EE) Programs for the Period January 1, 2011 through December 31, 2012*, dated June 27, 2014, available online at: http://www.cpuc.ca.gov/PUC/Water/Available+Documents/Downloadable+Reports/Utility_Audit_Finance_and_Compliance_Reports.htm

[12] Ibid at page 1.

Table 2: PG&E Filed 2013 Incentive Award Claim

Award Component	**Requested Amount**
Energy savings with ex ante parameter estimates	$ 7,121,842
Ex ante review performance	$ 5,245,594
Codes and standards management fee	$ 755,474
Non-resource program management fee	$ 860,262
Total	$ 13,983,172

Component 1: Energy Savings Performance Award

In Energy Division's review of PG&E AL 3492-G/4451-E, staff finds PG&E's filing to be inconsistent with the utility-reported data on file with the CPUC and stored on the ED Central Server, despite the corrections made in the supplemental AL. The differences between the PG&E-filed savings values and the CPUC data are noted below.

Table 3: Comparison of PG&E Filed Energy Savings and ED Central Server Values

	IOU Claimed Value (supplemental AL)	**ED Central Server Value**	**Difference**
GWh	1,713.4	1,461	17.3%
MW	312.7	266.3	17.4%
MMth	40.2	32.7	22.9%

It is unclear why the utility-reported data on file at the CPUC would differ from PG&E's advice letter filing. The savings values staff used for the purposes of this Resolution is included as Attachment 3. Given that the CPUC data on file are comprised of utility-filed claimed reviewed by Commission staff, staff relied on the CPUC data to verify and confirm PG&E's filing. <u>As such, the energy savings component of the shareholder incentive award for PG&E is calculated per Table 4 below, for a total reduction of $1,084,685 from the claimed amount in PGE AL 3492-G4451-E.</u>

Table 4: PG&E Energy Savings Performance Award Calculation

Energy Units Saved	Earnings Rate	Total Earnings
1,423.6 GWh	$2,525/GWh	$ 3,689,121
260.3 MW-Yr	$6,200/MW-Yr	$ 1,650,791
31.8 MMth	$21,331	$ 697,244
		$ 6,037,157

Energy Efficiency Program Expenditures

In AL 3492-G/4451-E PG&E notes the following expenditures that are applicable to the four incentive award components:

Table 5: PG&E Filed Expenditures

Award Component	Applicable Budget(s)	Expenditures (less administrative costs)
2. Ex ante review performance	All resource programs	$ 275,359,291
3. Codes and standards management fee	Codes and standards programs	$ 6,295,616
4. Non-resource program management fee	Non-resource programs	$ 28,675,407

PG&E's filed expenditures for resource and non-resource programs are consistent with the utility-reported data on file at the CPUC. The differences are noted below:

Table 6: Comparison of PG&E and ED Central Server Expenditures

	IOU Claimed Value	ED Central Server Value	Difference
Resource programs	$275,359,291	$ 277,513,501	-0.8%
Codes and standards programs	$6,295,616	$ 6,295,616	0%
Non-resource programs	$28,675,407	$ 26,396,723	8.6%

The list of resource and non-resource programs, with the reported expenditures, is included as Attachment 2 to this Resolution. In staff's initial analysis of PG&E's expenditures, staff noted relatively large inconsistencies between

PG&E's filed expenditures and CPUC data. In working with PG&E to clarify the expenditure inconsistencies, PG&E noted that staff's original expenditure totals only considered the incentives funded out the 2013-14 budget (Column F of Attachment 2) rather than the total incentives spent in 2013 (Column G of Attachment 2) which also includes carryover from 2010-12. Staff updated the expenditure calculations to include the total incentive expenditures in 2013, which is shown in the formulas for Column L of Attachment 2. Additionally, staff found that PG&E categorized all of its expenditures as either resource or non-resource, depending on the type of costs within each program, regardless of whether the programs are categorized as resource or non-resource. While this categorization may be technically correct, it is difficult for staff to verify these expenditures because the IOUs are not required to report their expenditures to the CPUC in such a detailed manner. Attachment 2 of this Resolution shows that costs were reconciled for the On-Bill Financing loan pool, Local Government Partnership program non-resource costs, Ozone Laundry program non-resource costs, Strategic Energy Resources non-resource costs, IDEEA resource costs, an administrative cost accrual error, and a relatively minor ($1,523) remaining resource expenditure inconsistency. PG&E's 2013 expenditures are highlighted in the blue cells in Columns R, S, and, T of Attachment 2.

Per the staff-issued memo distributed on June 9, 2014 and included as Attachment 1 to this Resolution, the IOUs' 2013 expenditures will be trued up once the UAFCB final 2013 audit is complete. For the purposes of this Resolution, staff relied on PGE's comments to reconcile expenditure data differences between PG&E AL 3492-G/4451-E and the data from the ED Central Server (included as Attachment 2 to this Resolution). Moving forward, staff recommends that prior to next year's ESPI advice letter filing, Commission staff meet with the IOUs to develop a resource versus non-resource expenditure categorization approach that is consistent with the intent of the ESPI decision.

Component 2: Ex Ante Review Performance Award

In accordance with D.13-09-023, PG&E is eligible to earn up to three percent of resource program expenditures, less administrative spend, for the ex ante review performance award. As noted above, PG&E's final 2013 ex ante performance score was 63.5/100. The ex ante performance award component for PG&E is calculated as:

$$\$\ 275{,}359{,}291 * 3\% * 63.5\% = \$5{,}245{,}594$$

This award is the same amount claimed in PG&E AL 3492-G/4451-E.

Component 3: Codes and Standards Program Management Fee

Per D.13-09-023, the codes and standards program management fee is equal to 12% of the codes and standards program expenditures, less administrative spend. The codes and standards management fee is calculated as:

$6,295,616* 12% = $ 755,474

This award is the same amount claimed in PG&E AL 3492-G/4451-E.

Component 4: Non-resource Program Management Fee

Per D.13-09-023, the non-resource program management fee is equal to three percent of non-resource program expenditures, less administrative spend. The non-resource program management fee is calculated as:

$28,675,407 * 3%= $860,262

This award is the same amount claimed in PG&E AL 3492-G/4451-E.

Incentive Recovery though Retail Rates

The 2012 and 2013 shareholder incentive awards for PG&E total $36, 253,755, as shown below. This award is $1,084,685 less than the amount claimed in PG&E AL 3492-G/4451-E. PG&E is awarded a lesser amount than what was claimed in PG&E AL 3492-G/4451-E due to differences in the non-resource program expenditures and energy savings data in PG&E's advice letter and the ED Central Server.

Table 7: PG&E 2012 and 2013 Incentive awards

Award Component	**Award Amount**
2012 Management Fee + Ex Ante Review Performance	$ 23,355,268
2013 Energy Savings (with ex ante parameter estimates)	$ 6,037,157
2013 Ex Ante Review Performance	$ 5,245,594
Codes and Standards Management Fee	$ 755,474
Non-resource Program Management Fee	$ 860,262
Total	$ 36,253,755

Per PG&E AL 3492-G/4451-E, PG&E will recover the 2012 and 2013 incentive awards from ratepayers by allocating the total award between its electric and gas

balancing accounts in accordance with the electric and gas net benefit factors approved for the 2010-12 and 2013-14 portfolios, as follows:

Table 8: PG&E Incentive Award Allocation

Allocation[13]	**2013 and 2013 Energy Efficiency Incentive Awards**
Electric Balancing Account (82%) Gas Balancing Account (18%)	$ 29,728,079 $ 6,525,676
Total	$ 36,253,755

SDG&E Advice Letter 2620-E

SDG&E requests $5,094,686 for the 2012 incentive award. This calculation is based upon the UAFCB final report,[14] which verified SDG&E's actual 2012 energy efficiency expenditures. In the final report, UAFCB did not identify any reported costs that SDG&E should not include in the calculation of 2012 incentive awards.[15] As such, SDG&E calculated the incentive as 5.31% of $95,945,113, which is $5,094,686.

SDG&E requests a total of $2,486,956 for the initial 2013 award. In accordance with D.13-09-023 and the staff-issued memo, the award is comprised of four components:

Table 9: SDG&E Filed 2013 Incentive Award Claim

Award Component	**Requested Amount**
Energy savings with ex ante parameter estimates	$ 1,071,072

[13] The electric and gas net benefit factor to allocate the 2012-12 Energy Efficiency portfolio expenditures was approved in PG&E Advice Letters 3065-G-A/3562-E-A and 3065-G-B/3562-E-B. The net benefit factor for the 2013-14 portfolio was approved in Advice Letter 3356-G-A/4176-E-A.

[14] Financial, Management Regulatory, and Compliance Examination Report of San Diego Gas and Electric Company's (SDG&E) EE Programs for the Period January 1, 2011 through December 31, 2012, dated June 27, 2014, available online at: http://www.cpuc.ca.gov/PUC/Water/Available+Documents/Downloadable+Reports/Utility_Audit_Finance_and_Compliance_Reports.htm

[15] Ibid at page 1.

Ex ante review performance	$ 1,161,974
Codes and standards management fee	$ 34,383
Non-resource program management fee	$ 219,527
Total	$ 2,486,956

Component 1: Energy Savings Performance Award

In Energy Division's review of SDG&E's AL 2620-E, staff finds SDG&E's filing to be generally acceptable but does, however, note some slight discrepancies between SDG&E's filed numbers and the reviewed data used to verify the advice letter claims, as shown below.

Table 10: Comparison of SDG&E Filed Energy Savings and ED Central Server Values

	IOU Claimed Value	**ED Central Server Value**	**Difference**
GWh	285	288.7	-1%
MW	55	57.4	-4.2%
MMTh	0.47	0.7	-32.9%

The savings values staff used for the purposes of this Resolution are included as Attachment 3. Given that the CPUC data on file are comprised of staff-reviewed utility-filed reports, staff relied on the CPUC data to verify and confirm SDG&E's filing. <u>As such, the energy savings component of the shareholder incentive award for SDG&E is calculated per Table 11 below, for a total increase of $29,101 from the claimed amount.</u>

Table 11: SDG&E Energy Savings Performance Award Calculation

Energy Units Saved	**Earnings Rate**	**Total Earnings**
288.7 GWh	$2,525/GWh	$ 729,003
57.4 MW-Yr	$6,200/MW-Yr	$ 356,027
0.7 MMth	$21,331	$ 15,143
		$1,100,173

In AL 2620-E, SDG&E notes the following expenditures that are applicable to three of the four incentive award components:

Table 12: SDG&E Filed Expenditures

Award Component	Applicable Budget(s)	Expenditures (less administrative costs)
2. Ex ante review performance	All resource programs	$ 60,050,342
3. Codes and standards management fee	Codes and standards programs	$ 286,526
4. Non-resource program management fee	Non-resource programs	$ 7,317,563

Energy Efficiency Program Expenditures

The utility-reported data on file at the CPUC generally supports SDG&E's expenditures claims, with the exception of non-resource program expenditures. The differences are noted below.

Table 13: Comparison of SDG&E and ED Central Server Expenditures

Program Area	SDG&E-filed	CPUC data	Difference
Resource programs	$ 60,050,342	$ 58,739,080	2.2%
Codes and standards programs	$ 286,526	$ 276,526	3.6%
Non-resource programs	$ 7,317,563	$ 6,027,540	21.4%

SDG&E's AL 2620-E identified the non-resource programs included in SDG&E's calculation of non-resource program expenditures (see Attachment 2). In working with SDG&E to better understand the expenditure categorization, SDG&E noted that it categorized the expenditures to maintain consistency with D.13-09-023. The list of resource and non-resource programs, with the reported expenditures, is included as Attachment 2 to this Resolution.

Staff notes that D.13-09-023 may have excluded some non-resource programs from the original earnings cap calculation. <u>As noted earlier, staff recommends that prior to next year's ESPI advice letter filing, staff meet with the IOUs to develop a resource versus non-resource expenditure categorization approach that is consistent with the intent of the ESPI decision.</u>

Component 2: Ex Ante Review Performance Award

In accordance with D.13-09-023, SDG&E is eligible to earn up to three percent of resource program expenditures, less administrative spend, for the ex ante review

performance award. As noted above, SDG&E's final 2013 ex ante performance score was 64.5/100. The ex ante performance award component for SDG&E is calculated as:

$58,739,080 * 3% * 64.5% = $1,136,601

This award is $25,373 less than the amount claimed in SDG&E AL 2620-E. SDG&E is awarded a lesser amount than what was claimed in SDG&E AL 2620-E due to the difference between resource program expenditures filed in SDG&E's advice letter and the data in the ED Central Server.

Component 3: Codes and Standards Program Management Fee

Per D.13-09-023, the codes and standards program management fee is equal to 12%of the codes and standards program expenditures, less administrative expenditures. As such, the codes and standards program management fee is calculated as:

$276,526 * 12% = $33,423.

This award is $960 less than the amount claimed in SDG&E AL 2620-E. SDG&E is awarded a lesser amount than what was claimed in SDG&E AL 2620-E due to the difference between codes and standards program expenditures filed in SDG&E's advice letter and the data in the ED Central Server.

Component 4: Non-resource Program Management Fee

In Energy Division's review of the attachments to AL 2620-E, staff found that the predominant reason for the discrepancy in the non-resource program expenditures seems to be due to SDG&E's Customer Relationship Management (CRM) program, which reports expenditures as administrative costs in the quarterly and monthly reports. As noted in Attachment B of SDG&E AL 2620-E, SDG&E included the CRM program expenditures as non-resource program costs eligible for shareholder incentives. Given that D.13-09-023 directs administrative costs to be excluded from the calculation of the non-resource program management fee,[16] staff considers the CPUC data to be the correct value to serve

[16] D.13-09-023 at page 95.

as the basis for the non-resource program management fee. As such, the non-resource program management fee shareholder incentive for SDG&E shall be equal to three percent of $6,027,540, which is $180,826. This award is $38,701 less than the amount claimed in SDG&E AL 2620-E. SDG&E is awarded a lesser amount than what was claimed in SDG&E AL 2620-E due to the difference between non-resource program expenditures filed in SDG&E's advice letter and the data in the ED Central Server.

Incentive Recovery through Retail Rates

SDG&E's 2012 and 2013 shareholder incentive awards total $7,545,709, as shown below. This award is $35,933 less than the amount claimed in SDG&E AL 2620-E. SDG&E is awarded a lesser amount than what was claimed in SDG&E AL 2620-E due to the differences in resource, non-resource, and codes and standards program expenditures and energy savings data filed in SDG&E's advice letter and the ED Central Server.

Table 14: SDG&E 2012 and 2013 Incentive Awards

Award Component	**Award Amount**
2012 Management Fee + Ex Ante Review Performance	$ 5,094,686
2013 Energy Savings (with ex ante parameter estimates)	$ 1,100,173,
2013 Ex Ante Review Performance	$ 1,136,601
Codes and Standards Management Fee	$ 33,423
Non-resource Program Management Fee	$ 180,826
Total	$ 7,545,709

Per SDG&E AL 2620-E, SDG&E will recover the 2012 and 2013 incentive awards from ratepayers by allocating the total award to its electric and gas Rewards and Penalties Balancing Accounts (RPBAs). The 2012 incentive award will be allocated according to the authorized 2010-12 electric and gas budget split of 80% electric and 20% gas. The 2013 incentive award will be allocated according to the authorized 2013-14 electric and gas budget split of 90% electric and 10% gas.

Table 15: SDG&E Incentive Award Allocation

Allocation	**Incentive Award**
2012 Incentive Award	
Electric RBPA (80%)	$ 4,075,749
Gas RBPA (20%)	$ 1,018,937

2013 Incentive Award	
Electric RBPA (90%)	$ 2,205,921
Gas RBPA (10%)	$ 245,102

SoCalGas Advice Letter 4661

SoCalGas requests $4,326,851 for the 2012 incentive award. This calculation is based upon the UAFCB final report,[17] which verified SoCalGas' actual 2012 expenditures. The final report did not identify any reported costs that SoCalGas should not include in the calculation of 2012 awards.[18] As such, SoCalGas calculated the incentive as 5.36% of $80,724,848, which is equal to $4,326,851.

SoCalGas requests a total of $1,498,062 for the initial 2013 award. In accordance with D.13-09-023 and the staff-issued memo, the award is comprised of four components:

Table 16: SoCalGas Filed 2013 Incentive Award Claim

Award Component	Requested Amount
Energy savings with ex ante parameter estimates	$ 578,652
Ex ante review performance	$ 784,105
Codes and standards management fee	$ 24,963
Non-resource program management fee	$ 110,342
Total	$ 1,498,062

Component 1: Energy Savings Performance Award

In Energy Division's review of SoCalGas' AL 4661, staff finds SoCalGas' filing to be acceptable. SoCalGas' filed energy savings values are generally consistent with the data on file with the CPUC, as shown below.

[17] Financial, Management, and Regulatory Compliance Examination Report of Southern California Gas Company (SCG) EE Programs for the Period January 1, 2011 through December 31, 2012, dated June 27, 2014, available online at: http://www.cpuc.ca.gov/PUC/Water/Available+Documents/Downloadable+Reports/Utility_Audit_Finance_and_Compliance_Reports.htm

[18] Ibid at page 1.

Table 17: Comparison of SoCalGas Filed Energy Savings and ED Central Server Values

	IOU Claimed Value	**ED Central Server Value**	**Difference**
MMth	27.13	29.5	-8.0%

Given that the CPUC data on file are comprised of utility-filed reports that Commission staff have reviewed, staff relies on the CPUC data to verify and confirm SoCalGas' filing. As such, the energy savings component of the shareholder incentive award for SoCalGas is calculated per Table 18 below. The award is $49,539 greater than the amount claimed in SoCalGas AL 4661. SoCalGas is awarded a greater amount than what was claimed in SoCalGas AL 4661 due to the difference between energy savings data filed in SoCalGas' advice letter and the data in the ED Central Server. Because the ex ante savings component of the ESPI currently does not have a true up method, staff relied on the ED Central Server data to verify the IOUs' claims.

Table 18: SoCalGas Energy Savings Performance Award Calculation

Energy Units Saved	**Earnings Rate**	**Total Earnings**
29.5 MMth	$21,331	$ 628,191
		$ 628,191

In AL 4661, SoCalGas notes the following expenditures that are applicable to the four incentive award components:

Table 19: SoCalGas Filed Expenditures

Award Component	**Applicable Budget(s)**	**Expenditures (less administrative costs)**
2. Ex ante review performance	All resource programs	$ 39,303,489
3. Codes and standards management fee	Codes and standards programs	$ 208,021
4. Non-resource program management fee	Non-resource programs	$ 3,678,072

The utility-reported data on file at the CPUC is more than SoCalGas' expenditures claims for resource programs. The CPUC data and the SoCalGas

filed data for non-resource programs and codes and standards programs match exactly. The program expenditures used to verify SoCalGas' claims are included as Attachment 2 of this Resolution. For the purposes of this Resolution, staff used SoCalGas' filed expenditures as a cap for incentive calculation. The expenditures will be trued up with the UAFCB final report in the 2015 ESPI Advice Letter filing.

Table 20: Comparison of SoCalGas and ED Central Server Expenditures

	IOU Claimed Value	**ED Central Server Value**	**Difference**
Resource programs	$ 39,303,489	$ 46,449,085	15.4%
Codes and standards programs	$ 208,021	$ 208,021	0%
Non-resource programs	$ 3,678,072	$ 3,678,072	0%

Component 2: Ex Ante Review Performance Award

In accordance with D.13-09-023, SoCalGas is eligible to earn up to three percent of resource program expenditures, less administrative spend, for the ex ante review performance award. As noted above, SoCalGas' final 2013 ex ante performance score was 66.5/100. As such, the ex ante performance award component for SoCalGas is calculated as:

$39,303,489 * 3% * 66.5% = $ 784,105

This is the same amount requested in SCG AL 4661.

Component 3: Codes and Standards Program Management Fee

Per D.13-09-023, the codes and standards program management fee is equal to 12% of the codes and standards program expenditures, less administrative spend. As such, the codes and standards management fee is calculated as:

$208,021 * 12% = $24,963

This is the same amount requested in SCG AL 4661.

Component 4: Non-resource Program Management Fee

Per D.13-09-023, the non-resource program management fee is equal to three percent of non-resource program expenditures, less administrative spend. As such, the non-resource program management fee is calculated as:

$3,678,072 * 3% = $ 110,342

This is the same amount requested in SCG AL 4661.

Incentive Recovery through Retail Rates

The 2012 and 2013 shareholder incentive awards for SoCalGas total $5,874,452, as shown below. This award is $49,539 greater than the amount claimed in SoCalGas AL 4661.

Table 21: SoCalGas 2012 and 2013 Incentive Awards

Award Component	**Award Amount**
2012 Management Fee + Ex Ante Review Performance	$ 4,326,851
2013 Energy Savings (with ex ante parameter estimates)	$ 628,191
2013 Ex Ante Review Performance	$ 784,105
Codes and Standards Management Fee	$ 24,963
Non-resource Program Management Fee	$ 110,342
Total	$ 5,874,452

In SoCalGas AL 4661, SoCalGas distributes the 2012 and 2013 incentive awards between its core (93%) and non-core (7%) classes of service. The revenue requirement impact by class of service is summarized below.

Table 22: SoCalGas Incentive Award Allocation

Class of Service	Applicable Rate Schedules	Increase
Core	GR, GS, GM, GO-AC, G-NGVR, GL, G-10, G-AC, G-EN, G-NGV	$ 5,463,241
Non-core	GT-F, GT-I, GT-TLS	$ 411,211
Total		$ 5,874,452

In AL 4661, SoCalGas requests "that the Commission, following consultation with the Audit Branch of the Water Division to formalize an audit schedule with specific deadlines to ensure final audit reports are available in time to support

the 'PY + 2' calculations, consistent with the approach outlined in the Commission Staff Memo.

SoCalGas requests that the final audit reports are made available at least two weeks in advance of the June 30 ESPI Advice Letter due date." SoCalGas also requests "that the Commission explicitly prescribes that any outcome of the financial audit be treated similarly as the currently adopted True-Up Mechanism." SoCalGas finds that any action that may obligate IOUs to restate prior year's earnings would undermine the goal of regular, reliable, and timely energy efficiency earnings. Comments jointly filed by PG&E and SDG&E on July 21, 2014 support SoCalGas' requests.

UAFCB has engaged the IOUs regarding the 2013 energy efficiency program audit. The proposed 2013 audit scope and timeline are set in the letters UAFCB sent out to the IOUs and included as Attachment 4 of this Resolution. Final 2013 energy efficiency audits are expected to be completed by June 30, 2015.

Thus, in the event that the reconciliation between utility-reported expenditures and Commission-audited expenditures results in the addition or subtraction of energy efficiency earnings, the adjustment will be treated as an offset to the "PY+2" earnings claims.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g)(2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

On December 4, 2014, PG&E, SDG&E, and SoCalGas filed comments in response to this resolution.

PG&E

PGE's comments on this draft resolution support the outcome related to the 2012 shareholder incentive, but request a correction to the 2013 non-resource program management fee and clarification on the 2013 energy savings award. PG&E agrees that Commission staff and IOUs should meet to discuss ESPI advice letter data sources and develop a resource versus non-resource expenditure categorization approach consistent with the ESPI decision. PG&E further recommends that Commission staff and the IOUs collaborate to understand all of the discrepancies in the energy savings calculations and correct any savings and expense-related issues in the next advice letter filing.

PG&E provides detailed resource versus non-resource cost corrections in Attachment A of its comments. Specifically, PG&E notes the following corrections:

1. Strategic Energy Resources costs totaling $2,225,484 were originally classified as resource and should instead be classified as non-resource expenditures;
2. Commission staff inadvertently did not add Ozone Laundry program expenditures totaling $132,951 to the non-resource program total;
3. Various IDEEA program costs totaling $69,751 were originally classified as non-resource and should instead be classified as resource expenditures; and
4. A remaining $1,523 difference between the draft Attachment 2 and PG&E's claimed expenditures should be included as resource expenditures so that the filed expenditures in AL 3492-G/4451-E are equal to the expenditures noted in Attachment 2.

PG&E requests that the Commission update the energy savings values in the draft Resolution in the following ways:

1. Include energy savings from the Commercial, Industrial, and Agricultural Energy Advisor subprograms into the deemed ex ante payments. Although these subprograms were historically treated as custom programs, PG&E requests that the programs be treated as deemed programs. PG&E cites the Home Energy Reports (PGECOALL107), Home Energy Checkup (PGECOALL106), and Energy Audits (PGECOALL102)

workpapers as the data sources for the ex ante values for these subprograms.

2. Do not adjust NTG values and instead use the values adopted in approved workpapers. Attachment B of PG&E's comments includes a 17 page list of measures with workpaper numbers where PG&E asserts the NTG values were inappropriately changed.

We agree with adjustments to the non-resource and resource program expenditures identified in PG&E's comments, and this Resolution adjusts those payments to align with those comments. In total, PG&E's shareholder incentive award is increased by $68,660 for the non-resource program management fee for 2013. The adjustments are reflected in red text in Attachment 2.

This Resolution rejects PG&E's comments related to energy savings and makes no adjustments to the savings-related incentives in response to PG&E's comments. Regarding the Commercial, Industrial, and Agricultural Energy Advisor subprograms, PG&E's comments state that the "subprograms are audit programs, and therefore not deemed or custom" and that "[w]hile PG&E has designated these subprograms as custom in prior data submissions, PG&E requests that these be treated as a deemed program."[19]

We find it inappropriate to use the ESPI advice letter process to change a program categorization, particularly when a program is "not deemed or custom." The program implementation plans for these programs state that the programs offer audit services to support customer education and participation in demand-side programs, as well as awareness of greenhouse gas and water conservation activities. Services include benchmarking, online audit tools, continuous energy improvement, non-residential audits, pump efficiency services, and retrocommissioning.[20] None of the services offered in the Energy

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[19] Pacific Gas and Electric Company's Comments to Draft Resolution G-3497, *Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric Company (SDG&E), and Southern California Gas Company (SoCalGas) requesting approval of program year 2012 and partial 2013 energy efficiency incentive awards*, dated December 4, 2014, page 3.

[20] Pacific Gas and Electric Company 2013-2014 Energy Efficiency Portfolio Program Implementation Plan Statewide Program Commercial Program PGE 2101, dated April 23, 2013.

Advisor programs lend themselves to deemed values, and it would be inappropriate to categorize the Energy Advisor programs as deemed.

Although PG&E cites three approved workpapers to serve as the basis for the ex ante values for these subprograms, we note that two of the workpapers are for residential applications and that the Home Energy Reports workpaper, in particular, is on the 2013 ESPI Uncertain List. Further, although the Non-residential Energy Audits workpaper exists, we find that audits and surveys do not qualify as deemed measures.

To count savings from a deemed measure, installation of an actual measure must occur. Audits and surveys are not linked to actual measure installations and there is no indication that an audit or survey would result in a measure installation. If anything, audits and surveys should be considered non-resource program activities and the measure installations resulting from these activities, if any, counted in the programs in which those measures are offered. If measure installations were to occur outside of a program, the savings would be considered market effects or spillover, which we already give IOUs credit for via the 5% market effects adder.

Finally, we note that the Commercial, Industrial, and Agriculture Energy Advisor subprograms were not included in the deemed ex ante energy savings award because PG&E's reported claims flag these programs as "DeemedFlag = 0," which means that the energy savings do not come from either DEER or a workpaper and, therefore, are subject to some form of custom treatment. Given the ambiguity around the program categorization, related measures, and impact of services offered, the Commercial, Industrial, and Agriculture Energy Advisor programs will not be included in this ex ante energy savings award. Commission staff should discuss the program savings as they relate to the ex post savings portion of the ESPI with PG&E prior to next year's advice letter filing.

Regarding the NTG adjustment, the documentation provided by PG&E in support of its comment that the claimed NTG values are appropriate do not come remotely close to answering the questions at hand. The 17 pages of material provided by PG&E does not include a single piece of information in support of PG&E's argument that a particular NTG value is warranted over staff's adjusted value.

In addition, a spot check of several of the measures that PG&E states were impacted by the NTG adjustment (e.g., variable speed drive for milking vacuum pump, milk pre-cooler, electric and gas fryers, process boilers, evaporator fan motor controller for walk-in evaporator fan with controller – 16W and 1/3HP, faucet aerators, energy efficient televisions, pipe insulation measures, and refrigerator and freezer recycling) indicated that the values provided in PG&E's supporting documentation were either not changed by staff in the Attachment 3 spreadsheet or that staff's replacement values were consistent with the value in the approved workpaper or disposition.[21]

There may be potential that some NTG values were inaccurately adjusted; however, PG&E has failed to prove the point. As stated in this Resolution, staff applied three-quarters of the NTG adjustment rather than the entire adjustment as a conservative application of the findings of the high level review. A deeper dive into the measure-level may show that PG&E accurately applied some NTG values consistent with Commission guidance (including the use of the hard-to-reach and emerging technology NTG values); however, it could also reveal broader problems with NTG application or other parameter values (EUL or RUL values, the use of the early retirement delivery type and related dual baseline, or unit energy savings), most of which did not receive scrutiny in the ex ante claim review process.

Regarding PG&E's recommendation to collaborate to better understand energy savings discrepancies, we do not believe there is merit in continuing to review discrepancies staff identified in the energy savings data. As noted above, staff has indicated that a conservative approach was taken in reducing savings values (conservative in the sense that staff believe more reductions would have resulted from a more thorough review). Past experience suggests that detailed discussions regarding energy savings data and the related impact to shareholder incentives are contentious, lengthy, and distract from other more important Commission work. As recounted in the Factual and Policy Background section

[21] Columns CS through CW of the "2013 Claims Summary v2" tab in the 2013_ESPI_ExAnteSavingsIncentiveCalculation_2014-11-12 spreadsheet linked to Attachment 3 of this Resolution shows the adjustments that Commission staff applied to the net lifecycle savings used to determine shareholder incentives in this Resolution. Consistent values across these columns indicate that no NTG adjustment was made.

of D.12-12-032, disagreements over the 2006-09 RRIM awards were deliberated for over three years. We believe the time and resources spent revisiting these savings claims would be better spent working with Commission staff to review the 2014 and 2015 ex ante datasets to reduce the discrepancies in energy savings data submitted by the utilities in the future.

Consequently, we reject PG&E's recommendation to continue to review the 2013 ex ante savings claims and retain the $12.9MM ex ante savings component of PG&E's 2013 ESPI award.

SDG&E

SDG&E's comments state that it agrees with the adjustment to the energy savings award and disagrees with the administrative cost adjustment made in Attachment 2 of this Resolution. SDG&E notes that it relied on direction from D.09-09-047 to categorize its administrative costs and that D.13-09-023 does not address how to handle the exclusion of administrative costs of certain programs allowed by D.09-09-047. Given that the predominant adjustment made to SDG&E's incentive award was related to the Customer Relationship Management (CRM) program costs that are reported as administrative costs, we infer that this comment is in relation to the non-resource program management fee adjustment.

SDG&E is correct that D.13-09-023 does not explicitly address the treatment of certain administrative costs (particularly for the CRM) directed in D.09-09-047. As noted in this Resolution, all expenditure-based shareholder incentives will be trued-up once the UAFCB 2013 audit is completed next year. We expect that the audit will verify SDG&E's non-resource program expenditures and, as SDG&E notes in its comments, SDG&E will update its 2013 second earnings claim based on the audit findings. Therefore, this Resolution does not make further adjustments to SDG&E's non-resource program management fee and the issue will be addressed in the next advice letter filing.

SoCalGas

SoCalGas' brief comments note that SoCalGas will work with Commission staff to identify and correct any discrepancies so that respective tracking systems are consistent. SoCalGas also requests that this Resolution clarify that the annual audits are to be made available at least two weeks prior to the June 30 ESPI Advice Letter filing.

As noted in Attachment 4 of this Resolution, UAFCB has sent engagement letters to the utilities to set the 2013 audit schedule. The tentative audit schedule notes that the draft audits will be provided to IOU management by April 30, 2015 and published by June 30, 2015. This Resolution cannot predict how long the process to finalize the audits will take. As an example, SCE's 2012 audit took two months longer to finalize than the other utilities due to additional time needed to review and provide comments on the draft report.[22] Therefore, this Resolution recommends that the utilities all work diligently with the 2013 audit teams to adjust the expected final audit publication date in time for the June 30 ESPI Advice Letter filing deadline.

FINDINGS

1. Commission decision D.13-09-023 directs the IOUs to file an annual Tier 3 Advice Letter to claim shareholder incentive awards.
2. Ordering paragraph 6 of D.13-09-023 directs the IOUs to consolidate the program year 2012 and 2013 incentive claim requests into a single advice letter filing in 2014.
3. The program year 2012 incentive award claims made in PG&E AL 3492-G/4451-E, SDG&E AL 2620-E, and SoCalGas AL 4661 are consistent with the directives of D.12-12-032.
4. The 2012 incentive award claims are based on the IOUs' respective final 2012 UAFCB audit reports. PG&E applied the UAFCB recommendation to exclude the On-Bill Financing loan pool receivables from its 2012 expenditures prior to calculating the incentive. UAFCB did not recommend that SDG&E or SoCalGas remove expenditures prior to calculating the 2012 incentives.
5. The UAFCB audit of the IOUs' 2013 energy efficiency program expenditures is not yet complete. As such, on June 9, 2014, Commission staff sent a memo

[22] Letter from Paul Clanon, Executive Director, to Kayode Kajopaiye, Chief of Division of Water and Audits (DWA), Re: A 60-day Extension Request of Time to Publish the Division of Water and Audit's (DWA) Examination Report on Southern California Edison Company's 2012 and 2011 Energy Efficiency Programs, dated June 20, 2014.

to direct IOUs to file the initial 2013 incentive claims based on utility-reported data. The memo is included as Attachment 1 to this Resolution.

6. The second installation of 2013 incentive awards will reconcile any differences between utility-reported and Commission-audited data. Any adjustments will be offset in the second (PY+2) payment and will not require IOUs to re-state the previous year's earnings.

7. Given that the CPUC data on file are comprised of utility-filed reports, Commission staff relies on the CPUC data to verify and confirm the IOUs' filings. Attachments 2 and 3 of this Resolution show the program expenditures and savings values, respectively, used to verify the IOUs' advice letter fillings. For incentives calculated based on expenditures, staff used the lower of the IOUs' values filed in their advice letters and the quarterly report data. The IOUs' expenditures will be trued up with the final 2013 UAFCB energy efficiency audit reports. For incentives calculated based on energy savings, staff used the quarterly report data to verify incentive claims. Because there is currently no true up method planned for ex ante savings, staff relies on the Energy Division Central Server data which is sourced from staff-reviewed utility-filed reports.

8. Staff's high level review of the energy savings data result in adjustments to increase savings to account for market effects (5% increase for all IOUs) and to reduce savings to account for Uncertain Measures that should be included in the IOUs' 2015 advice letters, incorrect application of installation rates, and incorrect use of hard-to-reach or emerging technology NTG values for PG&E and SDG&E (SoCalGas did not misapply the NTG values).

9. PG&E's initial 2013 incentive claim is consistent with the directions of D.13-09-023. PG&E's filed incentive claim is generally supported by the utility-reported expenditure and savings data on file at the CPUC. In total, <u>PG&E is awarded $1,084,685 less than the amount claimed in PG&E AL 3492-G/4451-E</u>. PG&E is awarded a lesser amount than what was claimed in PG&E AL 3492-G/4451-E due to differences in the energy savings data in PG&E's advice letter and the ED Central Server.

10. SDG&E's initial 2013 incentive claim is consistent with the directives of D.13-09-023. Commission staff found relatively minor inconsistencies between SDG&E's filed expenditures and savings and the CPUC data on file. In total, <u>SDG&E is awarded $35,933 less than the amount claimed in SDG&E AL 2620-E</u>. SDG&E is awarded a lesser amount than what was claimed in SDG&E AL 2620-E due to the differences in resource, non-resource, and

codes and standards program expenditures and energy savings data filed in SDG&E's advice letter and the ED Central Server.

11. SoCalGas' initial 2013 incentive claim is consistent with the directives of D.13-09-023. SoCalGas' filed expenditures and savings are consistent with the CPUC data on file, with the exception of the resource program expenditure total. SoCalGas' filed resource program expenditures are less than the utility-reported data on file at the CPUC. Commission staff used SoCalGas' filed expenditures as the cap for the purposes of incentive calculation. In total, SoCalGas is awarded $49,539 more than the amount claimed in SoCalGas AL 4661. SoCalGas is awarded a greater amount than what was claimed in SoCalGas AL 4661 due to the difference between energy savings data filed in SoCalGas' advice letter and the data in the ED Central Server. Because the ex ante savings component of the ESPI currently does not have a true up method, staff relies on the ED Central Server data to verify the IOUs' claims.

12. No protests were filed for PG&E AL 3492-G/4451-E, SDG&E AL2620-E, or SoCalGas AL 4661. On July 21, 2014, however, PG&E and SDG&E filed joint comments in support of SoCalGas' requests for clarification on the 2013 audit timing and the procedure to true up the first 2013 energy efficiency incentive awards.

13. On August 20, 2014, PG&E filed a supplemental advice letter for AL 3492-G/4451-E to make revisions to the energy savings performance award for the 2013 ESPI claim. PG&E's original filing inadvertently included savings awards claims for measure on the ESPI Uncertain List.

14. This Resolution approves the program year 2012 incentive awards without modification and program year 2013 energy efficiency incentive awards with modifications.

15. In its comments on the Draft Resolution, PG&E supports the 2012 shareholder incentive and requests corrections and clarification on the 2013 shareholder incentive. PG&E requests certain recategorization of non-resource and resource expenditures that result in a total increase of $68,660 to the non-resource management fee. PG&E also requests that non-residential (i.e., Commercial, Agricultural, and Industrial) Energy Advisory savings and no NTG adjustments be considered for the energy savings incentive award. PG&E also requests additional time to work with Commission staff to better understand the energy savings discrepancies so that any corrections can be trued up in the next advice letter filing.

16. This Resolution accepts PG&E expenditure-related recommendations. In total, PG&E is awarded an additional $68,660 for the 2013 non-resource management fee.
17. This Resolution rejects PG&E's energy savings-related recommendations. The non-residential Energy Advisor programs do not qualify as deemed programs since the audit services offered through these programs are not linked to an actual measure installation. Commission staff are directed to discuss the program savings from the non-residential Energy Advisor programs as they relate to the ex post savings component of the ESPI with PG&E prior to next year's advice letter filing.
18. We do not remove the NTG adjustments applied in this Resolution because PG&E did not provide adequate documentation as to why the values should not be adjusted. We consider the application of three-quarters of the potential NTG adjustments identified by staff to be a conservative application of the findings of the high level review.
19. This Resolution does not grant PG&E additional time to collaborate with Commission staff regarding the discrepancies in the energy savings data. In our experience, discussions of energy savings data and the related impact to shareholder incentives have been contentious, lengthy, and distracting from more important Commission work. PG&E is directed to instead work with Commission staff to review the 2014 and 2015 ex ante datasets to minimize or eliminate future discrepancies in energy savings data.
20. SDG&E's comments on the Draft Resolution state that it agrees with the adjustment to the energy savings award and disagrees with the administrative cost adjustment made to the non-resource program management fee. SDG&E states that D.13-09-023 does not address how to handle the exclusion of administrative costs of certain programs allowed by D.09-09-047.
21. The 2013 UAFCB audit of SDG&E's expenditures is expected to verify SDG&E's non-resource program and administrative expenditures. Once the audit is complete, SDG&E will update its 2013 second earnings claim based on the audit findings. This Resolution does not make further adjustments to SDG&E's non-resource program management fee in response to comments.
22. SoCalGas' brief comments note that SoCalGas will work with Commission staff to identify and correct any discrepancies with tracking systems. SoCalGas requests that this Resolution clarify that the annual audits will be

made available at least two weeks prior to the June 30 ESPI Advice Letter filing.

23. UAFCB has set the tentative schedule for 2013 audits. This Resolution cannot predict how long the process to finalize audits will take in any given year. This Resolution recommends that the utilities all work diligently with the audits teams to adjust the expected final audit publication date in time for the June 30 ESPI Advice Letter filing.

THEREFORE IT IS ORDERED THAT:

1. The request of Pacific Gas and Electric Company (PG&E) for energy efficiency shareholder incentives as made in Advice Letter AL 3492-G/4451-E is modified from the original request. PG&E is awarded $23,355,268 for program year 2012 shareholder incentives, as requested in AL 3492-4451-E. PG&E is awarded $12,898,487 for the initial program year 2013 Efficiency Savings and Performance Incentive (ESPI) award.
2. Pacific Gas and Electric Company (PG&E) is authorized to record its combined 2012 and 2013 incentive awards totaling $36, 253,755 in its electric and gas balancing accounts according to the electric and gas net benefit factors allocating 2010-12 and 2013-14 energy efficiency portfolio expenditures (82% electric, 18% gas) for recovery in its customer rates.
3. The request of San Diego Gas and Electric Company (SDG&E) for energy efficiency shareholder incentives as made in Advice Letter AL 2620-E is slightly modified from the original request. SDG&E is awarded $5,094,686 for program year 2012 shareholder incentives, as requested in AL 2620-E. SDG&E is awarded $2,451,023 for the initial program year 2013 ESPI award.
4. San Diego Gas & Electric Company (SDG&E) is authorized to record its combined 2012 and 2013 incentive awards totaling $7,545,709 in its electric and gas Rewards and Penalties Balancing Accounts. The 2012 incentive award will be allocated according to the authorized 2010-12 electric and gas budget split of 80% electric and 20% gas. The 2013 incentive award will be allocated according to the authorized 2013-14 electric and gas budget split of 90% electric and 10% gas.
5. The request of Southern California Gas Company (SoCalGas) for energy efficiency shareholder incentives as made in Advice Letter 4661 is slightly modified from the original request. SoCalGas is awarded $4,326,851 for

program year 2012 shareholder incentives, as requested in AL 4661. SoCalGas is awarded $1,547,601 for the initial program year 2013 ESPI award.

6. Southern California Gas Company (SoCalGas) is authorized to record its combined 2012 and 2013 incentive awards totaling $5,874,452 in its Rewards and Penalties Balancing Account for recover in its core and non-core customer rates.
7. Prior to the next Efficiency Savings and Performance Incentive (ESPI) Advice Letter filing, the utilities are directed to meet with Commission staff to discuss the data sources to be used in the ESPI advice letter filings moving forward and to develop a resource versus non-resource expenditure categorization approach that is consistent with the intent of the ESPI decision.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on December 18, 2014; the following Commissioners voting favorably thereon:

_____
PAUL CLANON
Executive Director

ATTACHMENT 1: STAFF-ISSUED MEMO PROVIDING GUIDANCE ON ESPI ADVICE LETTER FILING

STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

To: All Parties in R.13-11-005 and R.12-01-005

From: Katie Wu, Energy Division

Date: June 9, 2014

Subject: Additional Detail on Implementation of the Efficiency Savings and Performance Incentive (ESPI) Mechanism

To all parties:

Since adoption of the ESPI, Commission staff has begun implementation of the tasks prescribed in D.13-09-023, the decision adopting the ESPI. Staff is coordinating internally to ensure that the deadlines are met and IOUs have the information needed to ultimately file award claims each June. During the course of these activities, staff found that the annual energy efficiency audit performed by the Commission's Audit Branch would not be complete by June of the year following program implementation. In order to conduct a robust audit, the Commission audit team requires at least nine months to complete an audit.

As such, in order to meet the deadlines set in D.13-09-023 and allow adequate time for IOU EE audits to be complete, the incentive distribution process is described in more detail below. In general, incentive awards in the year following program year (i.e., PY +1) will be calculated using utility-reported information and incentive awards in the year two years after program year (i.e., PY +2) will be calculated based on Commission-verified information. The PY+2 incentive payment will include a true-up to reconcile any differences between utility-reported and Commission-verified information. Program years 2013 and 2014 are referenced below for illustrative purposes; the process will be identical each year unless and until the Commission modifies the ESPI.

1. By June 30 of the year following the program year (e.g., 2014 for 2013 program activities), each utility will file a Tier 3 Advice Letter to Energy Division to request energy efficiency incentive award payments for:

a. Non-resource management fee: Equal to 3% of the utility's reported expenditures on non-resource programs during the previous program year.

b. Codes and standards management fee: Equal to 12% of the utility's reported expenditures on codes and standards programs during the previous program year.

c. Ex ante review performance: Equal to 3% of the utility's reported expenditures on resource programs (excluding administrative costs) during the previous program year multiplied by the utility's ex ante review score determined in accordance with Attachment 5 of D.13-09-023.

d. Energy savings with ex ante parameter estimates: Equal to the utility's net lifecycle reported savings and installation rates multiplied by the adopted earnings rates coefficients, determined in accordance with Attachment 1 of D.13-09-023. Only savings from deemed measures not included on the ESPI Uncertain List are included in this calculation.

2. By June 30 two years after the program year (e.g., 2015 for PY 2013), each utility will file a Tier 3 Advice Letter to Energy Division to request:

a. Incentive awards for energy savings with ex post parameter estimates: Equal to the utility's net lifecycle verified savings and installation rates from two program years ago (e.g., savings subject to ex post verification in 2013 will be awarded in 2015) for deemed measures on the ESPI Uncertain List and custom projects and measures.

b. A true-up of award payments distributed the previous year for items a-d in Item 1 above for two years prior (e.g., for PY2013 in the 2015 Advice Letter) based on verified expenditures and measure installation rates. The true-up will reconcile any differences between the utility-reported versus Commission-audited expenditures / Commission-verified measure installation rates.

Publicly available Commission-led audits and EM&V studies will be used to verify expenditures and installation rates, respectively.

c. Incentive award payments for items a-d listed above for the previous program year (e.g., for PY2014 in the 2015 Advice Letter) based on reported expenditures.

This process is summarized in a table in the attached appendix. Commission staff finds that this incentive distribution process will allow utilities to reliably predict energy efficiency incentive awards while protecting ratepayers from potentially overpaying for energy efficiency incentive awards.

If parties have any questions or concerns regarding this incentive distribution process, please contact Katie Wu at katie.wu@cpuc.ca.gov or 415.703.2452.

APPENDIX: Incentive Distribution Process Summary

Program Year + 1 **(uses utility-reported data)**	**Program Year + 2** **(uses Commission-verified data)**
Non-resource Management Fee	Energy Savings from custom projects and measures
Codes and Standards Management Fee	Deemed Energy Savings with ex post parameters (i.e., savings from the ESPI Uncertain List measures)
Ex Ante Review Performance Award	True-up of all PY+1 payments using Commission audited expenditures and verified installation rates
Deemed Energy Savings with ex ante parameters	

ATTACHMENT 2: 2013 PROGRAM EXPENDITURES

Attachment 2 to this Resolution is a spreadsheet of the 2013 program expenditures, as reported to the CPUC by the IOUs in their quarterly and monthly reports. The electronic spreadsheet separates costs for each program administrator into different tabs. Columns A and B of each tab note the Program ID number and Program Name, respectively. Columns H and I note the administrative costs, which were subtracted from the total expenditures in Columns L (quarterly reports) and M (monthly reports). Columns P and Q show the total expenditures less administrative spend using quarterly reports (Column P) and monthly reports (Column Q). Columns N and O show the differences between the monthly and quarterly reports.

Resource programs are noted in white cells. Non-resource programs are highlighted as pink cells. Green cells highlight codes and standards programs and red cells highlight programs that were not included in the calculations. The total resource, non-resource, and codes and standards expenditures are noted in the blue cells in Columns R, S, and T, respectively. The formula bar for each of the blue cells will note which program expenditures were used to calculate the total values.

White cells note resource programs
Pink cells note non-resource programs Green cells note c
odes and standards programs Red cells note programs that
are not included in calculations Blue cells note total ex
penditures less administrative spend

							Program Cost Table				Quarterly Report	Monthly Report			Quaterly Report	Monthly Report			
Program ID	Program Name	Savings First Year Gross kW	Savings First Year Gross kWh	Savings First Year Gross Therms	incentive 13/14 only	total incentive	Admin Costs Overhead And GA	Admin Costs Other	Marketing Outreach	Direct Implementation Activity	Total Expenditures	Total Expenditures	Difference (Monthly-Quarterly)	Percent Difference	Total minus admin	Total minus admin	Resource Total	Non-resource Total	C&S Total
PGE21001	Residential Energy Advisor [8]	12,300	79,200,000	2,495,700	$ -	$ -	$ 258,154	$ -	$ 505,459	$ 10,283,413	$ 11,047,027	$ 11,047,027	$ -	0.0%	**$ 10,788,872**	**$ 10,788,872**	$ 282,575,934	$ 31,290,277	**$ 6,295,616**
PGE21002	Plug Load and Appliances	9,642	47,146,896	118,898	$ 10,877,306	$ 11,371,720	$ 2,318,370	$ -	$ 1,040,834	$ 4,384,094	$ 19,115,019	$ 18,615,907	$ (4,698)	0.0%	**$ 16,796,649**	**$ 16,297,537**		(9,728,311)	OBF Loan Pool
PGE21003	Multifamily Energy Efficiency Rebates Program	557	1,524,442	134,985	$ 649,836	$ 649,836	$ 175,706	$ -	$ 17,332	$ 185,363	$ 1,028,237	$ 1,028,237	$ (0)	0.0%	**$ 852,531**	**$ 852,531**	(4,824,757)	4,824,757	LGP non-resource costs
PGE21004	Energy Upgrade California	5,084	4,328,724	682,990	$ 5,020,333	$ 5,878,100	$ 577,813	$ -	$ 307,465	$ 4,363,453	$ 11,126,831	$ 10,205,822	$ (63,242)	-0.6%	**$ 10,549,018**	**$ 9,628,009**	(132,951)	132,951	Ozone laundry non-resourc e costs
PGE21005	Residential New Construction	4,450	2,365,325	377,742	$ 228,530	$ 4,342,221	$ 163,567	$ -	$ 45,249	$ 1,497,871	$ 6,048,907	$ 1,709,370	$ (225,846)	-13.2%	**$ 5,885,341**	**$ 1,545,804**	(104,726)		Carryover admin (acc rual error)
PGE21006	Residential HVAC	345	238,328	6,400	$ 703,850	$ 703,850	$ 398,717	$ -	$ 110,295	$ 1,693,394	$ 2,906,255	$ 2,906,256	$ 0	0.0%	**$ 2,507,539**	**$ 2,507,539**	**$ 277,513,501**	**$ 26,386,723**	
PGE21007	California New Homes Multifamily	2,366	2,759,684	164,966	$ 2,507,638	$ 2,507,638	$ 169,184	$ -	$ 53,763	$ 917,762	$ 3,648,348	$ 3,648,365	$ 18	0.0%	**$ 3,479,163**	**$ 3,479,181**			
PGE21008	Enhance Time Delay Relay	1,638	1,025,806	(1,414)	$ 446,714	$ 446,714	$ 37,016	$ -	$ 24,973	$ 300,886	$ 809,589	$ 809,589	$ (0)	0.0%	**$ 772,573**	**$ 772,573**			
PGE21009	Direct Install for Manufactured and Mobile Homes	4,573	6,567,556	(32,197)	$ 2,795,796	$ 2,795,796	$ 140,365	$ -	$ 59,242	$ 47,297	$ 3,042,699	$ 3,042,699	$ 0	0.0%	**$ 2,902,334**	**$ 2,902,334**			
PGE21011	Commercial Calculated Incentives	14,103	124,172,559	2,563,088	$ 3,187,246	$ 12,667,431	$ 4,821,356	$ -	$ 762,025	$ 11,012,524	$ 29,263,336	$ 19,162,932	$ (620,219)	-3.2%	**$ 24,441,980**	**$ 14,341,576**			
PGE210110	Monitoring-Based Persistence Commissioning	272	3,638,554	417,753	$ 433,365	$ 761,593	$ 141,510	$ -	$ 87,532	$ 1,523,578	$ 2,514,214	$ 1,937,015	$ (248,971)	-12.9%	**$ 2,372,704**	**$ 1,795,505**			
PGE210111	Lodging Savers	2,363	7,809,892	4,706	$ 1,679,880	$ 1,679,880	$ 535,721	$ -	$ 112,928	$ 573,772	$ 2,902,301	$ 2,902,292	$ (9)	0.0%	**$ 2,366,580**	**$ 2,366,571**			
PGE210112	School Energy Efficiency	249	4,494,666	16,529	$ 446,120	$ 446,120	$ 331,967	$ -	$ 67,963	$ 1,271,300	$ 2,117,349	$ 2,117,357	$ 8	0.0%	**$ 1,785,382**	**$ 1,785,390**			
PGE210113	Energy Fitness Program	1,156	5,674,392	(15,457)	$ 812,230	$ 812,230	$ 403,053	$ -	$ 99,440	$ 889,729	$ 2,204,451	$ 2,204,451	$ (0)	0.0%	**$ 1,801,399**	**$ 1,801,399**			
PGE210114	Energy Savers	767	3,816,174	(10,160)	$ 622,990	$ 622,990	$ 160,417	$ -	$ 56,359	$ 564,937	$ 1,404,703	$ 1,404,703	$ 0	0.0%	**$ 1,244,286**	**$ 1,244,286**			
PGE210115	RightLights	2,117	13,204,117	(29,662)	$ 2,481,584	$ 2,481,584	$ 686,297	$ -	$ 140,885	$ 1,452,748	$ 4,761,513	$ 4,761,509	$ (5)	0.0%	**$ 4,075,217**	**$ 4,075,212**			
PGE210116	Small Business Commercial Comprehensive	164	1,355,228	(2,902)	$ 222,899	$ 222,899	$ 268,900	$ -	$ 16,432	$ 383,464	$ 891,694	$ 891,694	$ 0	0.0%	**$ 622,794**	**$ 622,794**			
PGE210117	Energy-Efficient Parking Garage	26	193,140	-	$ 12,073	$ 12,073	$ 54,749	$ -	$ 3,815	$ 125,463	$ 196,100	$ 196,098	$ (2)	0.0%	**$ 141,350**	**$ 141,348**			
PGE210118	Furniture Store Energy Efficiency	993	4,687,014	(26,190)	$ 919,318	$ 919,318	$ 147,959	$ -	$ 30,612	$ 424,053	$ 1,521,942	$ 1,521,942	$ 0	0.0%	**$ 1,373,983**	**$ 1,373,983**			
PGE210119	LED Accelerator	1,004	5,189,111	(5,869)	$ 1,025,084	$ 1,025,084	$ 160,632	$ -	$ 104,671	$ 885,874	$ 2,176,261	$ 2,176,345	$ 84	0.0%	**$ 2,015,629**	**$ 2,015,713**			
PGE21012	Commercial Deemed Incentives	10,993	59,105,368	2,114,818	$ 8,521,046	$ 8,521,046	$ 2,377,320	$ -	$ 940,321	$ 2,930,750	$ 14,769,437	$ 14,768,187	$ (1,250)	0.0%	**$ 12,392,117**	**$ 12,390,867**			
PGE210120	Monitoring-Based Commissioning	136	2,091,713	250,228	$ 39,159	$ 198,758	$ 40,807	$ -	$ 12,628	$ 477,547	$ 729,740	$ 185,685	$ (384,456)	-207.0%	**$ 688,933**	**$ 144,878**			

PGE210122	Casino Green	310	1,700,348	9,232	$ 234,626	$ 234,626	$ 216,658	$ -	$ 59,714	$ 692,250	$ 1,203,247	$ 1,068,537	$ (134,711)	-12.6%	**$ 986,589**	**$ 851,879**			
PGE210123	Healthcare Energy Efficiency Program	96	1,169,050	261,809	$ 109,601	$ 248,201	$ 184,897	$ -	$ 96,076	$ 1,144,511	$ 1,673,686	$ 1,490,355	$ (44,731)	-3.0%	**$ 1,488,788**	**$ 1,305,458**			
PGE210124	Ozone Laundry Energy Efficiency	-	-	58,674	$ 50,947	$ 50,947	$ 52,148	$ -	$ 7,302	$ 126,030	$ 236,426	$ 236,426	$ (0)	0.0%	**$ 184,278**	**$ 184,278**			

							Program Cost Table				Quarterly Report	Monthly Report			**Quaterly Report**	**Monthly Report**			
Program ID	Program Name	Savings First Year Gross kW	Savings First Year Gross kWh	Savings First Year Gross Therms	incentive 13/14 only	total incentive	Admin Costs Overhead And GA	Admin Costs Other	Marketing Outreach	Direct Implementation Activity	Total Expenditures	Total Expenditures	Difference (Monthly-Quarterly)	Percent Difference	**Total minus admin**	**Total minus admin**	**Resource Total**	**Non-resource Total**	**C&S Total**
PGE210125	California Preschool Energy Efficiency Program	45	66,011	2,727	$ 63,180	$ 63,180	$ 68,073	$ -	$ 3,623	$ 102,383	$ 237,259	$ 237,259	$ (0)	0.0%	**$ 169,186**	**$ 169,186**			
PGE210126	K-12 Private Schools and Colleges Audit Retro	259	2,886,515	(23,893)	$ 627,776	$ 627,776	$ 104,373	$ -	$ 20,255	$ 281,778	$ 1,034,182	$ 1,034,182	$ 0	0.0%	**$ 929,809**	**$ 929,809**			
PGE210127	Innovative Designs for Energy Efficiency Approaches (IDEEA)	NULL	NULL	NULL	$ -	$ -	$ 596,298	$ -	$ 52,907	$ 524,279	$ 1,173,484	$ 1,173,484	$ -	0.0%	**$ 577,186**	**$ 577,186**			
PGE210132	RSG The Smarter Water Heater	-	-	8,620	$ 45,000	$ 45,000	$ -	$ -	$ -	$ 5,400	$ 50,400	$ 50,400	$ -	0.0%	**$ 50,400**	**$ 50,400**			
PGE210133	Staples Low Pressure Irrigation DI	NULL	NULL	NULL	$ -	$ -	$ 144,313	$ -	$ 5,000	$ 170,000	$ 319,313	$ 319,313	$ -	0.0%	**$ 175,000**	**$ 175,000**			
PGE21014	Commercial Energy Advisor	6,332	10,628,112	1,826,820	$ -	$ -	$ 868,249	$ -	$ 8,552	$ 4,617,631	$ 5,494,433	$ 5,494,433	$ -	0.0%	**$ 4,626,184**	**$ 4,626,184**			
PGE21015	Commercial HVAC	3,872	24,965,582	556,699	$ 11,975,536	$ 11,975,536	$ 796,643	$ -	$ 9,301	$ 5,183,639	$ 17,965,119	$ 17,965,119	$ 0	0.0%	**$ 17,168,476**	**$ 17,168,476**			
PGE21016	Air Care Plus	453	3,598,896	243,760	$ 1,140,380	$ 1,140,380	$ 762,333	$ -	$ 102,432	$ 1,587,459	$ 3,592,605	$ 3,592,605	$ 0	0.0%	**$ 2,830,272**	**$ 2,830,272**			
PGE21017	Boiler Energy Efficiency Program	45	208,869	1,248,489	$ 273,960	$ 752,059	$ 253,760	$ -	$ 51,356	$ 1,100,171	$ 2,157,346	$ 1,509,712	$ (169,535)	-11.2%	**$ 1,903,586**	**$ 1,255,952**			
PGE21018	EnergySmart Grocer	2,340	21,294,435	48,877	$ 1,878,459	$ 1,878,459	$ 1,012,784	$ -	$ 129,110	$ 3,565,399	$ 6,585,752	$ 6,585,752	$ 0	0.0%	**$ 5,572,968**	**$ 5,572,968**			
PGE21019	Enhanced Automation Initiative	-	-	89,261	$ -	$ 8,051	$ 78,928	$ -	$ 4,845	$ 151,245	$ 243,070	$ 243,066	$ 8,048	3.3%	**$ 164,141**	**$ 164,138**			
PGE21021	Industrial Calculated Incentives	2,816	21,202,256	8,330,982	$ 987,047	$ 6,391,251	$ 2,720,735	$ -	$ 103,749	$ 5,819,558	$ 15,035,294	$ 7,703,076	$ (1,928,014)	-25.0%	**$ 12,314,559**	**$ 4,982,341**			
PGE210210	Industrial Recommissioning Program	157	1,704,182	109,911	$ 134,759	$ 201,328	$ 199,796	$ -	$ 73,593	$ 1,254,851	$ 1,729,569	$ 1,161,224	$ (501,776)	-43.2%	**$ 1,529,773**	**$ 961,427**			
PGE21022	Industrial Deemed Incentives	1,469	6,352,064	16,924	$ 1,011,376	$ 1,011,376	$ 319,688	$ -	$ 80,509	$ 264,782	$ 1,676,354	$ 1,676,354	$ 0	0.0%	**$ 1,356,666**	**$ 1,356,666**			
PGE21024	Industrial Energy Advisor	490	822,601	126,253	$ -	$ -	$ 157,238	$ -	$ 3,535	$ 942,016	$ 1,102,789	$ 1,102,789	$ -	0.0%	**$ 945,551**	**$ 945,551**			
PGE21025	California Wastewater Process Optimization	644	6,202,194	-	$ 527,320	$ 622,462	$ 153,283	$ -	$ 85,517	$ 1,025,197	$ 1,886,459	$ 1,496,546	$ (294,771)	-19.7%	**$ 1,733,176**	**$ 1,343,263**			
PGE21026	Energy Efficiency Services for Oil Production	2,281	22,460,005	-	$ 828,127	$ 1,946,119	$ 619,118	$ -	$ 122,483	$ 1,933,483	$ 4,621,203	$ 2,908,525	$ (594,685)	-20.4%	**$ 4,002,085**	**$ 2,289,407**			
PGE21027	Heavy Industry Energy Efficiency Program	4,175	32,361,874	926,832	$ 2,392,423	$ 4,800,135	$ 1,153,573	$ -	$ 193,003	$ 4,927,246	$ 11,073,958	$ 7,709,999	$ (956,247)	-12.4%	**$ 9,920,385**	**$ 6,556,425**			
PGE21028	Industrial Compressed Air Program	909	7,388,772	-	$ 514,245	$ 650,286	$ 179,802	$ -	$ 81,247	$ 862,019	$ 1,773,354	$ 1,535,311	$ (102,002)	-6.6%	**$ 1,593,552**	**$ 1,355,509**			
PGE21029	Refinery Energy Efficiency Program	199	1,102,348	4,000,505	$ 297,956	$ 1,367,488	$ 604,509	$ -	$ 76,903	$ 2,486,242	$ 4,535,142	$ 3,013,735	$ (451,875)	-15.0%	**$ 3,930,633**	**$ 2,409,226**			
PGE21031	Agricultural Calculated Incentives	5,738	32,545,131	3,098,403	$ 2,009,266	$ 4,681,872	$ 1,859,398	$ -	$ 304,630	$ 3,068,420	$ 9,914,320	$ 7,616,722	$ 375,008	4.9%	**$ 8,054,922**	**$ 5,757,324**			
PGE210310	Dairy Industry Resource Advantage Pgm	463	2,017,397	(1,656)	$ 251,136	$ 251,136	$ 69,443	$ -	$ 28,619	$ 662,784	$ 1,011,982	$ 1,011,991	$ 10	0.0%	**$ 942,539**	**$ 942,549**			
PGE210311	Process Wastewater Treatment EM Pgm for Ag Food Processing	121	1,398,705	-	$ 55,072	$ 55,072	$ 82,990	$ -	$ 21,628	$ 437,982	$ 597,672	$ 597,651	$ (21)	0.0%	**$ 514,682**	**$ 514,661**			
PGE21032	Agricultural Deemed Incentives	15,490	24,866,714	211,394	$ 1,621,580	$ 1,621,580	$ 679,379	$ -	$ 461,754	$ 475,179	$ 3,237,893	$ 3,237,893	$ 0	0.0%	**$ 2,558,513**	**$ 2,558,513**			
PGE21034	Agricultural Energy Advisor	1,985	12,025,701	132,261	$ 821,789	$ 821,789	$ 511,565	$ -	$ 76,822	$ 1,671,085	$ 3,081,261	$ 3,081,252	$ (9)	0.0%	**$ 2,569,696**	**$ 2,569,686**			
PGE21035	Dairy Energy Efficiency Program	55	866,301	-	$ 62,405	$ 62,405	$ 36,700	$ -	$ 15,577	$ 169,479	$ 284,161	$ 284,161	$ -	0.0%	**$ 247,461**	**$ 247,461**			

PGE21036	Industrial Refrigeration Performance Plus	467	4,918,894	-	$ 368,071	$ 368,071	$ 131,009	$ -	$ 17,577	$ 180,999	$ 697,657	$ 697,827	$ 170	0.0%	**$ 566,648**	**$ 566,818**			
PGE21037	Light Exchange Program	297	1,218,602	-	$ 270,200	$ 270,200	$ 162,055	$ -	$ 89,107	$ 277,112	$ 798,474	$ 798,474	$ (0)	0.0%	**$ 636,419**	**$ 636,419**			
PGE21038	Wine Industry Efficiency Solutions	795	3,931,780	101,322	$ 445,927	$ 445,927	$ 208,036	$ -	$ 57,151	$ 902,481	$ 1,613,595	$ 1,613,583	$ (12)	0.0%	**$ 1,405,559**	**$ 1,405,547**			

							ProgramCostTable				Quarterly Report	Monthly Report			Quaterly Report	Monthly Report			
ProgramID	ProgramName	Savings FirstYear GrosskW	Savings FirstYear GrosskWh	Savings FirstYear GrossTherms	incentive 13/14 only	total incentive	AdminCosts Overhead And GA	AdminCosts Other	Marketing Outreach	Direct Implementation Activity	Total Expenditures	Total Expenditures	Difference (Monthly-Quarterly)	Percent Difference	Total minus admin	Total minus admin	Resource Total	Non-resource Total	C&S Total
PGE21039	Comprehensive Food Process Audit & Resource Efficiency Pgm [14]	448	2,551,139	52,817	$ 218,539	$ 286,229	$ 402,778	$ -	$ 87,771	$ 6,663,212	$ 7,439,990	$ 7,292,999	$ (79,301)	-1.1%	**$ 7,037,213**	**$ 6,890,221**			
PGE21041	Primary Lighting [6]	6,876	51,452,011	(986,680)	$ 4,323,520	$ 4,323,520	$ 1,568,158	$ -	$ 330,338	$ 439,269	$ 6,661,285	$ 6,661,285	$ 1	0.0%	**$ 5,093,127**	**$ 5,093,128**			
PGE21042	Lighting Innovation	1,068	4,929,365	(18,312)	$ 560,755	$ 560,755	$ 206,696	$ -	$ 814	$ 1,159,649	$ 1,927,914	$ 1,927,914	$ 0	0.0%	**$ 1,721,218**	**$ 1,721,218**			
PGE2110011	California Community Colleges	719	3,787,880	684,028	$ 626,748	$ 1,829,196	$ 122,323	$ -	$ -	$ 509,190	$ 2,460,709	$ 1,213,842	$ (44,419)	-3.7%	**$ 2,338,386**	**$ 1,091,519**			
PGE2110012	University of California/California State University	2,953	19,431,453	974,558	$ 2,719,674	$ 5,741,626	$ 1,722,379	$ -	$ 7,754	$ 5,385,244	$ 12,857,003	$ 9,614,520	$ (220,531)	-2.3%	**$ 11,134,624**	**$ 7,892,141**			
PGE2110013	State of California	668	1,932,528	24,747	$ 139,170	$ 425,390	$ 90,400	$ -	$ -	$ 312,631	$ 828,422	$ 455,341	$ (86,860)	-19.1%	**$ 738,021**	**$ 364,941**			
PGE2110014	Department of Corrections and Rehabilitation	1,936	2,678,076	245,109	$ 544,338	$ 544,338	$ 320,240	$ -	$ -	$ 776,246	$ 1,640,824	$ 1,640,759	$ (65)	0.0%	**$ 1,320,585**	**$ 1,320,519**			
PGE2110051	Local Government Energy Action Resources (LGEAR)	340	8,028,301	(7,223)	$ 1,295,452	$ 1,295,452	$ 518,730	$ -	$ 207,327	$ 4,220,446	$ 6,241,955	$ 6,241,955	$ (0)	0.0%	**$ 5,723,225**	**$ 5,723,225**			
PGE2110052	Strategic Energy Resources	NULL	NULL	NULL	$ -	$ -	$ 240,681	$ -	$ 552,255	$ 1,673,229	$ 2,466,165	$ 2,466,165	$ -	0.0%	**$ 2,225,484**	**$ 2,225,484**			
PGE211007	Association of Monterey Bay Area Governments (AMBAG)	1,177	6,424,146	7,432	$ 1,412,525	$ 1,412,525	$ 592,377	$ -	$ 242,779	$ 1,261,964	$ 3,509,645	$ 3,509,605	$ (41)	0.0%	**$ 2,917,268**	**$ 2,917,228**			
PGE211009	East Bay	918	18,697,704	106,550	$ 4,435,535	$ 4,590,230	$ 1,470,178	$ -	$ 423,159	$ 3,369,676	$ 9,853,243	$ 9,698,521	$ (27)	0.0%	**$ 8,383,065**	**$ 8,228,343**			
PGE211010	Fresno	477	2,654,258	(6,757)	$ 491,462	$ 491,462	$ 327,897	$ -	$ 101,330	$ 797,899	$ 1,718,588	$ 1,718,593	$ 5	0.0%	**$ 1,390,691**	**$ 1,390,696**			
PGE211011	Kern	1,151	6,527,341	(24,737)	$ 955,672	$ 955,672	$ 330,841	$ -	$ 96,723	$ 861,814	$ 2,245,049	$ 2,245,057	$ 8	0.0%	**$ 1,914,209**	**$ 1,914,217**			
PGE211012	Madera	83	409,044	(997)	$ 74,013	$ 74,013	$ 34,550	$ -	$ 12,555	$ 111,604	$ 232,721	$ 232,721	$ (0)	0.0%	**$ 198,171**	**$ 198,171**			
PGE211013	Marin County	225	1,865,356	(2,606)	$ 415,502	$ 415,502	$ 213,715	$ -	$ 41,500	$ 693,347	$ 1,364,064	$ 1,364,040	$ (25)	0.0%	**$ 1,150,349**	**$ 1,150,325**			
PGE211014	Mendocino County	109	610,303	680	$ 77,842	$ 77,842	$ 42,534	$ -	$ 11,690	$ 202,850	$ 334,916	$ 334,915	$ (1)	0.0%	**$ 292,383**	**$ 292,382**			
PGE211015	Napa County	256	1,332,941	(1,526)	$ 195,404	$ 195,404	$ 86,479	$ -	$ 33,503	$ 321,613	$ 637,000	$ 637,004	$ 4	0.0%	**$ 550,521**	**$ 550,525**			
PGE211016	Redwood Coast	99	661,715	(2,502)	$ 118,616	$ 118,616	$ 242,974	$ -	$ 44,328	$ 1,028,945	$ 1,434,862	$ 1,434,861	$ (1)	0.0%	**$ 1,191,888**	**$ 1,191,887**			
PGE211018	San Luis Obispo County	298	2,171,900	(8,333)	$ 417,787	$ 417,787	$ 133,649	$ -	$ 78,112	$ 519,734	$ 1,149,283	$ 1,149,283	$ 0	0.0%	**$ 1,015,634**	**$ 1,015,634**			
PGE211019	San Mateo County	344	3,575,104	529	$ 791,693	$ 791,693	$ 237,511	$ -	$ 90,823	$ 493,823	$ 1,613,849	$ 1,613,855	$ 6	0.0%	**$ 1,376,338**	**$ 1,376,344**			
PGE211020	Santa Barbara	213	2,682,718	(5,823)	$ 694,564	$ 694,564	$ 112,449	$ -	$ 36,738	$ 358,364	$ 1,202,114	$ 1,202,114	$ 0	0.0%	**$ 1,089,665**	**$ 1,089,665**			
PGE211021	Sierra Nevada	455	3,346,966	(8,462)	$ 761,603	$ 761,603	$ 344,099	$ -	$ 66,572	$ 1,193,379	$ 2,365,653	$ 2,365,652	$ (1)	0.0%	**$ 2,021,554**	**$ 2,021,553**			
PGE211022	Sonoma County	398	2,713,074	(5,609)	$ 392,163	$ 392,163	$ 180,917	$ -	$ 55,381	$ 524,331	$ 1,152,793	$ 1,152,799	$ 6	0.0%	**$ 971,875**	**$ 971,882**			
PGE211023	Silicon Valley	509	5,592,070	50,578	$ 1,106,441	$ 1,122,582	$ 413,798	$ -	$ 191,863	$ 1,650,732	$ 3,378,975	$ 3,378,980	$ 16,146	0.5%	**$ 2,965,177**	**$ 2,965,182**			
PGE211024	San Francisco	2,247	9,143,670	70,363	$ 2,010,433	$ 2,010,433	$ 970,322	$ -	$ 285,945	$ 3,920,354	$ 7,187,054	$ 7,187,063	$ 8	0.0%	**$ 6,216,732**	**$ 6,216,741**			
PGE211025	Savings by Design (SBD)	9,212	34,201,675	207,642	$ 2,750,154	$ 6,639,793	$ 1,129,469	$ -	$ 21,349	$ 3,431,334	$ 11,221,944	$ 7,299,369	$ (32,937)	-0.5%	**$ 10,092,475**	**$ 6,169,899**			
PGE210128	Enovity SMART	NULL	NULL	NULL	$ -	$ -	$ 46	$ -	$ -	$ 920	$ 966	$ 966	$ -	0.0%	**$ 920**	**$ 920**			
PGE210129	Nexant AERCx	NULL	NULL	NULL	$ -	$ -	$ 43	$ -	$ -	$ 854	$ 897	$ 897	$ -	0.0%	**$ 854**	**$ 854**			
PGE21013	Commercial Continuous Energy Improvement	NULL	NULL	NULL	$ -	$ -	$ 36,978	$ -	$ 18,143	$ 113,738	$ 168,859	$ 168,859	$ -	0.0%	**$ 131,882**	**$ 131,882**			
PGE210130	RSG AERCx	NULL	NULL	NULL	$ -	$ -	$ 117,430	$ -	$ 34,300	$ 723	$ 152,453	$ 152,453	$ -	0.0%	**$ 35,023**	**$ 35,023**			
PGE210131	PECI AERCx	NULL	NULL	NULL	$ -	$ -	$ 31,264	$ -	$ 24,953	$ 8,000	$ 64,218	$ 64,218	$ -	0.0%	**$ 32,953**	**$ 32,953**			
PGE21023	Industrial Continuous Energy Improvement	NULL	NULL	NULL	$ -	$ -	$ 57,704	$ -	$ 344	$ 106,410	$ 164,459	$ 164,459	$ -	0.0%	**$ 106,755**	**$ 106,755**			
PGE21033	Agricultural Continuous Energy Improvement	NULL	NULL	NULL	$ -	$ -	$ 34,618	$ -	$ 17,524	$ 118,643	$ 170,785	$ 170,785	$ -	0.0%	**$ 136,167**	**$ 136,167**			

PGE21043	Lighting Market Transformation	NULL	NULL	NULL	$ -	$ -	$ 26,920	$ -	$ 97	$ 36,053	$ 63,070	$ 63,070	$ -	0.0%	**$ 36,150**	**$ 36,150**			
PGE21061	Technology Development Support	NULL	NULL	NULL	$ -	$ -	$ 27,287	$ -	$ 293	$ 815,812	$ 843,392	$ 446,824	$ (396,568)	-88.8%	**$ 816,105**	**$ 419,537**			
PGE21062	Technology Assessments	NULL	NULL	NULL	$ -	$ -	$ 223,269	$ -	$ 14,051	$ 3,041,108	$ 3,278,428	$ 1,588,478	$ (1,689,950)	-106.4%	**$ 3,055,159**	**$ 1,365,210**			
PGE21063	Technology Introduction Support	NULL	NULL	NULL	$ -	$ -	$ 120,474	$ -	$ 4,661	$ 2,234,478	$ 2,359,614	$ 753,485	$ (1,606,129)	-213.2%	**$ 2,239,140**	**$ 633,011**			

							ProgramCostTable				Quarterly Report	Monthly Report			Quaterly Report	Monthly Report			
ProgramID	ProgramName	Savings FirstYear GrosskW	Savings FirstYear GrosskWh	Savings FirstYear GrossTherms	incentive 13/14 only	total incentive	AdminCosts Overhead And GA	AdminCosts Other	Marketing Outreach	Direct Implementation Activity	Total Expenditures	Total Expenditures	Difference (Monthly-Quarterly)	Percent Difference	Total minus admin	Total minus admin	Resource Total	Non-resource Total	C&S Total
PGE21071	Centergies	NULL	NULL	NULL	$ -	$ -	$ 484,696	$ -	$ 22,705	$ 8,195,379	$ 8,702,779	$ 8,702,779	$ -	0.0%	**$ 8,218,083**	**$ 8,218,083**			
PGE21072	Connections	NULL	NULL	NULL	$ -	$ -	$ 27,140	$ -	$ 569	$ 2,063,076	$ 2,090,786	$ 2,090,786	$ -	0.0%	**$ 2,063,646**	**$ 2,063,646**			
PGE21073	Strategic Planning	NULL	NULL	NULL	$ -	$ -	$ 129,652	$ -	$ -	$ 668,076	$ 797,728	$ 797,728	$ -	0.0%	**$ 668,076**	**$ 668,076**			
PGE21074	Builder Energy Code Training	NULL	NULL	NULL	$ -	$ -	$ 171,652	$ -	$ 22,688	$ 169,584	$ 363,924	$ 363,924	$ -	0.0%	**$ 192,272**	**$ 192,272**			
PGE21075	Green Building Technical Support Services	NULL	NULL	NULL	$ -	$ -	$ 211,802	$ -	$ 14,472	$ 269,021	$ 495,295	$ 495,295	$ -	0.0%	**$ 283,493**	**$ 283,493**			
PGE21081	Statewide DSM Coordination & Integration	NULL	NULL	NULL	$ -	$ -	$ 177,870	$ -	$ (64)	$ 306,543	$ 484,349	$ 484,349	$ -	0.0%	**$ 306,479**	**$ 306,479**			
PGE21091	On-Bill Financing (includes Loan Pool)*	NULL	NULL	NULL	$ -	$ -	$ 758,644	$ -	$ 921,171	$ 10,976,847	$ 12,656,662	$ 12,656,662	$ -	0.0%	**$ 11,898,018**	**$ 11,898,018**			
PGE21092	Third-Party Financing	NULL	NULL	NULL	$ -	$ -	$ 512	$ -	$ -	$ 150,058	$ 150,569	$ 150,569	$ -	0.0%	**$ 150,058**	**$ 150,058**			
PGE21093	New Financing Offerings	NULL	NULL	NULL	$ -	$ -	$ 207,988	$ -	$ -	$ 919,043	$ 1,127,032	$ 1,127,032	$ -	0.0%	**$ 919,043**	**$ 919,043**			
PGE210931	Off-Bill Small Business Lease Providers Pilot	NULL	NULL	NULL	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	#DIV/0!	**$ -**	**$ -**			
PGE210932	Single Family Loan Program	NULL	NULL	NULL	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	#DIV/0!	**$ -**	**$ -**			
PGE210933	OBR Small Business Lease Providers Pilot	NULL	NULL	NULL	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	#DIV/0!	**$ -**	**$ -**			
PGE210934	OBR Small Business Loan Pilot	NULL	NULL	NULL	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	#DIV/0!	**$ -**	**$ -**			
PGE210935	Master-Metered Multifamily Financing Pilot	NULL	NULL	NULL	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	#DIV/0!	**$ -**	**$ -**			
PGE210936	Energy Finance Line Item Charge	NULL	NULL	NULL	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	#DIV/0!	**$ -**	**$ -**			
PGE210937	On Bill Repayment (OBR) for Medium and Large Business	NULL	NULL	NULL	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	#DIV/0!	**$ -**	**$ -**			
PGE21051	Building Codes Advocacy	NULL	NULL	NULL	$ -	$ -	$ 53,398	$ -	$ (263)	$ 1,360,235	$ 1,413,370	$ 890,437	$ (522,933)	-58.7%	**$ 1,359,972**	**$ 837,039**			
PGE21052	Appliance Standards Advocacy	NULL	NULL	NULL	$ -	$ -	$ 36,374	$ -	$ -	$ 2,982,242	$ 3,018,616	$ 3,019,411	$ 795	0.0%	**$ 2,982,242**	**$ 2,983,037**			
PGE21053	Compliance Improvement	NULL	NULL	NULL	$ -	$ -	$ 20,357	$ -	$ -	$ 1,258,948	$ 1,279,305	$ 1,279,305	$ -	0.0%	**$ 1,258,948**	**$ 1,258,948**			
PGE21054	Reach Codes	NULL	NULL	NULL	$ -	$ -	$ 2,543	$ -	$ -	$ 30,070	$ 32,614	$ 32,614	$ -	0.0%	**$ 30,070**	**$ 30,070**			
PGE21055	Planning and Coordination	NULL	NULL	NULL	$ -	$ -	$ 29,374	$ -	$ -	$ 664,383	$ 693,758	$ 669,872	$ (23,886)	-3.6%	**$ 664,383**	**$ 640,498**			

							ProgramCostTable				Quarterly Report	Monthly Report			Quaterly Report	Monthly Report			
ProgramID	ProgramName	Savings FirstYear Gross kW	Savings FirstYear Grosskwh	Savings FirstYear Gross Therms	incentive 13/14 only	total incentive	AdminCosts Overhead And GA	AdminCosts Other	Marketing Outreach	Direct Implementation Activity	Total Expenditures	Total Expenditures	Difference (Monthly-Quarterly)	Percent Difference	Total minus admin	Total minus admin	Resource Total	Non-resource Total	C&S Total
SDGE3201	SW-CALS-Energy Advisor-HEES, UAT	NULL	NULL	NULL	$ -	$ -	$ 46,471	$ -	$ 186,363	$ 127,204	$ 360,038	$ 360,038	$ 0	0.0%	**$ 313,567**	**$ 313,567**	**$ 58,739,080**	**$ 6,027,540**	**$ 276,246**
SDGE3203	SW-CALS-Plug Load and Appliances HEER	NULL	NULL	NULL	$ 885,157	$ 885,157	$ 121,396	$ -	$ 13,317	$ 245,504	$ 1,265,374	$ 1,265,374	$ (0)	0.0%	**$ 1,143,979**	**$ 1,143,978**			
SDGE3204	SW-CALS-Plug Load and Appliances POS Rebates	NULL	NULL	NULL	$ 194,766	$ 194,766	$ 45,078	$ -	$ 29,489	$ 349,741	$ 619,074	$ 619,074	$ 0	0.0%	**$ 573,996**	**$ 573,996**			
SDGE3205	SW-CALS-Plug Load and Appliances BCE	NULL	NULL	NULL	$ -	$ -	$ 22,794	$ -	$ (67)	$ 54,346	$ 77,073	$ 77,073	$ 0	0.0%	**$ 54,279**	**$ 54,279**			
SDGE3206	SW-CALS-Plug Load and Appliances ARP	NULL	NULL	NULL	$ 1,259,089	$ 1,259,089	$ 24,679	$ 16,988	$ 196,635	$ 143,830	$ 1,641,221	$ 1,641,221	$ 0	0.0%	**$ 1,599,554**	**$ 1,599,554**			
SDGE3207	SW-CALS-MFEER	NULL	NULL	NULL	$ 882,614	$ 882,614	$ 99,224	$ -	$ 6,083	$ 199,956	$ 1,187,877	$ 1,187,877	$ 0	0.0%	**$ 1,088,653**	**$ 1,088,653**			
SDGE3209	SW-CALS - EUC WHRP - Advanced	176	204,099	17,343	$ 238,857	$ 238,857	$ 323,286	$ -	$ 114,366	$ 2,660,244	$ 3,336,753	$ 3,333,145	$ (3,608)	-0.1%	**$ 3,013,467**	**$ 3,009,859**			
SDGE3211	Local-CALS - Middle Income Direct Install (MIDI)	NULL	NULL	NULL	$ 256,287	$ 256,287	$ 11,949	$ -	$ 14,677	$ 253,136	$ 536,049	$ 536,049	$ (0)	0.0%	**$ 524,101**	**$ 524,100**			
SDGE3212	SW-CALS – Residential HVAC-QI/QM	NULL	NULL	NULL	$ 218,160	$ 218,160	$ 17,655	$ 77,476	$ 5,177	$ 858,644	$ 1,177,113	$ 1,177,113	$ 0	0.0%	**$ 1,081,981**	**$ 1,081,981**			
SDGE3213	SW-CALS - CAHP/ESMH-CA Advanced Homes (1)	602	1,178,705	51,405	$ 1,373,460	$ 1,373,460	$ 218,651	$ -	$ 50,089	$ 674,277	$ 2,316,477	$ 2,316,477	$ 0	0.0%	**$ 2,097,825**	**$ 2,097,826**			
SDGE3214	SW-CALS - CAHP/ESMH-E Star Manufactured Homes	NULL	NULL	NULL	$ 3,000	$ 3,000	$ 4,115	$ -	$ -	$ 12,962	$ 20,076	$ 20,076	$ (0)	0.0%	**$ 15,962**	**$ 15,961**			
SDGE3215	SW-COM-Continuous Energy Improvement	NULL	NULL	NULL	$ -	$ -	$ 29,425	$ -	$ 2,700	$ 116,997	$ 149,122	$ 149,122	$ (0)	0.0%	**$ 119,697**	**$ 119,697**			
SDGE3216	SW-COM-Customer Services-Benchmarking	NULL	NULL	NULL	$ -	$ -	$ 5,215	$ -	$ -	$ 79,577	$ 84,792	$ 84,792	$ (0)	0.0%	**$ 79,577**	**$ 79,577**			
SDGE3217	SW-COM-Customer Services-Audits NonRes	NULL	NULL	NULL	$ -	$ -	$ 28,212	$ -	$ 65	$ 136,019	$ 164,297	$ 164,296	$ (1)	0.0%	**$ 136,085**	**$ 136,084**			
SDGE3218	SW-COM-Customer Services-Audits Healthcare Energy Efficiency (HEEP)	NULL	NULL	NULL	$ -	$ -	$ 5,563	$ 25,500	$ 1,500	$ 781,239	$ 813,802	$ 813,802	$ (0)	0.0%	**$ 782,739**	**$ 782,739**			
SDGE3219	SW-COM-Customer Services-Audits Lodging Energy Efficiency (LEEP)	NULL	NULL	NULL	$ -	$ -	$ 18,136	$ 25,500	$ 3,135	$ 1,138,965	$ 1,185,736	$ 1,185,736	$ 0	0.0%	**$ 1,142,100**	**$ 1,142,100**			
SDGE3220	SW-COM-Calculated Incentives-Calculated (2)	1,716	30,256,592	777,481	$ 4,151,081	$ 4,151,081	$ 659,364	$ -	$ 9,938	$ 3,793,848	$ 8,614,230	$ 8,614,230	$ 0	0.0%	**$ 7,954,866**	**$ 7,954,866**			
SDGE3221	SW-COM-Calculated Incentives-RCx	86	608,523	51,169	$ 34,389	$ 34,389	$ 24,083	$ 83,480	$ 23,405	$ 1,655,524	$ 1,820,882	$ 1,820,882	$ 0	0.0%	**$ 1,713,318**	**$ 1,713,319**			
SDGE3222	SW-COM-Calculated Incentives-Savings by Design (3)	3,266	11,594,215	19,901	$ 2,592,404	$ 2,592,404	$ 328,729	$ -	$ 51,030	$ 1,272,091	$ 4,244,253	$ 4,244,253	$ 0	0.0%	**$ 3,915,524**	**$ 3,915,524**			
SDGE3223	SW-COM-Deemed Incentives-Commercial Rebates	28	116,073	(177)	$ 2,341,096	$ 2,341,096	$ 281,810	$ -	$ 30,515	$ 772,891	$ 3,426,311	$ 3,426,311	$ (0)	0.0%	**$ 3,144,502**	**$ 3,144,501**			
SDGE3224	SW-COM-Deemed Incentives-HVAC Commercial	135	363,452	(672)	$ 1,712,555	$ 1,712,555	$ 36,707	$ 161,837	$ 89,374	$ 886,537	$ 2,887,010	$ 2,887,010	$ (0)	0.0%	**$ 2,688,466**	**$ 2,688,466**			

SDGE3225	SW-COM-Deemed Incentives-HVAC Core	NULL	NULL	NULL	$ -	$ -	$ 13,972	$ -	$ -	$ 34,311	$ 48,283	$ 48,283	$ 0	0.0%	**$ 34,311**	**$ 34,311**			
SDGE3226	SW-COM Direct Install	672	2,527,177	(4,376)	$ 9,794,601	$ 9,794,601	$ 50,762	$ 75,804	$ 510	$ 2,458,977	$ 12,380,654	$ 12,380,654	$ (0)	0.0%	**$ 12,254,088**	**$ 12,254,088**			
SDGE3227	SW-IND-Continuous Energy Improvement	NULL	NULL	NULL	$ -	$ -	$ 31,940	$ -	$ -	$ 174,807	$ 206,747	$ 206,747	$ (0)	0.0%	**$ 174,807**	**$ 174,807**			
SDGE3228	SW-IND-Customer Services-Benchmarking	NULL	NULL	NULL	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	#DIV/0!	**$ -**	**$ -**			

							ProgramCostTable				Quarterly Report	Monthly Report			Quaterly Report	Monthly Report			
ProgramID	ProgramName	Savings FirstYear Gross kW	Savings FirstYear Grosskwh	Savings FirstYear Gross Therms	incentive 13/14 only	total incentive	AdminCosts Overhead And GA	AdminCosts Other	Marketing Outreach	Direct I mplementation Activity	Total Expenditures	Total Expenditures	Difference (Monthly-Quarterly)	Percent Difference	Total minus admin	Total minus admin	Resource Total	Non-resource Total	C&S Total
SDGE3229	SW-IND-Customer Services-Audits NonRes	NULL	NULL	NULL	$ -	$ -	$ 20,911	$ -	$ 12	$ 77,972	$ 98,895	$ 98,895	$ (0)	0.0%	**$ 77,984**	**$ 77,984**			
SDGE3230	SW-IND-Customer Services-Audits CI EEP	NULL	NULL	NULL	$ -	$ -	$ 8,504	$ 24,005	$ 13,646	$ 438,858	$ 485,013	$ 485,013	$ (0)	0.0%	**$ 452,504**	**$ 452,504**			
SDGE3231	SW-IND-Calculated Incentives-Calculated	314	2,205,281	7,794	$ 223,540	$ 223,540	$ 97,803	$ -	$ 530	$ 591,153	$ 913,026	$ 913,026	$ 0	0.0%	**$ 815,223**	**$ 815,223**			
SDGE3233	SW-IND-Deemed Incentives	2	5,733	(10)	$ 76,957	$ 76,957	$ 57,541	$ -	$ 477	$ 254,799	$ 389,774	$ 389,774	$ (0)	0.0%	**$ 332,233**	**$ 332,233**			
SDGE3234	SW-AG-Customer Services-Benchmarking	NULL	NULL	NULL	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	#DIV/0!	**$ -**	**$ -**			
SDGE3235	SW-AG-Customer Services-Pump Test Services	NULL	NULL	NULL	$ -	$ -	$ 1,934	$ 1,400	$ 7,275	$ 12,341	$ 22,951	$ 22,951	$ 0	0.0%	**$ 19,616**	**$ 19,617**			
SDGE3236	SW-AG-Customer Services-Audits	NULL	NULL	NULL	$ -	$ -	$ 5,314	$ -	$ -	$ 11,436	$ 16,750	$ 16,750	$ 0	0.0%	**$ 11,436**	**$ 11,436**			
SDGE3237	SW-AG-Calculated Incentives-Calculated	-	-	10,710	$ 10,710	$ 10,710	$ 29,838	$ -	$ -	$ 120,468	$ 161,016	$ 161,016	$ (0)	0.0%	**$ 131,178**	**$ 131,178**			
SDGE3239	SW-AG-Deemed Incentives	NULL	NULL	NULL	$ -	$ -	$ 20,091	$ -	$ 37	$ 80,808	$ 100,936	$ 100,936	$ 0	0.0%	**$ 80,845**	**$ 80,845**			
SDGE3240	SW-Lighting-Lighting Market Transformation	NULL	NULL	NULL	$ -	$ -	$ 18,777	$ -	$ 21,135	$ 85,928	$ 125,839	$ 125,839	$ (0)	0.0%	**$ 107,063**	**$ 107,063**			
SDGE3241	SW-Lighting-Lighting Innovation-ETPC MD	NULL	NULL	NULL	$ -	$ -	$ 1,194	$ -	$ 341	$ 4,745	$ 6,281	$ 6,281	$ 0	0.0%	**$ 5,086**	**$ 5,087**			
SDGE3242	SW-Lighting-Lighting Innovation-ETPC Pilots	NULL	NULL	NULL	$ -	$ -	$ 1,455	$ -	$ -	$ 4,745	$ 6,200	$ 6,200	$ (0)	0.0%	**$ 4,745**	**$ 4,745**			
SDGE3243	SW-Lighting-Lighting Innovation-ETPC Advanced LED	NULL	NULL	NULL	$ -	$ -	$ 16,697	$ -	$ 2,766	$ 53,376	$ 72,840	$ 72,840	$ (0)	0.0%	**$ 56,143**	**$ 56,143**			
SDGE3245	SW-Lighting-Primary Lighting	NULL	NULL	NULL	$ 2,864,035	$ 2,864,035	$ 219,758	$ -	$ 36,215	$ 274,344	$ 3,394,353	$ 3,394,353	$ 0	0.0%	**$ 3,174,595**	**$ 3,174,595**			
SDGE3262	SW-FIN-On-Bill Finance	NULL	NULL	NULL	$ -	$ -	$ 35,157	$ -	$ 602	$ 182,934	$ 218,693	$ 218,693	$ (0)	0.0%	**$ 183,536**	**$ 183,536**			
SDGE3263	SW-FIN-ARRA Originated Financing	NULL	NULL	NULL	$ -	$ -	$ 29,962	$ -	$ -	$ 445,061	$ 475,023	$ 475,023	$ (0)	0.0%	**$ 445,061**	**$ 445,061**			
SDGE3264	SW-FIN-New Finance Offerings	NULL	NULL	NULL	$ -	$ -	$ 32,894	$ -	$ -	$ 152,374	$ 185,269	$ 185,269	$ 0	0.0%	**$ 152,374**	**$ 152,375**			
SDGE3266	LInstP-CA Department of Corrections Partnership	NULL	NULL	NULL	$ -	$ -	$ 20,355	$ 2,250	$ 1,168	$ 44,687	$ 68,460	$ 68,460	$ 0	0.0%	**$ 45,855**	**$ 45,855**			
SDGE3267	LInstP-California Community College Partnership	NULL	NULL	NULL	$ -	$ -	$ 50,104	$ 22,853	$ (53,856)	$ 133,028	$ 152,129	$ 152,129	$ 0	0.0%	**$ 79,171**	**$ 79,172**			
SDGE3268	LInstP-UC/CSU/IOU Partnership	NULL	NULL	NULL	$ -	$ -	$ 145,799	$ -	$ 12,349	$ 177,238	$ 335,385	$ 335,385	$ (0)	0.0%	**$ 189,587**	**$ 189,586**			
SDGE3269	LInstP-State of California /IOU	NULL	NULL	NULL	$ -	$ -	$ 19,838	$ -	$ 1,172	$ 42,044	$ 63,054	$ 63,054	$ (0)	0.0%	**$ 43,216**	**$ 43,216**			
SDGE3270	LInstP-University of San Diego Partnership	NULL	NULL	NULL	$ -	$ -	$ 21,789	$ -	$ 43,347	$ 101,946	$ 167,082	$ 167,082	$ 0	0.0%	**$ 145,293**	**$ 145,293**			
SDGE3271	LInstP-San Diego County Water Authority Partnership	NULL	NULL	NULL	$ -	$ -	$ 19,616	$ 1,440	$ 5,671	$ 64,098	$ 90,826	$ 90,826	$ 0	0.0%	**$ 69,770**	**$ 69,770**			
SDGE3272	LGP- City of Chula Vista Partnership	NULL	NULL	NULL	$ -	$ -	$ 212,614	$ -	$ 64,020	$ 1,005,826	$ 1,282,459	$ 1,282,459	$ 0	0.0%	**$ 1,069,845**	**$ 1,069,845**			

SDGE3273	LGP- City of San Diego Partnership	NULL	NULL	NULL	$ -	$ -	$ 117,888	$ 94,930	$ 153,803	$ 737,442	$ 1,104,063	$ 1,104,063	$ 0	0.0%	**$ 891,245**	**$ 891,245**			
SDGE3274	LGP- County of San Diego Partnership	NULL	NULL	NULL	$ -	$ -	$ 84,649	$ 14,856	$ 44,577	$ 626,095	$ 770,177	$ 770,177	$ 0	0.0%	**$ 670,672**	**$ 670,672**			
SDGE3275	LGP- Port of San Diego Partnership	NULL	NULL	NULL	$ -	$ -	$ 86,294	$ -	$ 28,559	$ 584,425	$ 699,278	$ 699,278	$ (0)	0.0%	**$ 612,985**	**$ 612,984**			
SDGE3276	LGP- SANDAG Partnership	NULL	NULL	NULL	$ -	$ -	$ 91,917	$ 12,801	$ 12,129	$ 529,177	$ 646,024	$ 646,024	$ 0	0.0%	**$ 541,306**	**$ 541,306**			

							ProgramCostTable				Quarterly Report	Monthly Report			Quaterly Report	Monthly Report			
ProgramID	ProgramName	Savings FirstYear Gross kW	Savings FirstYear Grosskwh	Savings FirstYear Gross Therms	incentive 13/14 only	total incentive	AdminCosts Overhead And GA	AdminCosts Other	Marketing Outreach	Direct Implementation Activity	Total Expenditures	Total Expenditures	Difference (Monthly-Quarterly)	Percent Difference	Total minus admin	Total minus admin	Resource Total	Non-resource Total	C&S Total
SDGE3277	LGP- SEEC Partnership	NULL	NULL	NULL	$ -	$ -	$ 25,882	$ -	$ 7,761	$ 159,775	$ 193,419	$ 193,419	$ 0	0.0%	**$ 167,536**	**$ 167,537**			
SDGE3278	LGP- Emerging Cities Partnership	NULL	NULL	NULL	$ -	$ -	$ 14,869	$ -	$ 3,564	$ 70,351	$ 88,784	$ 88,784	$ (0)	0.0%	**$ 73,915**	**$ 73,915**			
SDGE3279	3P-Res-Comprehensive Manufactured-Mobile Home	NULL	NULL	NULL	$ 1,817,767	$ 1,817,767	$ 14,503	$ 170,360	$ 129,094	$ 336,705	$ 2,468,429	$ 2,468,429	$ 0	0.0%	**$ 2,283,565**	**$ 2,283,566**			
SDGE3280	3P-IDEA	NULL	NULL	NULL	$ -	$ -	$ 6,556	$ -	$ -	$ -	$ 6,556	$ 6,556	$ 0	0.0%	**$ -**	**$ 0**			
SDGE3291	SW-Ind-Customer Services-Pump Test Services	NULL	NULL	NULL	$ -	$ -	$ 5,419	$ 8,550	$ 14,260	$ 87,329	$ 115,557	$ 115,557	$ 0	0.0%	**$ 101,588**	**$ 101,588**			
SDGE3292	SW-Com-Customer Services-Pump Test Services	NULL	NULL	NULL	$ -	$ -	$ 4,464	$ 3,250	$ 5,025	$ 31,670	$ 44,409	$ 44,409	$ 0	0.0%	**$ 36,695**	**$ 36,695**			
SDGE3293	SW-CALS – Residential HVAC-HVAC Core	NULL	NULL	NULL	$ -	$ -	$ 10,300	$ -	$ -	$ 19,770	$ 30,070	$ 30,070	$ (0)	0.0%	**$ 19,770**	**$ 19,770**			
SDGE3246	SW-ET-Technology Introduction Support	NULL	NULL	NULL	$ -	$ -	$ 12,579	$ -	$ -	$ 58,843	$ 71,422	$ 71,422	$ 0	0.0%	**$ 58,843**	**$ 58,843**			
SDGE3247	SW-ET-Technology Assessment Support	NULL	NULL	NULL	$ -	$ -	$ 37,512	$ -	$ -	$ 320,673	$ 358,185	$ 358,185	$ (0)	0.0%	**$ 320,673**	**$ 320,673**			
SDGE3248	SW-ET-Technology Deployment Support	NULL	NULL	NULL	$ -	$ -	$ 45,210	$ -	$ 21,329	$ 160,136	$ 226,674	$ 226,674	$ (0)	0.0%	**$ 181,464**	**$ 181,464**			
SDGE3254	SW-WE&T-Centergies	NULL	NULL	NULL	$ -	$ -	$ 536,415	$ -	$ 234,371	$ 2,038,759	$ 2,809,546	$ 2,809,546	$ 0	0.0%	**$ 2,273,131**	**$ 2,273,131**			
SDGE3255	SW-WE&T-Connections	NULL	NULL	NULL	$ -	$ -	$ 65,968	$ -	$ 8,839	$ 423,056	$ 497,862	$ 497,862	$ (0)	0.0%	**$ 431,894**	**$ 431,894**			
SDGE3256	SW-WE&T-Connections K-12	NULL	NULL	NULL	$ -	$ -	$ 464	$ (18,741)	$ 1,530	$ 232,567	$ 215,819	$ 215,819	$ (0)	0.0%	**$ 234,096**	**$ 234,096**			
SDGE3257	SW-WE&T-Strategic Planning	NULL	NULL	NULL	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	#DIV/0!	**$ -**	**$ -**			
SDGE3259	SW-ME&O (4)	NULL	NULL	NULL	$ -	$ -	$ 1,655	$ -	$ 1,439,988	$ -	$ 1,441,643	$ 1,441,643	$ (0)	0.0%	**$ 1,439,988**	**$ 1,439,988**			
SDGE3260	Local-IDSM-ME&O-Local Marketing (EE)	NULL	NULL	NULL	$ -	$ -	$ 329,008	$ -	$ 303,268	$ 73,771	$ 706,047	$ 706,048	$ 1	0.0%	**$ 377,039**	**$ 377,040**			
SDGE3261	Local-IDSM-ME&O-Behavioral Programs (EE)	NULL	NULL	NULL	$ -	$ -	$ 48,547	$ -	$ -	$ 657,463	$ 706,010	$ 706,010	$ 0	0.0%	**$ 657,463**	**$ 657,463**			
SDGE3282	SW-IDSM-IDSM	NULL	NULL	NULL	$ -	$ -	$ 214,321	$ -	$ -	$ 52,947	$ 267,268	$ 267,268	$ 0	0.0%	**$ 52,947**	**$ 52,947**			
SDGE3288	CRM	NULL	NULL	NULL	$ -	$ -	$ 1,613,270	$ -	$ -	$ -	$ 1,613,270	$ 1,613,270	$ 0	0.0%	**$ -**	**$ 0**			
SDGE3249	SW C&S - Building Codes & Compliance Advocacy	NULL	NULL	NULL	$ -	$ -	$ 10,280	$ -	$ -	$ 88,002	$ 98,282	$ 98,282	$ (0)	0.0%	**$ 88,002**	**$ 88,002**			
SDGE3250	SW C&S - Appliance Standards Advocacy	NULL	NULL	NULL	$ -	$ -	$ 12,080	$ -	$ -	$ 103,612	$ 115,692	$ 115,692	$ 0	0.0%	**$ 103,612**	**$ 103,612**			
SDGE3251	SW C&S - Compliance Enhancement	NULL	NULL	NULL	$ -	$ -	$ 11,043	$ -	$ 263	$ 61,379	$ 72,685	$ 72,685	$ -	0.0%	**$ 61,642**	**$ 61,642**			
SDGE3252	SW C&S - Reach Codes	NULL	NULL	NULL	$ -	$ -	$ 4,487	$ -	$ -	$ 10,791	$ 15,278	$ 15,278	$ (0)	0.0%	**$ 10,791**	**$ 10,791**			
SDGE3253	SW C&S - Planning Coordination	NULL	NULL	NULL	$ -	$ -	$ 5,754	$ -	$ -	$ 12,199	$ 17,952	$ 17,952	$ (0)	0.0%	**$ 12,199**	**$ 12,198**			

							ProgramCostTable				Quarterly Report	Monthly Report			Quaterly Report	Monthly Report			
ProgramID	ProgramName	Savings FirstYear GrosskW	Savings FirstYear GrosskWh	Savings FirstYear GrossTherms	incentive 13/14 only	total incentive	AdminCosts Overhead And GA	AdminCosts Other	Marketing Outreach	Direct Implementation Activity	Total Expenditures	Total Expenditures	Difference (Monthly-Quarterly)	Percent Difference	Total minus admin	Total minus admin	Resource Total	Non-resource Total	C&S Total
SCG3702	SW-CALS-Plug Load and	NULL	NULL	NULL	$ 3,421,729	$ 3,421,729	$ 466,146	$ -	$ 732,842	$ (254,687)	$ 4,366,030	$ 4,366,030	$ 0	0.0%	$ 3,899,884	$ 3,899,885	$ 46,449,085	$ 3,678,072	$ 208,021
SCG3703	SW-CALS-Plug Load and Appliances - POS	NULL	NULL	NULL	$ 1,822,687	$ 1,822,687	$ 171,362	$ -	$ 936	$ (210,068)	$ 1,784,916	$ 2,011,656	$ 226,740	11.3%	$ 1,613,555	$ 1,840,295			
SCG3704	SW-CALS-MFEER	NULL	NULL	NULL	$ 319,007	$ 319,007	$ 126,076	$ -	$ 64,885	$ 380,709	$ 890,676	$ 891,076	$ 400	0.0%	$ 764,601	$ 765,001			
SCG3705	SW-CALS-EUC	-	1,839	19,323	$ 787,525	$ 787,525	$ 372,219	$ -	$ 347,863	$ 3,002,897	$ 4,510,504	$ 3,926,629	$ (583,875)	-14.9%	$ 4,138,285	$ 3,554,410			
SCG3706	SW-CALS-Residential HVAC	NULL	NULL	NULL	$ -	$ -	$ 4,303	$ -	$ 2,016	$ 14,390	$ 20,709	$ 20,709	$ 0	0.0%	$ 16,406	$ 16,406			
SCG3710	SW-COM-Calculated Incentives	-	-	1,378,765	$ 487,280	$ 1,145,160	$ 145,563	$ -	$ 80,036	$ 618,217	$ 1,988,976	$ 1,331,096	$ (0)	0.0%	$ 1,843,413	$ 1,185,533			
SCG3711	SW-COM-Deemed Incentives	NULL	NULL	NULL	$ 876,787	$ 876,787	$ 598,958	$ -	$ 537,128	$ 1,821,085	$ 3,833,957	$ 3,833,758	$ (199)	0.0%	$ 3,234,999	$ 3,234,800			
SCG3707	SW-CALS-RNC	1,559	1,631,015	244,722	$ 204,147	$ 2,456,331	$ 251,987	$ -	$ 85,503	$ 1,084,565	$ 3,878,386	$ 1,626,202	$ (0)	0.0%	$ 3,626,399	$ 1,374,215			
SCG3715	SW-IND-Calculated Incentives	-	-	12,515,931	$ 3,166,166	$ 6,053,237	$ 796,886	$ -	$ 179,070	$ 2,473,043	$ 9,502,235	$ 6,459,487	$ (155,677)	-2.4%	$ 8,705,350	$ 5,662,601			
SCG3716	SW-IND-Deemed Incentives	NULL	NULL	NULL	$ 166,681	$ 166,681	$ 161,936	$ -	$ 200,041	$ 477,998	$ 1,006,656	$ 1,006,656	$ (0)	0.0%	$ 844,719	$ 844,719			
SCG3719	SW-AG-Calculated Incentives	-	-	357,240	$ 304,488	$ 304,488	$ 88,057	$ -	$ 10,392	$ 333,058	$ 735,994	$ 717,328	$ (18,666)	-2.6%	$ 647,937	$ 629,271			
SCG3720	SW-AG-Deemed Incentives	NULL	NULL	NULL	$ 103,559	$ 103,559	$ 56,868	$ -	$ 16,279	$ 190,308	$ 367,014	$ 367,014	$ 0	0.0%	$ 310,146	$ 310,146			
SCG3701	SW-CALS-Energy Advisor	NULL	NULL	NULL	$ -	$ -	$ 19,314	$ -	$ 8,872	$ 138,449	$ 166,635	$ 166,635	$ 0	0.0%	$ 147,322	$ 147,322			
SCG3708	SW-COM-Energy Advisor	NULL	NULL	NULL	$ -	$ -	$ 29,488	$ -	$ 220	$ 189,046	$ 218,754	$ 218,754	$ 0	0.0%	$ 189,266	$ 189,266			
SCG3709	SW-COM-CEI	NULL	NULL	NULL	$ -	$ -	$ 3,195	$ -	$ 950	$ 18,586	$ 22,731	$ 22,731	$ (0)	0.0%	$ 19,536	$ 19,536			
SCG3712	SW-COM-NonRes HVAC	NULL	NULL	NULL	$ -	$ -	$ 2,606	$ -	$ -	$ 22,184	$ 24,790	$ 24,790	$ 0	0.0%	$ 22,184	$ 22,184			
SCG3713	SW-IND-Energy Advisor	NULL	NULL	NULL	$ -	$ -	$ 90,520	$ -	$ -	$ 551,970	$ 642,490	$ 642,490	$ 0	0.0%	$ 551,970	$ 551,970			
SCG3714	SW-IND-CEI	NULL	NULL	NULL	$ -	$ -	$ 4,316	$ -	$ 896	$ 22,795	$ 28,007	$ 28,007	$ (0)	0.0%	$ 23,691	$ 23,691			
SCG3717	SW-AG-Energy Advisor	NULL	NULL	NULL	$ -	$ -	$ 3,324	$ -	$ -	$ 20,203	$ 23,527	$ 23,527	$ (0)	0.0%	$ 20,203	$ 20,203			
SCG3718	SW-AG-CEI	NULL	NULL	NULL	$ -	$ -	$ 954	$ -	$ 20	$ 5,742	$ 6,716	$ 6,716	$ (0)	0.0%	$ 5,762	$ 5,762			
SCG3735	SW-FIN-On-Bill Financing	NULL	NULL	NULL	$ -	$ -	$ 63,712	$ -	$ 39,676	$ 275,179	$ 378,567	$ 378,567	$ 0	0.0%	$ 314,855	$ 314,855			
SCG3736	SW-FIN-ARRA-Originated	NULL	NULL	NULL	$ -	$ -	$ 101,332	$ -	$ 203,132	$ 62,271	$ 366,735	$ 366,735	$ 0	0.0%	$ 265,403	$ 265,403			
SCG3737	SW-FIN-New Financing	NULL	NULL	NULL	$ -	$ -	$ 20,883	$ -	$ 3,607	$ 183,550	$ 208,039	$ 208,039	$ (0)	0.0%	$ 187,156	$ 187,156			
SCG3738	LInstP-CA Department of Corrections Partnership	NULL	NULL	NULL	$ -	$ -	$ 38,793	$ -	$ 2,666	$ 24,554	$ 66,013	$ 66,013	$ (0)	0.0%	$ 27,220	$ 27,220			
SCG3739	LInstP-California Community College Partnership	NULL	NULL	NULL	$ -	$ -	$ 56,244	$ -	$ 13,414	$ 183,365	$ 253,023	$ 253,023	$ 0	0.0%	$ 196,779	$ 196,779			
SCG3740	LInstP-UC/CSU/IOU Partnership	NULL	NULL	NULL	$ -	$ -	$ 119,171	$ -	$ 12,700	$ 162,912	$ 294,783	$ 294,783	$ 0	0.0%	$ 175,612	$ 175,612			
SCG3741	LInstP-State of CA/IOU	NULL	NULL	NULL	$ -	$ -	$ 28,528	$ -	$ 2,752	$ 30,029	$ 61,309	$ 61,309	$ 0	0.0%	$ 32,781	$ 32,781			
SCG3742	LGP-LA Co Partnership	NULL	NULL	NULL	$ -	$ -	$ 24,410	$ -	$ 11,358	$ 22,821	$ 58,589	$ 58,589	$ (0)	0.0%	$ 34,179	$ 34,179			
SCG3743	LGP-Kern Co Partnership	NULL	NULL	NULL	$ -	$ -	$ 24,379	$ -	$ 11,376	$ 41,110	$ 76,865	$ 76,865	$ 0	0.0%	$ 52,486	$ 52,486			
SCG3744	LGP-Riverside Co Partnership	NULL	NULL	NULL	$ -	$ -	$ 18,926	$ -	$ 3,621	$ 27,754	$ 50,302	$ 50,302	$ 0	0.0%	$ 31,376	$ 31,376			
SCG3745	LGP-San Bernardino Co	NULL	NULL	NULL	$ -	$ -	$ 31,531	$ -	$ 3,629	$ 58,937	$ 94,097	$ 94,097	$ 0	0.0%	$ 62,566	$ 62,566			
SCG3746	LGP-Santa Barbara Co	NULL	NULL	NULL	$ -	$ -	$ 32,474	$ -	$ 21,222	$ 29,147	$ 82,843	$ 82,843	$ 0	0.0%	$ 50,368	$ 50,368			
SCG3747	LGP-South Bay Cities Partnership	NULL	NULL	NULL	$ -	$ -	$ 45,156	$ -	$ 29,288	$ 65,707	$ 140,151	$ 140,151	$ (0)	0.0%	$ 94,995	$ 94,995			
SCG3748	LGP-San Luis Obispo Co Partnership	NULL	NULL	NULL	$ -	$ -	$ 32,123	$ -	$ 21,356	$ 45,572	$ 99,051	$ 99,051	$ 0	0.0%	$ 66,928	$ 66,928			
SCG3749	LGP-San Joaquin Valley Partnership	NULL	NULL	NULL	$ -	$ -	$ 20,672	$ -	$ 7,693	$ 32,256	$ 60,622	$ 60,622	$ (0)	0.0%	$ 39,950	$ 39,950			
SCG3750	LGP-Orange Co Partnership	NULL	NULL	NULL	$ -	$ -	$ 22,317	$ -	$ 14,154	$ 19,587	$ 56,059	$ 56,059	$ 0	0.0%	$ 33,741	$ 33,741			
SCG3751	LGP-SEEC Partnership	NULL	NULL	NULL	$ -	$ -	$ 8,766	$ -	$ 2,188	$ 66,577	$ 77,532	$ 77,532	$ 0	0.0%	$ 68,766	$ 68,766			
SCG3752	LGP-Community Energy Partnership	NULL	NULL	NULL	$ -	$ -	$ 31,339	$ -	$ 11,873	$ 65,853	$ 109,065	$ 109,065	$ 0	0.0%	$ 77,725	$ 77,725			

SCG3753	LGP-Desert Cities Partnership	NULL	NULL	NULL	$ -	$ -	$ 4,572	$ -	$ 202	$ 3,535	$ 8,309	$ 8,309	$ (0)	0.0%	**$ 3,737**	**$ 3,737**			
SCG3754	LGP-Ventura County Partnership	NULL	NULL	NULL	$ -	$ -	$ 32,848	$ -	$ 9,094	$ 35,814	$ 77,756	$ 77,756	$ 0	0.0%	**$ 44,909**	**$ 44,909**			
SCG3755	LGP-Local Government Energy Efficiency Pilots	NULL	NULL	NULL	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	#DIV/0!	**$ -**	**$ -**			

							ProgramCostTable				Quarterly Report	Monthly Report			Quaterly Report	Monthly Report			
ProgramID	ProgramName	Savings FirstYear Gross kW	Savings FirstYear Gross kWh	Savings FirstYear Gross Therms	incentive 13/14 only	total incentive	AdminCosts Overhead And GA	AdminCosts Other	Marketing Outreach	Direct Implementation Activity	Total Expenditures	Total Expenditures	Difference (Monthly-Quarterly)	Percent Difference	Total minus admin	Total minus admin	Resource Total	Non-resource Total	C&S Total
SCG3756	3P-Energy Challenger	NULL	NULL	NULL	$ -	$ -	$ 10,404	$ -	$ 1,925	$ 70,183	$ 82,512	$ 82,512	$ -	0.0%	**$ 72,108**	**$ 72,108**			
SCG3757	3P-Small Industrial Facility Upgrades	-	-	204,429	$ 26,477	$ 174,870	$ 45,388	$ -	$ 10,400	$ 262,776	$ 493,433	$ 318,563	$ (26,477)	-8.3%	**$ 448,045**	**$ 273,175**			
SCG3758	3P-PREPS	NULL	NULL	NULL	$ 143,862	$ 145,752	$ 43,502	$ -	$ 48,094	$ 224,981	$ 462,330	$ 460,440	$ 1	0.0%	**$ 418,827**	**$ 416,938**			
SCG3759	3P-On Demand Efficiency	NULL	NULL	NULL	$ 1,675,586	$ 1,675,586	$ 109,220	$ -	$ 50,848	$ 879,424	$ 2,715,078	$ 2,558,278	$ (156,800)	-6.1%	**$ 2,605,858**	**$ 2,449,058**			
SCG3760	3P-HERS Rater Training Advancement	NULL	NULL	NULL	$ -	$ -	$ 32,221	$ -	$ 16,862	$ 473,396	$ 522,479	$ 522,479	$ -	0.0%	**$ 490,258**	**$ 490,258**			
SCG3761	3P-MF Home Tune-Up	NULL	NULL	NULL	$ 887,405	$ 887,405	$ 130,883	$ -	$ 10,429	$ 646,954	$ 1,675,671	$ 1,659,103	$ (16,568)	-1.0%	**$ 1,544,788**	**$ 1,528,220**			
SCG3762	3P-CLEO	NULL	NULL	NULL	$ -	$ -	$ 27,421	$ -	$ 15,969	$ 220,432	$ 263,822	$ 263,822	$ -	0.0%	**$ 236,401**	**$ 236,401**			
SCG3763	3P-MF Direct Therm Savings	NULL	NULL	NULL	$ 1,570,655	$ 1,570,655	$ 201,438	$ -	$ 95,949	$ 85,207	$ 1,953,249	$ 1,941,077	$ (12,172)	-0.6%	**$ 1,751,811**	**$ 1,739,639**			
SCG3764	3P-LivingWise	NULL	NULL	NULL	$ 279,696	$ 279,696	$ 80,377	$ -	$ 42,868	$ 606,575	$ 1,009,516	$ 1,009,516	$ -	0.0%	**$ 929,139**	**$ 929,139**			
SCG3765	3P-Manufactured Mobile Home	NULL	NULL	NULL	$ 2,436,425	$ 2,436,425	$ 216,336	$ -	$ 118,058	$ 706,940	$ 3,477,759	$ 3,022,875	$ (454,884)	-15.0%	**$ 3,261,423**	**$ 2,806,540**			
SCG3766	3P-SaveGas	NULL	NULL	NULL	$ 16,159	$ 16,159	$ 78,340	$ -	$ 46,492	$ 159,605	$ 300,596	$ 300,596	$ -	0.0%	**$ 222,257**	**$ 222,257**			
SCG3768	3P-CA Sustainability Alliance	NULL	NULL	NULL	$ -	$ -	$ 50,231	$ -	$ 57,640	$ 432,845	$ 540,716	$ 540,716	$ -	0.0%	**$ 490,485**	**$ 490,485**			
SCG3769	3P-PoF	NULL	NULL	NULL	$ -	$ -	$ 42,259	$ -	$ 5,152	$ 443,803	$ 491,214	$ 491,214	$ -	0.0%	**$ 448,954**	**$ 448,954**			
SCG3770	3P-PACE	NULL	NULL	NULL	$ -	$ -	$ 57,543	$ -	$ 40,442	$ 678,403	$ 776,388	$ 776,388	$ -	0.0%	**$ 718,845**	**$ 718,845**			
SCG3771	3P-Innovative Designs for Energy Efficiency Activities (IDEEA365)	NULL	NULL	NULL	$ -	$ -	$ 40,374	$ -	$ -	$ 76,255	$ 116,630	$ 116,630	$ -	0.0%	**$ 76,255**	**$ 76,255**			
SCG3773	LGP-New Partnership Programs	NULL	NULL	NULL	$ -	$ -	$ 56,374	$ -	$ 7,793	$ 36,928	$ 101,095	$ 101,095	$ (0)	0.0%	**$ 44,721**	**$ 44,721**			
SCG3774	LGP-LG Regional Resource Placeholder	NULL	NULL	NULL	$ -	$ -	$ 107,697	$ -	$ 249	$ 97,661	$ 205,607	$ 205,607	$ 0	0.0%	**$ 97,910**	**$ 97,910**			
SCG3776	LGP-Gateway Cities Partnership	NULL	NULL	NULL	$ -	$ -	$ 7,769	$ -	$ 2,491	$ 6,610	$ 16,869	$ 16,869	$ (0)	0.0%	**$ 9,101**	**$ 9,101**			
SCG3777	LGP-San Gabriel Valley COG Partnership	NULL	NULL	NULL	$ -	$ -	$ 12,720	$ -	$ 7,226	$ 13,827	$ 33,773	$ 33,773	$ 0	0.0%	**$ 21,053**	**$ 21,053**			
SCG3778	LGP-City of Santa Ana Partnership	NULL	NULL	NULL	$ -	$ -	$ 7,325	$ -	$ 2,364	$ 8,572	$ 18,261	$ 18,261	$ (0)	0.0%	**$ 10,936**	**$ 10,936**			
SCG3779	LGP-West Side Cities Partnership	NULL	NULL	NULL	$ -	$ -	$ 16	$ -	$ -	$ 155	$ 171	$ 171	$ 0	0.0%	**$ 155**	**$ 155**			
SCG3780	LGP-City of Simi Valley Partnership	NULL	NULL	NULL	$ -	$ -	$ 6,099	$ -	$ 9,418	$ 4,967	$ 20,484	$ 20,484	$ (0)	0.0%	**$ 14,385**	**$ 14,385**			
SCG3781	LGP-City of Redlands Pilots	NULL	NULL	NULL	$ -	$ -	$ 6,418	$ -	$ 3,227	$ 11,667	$ 21,311	$ 21,311	$ (0)	0.0%	**$ 14,893**	**$ 14,893**			
SCG3782	LGP-City of Beaumont Programs	NULL	NULL	NULL	$ -	$ -	$ 6,579	$ -	$ 3,773	$ 11,372	$ 21,725	$ 21,725	$ 0	0.0%	**$ 15,146**	**$ 15,146**			
SCG3783	LGP-Western Riverside Energy Partnership	NULL	NULL	NULL	$ -	$ -	$ 8,731	$ -	$ 2,425	$ 15,742	$ 26,898	$ 26,898	$ 0	0.0%	**$ 18,167**	**$ 18,167**			
SCG3734	SW-IDSM-IDSM	NULL	NULL	NULL	$ -	$ -	$ 53,841	$ -	$ 16,353	$ 157,783	$ 227,976	$ 227,976	$ 0	0.0%	**$ 174,136**	**$ 174,136**			
SCG3721	SW-ET-Technology Development Support	NULL	NULL	NULL	$ -	$ -	$ 15,094	$ -	$ -	$ 135,554	$ 150,648	$ 150,648	$ (0)	0.0%	**$ 135,554**	**$ 135,554**			
SCG3722	SW-ET-Technology Assessment Support	NULL	NULL	NULL	$ -	$ -	$ 224,684	$ -	$ 74	$ 730,658	$ 955,416	$ 955,416	$ (0)	0.0%	**$ 730,732**	**$ 730,732**			

SCG3723	SW-ET-Technology Introduction Support	NULL	NULL	NULL	$ -	$ -	$ 31,707	$ -	$ 1,823	$ 189,021	$ 222,551	$ 222,551	$ 0	0.0%	**$ 190,843**	**$ 190,843**			
SCG3729	SW-WE&T-Centergies	NULL	NULL	NULL	$ -	$ -	$ 293,502	$ -	$ 154,416	$ 1,971,651	$ 2,419,570	$ 2,419,570	$ 0	0.0%	**$ 2,126,067**	**$ 2,126,067**			
SCG3730	SW-WE&T-Connections	NULL	NULL	NULL	$ -	$ -	$ 28,467	$ -	$ -	$ 301,128	$ 329,595	$ 329,595	$ (0)	0.0%	**$ 301,128**	**$ 301,128**			
SCG3731	SW-WE&T-Strategic Planning	NULL	NULL	NULL	$ -	$ -	$ 1,789	$ -	$ -	$ 10,110	$ 11,899	$ 11,899	$ (0)	0.0%	**$ 10,110**	**$ 10,110**			

							ProgramCostTable				Quarterly Report	Monthly Report			Quaterly Report	Monthly Report			
ProgramID	ProgramName	Savings FirstYear GrosskW	Savings FirstYear GrosskWh	Savings FirstYear GrossTherms	incentive 13/14 only	totalincentive	AdminCosts Overhead And GA	AdminCosts Other	Marketing Outreach	Direct Implementation Activity	Total Expenditures	Total Expenditures	Difference (Monthly-Quarterly)	Percent Difference	**Totalminusadmin**	**Totalminusadmin**	**Resource Total**	**Non-resource Total**	**C&S Total**
SCG3775	CRM	NULL	NULL	NULL	$ -	$ -	$ 1,436,972	$ -	$ -	$ 9,502	$ 1,446,475	$ 1,446,475	$ 0	0.0%	**$ 9,502**	**$ 9,502**			
SCG3724	SWC&S-Building Codes & Compliance Advocacy	NULL	NULL	NULL	$ -	$ -	$ 9,785	$ -	$ 13	$ 86,986	$ 96,783	$ 96,783	$ (0)	0.0%	**$ 86,999**	**$ 86,999**			
SCG3725	SWC&S-Appliance Standards Advocacy	NULL	NULL	NULL	$ -	$ -	$ 5,113	$ -	$ -	$ 35,289	$ 40,402	$ 40,402	$ 0	0.0%	**$ 35,289**	**$ 35,289**			
SCG3726	SWC&S-Compliance Enhancement	NULL	NULL	NULL	$ -	$ -	$ 7,799	$ -	$ -	$ 47,648	$ 55,447	$ 55,447	$ 0	0.0%	**$ 47,648**	**$ 47,648**			
SCG3727	SWC&S-Reach Codes	NULL	NULL	NULL	$ -	$ -	$ 2,684	$ -	$ -	$ 15,865	$ 18,549	$ 18,549	$ 0	0.0%	**$ 15,865**	**$ 15,865**			
SCG3728	SWC&S-Planning Coordination	NULL	NULL	NULL	$ -	$ -	$ 3,556	$ -	$ -	$ 22,221	$ 25,777	$ 25,777	$ (0)	0.0%	**$ 22,221**	**$ 22,221**			
SCG3733	SW-ME&O-ME&O	NULL	NULL	NULL	$ -	$ -	$ 20,096	$ -	$ 188,528	$ 64,495	$ 273,119	$ 273,119	$ -	0.0%	**$ 253,023**	**$ 253,023**			

ATTACHMENT 3: 2013 DEEMED EX ANTE SAVINGS

Attachment 3 to this Resolution is a series of summary tables of the 2013 deemed ex ante savings. The summary tables were created from the utility-filed quarterly report that were rolled up into a summary table that retain measure-specific information by summing parameters of the records for each program administrator. Specifically, the records were rolled up based on: program administrator, portfolio subprogram, measure name, type of measure (normal replacement, early retirement, etc.), sector (residential, commercial, etc.), measure full life and replaced equipment remaining life, net-to-gross, installation rate, custom measure realization rate, and a flag indicating if the record is for a deemed savings or custom savings calculation measure.

The summary tables are available at:
ftp://deeresources.com/ESPI/2013_ESPI_ExAnteSavingsIncentiveCalculation_2014-11-12.xlsx

The review targeted the following issues:

1. Removal of all Uncertain Measures from this advice letter filing,
2. Proper application of installation rates,
3. Consideration of market effects, and
4. Proper application of the Hard-to-Reach and Emerging Technology net-to-gross (NTG) values.

Staff classifies the erroneous and inappropriate assignments of NTG into five categories as described below.

- <u>Possible error in NTG assignment:</u> Some measures appear to have incorrect NTG assignments. For example, several non-lighting measures appear to be assigned NTG values that are only applicable for lighting measures for direct install to hard-to-reach customers (0.89 for T8 linear fluorescent and 0.8 for commercial CFLs).
- <u>Use of upstream NTG values:</u> Some NTG assignments appear to be values that can only represent upstream incentive delivery mechanisms (such as

the commercial package HVAC), but the program and measure information do not clearly indicate these are upstream programs.

- Use of direct install to hard-to-reach customer default: It appears that all utilities are assigning NTG values from the category of "direct install to hard-to-reach customers" for local government and third-party programs. *This NTG designation is NOT for activities that are either direct install OR to hard-to-reach customer, but instead they are only for direct install activities into hard-to-reach customer facilities/homes*.

  Specific criteria were developed by staff to be used in classifying a customer as hard-to-reach. Two criteria are considered sufficient if one of the criteria met is the geographic criteria defined below. There are common as well as separate criteria when defining hard-to-reach for residential versus small business customers. The barriers common to both include:

  - Those customers who do not have easy access to program information or generally do not participate in energy efficiency programs due to a combination of language, business size, geographic, and lease (split incentive) barriers. These barriers to consider include:
    - Language – Primary language spoken is other than English, and/or
    - Geographic – Businesses or homes in areas other than the United States Office of Management and Budget Combined Statistical Areas of the San Francisco Bay Area, the Greater Los Angeles Area and the Greater Sacramento Area or the Office of Management and Budget metropolitan statistical areas of San Diego County.
  - For small business added criteria to the above to consider:
    - Business Size – Less than ten employees and/or classified as Very Small (Customers whose annual electric demand is less than 20kW, or whose annual gas consumption is less than 10,000 therm, or both) , and/or
    - Leased or Rented Facilities – Investments in improvements to a facility rented or leased by a participating business customer
  - For residential added criteria to the above to consider:

- Income – Those customers who qualify for the California Alternative Rates for Energy (CARE) or the Family Electric Rate Assistance Program (FERA), and/or
- Housing Type – Multi-family and Mobile Home Tenants (rent and lease)

In place of the direct install hard-to-reach NTG values (0.89 for T8 linear fluorescent, 0.80 for commercial CFL, and 0.85 for all other technologies) for measure installations at the facilities and homes of customers who do not meet the hard-to-reach minimum criteria, staff expects the use of more appropriate defaults, most commonly 0.55 to 0.70 for residential sectors and 0.60 to 0.70 for commercial, industrial and agricultural sectors.

- Use of Emerging Technology default: It appears that all program administrators are assigning the Emerging Technology default of 0.85 to all LED measures. It is not clear of the basis for this assignment. Since many LED measures appear in third party or local government partnership programs, these may also be assigned the hard-to-reach defaults as described above. As directed in D.12-05-015, program administrators must propose and request approval from staff for the use of the emerging technology default. Additionally, D.12-05-015 requires that, in order for the emerging technology default to be used, the measure inclusion into the portfolio must be directly attributable to the emerging technology program activity. Simply including the emerging technology NTG designation in a workpaper or other document, with no documentation to support the emerging technology program influence claim, is not sufficient.
- Use of NTG value that is not in DEER: Values that appear to be from earlier versions of DEER. For example, a number of upstream CFL claims identified with the 2010-2012 cycle have NTG values of 0.76 assigned instead of the DEER 2011 value of 0.53.

ATTACHMENT 4: 2013 AUDIT ENGAGEMENT LETTER FROM UAFCB TO IOUS

Please note that while the attachment is the letter specifically sent to SCE, all IOUs received the exact same letter with the same timeline and different points of contact.

STATE OF CALIFORNIA JERRY BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

August 27, 2014

Mr. Marc L. Ulrich, Ph.D.
Vice President of Customer Programs & Services
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, CA 91770

Dear Dr. Ulrich:

Re: Financial, Management, Regulatory, and Compliance Examination of Energy Efficiency (EE) Program of Southern California Edison Company (SCE)

Pursuant to Commission Ordering Paragraph 17 in Decision (D.) 13-09-023 at pages 97 and 98, the Utility Audit, Finance and Compliance Branch (UAFCB) of the Division of Water and Audits of the California Public Utilities Commission (CPUC) will conduct the above mentioned examination of ratepayers' funded EE programs of SCE for 2013-2014 budget cycle. The CPUC's Energy Division requested the UAFCB to conduct the examination. The examination will verify SCE's compliance with EE program requirements and directives as specified in CPUC's decisions, Program Manuals, pertinent Rulings and guidelines, including any necessary internal controls put in place by SCE to ensure full compliance.

The examination will also test or ascertain the use of EE program funds with specific focus on (1) Codes and Standards Costs; (2) Non-resource Program Costs; (3) Program Administrative Costs; (4) EE Programs Fund Shifting; (5) EE Program Balancing Accounts; (6) Plug Load and Appliances; (7) San Gabriel Valley Energy Leadership Partnership; (8) EE contracts; and (9) Other pertinent matters that may arise during the examination. The examination will include program structure, implementation and processes, accounting and reporting, and management oversight and any other related matters pertaining to SCE's compliance with CPUC decisions and directives. The objective of our examination is to express an opinion on whether SCE is in compliance with CPUC's requirements and directives in implementing, managing and controlling the EE funded programs by ratepayers.

The examination will be conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA) and accordingly, will include examining, on a test basis, evidence about SCE's compliance with the program requirements and directives and performing such other procedures as we consider necessary in the circumstances. Those standards also require obtaining a reasonable, rather than absolute, assurance about whether ratepayers funded program expenditures, accounting, reporting, and any other SCE reports submitted to the Commission are free of material misstatement, caused by error or fraud. Accordingly, an examination cannot be relied upon to identify all material errors or fraud or illegal acts that may exist. Also, an examination is not designed to detect an error that is immaterial to the subject under examination.

All information and reports provided to UAFCB staff are the responsibility of SCE's management. Management is also responsible for (1) complying with all CPUC directives, (2) establishing and maintaining effective internal control of the EE programs, (3) establishing systems and procedures for prevention and detection of misapplication of program funds, (4) identifying and ensuring that SCE complies with the laws and regulations applicable to its activities, (5) identifying any vendor relationships in which the vendor has responsibility for program compliance and for the accuracy and completeness of that information (6) ensuring that all vendors are in compliance with program requirements, and (7) making all program financial records and information requested available to UAFCB staff in a timely manner.

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At the conclusion of the engagement, SCE will provide to UAFCB staff a letter that confirms certain representations made during the examination, including that the effects of any uncorrected misstatements that the UAFCB brings to SCE's attention are immaterial to the EE program taken as a whole.

SCE will have the opportunity to comment on the draft memo report before it is finalized for publication and redact any non-public information.

The tentative schedule for the first phase of the 2013-2014 budget cycle examination is as follows:

Beginning field work	09/15/2014
Completion of Fieldwork	02/28/2014
Draft of audit memo to Management	04/30/2015
Expected Date of Publication	06/30/2015

The second phase of the examination will start after the first phase is completed and it will be for the 2014 program year.

In order for the examination to progress efficiently as expected by SCE, it is SCE's responsibility to provide any information in the format specified by staff within a reasonable time. The initial Master Data Request (MDR) is attached to seek pertinent information and to gain broader understanding of the energy efficiency programs administered by SCE. UAFCB requests that SCE provide responses to the MDR on or before September 11, 2014. Also, throughout the audit engagement, the auditors will send additional data requests as deemed necessary and will expect a response within a period not greater than ten business days.

Mr. Kevin Nakamura will be the Lead Auditor. Please contact Kevin or me if you have any questions. Kevin can be reached at (916) 928-4736 or via email at Kevin.Nakamura@cpuc.ca.gov.

SCE acknowledges that by receiving this letter it will do its utmost to cooperate and support the CPUC sponsored audit. The UAFCB staff looks forward to SCE's cooperation.

Very truly yours,

Kayode Kajopaiye, Chief
Utility Audit, Finance and Compliance Branch

Attachment: Master Data Request

cc: Rami Kahlon - CPUC, Division of Water and Audits Director
Bernard Ayanruoh, UAFCB, Program and Project Supervisor
Susan Reed, SCE, Regulatory Audits and Investigations
Pete Skala, CPUC, Energy Division Program Manager
Kevin Nakamura, CPUC, Analyst, EE Program Lead Auditor

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