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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Southern California Edison Company (U338E) for Approval of its 2009-2011 Energy Efficiency Program Plans And Associated Public Goods Charge (PGC) And Procurement Funding Requests.

Application 08-07-021
(Filed July 21, 2008)

Application of Southern California Gas Company (U904G) for Approval of Natural Gas energy Efficiency Programs and Budgets for Years 2009 through 2011.

Application 08-07-022
(Filed July 21, 2008)

Application of San Diego Gas & Electric Company (U902M) for Approval of Electric and Natural Gas Energy Efficiency Programs and Budgets for Years 2009 through 2011.

Application 08-07-023
(Filed July 21, 2008)

Application of Pacific Gas and Electric Company for Approval of the 2009-2011 Energy Efficiency Programs and Budget. (U39M).

Application 08-07-031
(Filed July 21, 2008)

**WOMEN'S ENERGY MATTERS
COMMENT ON PROPOSED DECISION**

September 14, 2009

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WOMEN'S ENERGY MATTERS COMMENT ON THE PROPOSED DECISION

Women's Energy Matters (WEM) appreciates this opportunity to comment on the August 25, 2009 Proposed Decision Approving 2010 to 2012 Energy Efficiency Portfolios and Budgets ("PD"). Because of time constraints and the urgent issues described herein, WEM's comments concentrate on PG&E's application, but many of our observations and recommendations are relevant to other utilities' applications as well. We reserve the right to file further supplements to these comments.

Introduction

The Proposed Decision demonstrates careful consideration of a great number of significant issues related to these multi-billion dollar portfolios. In the additional year we all waited while utilities produced three versions of their energy efficiency portfolios for the upcoming cycle, none fully compliant with the Commission's policies, the ALJ, Commissioner, staff and parties used the time fruitfully to develop ways EE programs can be improved, demonstrating that community collaboration can accomplish what investor-owned utility (IOU) administrators have failed to do.

The IOU applications remain problematic, but utilities have succeeded in "running the clock" so that the urgency to approve *something* has become very strong. The PD has made significant improvements, and in a normal time, it would be enough for this round. But this is not a normal time. These programs cannot be saved from PG&E's decision to use them as a major battleground in its war against California communities.

Until this summer, it seemed that PG&E's war might be contained within a few cities and counties — Marin, San Francisco, Oakland, Berkeley and the vicinity of the San Joaquin Valley Power Authority. But then PG&E funded a statewide ballot campaign in an attempt to deny choice of energy providers to all of California by requiring a 2/3 vote for communities that want to control their energy future.

WEM has documented PG&E's blatant misuse of EE funds in Marin, in comments in this proceeding and the related Risk/Reward proceeding (R0901019). We present further evidence of this misconduct herein.

Because of PG&E's involvement in the statewide ballot campaign, the company has powerful motives to extend its misuse of EE funds to any other jurisdiction in its territory. It may also enlist other utilities to do the same in their own service areas. Unfortunately, the CPUC's policies are not sufficient to prevent this from happening.

WEM and other parties have complained in our comments in this proceeding that many aspects of the portfolios already overstep civic boundaries and are inappropriate for utilities to control. For reasons similar to the issues in this case, the Commission took Strategic Planning in-house. After a year and a half of an IOU-led Strategic Planning process, instead of approving the utilities Strategic Plan applications, the Commission opened a new OIR and issued a decision within a few months, including a CPUC-authored Strategic Plan.

The Commission must find a similar emergency solution for the 2010-12 EE programs, and immediately remove IOU control of these funds.

In these comments, WEM shows that PG&E's is currently offering EE funds beginning in 2010 as part of a special "partnership" or "collaboration" with the City of Novato in Marin Co. — potentially including a new "Local Government Partnership" — in order to persuade that City Council to reject Community Choice.

These offers unmistakably demonstrate PG&E's intention to misuse energy efficiency (EE) funds for political purposes in the 2010-12 cycle. We show that such misuse has already occurred with 2006-08 and bridge funds, despite PG&E's explicit denial.

The company's misuse of funds encompass not just one or two programs, or components of programs such as Marketing, Education and Outreach, but its whole EE portfolio — because the promises are made in the marketing activities, and they are fulfilled (to the extent that the company keeps its promises) by the implementation of the programs.¹

We show that the Commission has insufficient controls to prevent PG&E from misusing funds in a similar manner anywhere in its territory. *And finally, we show that PG&E's funding and sponsorship of a statewide ballot measure creates an emergency*

¹ PG&E also promises to misuse funds intended for solar and other renewables, in a travesty of an integrated Strategic Plan.

situation where the Commission must take action to prevent the flagrant misuse of EE funds statewide by all IOUs.

This is not just a threat to Community Choice and Public Power. It could seriously damage California's reputation in Energy Efficiency, by associating EE with bribery and fraud of billion-dollar dimensions. The controversy could engulf the Commission as well.

***This can be prevented by immediately removing IOU control of EE funds.
Alternatively, PG&E could cancel the ballot measure.***

Also, to prevent continued dirty tricks within Marin and other jurisdictions working to create Community Choice or Public Power, CPUC would also need to make the changes WEM has long requested: ***requiring the utilities to reveal where they spend EE funds and actual produce the savings.*** This would have the added advantage of making it possible for EE to take its place as comparable to supply-side resources.

Summary of Recommendations

- Remove utility control of EE funds, effective immediately, unless PG&E cancels the statewide ballot measure described below.
- Consider removing all IOU control of EE at this time, because of the potential for PG&E to enlist other IOUs in its measure campaign.
- Take other measures to prevent misuse of funds on the local level, including requiring utilities (or measurement contractors) to reveal where in their territories IOUs spend EE funds, and where the savings occurred.

The Commission must ensure that PG&E cannot use EE funds to discourage or interfere with community control of energy and/or to promote a PG&E-funded ballot measure

WEM appreciates the PD stating, "we will require utilities not to use energy efficiency funds in any way which would discourage or interfere with a local government's efforts to consider or to become a Community Choice Aggregator." (PD p. 255)

However, the PD prefaces this statement by saying, "We have no clear evidence in the record on this point." WEM has provided evidence of PG&E's lobbying efforts in many of our comments in this proceeding and the RRIM (R0901019). We submit further evidence with these comments, including:

1. Attachment A- PG&E's letter-proposal to Novato (5-28-09);
2. Attachment B – PG&E's revised proposal to Novato (6-30-09);

3. Attachment C – PG&E’s letter-proposal to Marin County (11-14-08),
4. Attachment D – Notice of Availability of WEM’s video documentary of the June 8, 2009 meeting of the Novato City Council's Sustainability Committee, where PG&E's General Counsel Chris Warner and two junior staffers promoted PG&E's offer of extra EE resources if Novato stays out of the Marin Energy Authority (MEA is the agency that is implementing Community Choice). The video is posted at http://www.womensenergymatters.org/video/Marin/pgvideo_novatoDemocracy.htm and we are providing DVDs of it to the Docket Office, ALJ and Assigned Commissioner for filing with these comments.

A similarly worded paragraph found in all three letters (Attachments A, B, C) demonstrates that the company’s offers are conditioned on rejection of Community Choice:²

We believe that our Partnership Proposal provides a pathway for Novato to meet its climate change objectives faster, cheaper and with better results without exposing itself, the City, our customers and taxpayers to the uncertainty and risk of a Community Choice Aggregation scheme. (PG&E 5-28-09 and 6-30-09 letters to Novato, p. 13)

Nearly identical language appeared in PG&E’s 11-14-08 letter to Marin County, (Attachment C, p. 3). Unlike Novato’s City Council, Marin Supervisors did not agree to PG&E’s request to delay voting on CCA in order to pursue negotiations with PG&E. At their 11-18-09 meeting Supervisors voted unanimously to establish the Marin Energy Authority (MEA), the Joint Powers Agency that would implement Community Choice.

However, at that meeting, Supervisors first heard a presentation by PG&E representatives about the proposal described in the 11-14-08 letter, and took time to discuss it. It is possible that PG&E lobbying and earlier proposals of a similar nature contributed to several delays in the voting on MEA that occurred throughout the county. The first written proposal from PG&E that WEM is aware of was dated May 15, 2008.

² A similar point is also made three times in different ways by PG&E's General Counsel Chris Warner during the videotaped meeting.

At the 7-28-09 PPH, the Assigned Commissioner stated that it is wrong for PG&E to use EE this way, and promised to investigate. WEM will be glad to assist with this investigation in any way we can.

Serious harm has been done...

PG&E's use of EE funds to oppose Community Choice has harmed multiple parties in the following ways:

1. On February 10, 2009, the Novato City Council voted to negotiate with PG&E over its "partnership" proposal instead of joining the Marin Energy Authority (MEA), and to date they have refused to reconsider that vote; negotiations with PG&E are still dragging along. The deadline for Novato to join MEA for free as a founding member expired in June; the city would have to pay a fee if it wants to join in the future.
2. Meanwhile, Novato citizens are being deprived of their opportunity to enjoy the benefits of MEA, which include twice as much renewable energy as PG&E currently offers, and the potential for greater energy efficiency, including but not limited to community control of Public Goods Charge funds for energy efficiency, pursuant to the CCA statute, AB117 of 2002.
3. During the 6-8-09 meeting, PG&E indicated that it may shift funds out of Marin's Local Government Partnership, the Marin Energy Watch, to fund its promised efforts in Novato, which potentially may include a new Novato LGP. This is creating uncertainty in the County and may require it to reduce its programs, punishing it for participating in MEA.

More harm is imminent

PG&E clearly feels entitled to use EE for political ends

PG&E's actions, in broad daylight, in full view of the public and video cameras, demonstrate that it feels it has impunity to use EE funds in service of its political objectives, especially to prevent community control of energy.³

³ Teams of PG&E's anti-CCA lobbyists have met repeatedly with elected officials and government staff throughout Marin for at least the past two years. The public has little or no information about these meetings and is not able to attend; the company may be making even more substantial offers behind closed doors than it

PG&E-funded statewide ballot measure increases likelihood of EE misconduct

The Commission is surely aware that signature gathering has begun for a statewide ballot measure intended for the June 2010 election, titled by the Attorney General as the “New Two-Thirds Requirement for Local Public Electricity Providers Initiative Constitutional Amendment.” If passed, it would amend the California Constitution to require a 2/3 vote to establish or expand either Community Choice or Public Power. PG&E has put forth \$750,000 for signature gathering; according to the CA Secretary of State’s, PG&E is currently the only funder of this initiative.⁴

From now until the election in June 2010, it is all but certain that PG&E will leverage its EE budget wherever it feels it would be useful to influence community leaders — including public officials, financial institutions, businesses, academics, community and environmental organizations, and the media — to assist PG&E in this ballot measure fight and/or to oppose efforts for community control of energy.

It is not enough to *tell* PG&E not to use EE funds for political ends

It is important for the Commission to state clearly in its order that EE funds cannot be used for political purposes. Unfortunately, however, this would not be sufficient to prevent misuse from occurring.

The company can make offers in private, behind closed doors, and no one is the wiser. There is little to nothing in the current policy or EM&V framework that could prevent PG&E’s overt or covert use of EE funds for political aims. It is very difficult to prove after the fact that funds have been used this way, because the Commission has no requirement for utilities (or measurement contractors) to reveal where in their territories IOUs spent EE funds, or where the savings occurred.

These are the perfect conditions for utilities to use EE funds for political ends, as WEM has repeatedly pointed out in this and other EE proceedings as well as the current and previous Long-Term Procurement Proceedings.

Potential for short-changing customers in areas outside the battleground

makes in public documents. Berkeley and Oakland residents testified at the 7-28-09 PPH stated that PG&E’s anti-CCA lobbyists are promising enhanced EE to their public officials also.

⁴ PG&E has spent vast sums in recent elections to defeat public power in San Francisco in 2001, 2002 and 2008 (\$10 million), and in Davis in 2006 (\$11.3 million).

The Commission should consider the harm that may occur to customers whose homes and businesses PG&E does not consider relevant to its political objectives. These may well be forgotten while PG&E funnels its EE budgets to battleground communities.

PG&E is currently using EE budgets for political advantage — and lying about it

PG&E's General Counsel stated in the 6-8-09 Novato meeting that PG&E allocates EE funds "where there is interest," implying that the company is merely responding to people who care about EE enough to ask for it. But obviously, the company can work to create "interest" wherever it wants through its lobbying and promotional activities.

PG&E's letter-proposals to Novato are heavy on the promotional side, describing in a detailed timeline a number of events the company will hold there, as well as mailings it will send. On July 16, 2009, WEM issued three data requests to PG&E concerning its proposal. In Question 1 we asked:

The 5/28/09 letter describes outreach activities that PG&E may have already conducted or may be currently preparing. **For each of the following activities** please provide (A) the program name(s), account name(s), and account number(s) of any and all funds that were used or are being used for these activities, (indicate whether these are energy efficiency accounts or another category of funds), and (B) the total amount of funds used or to be used from each account... (7-16-09 WEM Data Request to PG&E)

Here is PG&E's full response:

PG&E has not implemented any of the outreach activities described in the letter and referenced above. PG&E has not determined the programs or total amount of funds that would be used for these potential outreach activities, because it needs to discuss the details of the proposed collaboration with the City of Novato and the Marin Energy Watch. Once the goals of the collaboration effort have been confirmed between the City of Novato and PG&E, the appropriate funding source will then be identified. **Potential sources of funds for these activities could include, *inter alia*, statewide and local customer energy efficiency programs; California Solar Initiative programs; funding under the federal State Energy Program and Energy Efficiency and Conservation Block Grant programs; and Low Income Energy Efficiency programs.** (PG&E 7-31-09 response to WEM Data Request, Q1)

PG&E's denial is false. The first event on the list did in fact occur on May 16, 2009, and was promoted in the Marin Independent Journal on May 14, 2009 only two days earlier:

Energy efficiency tips to be offered at event

Residents can learn how to reduce their carbon footprint Saturday at "Green Your City Day" in Novato.

The event, sponsored by Pacific Gas and Electric Co., will include information about being more "green," appliance rebates, solar energy systems and energy audits for local merchants.

Refreshments and prizes will be provided. It is from 9 a.m. to 2 p.m. at Pini Ace Hardware at 1535 S. Novato Blvd. (see

http://www.marinij.com/ci_12367268?source=rss)

PG&E's response to our second question also contained falsehoods and evasions. We asked PG&E to identify which programs or subprograms in PG&E's current or planned EE portfolios (and other programs) would provide funding for the elements of its proposal to Novato that were listed with "immediate" start dates. (See Attachment A - 5-28-09 PG&E Proposal to Novato, Table 1, pp. 3-4)

Echoing statements by the General Counsel at the 6-8-09 meeting, PG&E pretended that it was simply responding to a request from Novato:

From time to time, PG&E's customers, including local governments, request that PG&E identify and discuss various customer energy efficiency and renewable energy programs and services that PG&E makes available as part of both statewide energy programs and local energy programs... In this regard, at the City of Novato's request in early 2009, PG&E began discussing with the City various programs and initiatives that the City and PG&E could undertake, jointly or separately, to provide support and services to Novato residents, businesses and public agencies for energy efficiency improvements and additional use of renewable energy. (PG&E response to WEM DR, Q2)

This implies that the city was motivated by the existence of PG&E's programs, instead of the EE offers that PG&E lobbyists made throughout Marin in 2008 including at Novato Council meetings in August 2008, and January and February 2009. WEM videotaped these meetings and they are also posted on the City's website.

MEO for individual programs urgently needs review to prevent misuse of funds

Statewide MEO programs have been extensively reviewed, and WEM applauds the PD for canceling funding for Flex Your Power, which has never come close to the effectiveness of the State's original program ever since under SCE began administering it in 2002.

However, ED has not looked into questions WEM raised regarding marketing, education and outreach for individual programs; the Commission must recognize that IOUs

may not be using these budgets very effectively in terms of increasing the level of energy savings — *and* that they provide substantial opportunities for the company’s political outreach, such as PG&E has promised to Novato and has already been conducting in Novato and elsewhere.

Each program has a portion of funds set aside for MEO; together they add up to \$112 million for PG&E’s whole portfolio *excluding* statewide MEO (Appendix C, 7-2-09 Amended Application).⁵ The budgets specified as MEO are only part of the problem. The subcategories of Direct Implementation called Customer Education & Training (\$11 m), as well as Workforce, Education & Training (\$66 m) may also be used for PG&E’s potential political outreach fund. ***Together with MEO for individual programs, these amount to a total of almost \$200 million.***

Just the \$112 m budgeted for MEO for individual programs is a fantastic sum.⁶ If this amount were well used, one could expect a much higher level of awareness and adoption of EE throughout Northern California than currently exists. An unspecified amount of these budgets appear to be squandered on bread and circuses that may do little to enhance energy savings, but instead are used to glorify the company’s corporate image and boost its chances of defeating community-controlled energy programs.⁷ These problems could be expected to be exacerbated if the Commission approves these portfolios.

There is an urgent need for better oversight of the marketing, education and outreach program components, including audits. Energy Division (ED) staff told WEM that MEO components of individual programs are never separately analyzed by marketing or financial experts — they are only reviewed as part of the program EM&V. This mostly takes place long after the fact. There needs to be contemporaneous field investigations of marketing, education and outreach components to understand whether all the funds were actually used as claimed, and whether they are being used inappropriately to exert political influence.

⁵

⁶ \$112 m excludes statewide MEO, as noted above.

⁷ One of the speakers at the 7-28-09 PPH in this proceeding described his disappointment with the lack of useful EE information at PG&E’s booth at the Marin Co. Fair (as well as the company’s website to which he was referred by people at the booth). WEM described the company’s extravagant and no doubt costly presence at the fair in our filings in this case. Such image-advertising by a government agency would be frowned upon if not banned outright. Thus, simply transferring administrative responsibilities to local governments or a state agency would prevent such waste of funds.

Clearly, the Commission's ability to prevent the use of PG&E's marketing and program funds for political ends is nil — and its ability to determine how effectively they serve the purpose of increasing energy savings is also very limited.

CPUC must take action — immediately

This situation requires immediate action to prevent further harm. WEM recommends that the Commission remove PG&E's control of EE funds as soon as possible, and certainly before the "official" campaign on its statewide ballot measure would begin. The signature-gathering deadline is mid-December, but the campaign can move forward as soon as the necessary signatures have been gathered (approximately 700,000 are needed). No doubt PG&E has long since begun laying the groundwork for the campaign.

In these comments WEM has established the fact that the company has already been using EE funds for political purposes in Marin since at least May 2008. We encourage the Commission to investigate these abuses.

However, while an investigation is necessary, the Commission must not wait to take action on utility control until an investigation could be concluded. By then it would be too late; the harm has already begun. The investigation should take place after the Commission removes utility control of EE funds.

The Commission should consider removing all IOU control of EE at this time, because of the potential for PG&E to enlist other IOUs in the ballot measure campaign.

Dated: September 14, 2009

Respectfully Submitted,

/s/ Barbara George

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Attachment A - 5-28-09 PG&E letter-proposal to Novato (see attached)

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Attachment C - 11-14-08 PG&E proposal to Marin Co. (see attached)

Attachment D (see attached Notice of Availability)

CERTIFICATION OF SERVICE

A0807021 et al.

I, Barbara George, certify that on this day September 15, 2009 I caused copies of the attached **WOMEN'S ENERGY MATTERS COMMENTS ON THE PROPOSED DECISION** to be served on all parties by emailing a copy to all parties identified on the electronic service list provided by the California Public Utilities Commission for this proceeding, and also by e-filing to the CPUC Docket office, with a paper copy to Administrative Law Judge David Gamson and Presiding Commissioner Dian Grueneich.

Dated: September 15, 2009 at Fairfax, California.

/s/ Barbara George

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(Electronic service List attached to original only)

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