



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Integrate and )  
Refine Procurement Policies and Consider Long )  
Term Procurement Plans )

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R.10-05-006  
(Filed May 6, 2010)

**AMENDED POST-WORKSHOP COMMENTS OF SOUTHERN CALIFORNIA EDISON  
COMPANY (U-338-E) ON PROPOSED ENERGY EFFICIENCY PLANNING  
STANDARDS AND ASSUMPTIONS**

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Dated: **July 22, 2010**

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Pursuant to California Public Utilities Commission Rule of Practice and Procedure Rule 1.12(a) and Administrative Law Judge Victoria Kolakowski’s June 22, 2010 Ruling on Resource Planning Assumptions – Part 3 (Energy Efficiency) – Track 1 (June 22 Ruling), Southern California Edison (SCE) submits the following amended comments and responses to questions posed by Energy Division Staff (Staff) regarding the proposed energy efficiency (EE) resource planning assumptions. SCE initially filed these comments on July 2, 2010. However, three columns of data in Attachment 1 were inadvertently omitted from SCE’s July 2, 2010 filing. Accordingly, SCE submits the following amended comments solely to provide a corrected version of Attachment 1. These comments are otherwise identical to SCE’s July 2nd comments.

**I.**

**INTRODUCTION**

SCE appreciates the opportunity to review and comment on Staff’s proposed planning standards and assumptions for energy efficiency. Below, in Section A, SCE offers general comments on the June 22 Ruling. In Section B, SCE offers responses to the questions posed by

Staff in Attachment 1 to the June 22 Ruling. In Section C, SCE provides responses to Staff’s request for possible assumptions for incremental EE relative to the California Energy Commission’s (CEC) 2009 Integrated Energy Policy Report (IEPR) forecast in GWh and MW.

## II.

### DISCUSSION

#### A. General Comments on the Ruling

The Order Instituting Rulemaking and Preliminary Scoping Memo issued in this proceeding<sup>1</sup> states that “we may address or reassess the energy efficiency (EE) and demand response (DR) assumptions utilized in determining future need.”<sup>2</sup> SCE supports this approach and the OIR’s careful separation of the process of setting and implementing goals consistently across proceedings from the process of developing a flexible resource plan that can address uncertainties. The process of developing a new managed demand forecast is complicated by the dynamic nature of the EE business environment. The need to address these changes, by its very nature, introduces uncertainty of thousands of MW into the forecasting process as the effects of unprecedented changes are difficult, if not impossible, to predict.

SCE supports a methodology that deploys a reasonable approach to assumptions regarding the potential for expanded reliance on EE, bounded by a prudent effort to build flexibility into the resource planning process. Built-in flexibility will ensure robust resource planning capabilities and enable the investor-owned-utilities (IOU) to respond effectively to uncertainty. SCE encourages consideration of a variety of load forecasts, so that the resource planning strategies adopted by the California Public Utilities Commission (Commission) can

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<sup>1</sup> Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans (R.10-05-006) (OIR), issued May 13, 2016.

<sup>2</sup> OIR, at 12.

accommodate potential forecast errors without exposing IOU customers to excessive costs or reliability risks.

When developing long-term forecasts for projected load to meet customer demand, EE has a direct impact on resource planning. The level of expected EE to be achieved reduces the demand forecast over the analysis planning horizon. As a result, it is important that the Commission's consideration of the uncertainty associated with achievement of EE goals be subsumed within the larger resource planning challenge of addressing the overall load forecast uncertainty that arises from all contributing factors, including energy efficiency. The CEC and SCE each developed different load forecasts covering the period 2010-2020 that are considerably different in magnitude. SCE is mindful of the Commission's determination that the CEC's demand forecast shall serve as the "state's official load forecast,"<sup>3</sup> and these comments are not intended to seek relitigation of this finding. However, from a practical perspective, the fact that two different modeling techniques<sup>4</sup> produce divergent values suggests a level of forecast uncertainty that should be considered when developing resource plans. For this reason, SCE suggests that the Commission consider SCE's load forecasts as it conducts its overall assessment of uncertainty.

ED Staff should clarify how the case assumptions for incremental EE are going to be used in resource planning. If the Staff proposal treats load as a separate case due to varying levels of EE being achieved, then it will require a different resource portfolio buildout for each case. Such a case would imply that when different amounts of energy are "sold," then different levels of renewable resource buildouts will be required to meet a 33% renewables portfolio standard (RPS) energy goal.

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<sup>3</sup> See D.07-12-052 at 23 (citing D.05-10-042).

<sup>4</sup> CEC load forecasts are developed from an end-use forecasting model that identifies the stock of appliances, space conditioning equipment and commercial and industrial electricity-consuming devices, and forecasts the intensity of use to develop an aggregate total level of consumption. SCE's load forecasts are developed using econometric techniques that identify historical relationships between electricity consumption and key variables such as number of customers, kW used per customer, employment, weather, electric price, and building permits. Reduction of sales from EE and self-generation (thermal and PEV) are also modeled, which reduces the load forecast.

**B. Responses to Questions Posed by Staff**

**1. Is it reasonable for the LTPP analysis to use updated economic/demographic drivers, even if they differ from those employed in the 2008 Goals Study? If so, is the CED 2009 an appropriate source?**

It is appropriate to update the economic and demographic inputs to the load forecast models to reflect the best available information. Since the Goals Study was completed in March 2007, the economy entered a severe recession that affects load growth. The effects of the recession and updates in economic and demographic inputs are reflected in the CEC's 2009 Demand Forecast (CED 2009), which is appropriate.

Table 1 of Attachment 1 to the Staff Proposal compares the growth rates between the CED 2007 and CED 2009 load forecasts. SCE requests that this table be augmented to include the 2008-2012 and 2013-2020 time frames. These time frames distinguish between recession and post-recession periods, and the growth rates between these two time periods are expected to be different.

SCE believes the current Total Market Gross (TMG) goals adopted in D.08-07-047 represent the most appropriate EE savings data to use for procurement planning purposes. In the OIR, the Commission indicated "that new EE goals would not be considered in the proceeding."<sup>5</sup> SCE supports this vision and the overarching Commission policy that elevates EE as a prioritized and reliable procurement resource. As a result, SCE is committed to achieving the Commission's EE goals and the reliance on EE in SCE's load forecast.

Given its importance, EE savings should be employed consistently across all Commission proceedings, including the LTPP proceeding. The use of the 2013-2020 TMG goals, and the assumptions used to generate them, should be consistently applied.

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<sup>5</sup> OIR, at 12

Since the goals that the IOUs' programs are striving to achieve will not be updated, neither should the input assumptions that were used to generate them. Inconsistent application of EE goals will only dilute the policy ambitions of the Commission. On the other hand, maintaining consistency will ensure that the Commission's policy for EE is integrated across the Commission, CEC, IOUs, and other stakeholders.

**2. Is it reasonable for the LTPP analysis to use updated consumption and peak growth rates, even if they differ from those employed in the goals analysis? If so is the CED 2009 appropriate?**

Yes, it reasonable for the LTPP load models to use updated consumption and peak growth rates, even if they differ from those employed in the goals analysis. The reason is that, since the Goals study was made, the economy has entered a severe recession, reducing the level of consumption and peak demand, and this should be reflected in the 2010 long term procurement planning proceeding (LTPP) and used for procurement planning purposes. To be clear, SCE advocates using updated load modeling inputs, but does not advocate changes to the TMG goals.

**3. Is it reasonable to use updated Title 20 and Title 24 assumptions based current information? If so, how should the updated assumptions be employed in the 2010 LTPP?**

Yes, it would be reasonable to use updated Title 20 and Title 24 assumptions, if there were some known current information about such programs, as long as the study also includes known information about future energy-using appliances. It does not appear the study accounts for this information.

The 2009 CED apparently did not take into account any assumptions about changes to Title 20 or Title 24 standards beyond the 2005 Title 24 standards.<sup>6</sup> The 2009

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<sup>6</sup> CED 2009, at 253.

CED did include one new significant “appliance” (electric and plug-in hybrid vehicles), but apparently did not include any electric load from current or future electro-technologies (cold-ironing at ports, electric forklifts replacing internal combustion powered forklifts, electrified truck-stops, and electric rail extensions and conversions). In other words, for a balanced analysis, inclusions of future trends in efficiency should be complemented by inclusions of future trends in energy use patterns.

A further issue is that, for the current study, the Demand Forecast and Energy Efficiency Project (DFEEQP) has stated that it will not produce any further scenarios. Changes in building standards impact technically-available savings for IOU programs. Thus, to the extent that the DFEEQP study does or does not include the effect of changes in Title 20 or Title 24, it would be improper to assume savings beyond what is in DFEEQP, without running a complete scenario analyzing the combined effect on both standards and the IOU programs.

**4. Is it reasonable to use different peak-to-energy ratios than in the 2008 Goals Study? If so, which peak-to-energy ratios should be employed in the 2010 LTPP?**

As directed in D.08-07-047, TMG goals, which are based on 2004 peak-to-energy ratios, should be used by IOUs for procurement planning in the 2010 LTPP. SCE is committed to achieving these goals, and will tailor its future program plans accordingly.

As indicated in the response to question 1 above, the EE goals, and the inputs used to generate them, should be consistently applied across all of the Commission’s proceedings, including the LTPP. Since the goals that the IOU programs are striving to achieve have not been updated, neither should the input assumptions that were used to generate them.

As also stated in question 1 above, SCE believes that it is appropriate to update the economic and demographic inputs to the load forecast models to reflect the best

available information. However, SCE believes, and the commission directed, that the TMG goals are to be used by the IOUs for procurement planning in the 2010 LTPP.

**5. Please provide any quantitative analysis to support the use of a specific peak to-energy ratio assumption (e.g., mild, normal, or extreme).**

Given the short response time frame, SCE does not have quantitative estimates of peak-to-energy ratio assumptions at this time. SCE is currently working on this issue.

**6. Despite any disparity between the methods used to develop adopted goals, the CEC incremental uncommitted analysis, and the CED 2009, are the composite of IOU program savings/naturally occurring reported in the CEC Incremental EE Report a reasonable estimate of total EE savings from these two sources?**

The disparity between methods and assumptions between the CED 2009 and the uncommitted portion (2013-2020) of the load forecast lead to such significant differences in apparent results as to make any judgment of reasonableness of total EE savings from the two sources highly uncertain. In addition, the lack of specific naturally-occurring data in the uncommitted forecast makes it impossible to compare the difference between CED 2009 and the uncommitted portion (2013-2020) of the load forecast.

**7. While there may be important reasons to differentiate between IOU program impacts, naturally occurring savings, and customer response to price, given the “total market gross” orientation of the adopted goals, is it necessary to pursue these attribution questions further within the context of the 2010 LTPP?**

Yes. The DFEEQP study did not analyze the overlap of uncommitted savings between the adopted TMG goals and the adopted CED forecast. To correct for this, if the original peak-to-energy ratios from the Goals study are applied to the BBES results

from the DFEEQP study, the MW and GWH savings are fairly close to the adopted TMG goals. This implies that, assuming the same peak-to-energy ratio, there is no overlap between the DFEEQP uncommitted EE forecast and the CED forecast. However, CEC admits that there is significant overlap in the area of lighting savings.<sup>7</sup> In the 2006 LTPP it was assumed that there was an 80% overlap between the forecast of uncommitted savings and the 2007 CED forecast for SCE.<sup>8</sup> This is a very big change in the implied overlap, and it is not clear to what source this should be attributed. Thus, despite an extremely detailed CED end-use forecast and a DFEEQP study that digs deeper into the details of energy savings by end-use, the big picture of whether there is overlap between the CED load forecast and the DFEEQP forecast of uncommitted savings has not been addressed, and where this overlap may be attributed has not be clearly demonstrated.

**8. What is a reasonable base case assumption for the amount (GWh and MW) of committed savings shortfall (from years prior to 2012) that the IOUs would be expected to make up in the uncommitted period?**

SCE is committed to achieving the Commission's EE goals. The current goals are cumulative goals from 2006-2012, and represent 7,581 GWh and 1,644 MW of EE savings. SCE's current program cycle (2010-2012) is designed to achieve the cumulative Commission's goals. As such, there will be no committed savings shortfall (from years prior to 2012) to be made up in the uncommitted period. This is a reasonable assumption, as SCE's portfolio is designed to, and is well on its way to, meeting or exceeding these goals.

**a) What are reasonable high and low assumptions?**

Please see response to Question 8b below.

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<sup>7</sup> *Id.*

<sup>8</sup> *See* D.07-12-052, at 45.

**b) What probability would you assign to these three estimates?**

Since SCE does not anticipate committed savings shortfall (from years prior to 2012) it is not reasonable to estimate high and low assumptions or assigned probability factors.

**c) What justification or documentation supports these estimates?**

Advice Letter 2410-E, submitted by SCE on November 23, 2009, contained program budgets and forecasts in compliance with D.09-09-047. This Advice Letter constitutes SCE's program plans for the 2010-2012 program cycle. SCE's programs are designed to achieve or exceed the cumulative 2012 EE goal. Specifically, SCE forecasts that it will achieve 115% of its energy savings goal and 102% of its demand reduction goal.

**9. Does the uncertainty in year-to-year trends pose a significant risk for procurement purposes in the 2010 LTPP? If so, what should be done about it, if anything?**

Year-to-year trends in energy use can arise from weather, economic cycles, and other sources. SCE usually takes account of risk from cycles in weather in the planning reserve margin. During the last 30 years of economic growth, there have been significant boom-bust cycles in the economy, and these have translated into cyclical patterns in the growth of energy. At this point in time, most economists are forecasting a relatively slow recovery from the current economic recession, compared to other recovery periods, and this is what appears to have been adopted in the 2009 CED forecast. Should, for currently unknown reasons, economic growth accelerate for a period of time in the 2010-2020 period, then there could be a risk of insufficient generation reserves during those

years of the boom period. In the past, the dot-com industry, the aerospace and “star-wars” programs, and the housing industry fueled economic booms and rapidly growing peak demands that were not foreseen just a few years previous. The Commission should acknowledge that history can repeat itself, despite current outlooks for the economy that are very “tempered.” The LTPP should consider a “high economic growth” case, not knowing at what year the peak period may occur.

**10. Should the supplemental information on savings decay (i.e. 1,800 GWh and 380 MW by 2020) reported by the CEC, and consistent with D.09-09-047, be used to make an adjustment to the adopted 2009 IEPR base line demand forecast in developing managed demand forecasts for procurement purposes in the 2010 LTPP?**

**a) How should uncertainty associated with modeling and predicting measure savings decay be accounted for?**

The decay of IOU program-measured savings is a moot point, other than for attribution purposes. It is current Commission policy that the IOUs are responsible for making up for any measure savings decay. Specifically, the IOUs must account for 50% of measure savings that decay over time and SCE is committed to do so. The customer is expected to make up the rest.

Most IOU EE savings come from long-lived appliances, lighting fixtures, refrigerators, and air-conditioning units. However, for short-lived measures, such as compact fluorescent lights (CFL), it is expected that a customer will replace a burned-out CFL with a CFL and not an incandescent. Therefore, there is no savings decay.

11. **Given that BBEES are in the early stages of developing specific delivery mechanisms, should these savings be considered more uncertain than other components of the incremental EE forecast?**

There is more uncertainty surrounding the Big Bold Energy Efficiency Strategy (BBEES), as a component of the incremental EE forecast than with other components. Such uncertainty is the result of the fact that many of the energy efficient technologies that are crucial for achievement of the BBEES are in various stages of implementation. Some technologies, such as Hot-Dry HVAC are in the testing phase and are not commercialized; others that are essential for Zero Net Energy homes are further behind. Given current conditions, uncertainty exists around the achievement of the BBEES; however, the resource planning analysis should account for the fact that it is Commission policy to achieve the TMG goals, including the BBEES, by 2020. In addition, given that the goals are TMG, any possible future shortfall found in the BBEES can be overcome by increased energy efficiency output of IOU programs. Furthermore, SCE's programs are geared towards advancing the technologies and infrastructure that is needed to achieve those goals.

a) **What is a reasonable base case assumption for EE savings (GWh, MW) from BBEES?**

See Q 11.c

b) **High and Low case assumptions?**

See Q 11.c

c) **Please provide probability of occurrence for the three cases.**

In response to questions 11 a, b and c above, SCE presents, in section two below, the EE impact of five likely-to-occur cases. Assigning a "probability of

occurrence” to any of the likely-to-occur cases is impossible given the unprecedented changes anticipated in the EE environment starting in 2013. Please see Section 2 for further details.

**12. There is a difference between the 2006-2008 EE Evaluation Report results for IOU programs and the assumptions used by the CEC for savings in the 2006-2008 period. Given access to EM&V data, are these reasonable assumptions used to quantify IOU program savings through time?**

**a) Do the differences between these two assumptions values have a significant impact on the committed savings?**

The 2006-2008 EE Evaluation Report, released by the Energy Division as a Draft Report, has not been adopted by the Commission. It is SCE’s view that the Draft Report is significantly flawed and should not be used as a reliable assessment of IOU program achievement in the 2006-2008 program cycle. For example, some of the extensive errors in the Draft Report include poor measurement methodologies, small sample sizes, and a lack of statistical reliability. The numerous and significant flaws are detailed in SCE’s comments, filed on May 17, 2010, and in the interest of brevity, are incorporated herein by reference.<sup>2</sup>

SCE strongly believes that the evaluation measurement and verification (EM&V) assumptions used in the Draft Report are not reasonable and should not be used to quantify past, present, or future IOU EE programs. In contrast, SCE’s *ex ante* estimates, as used currently by the CEC, are a reasonable and reliable representation of SCE’s 2006-2008 program achievements. In addition, SCE is

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<sup>2</sup> See SCE’s Comments on the Energy Division’s Draft 2006-2008 Energy Efficiency Evaluation Report, May 17, 2010, served in R.09-01-019 and R.09-11-014, available at: [www.energydataweb.com/cpuc](http://www.energydataweb.com/cpuc).

requesting that the Energy Division correct the pervasive errors and release a Final Report that represents an accurate assessment of IOU program achievement in the 2006-2008 program cycle.

b) **In light of IOU program savings decay assumed in the CEC demand forecast, and the proposed “make up” of this decay to satisfy Commission policy direction, are any differences between alternative assumptions for realization rates significant?**

The use of differing realization rates can potentially have a major impact on the committed portion of IOU program savings. This is why it is crucially important that EM&V studies accurately quantify program achievements. The Draft Report for 2006-2008 in its current state, as stated above, does not do this.

13. **Does the historic trend of goal achievement for IOU programs have bearing on the likelihood of achieving overall goals in the future?**

Historic trends do not correlate to the ability of IOU programs to achieve future EE goals. In fact, SCE believes that the gap between *ex ante* and *ex post* impacts will narrow in the 2010-2012 program cycle and beyond due to the following:

- SCE evaluates all EM&V studies, including the Energy Division’s Draft 2006-2008 Evaluation Report, and adapts its programs and energy savings estimates, as appropriate.
- SCE continuously improves its EE programs to adapt to current market conditions.
- SCE and the Energy Division are collaboratively developing a new EM&V process that will allow EM&V contractors and IOU program staff to coordinate mid-cycle in order to reduce measurement inconsistencies as well as provide real-time feedback.

The above-mentioned processes will allow programs to adapt to new information more quickly, and result in *ex ante* and *ex post* energy savings that are more closely aligned. With such an outcome, the Commission can rely on EE as a durable procurement resource.

a) **How should procurement planning consider this source of uncertainty for IOU programs (e.g. Huffman Bill, BBEES, Codes and Standards)?**

While there appears to be a growing gap between goals and *ex post* performance, as stated in the response to question 13 above, SCE developed a process to mitigate that uncertainty going forward. As such, SCE believes that the uncertainty around the goal achievement of IOU programs is minimal and should not be a factor for procurement planning.

However, more uncertainty exists around the non-IOU program components of the TMG goals for 2013-2020, such as the Huffman Bill, BBEES, and Codes and Standards. For example, quantification of the effects of the Huffman Bill and Codes and Standards are not fully known until their implementation begins. As stated in the response to question 11 above, achievement of the BBEES relies on technologies that are still unproven and/or not commercialized. While such uncertainties exist, and may be significant, SCE is confident that its programs will be able to meet the policy directives of the CPUC.

As a result, SCE provides multiple cases that are differentiated based on the achievement of uncommitted non-IOU programs over the 2013-2020 period. These cases account for the uncertainties mentioned above; however, SCE continues to believe that because the Commission adopted a long-term strategic plan, significantly ramped up funding, and emphasizes EE as first in the resource loading order, the aggressive TMG goals will be met by 2020. In addition, given

that the goals are TMG, any possible future shortfall found in the BBEES can be overcome by increased output from IOU programs.

**14. Assuming that the CED 2009 is the required base case demand forecast for system need analysis, should the numerical value TMG goals adopted in D.08-07-047 (as modified in subsequent decisions), be required as the base case assumption for total EE (committed + uncommitted savings) in the minimum required analyses ordered in the Track I Scoping Memo?**

As stated in response to Question 1, SCE believes the current TMG goals adopted in D.08-07-047 represent the most appropriate EE savings data to use for procurement planning purposes. In the OIR, the Commission indicated “that new EE goals would not be considered in the proceeding.” SCE supports this vision and the overarching Commission policy that elevates EE as a prioritized and reliable procurement resource. As a result, SCE is committed to achieving the Commission’s EE goals and the reliance on EE in SCE’s load forecast.

Given its importance, EE savings should be employed consistently across all Commission proceedings, including the LTPP proceeding. The use of the 2013-2020 TMG goals, and the assumptions used to generate them, should be consistently applied. Since the goals that the IOUs’ programs are striving to achieve will not be updated, neither should the input assumptions that were used to generate them. Inconsistent application of EE goals will only dilute the policy ambitions of the Commission. On the other hand, maintaining consistency will ensure that the Commission’s policy for EE is integrated across the Commission, CEC, IOUs, and other stakeholders.

**a) If not, should the numerical value of TMG goals adopted in D.08-07-047 (as modified subsequently modified), be required as a sensitivity case assumption for total EE? If so, which case?**

Not applicable.

**C. SCE’s Response to Request to Provide Load Tables (High, Medium, Low Cases)**  
**(Questions, 15, 16 and 17)**

In the Tables below, SCE presents five possible cases for consideration. The high and low load cases are designed to bound the inherent uncertainty contained in the uncommitted forecast allowing resource planners to holistically consider the effects of extreme events on the resource planning process. The three middle cases are designed help assess the effects of less extreme uncertainty on the managed forecast.

***Table 1***  
***Case Definitions - Energy (GWh)***

<b>ID</b>	<b>Name</b>	<b>Source of Incremental EE Relative to the 2009 IEPR forecast</b>
Low Load	CEC Uncommitted High EE Case	Incremental Impacts of EE Policy Initiative Relative to the 2009 IEPR Adopted Demand Forecast - Attachment A (Page 156 Table 8-11)
Low/Mid Load	CEC Uncommitted Mid EE Case (2004 PE Ratios)	Incremental Impacts of EE Policy Initiative Relative to the 2009 IEPR Adopted Demand Forecast - Attachment A (Page 153 Table 8-7)
Mid Load	CEC Uncommitted Low EE Case (2004 PE Ratios) with no BBEES Goal Impacts	Incremental Impacts of EE Policy Initiative Relative to the 2009 IEPR Adopted Demand Forecast - Attachment A (Page 150 Table 8-3)
High/Mid Load	SCE (3/2010) Load Forecast - TMG Goal Impacts Included	Southern California Edison's March 2010 Load Forecast TMG (D. 08-07-047 Appendix Page 3 Table A-4 - adjusted start year to 2013)
High Load	SCE (3/2010) Load Forecast - TMG Less TMG BBEES Impacts	Southern California Edison's March 2010 Load Forecast TMG (D. 08-07-047 Appendix Page 3 Table A-4 - adjusted start year to 2013) Less TMG BBEES

**Table 2**  
**Case Definitions – Demand (MW)**

<b>ID</b>	<b>Name</b>	<b>Source of Incremental EE Relative to the 2009 IEPR forecast</b>
Low Load	CEC Uncommitted High EE Case	Incremental Impacts of EE Policy Initiative Relative to the 2009 IEPR Adopted Demand Forecast - Attachment A (Page 156 Table 8-12)
Low/Mid Load	CEC Uncommitted Mid EE Case (2004 PE Ratios)	Incremental Impacts of EE Policy Initiative Relative to the 2009 IEPR Adopted Demand Forecast Final Report - Attachment A (Page 153 Table 8-8) - Adjusted by Final Report Alternative Peak Case (Page 51 - Assumed 34% peak impact adjustment for Mid Case)
Mid Load	CEC Uncommitted Low EE Case (2004 PE Ratios) with no BBEES Goal Impacts	Incremental Impacts of EE Policy Initiative Relative to the 2009 IEPR Adopted Demand Forecast Final Report - Attachment A (Page 150 Table 8-4) - Adjusted by Final Report Alternative Peak Case (Page 51 - Assumed 32% peak impact adjustment for Low Case)
High/Mid Load	SCE (3/2010) Load Forecast - TMG Goal Impacts Included	Southern California Edison's March 2010 Load Forecast TMG (D. 08-07-047 Appendix Page 3 Table A-4 - adjusted start year to 2013)
High Load	SCE (3/2010) Load Forecast - TMG Less TMG BBEES Impacts	Southern California Edison's March 2010 Load Forecast TMG (D. 08-07-047 Appendix Page 3 Table A-4- adjusted start year to 2013) Less TMG BBEES

In Attachment 1, SCE presents the EE impact of five uncommitted likely-to-occur cases. Three of the cases are based in large part on the CEC’s *Incremental Impacts of Energy Efficiency Policy Initiatives Relative to the 2009 Integrated Energy Policy Report Adopted Demand Forecast*.<sup>10</sup> This forecast includes a rigorous analysis of a future set of policy initiatives designed to be used in resource planning and reliability studies. In short, the analysis sought to identify incremental electricity savings that are net of any overlap with savings already included in the adopted 2009 IEPR demand forecast. The two remaining cases are based on SCE’s March 2010 managed load forecast that includes variations of TMG goal impacts.

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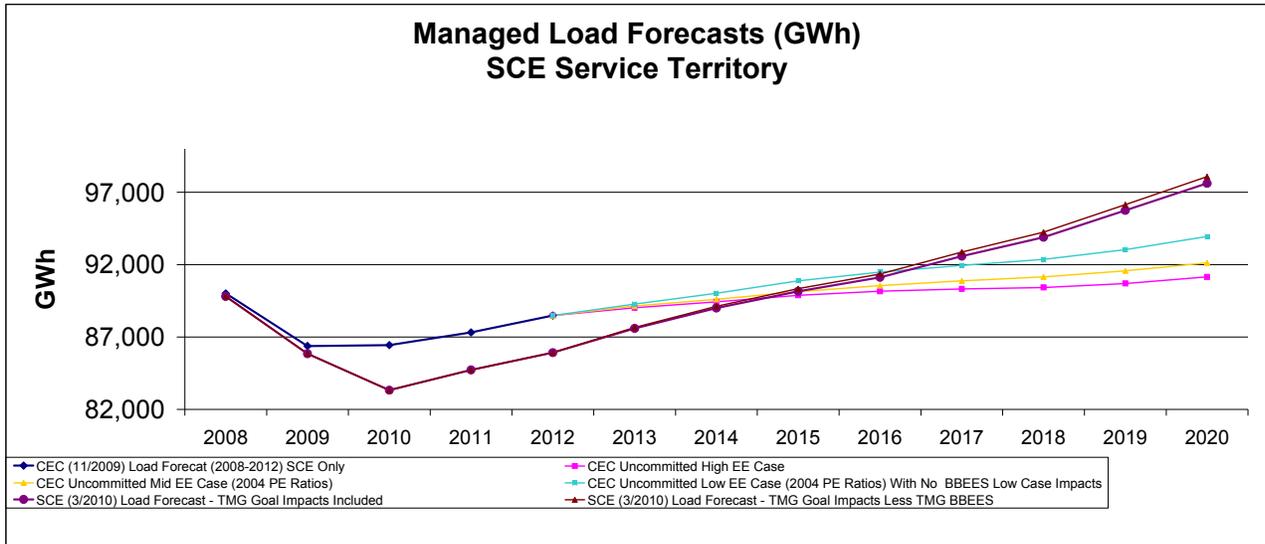
<sup>10</sup> CEC-200-2009-001-CTF

Assigning a “probability of occurrence” to any of the likely-to-occur cases is impossible given the unprecedented changes to the EE environment starting in 2013. Starting in 2013 the IOUs are scheduled to start a new EE program cycle with an EE portfolio designed to meet or exceed TMG goals promulgated in D. 08-07-047. A significant portion of the TMG goals, BBES for example, have not yet been assessed for cost effectiveness or realistic market adoptions. In addition, the BBES do not currently have a functioning delivery mechanism.

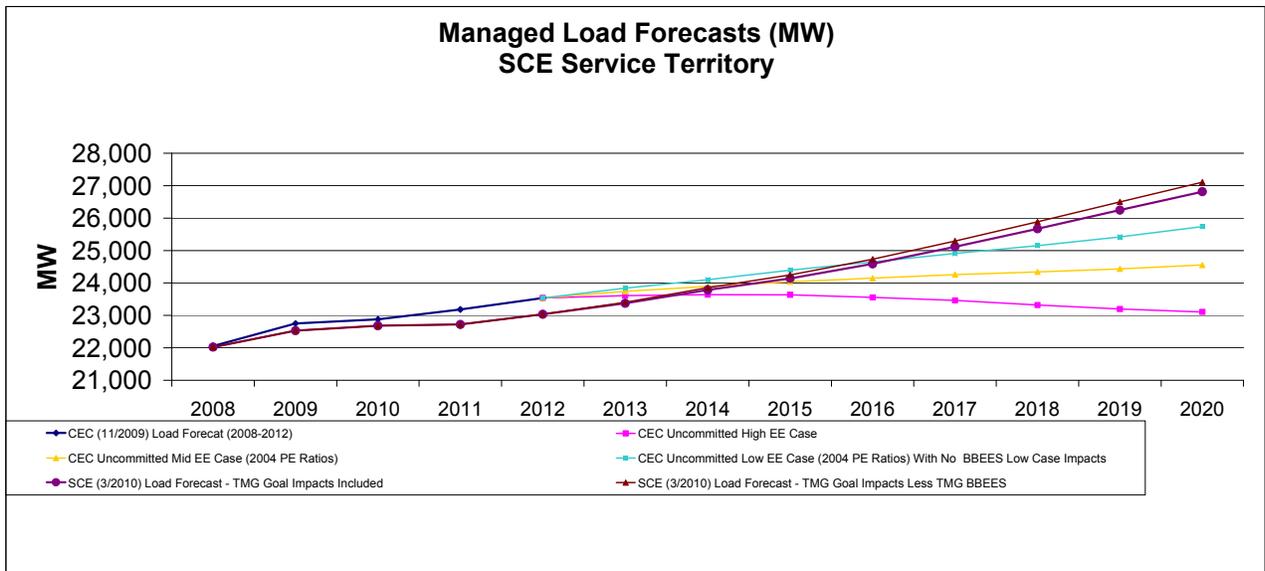
There could be a situation where two proceedings (EE and LTPP) could use different EE attainment assumptions (LTPP demand forecast vs. TMG goals). This fact further confounds SCE’s ability to assign a “probability of occurrence.”

In the tables below, SCE illustrates the possible load forecast impacts of the five cases presented above. Depending on the load forecasting model inputs (economic, demographic, floor stock, electricity price, etc) and the amount of EE assumed to be captured, the load forecast can range from a high of about 27,000 MW to a low of about 23,000 MW.

**Table 3**



**Table 4**



**III.**

**CONCLUSION**

SCE is firmly committed to achieving the Commission’s EE goals. With respect to system-wide resource planning, SCE supports a methodology for analyzing EE that deploys a reasonable approach to assumptions regarding the potential for expanded reliance on EE, bounded by a prudent effort to build flexibility into the resource planning process. Built-in

flexibility will ensure robust resource planning capabilities and enable the IOUs to respond effectively to uncertainty. SCE encourages consideration of a variety of load forecasts, so that the resource planning strategies adopted by the Commission can accommodate potential forecast errors without exposing IOU customers to excessive costs or reliability risks.

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July 22, 2010

# **ATTACHMENT 1**

Q 15, 16, 17: What is a reasonable \_\_\_\_ case assumption for incremental EE relative to the 2009 IEPR forecast in GWh and MW for PG&E, SCE, and SDG&E?

ID	Name	2013	2014	2015	2016	2017	2018	2019	2020	
Energy (GWh)										
	Low Load	CEC Uncommitted High EE Case	888	1564	2235	3109	4143	5194	6085	6848
	Low/Mid Load	CEC Uncommitted Mid EE Case (2004 PE Ratios)	773	1384	1985	2725	3590	4462	5215	5874
	Mid Load	CEC Uncommitted Low EE Case (2004 PE Ratios) with no BBEES Goal Impacts	633	974	1240	1790	2524	3259	3755	4055
	High/Mid Load	SCE (3/2010) Load Forecast - TMG Goal Impacts Included	861	1645	2396	3173	3962	4765	5569	6377
	High Load	SCE (3/2010) Load Forecast - TMG Less TMG BBEES Impacts	800	1528	2217	2940	3675	4418	5164	5915
Demand (MW)										
	Low Load	CEC Uncommitted High EE Case	303	581	908	####	1,766	2,242	2,706	3,160
	Low/Mid Load	CEC Uncommitted Mid EE Case (2004 PE Ratios)	169	325	506	729	967	1,220	1,468	1,711
	Mid Load	CEC Uncommitted Low EE Case (2004 PE Ratios) with no BBEES Goal Impacts	72	116	147	225	319	411	479	528
	High/Mid Load	SCE (3/2010) Load Forecast - TMG Goal Impacts Included	199	389	583	794	1,010	1,232	1,455	1,677
	High Load	SCE (3/2010) Load Forecast - TMG Less TMG BBEES Impacts	165	322	477	653	833	1,016	1,200	1,385

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of the **AMENDED POST-WORKSHOP COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U-338-E) ON PROPOSED ENERGY EFFICIENCY PLANNING STANDARDS AND ASSUMPTIONS** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **22nd day of July, 2010**, at Rosemead, California.

/s/MELISSA SCHARY  
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California Public  
Utilities Commission

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## CALIFORNIA PUBLIC UTILITIES COMMISSION

### Service Lists

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