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

Southern California Edison Company's Application For Approval of Water-Embedded Energy Efficiency Pilot Programs for 2007-2008.	Application 07-01-024
Application of Pacific Gas and Electric Company Seeking Approval of Water-Embedded Energy Savings Pilot Program.	Application 07-01-026
San Diego Gas and Electric Company for Approval of Energy & Water Efficiency Partnership and Budget for Years 2007 Through 2008.	Application 07-01-029 (Filed January 16, 2007)
Southern California Gas Company for Approval of Energy & Water Efficiency Partnership and Budget for Years 2007 Through 2008.	Application 07-01-030 (Filed January 16, 2007)

**OPENING COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY
ON THE PROPOSED ORDER APPROVING PILOT WATER
CONSERVATION PROGRAMS**

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**BEFORE THE PUBLIC UTILITIES COMMISSION
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Southern California Edison Company's Application For Approval of Embedded Energy Efficiency Pilot Programs for 2007-2008.	Application 07-01-024 (Filed January 16, 2007)
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**OPENING COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY
ON THE PROPOSED ORDER APPROVING PILOT WATER
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Pursuant to Rule 14.3(a) of the Rules of Practice and Procedure of the California Public Utilities Commission (CPUC or Commission), and the Proposed Order Approving Pilot Water Conservation Programs Within the Energy Utilities' Energy Efficiency Programs (PO), pp. 85-86, Pacific Gas and Electric Company (PG&E) submits these Opening Comments regarding the PO. PG&E requests revisions:

- To permit PG&E to begin implementation of its approved pilot programs earlier than provided in the PO;
- To make Evaluation, Measurement and Verification (EM&V) proposed budgets

consistent with program funding allocations;

- To clarify process evaluation funding;
- To approve additional review and input for the EM&V plan;
- To clarify the scope of the emerging technologies pilot; and
- To correct certain clerical errors.

I. PG&E REQUESTS A REVISED TIMELINE FOR IMPLEMENTATION OF THE APPROVED PILOT PROGRAMS.

In accordance with the July 27, 2007, Assigned Commissioner's Ruling on the Evaluation of the Embedded Energy in Water Pilots, which stated that the anticipated start of the pilots would be January 1, 2008, PG&E has been working conscientiously and in good faith with its partner water utilities and their retailers to identify projects that can begin in January 2008. PG&E has identified some candidate customer partners with water-energy projects that are ready to proceed and are within the scope of the pilot studies as proposed by PG&E.

PG&E would like to begin implementation of its approved pilot programs prior to the July 2008 start date proposed in the PO. PG&E would coordinate the exact start date with the CPUC Energy Division and the CPUC EM&V contractors to ensure implementation does not conflict with any pre-implementation baseline studies needed for impact evaluation.

While PG&E requests permission to begin implementation of all of its approved programs earlier than provided in the PO, the special circumstances described below warrant early implementation of the winery and commercial laundry sectors of the commercial program.

As a result of PG&E's pilot project planning and coordination efforts, a large winery is anxious to begin a water audit immediately. This winery bottles wine in the fall. Consequently, it needs to conduct the audit, install any necessary in-line meters and complete the retrofits and/or process changes before then. Timely completion would not be possible were PG&E to

have to wait until July to initiate pilot implementation. The contracting process to obtain the water audit firm will on its own take 2 to 3 months, and by then the opportunity to complete retrofits before the fall would be lost. This large winery would thus likely be precluded from participating in the pilot. There is a second winery that has indicated interest in participating in the pilot, and it is likely to face the same timing requirements. Indeed, it is possible that delaying this pilot will mean that certain commercial sectors will not be able to participate at all.

PG&E is likewise concerned that if pilot implementation is delayed several months it will adversely affect its ability to include some of the larger commercial laundries and hotels in the laundry ozone treatment component of the large commercial program. At least one of the ozone technology vendors is actively marketing its product to hotels and laundry facilities in the area. Some of the large hotels in the PG&E pilot project area have already begun to implement ozone technology. Some laundries might respond to the vendor and opt to implement the technology before July. There are a limited number of these customers in the pilot footprint, and they use large quantities of water, so it would be unfortunate were they to be unavailable for the pilot due to timing.

If allowed to implement these pilots on a January schedule, PG&E would work closely with the Energy Division and the EM&V contractors to ensure that pilot implementation during Phase I would not jeopardize impact evaluation. For example, existing and proven protocols for establishing baseline water use can and should be used for water audits, including reviewing historical customer water bills and changes in customer water use over time. Pending assignment of the CPUC evaluation contract, PG&E would work with the CPUC staff and EM&V contractors on the data gathering activities and other protocols relevant to PG&E's candidate projects.

II. PG&E REQUESTS MODIFICATIONS TO THE PROPOSED BUDGETS FOR EM&V CONSISTENT WITH THE PROGRAM FUNDING ALLOCATION.

PG&E's programs account for approximately 36 percent of the total program budget, but its share of the EM&V budget is approximately 46 percent of the total. (*See* PO, Table 8, page 96.) PG&E requests an adjustment to the EM&V budget to reflect a PG&E contribution of 36 percent, in accordance with the program funding allocation. This adjustment would result in a reduction in PG&E's EM&V contribution of approximately \$258,000.

III. PG&E REQUESTS THAT PROCESS EVALUATION FUNDING BE INCREASED AND CLARIFIED.

The PO limits the process evaluation budget to 2 percent of the *individual program costs*. Process evaluations are likely to be a critical component in terms of the seven pilot goals, especially since impact evaluations will be limited to cost and savings data for each of the programs. (*See* PO, pages 57-61.) Without sufficient funding for process evaluation, it will be difficult to assess whether a larger program, operated differently, could be more cost-effective. Therefore, process evaluation funding should be restored to 2 percent of the *total pilot cost*, with a corresponding decrease in the impact evaluation studies budget. This funding level would be more in line with the April 23, 2007, Assigned Commissioner Ruling and Scoping Memo, page 18, that set aside 20 percent of the pilot budget for EMV and 18 percent for impact evaluation.

Further, it would be helpful for the Commission to clarify that the funding for process evaluations:

- Is an amount to be budgeted for each utility *in addition to* the program budgets and their respective shares of the budget for the CPUC's EM&V plan; and
- May be allocated across individual programs as the utilities see fit.

IV. ADDITIONAL REVIEW AND INPUT ARE NEEDED BEFORE THE PO'S STUDY PLAN IS APPROVED.

The PO proposes major changes to the program plans the utilities submitted. These changes have not been subjected to review by experts in water industry analysis, *e.g.*, for availability of alternative sources of data, cost, or suitability as compared to alternative analytical methods. The final decision should mandate that the Energy Division hire consultants with expertise in water usage measurement and analysis to develop a final plan. This final EM&V plan should be subject at a minimum to a workshop and written comments before the CPUC adopts it. Alternatively, it should be subject to the same external review requirements as the CPUC's energy efficiency program evaluations.

The PO, pages 58-59, states that "the studies proposed by the utilities alone are not likely to get us all the way" to determining if it is cost-effective to save energy through programs that focus on cold water, and that "taken together the proposals do not provide a clear plan for understanding how energy is used in the California water system." To attempt to remedy these deficiencies, the PO develops and describes two additional studies for the utilities to fund and Energy Division to manage. These new studies have not been subjected to a reasonableness, feasibility and cost review by people with extensive knowledge and experience in water system and water usage analysis. PG&E is concerned that in the absence of such review the Commission will not meet its stated objectives to use best available existing data and optimal methods for new data collection and analysis.

Of most concern are the costly options that the proposed new study plan requires. For example, the requirement to measure water use and changes in water use by in-line metering of water usage at the point of end use is an unduly costly approach when applied to small customers. The first choice should always be to use lower cost alternatives unless or until they

have been demonstrated to be unreliable. Lower cost alternatives include using readily available monthly water usage data (billing data), weather and other data, combined as necessary with relatively low-cost customer surveys and spot measurement data, in well-designed statistical regression analyses.

Thus, for measures such as high-efficiency residential toilets, the original utility plan proposed a statistical billing analysis approach because previous studies have demonstrated that this lower-cost approach provides significant and reliable results. In other cases, such as SDG&E's proposed Large Customer Water Audits Program, the plan proposed some in-line metering, but that was because the projects would be large and diverse enough to make the installation of such metering valuable and cost-effective for the large customer.

The major cost-increasing choice is the revision of the previous load profile study design to require in-line metering to develop water use load shapes for four to six end users in eight different market segments. A conservative estimate is that it will cost \$2,000 per site for samples of 250 sites in each of eight market segments, for a total data collection cost of \$4 million. An additional cost of in-line metering is the financial risk it imposes on the organizations responsible for it. Inserting measurement equipment by invasive means creates potential liability for damage to water pipes, metered equipment and other property from any breakages or leaks that customers claim are caused by the installation and removal of the measurement devices.

The new study plan does not cite a literature review or analysis to support the necessity of this costly data collection option. Such expense might not be justified since there is no documentation as to whether such usage information has already been collected by water agencies or researchers, and/or whether existing analysis shows that a significant fraction of water-embedded energy cost is linked to the time of day in which water is used.

V. PG&E REQUESTS CERTAIN CLARIFICATIONS AND CORRECTIONS.

A. Emerging Technologies

PG&E's proposed budget for the emerging technology program is sufficient to offer this incentive to only one of the three water utilities identified in its filing. The PO, however, implies that it would be offered to all three utilities. (*See* page 15, § 3.1.5.) The emerging technology program will require a feasibility and scoping study to research the opportunities for new technologies in water and waste water systems and to identify the associated evaluation process for these technologies. PG&E requests clarification that the \$100,000 identified in the PO for evaluation studies would cover feasibility and scoping of new technologies that would be demonstrated through the \$341,000 program.

B. Clerical Errors

The PO misidentifies the partner water utility proposed by PG&E for specific programs. At page 2-8 of its June 24, 2007, supplemental testimony, PG&E identified the following water utilities as partners for the specific proposed pilot programs:

Winery Sector – Sonoma County Water Agency (Sonoma)

Ozone Laundry Treatment in the Hospitality Sector – Sonoma

Custom Food Processing – Sonoma and East Bay Municipal Utility District (EBMUD)

The PO should be corrected to reflect the appropriate relationships, as follows:

- Page 14, section 3.1.2, currently reads, “PG&E developed a similar program with EBMUD and Sonoma to administer process surveys...in the winery sector,” when it should read, “PG&E developed a similar program with Sonoma to administer process surveys...in the winery sector.”
- Page 14, section 3.1.3, currently reads, “PG&E would also work with the same two water agencies to save water and energy by encouraging replacement of traditional laundry

treatment with ozone technology in large hotels and/or commercial laundries,” when it should read, “PG&E would also work with Sonoma to save water and energy by encouraging replacement of traditional laundry treatment with ozone technology in large hotels and/or commercial laundries.”

- Page 69, section 6.9.1.2, currently reads, “Custom Food Processing - PG&E proposes to work with EBMUD and Santa Clara to deliver surveys/audits...,” when it should read, “Custom Food Processing - PG&E proposes to work with EBMUD and Sonoma to deliver surveys/audits...”
- Page 69, section 6.9.1.2, currently reads, “Laundry Ozone Treatment – PG&E would work with Santa Clara to encourage replacement of traditional laundry treatment with ozone technology in large hotels and/or commercial laundries,” when it should read, “Laundry Ozone Treatment – PG&E would work with Sonoma to encourage replacement of traditional laundry treatment with ozone technology in large hotels and/or commercial laundries.”
- Page 69, section 6.9.1.2, currently reads, “Custom Winery Measures - PG&E and Santa Clara would undertake process surveys/audits and make recommendations for water saving process and/or technology changes that save water in wineries,” when it should read, “Custom Winery Measures - PG&E and Sonoma would undertake process surveys/audits and make recommendations for water saving process and/or technology changes that save water in wineries.”

VI. CONCLUSION

For the reasons stated above, the Commission should modify the PO to permit early implementation of certain of PG&E’s pilot programs, to make EM&V proposed budgets

consistent with program funding allocations, to clarify process evaluation funding, to approve additional review and input for the EM&V plan, to clarify the scope of the emerging technologies pilot, and to correct clerical errors.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **“OPENING COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY ON THE PROPOSED ORDER APPROVING PILOT WATER CONSERVATION PROGRAMS”** on all known parties to A.07-01-024 et al by

- transmitting an e-mail message with the document attached to each party on the official service list providing an email address; or
- by first-class mail, postage prepaid, to each party on the official service list not providing an email address.

Executed on December 5, 2007, at San Francisco, California.

/s/
MARTIE L. WAY

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Southern California Edison Company's Application For Approval of Embedded Energy Efficiency Water Pilot Programs for 2007-2008.	A.07-01-024 A.07-01-026 A.07-01-029 A.07-01-030
And Related Matters.	

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