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**BEFORE THE PUBLIC UTILITIES COMMISSION**

**OF THE STATE OF CALIFORNIA**

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| 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<br>(Filed July 21, 2008) |
| And Related Matters. | Application 08-07-022<br>Application 08-07-023<br>Application 08-07-031 |

**SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902 M) MOTION TO SHIFT UNSPENT, UNCOMMITTED FUNDS FROM PREVIOUS PROGRAM CYCLES TO ENSURE ADEQUATE FUNDING FOR IDENTIFIED 2009 ENERGY EFFICIENCY TRANSITION PROGRAMS—EXPEDITED TREATMENT REQUESTED**

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August 11, 2009

**BEFORE THE PUBLIC UTILITIES COMMISSION**

**OF THE STATE OF CALIFORNIA**

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# SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902 M) MOTION TO SHIFT UNSPENT, UNCOMMITTED FUNDS FROM PREVIOUS PROGRAM CYCLES TO ENSURE ADEQUATE FUNDING FOR IDENTIFIED 2009 ENERGY EFFICIENCY TRANSITION PROGRAMS—EXPEDITED TREATMENT REQUESTED

## I. INTRODUCTION

Pursuant to Rule 11.1 of the Rules and Practice and Procedure of the California Public Utilities Commission ("Commission"), San Diego Gas & Electric Company ("SDG&E") files this motion for authority to use unspent uncommitted funds from previous program cycles identified in its 2009-2011 Energy Efficiency Application (A.08-07-023) to augment the energy efficiency program funding adopted in Decision ("D.") 08-10-027 for the 2009 bridge period. This request will ensure adequate 2009 funding for specific energy efficiency programs which support the Commission's long-term energy efficiency goals. Specifically, SDG&E seeks authority to shift $17.44 million in unspent, uncommitted funds from past program cycles to augment the 2009 bridge period funding. Since these funds have already been recovered from customers, this request will not result in a rate increase.

## II. PURPOSE

SDG&E requests the use of available unspent and uncommitted funds for specific programs whose 2009 budgets are limited by bridge funding. SDG&E continues to manage its portfolio within the limited bridge funding budgets approved for 2009. The limitations of SDG&E's bridge funding budget, however, could require the curtailment of certain programs in the final quarter of 2009. These programs provide valuable opportunities to further Commission energy efficiency goals and to promote businesses and residential customers' participation in energy efficiency programs, particularly in these challenging economic times. Use of available funding for targeted programs will support continued pursuit of opportunities in these important areas.

This motion requests authorization to utilize $17.44 million of currently available, unspent, uncommitted funds from previous energy efficiency program years to augment the 2009 bridge funding for the programs specified in this motion. This augmentation will ensure that customer energy efficiency projects and activities which are focused on delivering energy savings and demand reductions will continue uninterrupted and have sustained funding until the Commission approves SDG&E's proposed 2009-2011 energy efficiency portfolio. Currently, these unspent funds have been identified and presented to the Commission in A.08-07-023 as part of SDG&E's revenue requirement and cost recovery proposal to fund the 2009-2011 energy efficiency portfolio.[1] To the extent these funds are not utilized during the bridge funding period, they would continue to be available to provide funding for the 2009-2011 portfolio.

SDG&E requests use of these currently available funds to provide additional funding for the following currently available programs:

| Program | 2009 Authorized Bridge Funding Budget | Incremental Funding Request | Estimated Incremental Net kWh Savings | Estimated Incremental Net kW Savings | Estimated Incremental Net Therm Savings |
|---|---|---|---|---|---|
| Residential Incentive Program | $4,051,201 | $870,000 | 807,691 | 784 | 905,594 |
| Multifamily Rebate Program | $2,757,872 | $673,000 | 760,022 | 305 | 125,254 |
| Energy Savings Bid Program | $8,823,595 | $13,300,000 | 79,000,000 | 9,908.55 | 166,000 |
| HVAC Training Installation and Maintanence | $5,736,432 | $1,000,000 | 2,962,963 | 1,631 | 8,135 |
| Upstream HVAC Motors* | $1,879,898 | $1,000,000 | 2,180,819 | 1,329 | -5,919 |
| Healthcare Energy Efficiency Program (Third Party) | $1,624,653 | $200,000 | 975,000 | 323.71 | |
| Lodging/Intergy EE (Third Party) | $994,051 | $400,000 | 2,105,000 | 510.93 | |
| **Total** | **$25,867,702** | **$17,443,000** | **88,791,495** | **14,792** | **1,199,064** |

*Negative therm savings are due to interactive effects.

[1] A.08-07-023, Supplemental Testimony of San Diego Gas & Electric Company, Chapter 2, July 2,2009 at page 153.

SDG&E submits this limited request for these specific programs in order to expedite the Commission's decision-making. SDG&E does not request additional funding for the remainder of the portfolio. SDG&E does not propose to initiate new programs with these funds or to transfer these funds to other programs that are not part of this request. In addition, this motion proposes no changes to any Commission policies currently in place. As such, this motion should not impact any decision-making regarding SDG&E's outstanding 2009-2011 Energy Efficiency Program Funding Application.

## III.
## BACKGROUND

On July 21, 2008, SDG&E, together with the other investor-owned utilities, filed their 2009-2011 energy efficiency applications. Those applications included a request for bridge funding to continue the operation of energy efficiency programs in the event that the Commission was unable to issue a decision in time for the new program cycle to begin on January 1, 2009. Due to a number of factors, a decision on the 2009-2011 energy efficiency portfolios was not issued in 2008.

On October 16, 2008, the Commission issued D.08-10-027 which provided funding for a select group of SDG&E's 2006-2008 energy efficiency programs to continue during the 2009 bridge funding period which began on January 1, 2009. The bridge period will continue until three months after a decision adopting SDG&E's proposed portfolio Application or December 31, 2009, whichever occurs first.

The Commission adopted bridge funding levels for 2009 which were anticipated to sustain programs on a month-to-month basis but only for a limited time until the Commission reached a final decision on 2009-2011 programs.[2] However, certain specific programs would benefit from the use of additional available funding to continue these programs until the Commission reaches a final decision on new programs. There continues to be significant interest in these programs, particularly as local governments work with SDG&E to leverage program funds with ARRA monies.

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[2] Decision 08-10-027, dated October 16, 2008, at p. 14.

## III.
## AUGMENTED PROGRAMS

Throughout the bridge period, SDG&E has continued to promote its energy efficiency programs with customers with the anticipation that design changes will be adopted for 2009-2011. However, due to the prolonged nature of the bridge period, certain programs have exhausted or are anticipated to exhaust incentive funds prior to the projected end of the bridge funding period. Therefore, SDG&E requests this supplemental funding in order to fund project commitments to commercial/industrial customers and continue to provide rebates to its residential customers and, just as importantly, to maintain the programs' readiness for the next year. Granting SDG&E's funding request would minimize the potential interruption of these programs that would otherwise occur causing market confusion and impeding the immediate ramp-up of the new 2009-2011 programs. SDG&E proposes to augment the funding for the following programs for the remainder of 2009.

### A. Residential Incentive Program ("SF Rebates")

The Residential Incentive program targets owners and renters of single-family homes, condominiums, mobile homes, and attached homes up to four-plex. The program contains four core components: (1) traditional customer incentives; (2) Point of Sale (POS) rebates, (3) customer information and education; and (4) marketing and outreach to trade allies including manufacturers, retailers and distributors. The program offers financial incentives for qualified ENERGY STAR® appliances, home improvement measures, and pool pump motors.

This request for additional funding will allow the SF Rebate program to sustain the continuing rebates for appliances and to introduce new measures such as Smart Strip televisions, monitors and computers, and cold water laundry detergent. Funding of these measures will allow SDG&E to work in coordination with local retailers and vendors who are planning heavy promotional events of these products in early fall.

### B. Multifamily Rebate Program

The Multifamily Rebate program ("MFRP") is designed specifically to motivate the multifamily property owner/manager toward installing energy efficient products. With product offerings suitable for the multifamily complex and incentive levels that help alleviate the split incentive dilemma. The MFRP is in the unique position to serve two distinct beneficiaries of energy savings, the multifamily property owner/manager and the tenant.

Property managers and contractors continue to show steady interest in the program. With the additional funding the program will be in a position to provide continuing rebates to sustain contractor participation and keep the program open throughout the year.

**C. Energy Savings BID Program**

Energy Savings Bid Program is a performance-based incentive program for very large commercial/industrial energy efficient retrofit projects. The program provides incentives for the installation of energy efficient lighting, HVAC & Refrigeration and other Electric and Natural Gas measures. The demand for the program has been extremely high in 2009. Projects are coming in at a much higher rate than can be funded through the bridge period budget. Many projects currently in the queue can only be completed if increased bridge funding is approved. These projects include customers from the Governmental, Manufacturing, Bio-Tech, Medical, Data Center, Grocery, Retail, Automotive and Commercial segments. Absent increased bridge funding, the BID Program will stop accepting projects and will lose the momentum that took years to create resulting in a significant amount of lost energy efficiency opportunities and associated jobs.

**D. HVAC Training, Installation, Main & Incentive Program**

The HVAC Training, Installation, Maintenance & Incentive ("AC TIMe"), a third party implemented program targets residential and non-residential customers with air-cooled DX air conditioning. It provides training and incentives to contractors for the implementation of qualifying HVAC energy efficiency measures (e.g., diagnostic tune-ups, condenser coil cleaning, duct test and sealing, and economizer restoration).

The current program has seen tremendous growth in participation and the additional funds will ensure the program remains open through the end of the year. Based on current participation trends this program would likely be closed by the end of September, 2009 unless additional funds are approved.

## E. Upstream HVAC Motors Program

The Upstream HVAC/Motors Program offers HVAC tune-ups and early retirement incentives for non-residential customers. The program is currently budgeted at $103,992 per month. At this funding level, the program has virtually closed its doors to all but two contractors, each supporting one half-time technician to perform HVAC tune-ups. Due to monthly caps, services are restricted to buildings with fewer than 75 tons of cooling which eliminates most schools, malls, office complexes, hospitals, and big box stores from participating in the program. Additional funding would provide enough work to each support 1.5 FTE technicians through December 31, 2009, and equipment incentives sufficient to retrofit 1.5 hotels or 300 tons per month.

## F. Healthcare Energy Efficiency Program (HEEP)

HEEP is a third party program that was first implemented in 2008. HEEP is a retrofit program that provides comprehensive energy efficiency services and establishes a permanent framework for a sustainable, long-term, comprehensive energy management program at hospitals and medical office buildings served by SDGE. HEEP addresses the complex issues of this industry's hesitancy to adopt energy efficiency behaviors and initiate facility upgrades, which achieve significant energy savings cost-effectively. Examples of hospitals targeted by the Program include Kaiser Permanente, St. Jude's, Scripps and Veteran's Administration (VA). HEEP will greatly enhance the feasibility of completing the projects within SDG&E's service territory by primarily targeting Medical Office Buildings and acute care facility energy efficiency services that are exempt from OSHPD requirements (central plant improvements and retro-commissioning activities). HEEP also targets projects that have already received OSHPD approval and need additional assistance and incentives to improve the energy efficiency component of the project.

HEEP has picked up momentum since starting in March of 2008 and has recently slowed down marketing efforts in order to avoid becoming overcommitted. At present, the program is no longer moving new projects forward, and without additional funding existing projects will be put on hold.

## G. Lodging Energy Efficiency Program ("LEEP")

LEEP is a third party program that was first implemented in 2008. LEEP offers complete audit and project identification, in addition to cash incentives for completing energy saving retrofits of existing equipment or systems in lodging facilities. This includes traditional lighting, HVAC, food service and refrigeration technologies. In addition, certain newer technologies are also being targeted –such as kitchen hood ventilation controls, hotel room occupancy sensors, and tankless water heaters. Energy saving Retro-Commissioning projects are also eligible for cash incentives through LEEP.

LEEP has gained momentum since March of 2008 but has had to slow down its marketing efforts in order to manage project commitments during the bridge funding period. Unlike HEEP, the LEEP program has sufficient funding to complete pipeline projects but cannot solicit new projects without additional funding in 2009. At present, the program is projected to stop accepting new projects later this summer if no additional funds are added to this program.

# IV.
# AVAILABLE FUNDS

Approval of this motion will not result in an increase in customer rates. As part of SDG&E's July 2, 2009 Supplemental Testimony of San Diego Gas & Electric Company for Approval of Electric and Natural Gas Energy Efficiency Programs and Budgets for Years 2009 through 2011 Chapter II included an estimated $73.6 million in uncommitted, unspent electric funds and $6.2 million in uncommitted, unspent natural gas funds for funding the requested application. SDG&E requests use of $17.44 million of these funds for use as specified in this motion. This amount is sufficiently covered by the amount of uncommitted, unspent 2009 budget as shown in Table 4-1 (at page 153). This request would not impact the current bill impact estimates and proposed customer average rates shown in Tables 4-2, 4-3, 4-4 and 4-5. Any funds not utilized during 2009, would continue to be utilized to support the final authorized budget for 2009-2011. Granting of this motion will not increase any rates or charge, cause the withdrawal of services, or conflict with any other rate schedule.

## V.
## REPORTING OF ENERGY SAVINGS FOR THE AUGMENTED PROGRAMS

SDG&E will report the expenses and energy savings resulting from this additional bridge funding monies consistent with the current monthly and quarterly reporting requirements. For the purposes of reporting energy savings, the augmented program funds will be treated consistent with D.09-05-037 that allows energy savings from mid-cycle funding augmentation to count towards the Minimum Performance Standard.

## VI.
## EXPEDITED TREATMENT IS REQUESTED TO MITIGATE THE NEGATIVE IMPACT ON PROGRAMS IN 2009

Time is of the essence to mitigate the impact of the decreased bridge funds available for use by these programs in this period and the next program cycle. In particular, the specific programs for which augmented funds are requested to avoid slowdown or reduction of services or availability require expedited action by the Commission to prevent serious harm to the program. As such, SDG&E requests the ALJ grant the motion and issue a proposed decision as soon as possible pursuant to Rule 11.1(g).

## VII.
## CONCLUSION

For the reasons articulated herein, SDG&E respectfully requests that the Commission authorize SDG&E to shift $17.44 million in uncommitted, unspent energy efficiency funds from past program cycles to augment the 2009 bridge funding period. This will enable SDG&E to supplement the operations of the specific programs discussed supra in 2009. Doing so will protect against the unnecessary slowdown, reduction, or interruption of programs, loss of program infrastructure, and loss of valuable momentum. The relief requested by SDG&E will continue the delivery of valuable, cost-effective benefits to SDG&E's ratepayers and will help to meet the Commission's and the State's objectives for energy efficiency. SDG&E further urges the Commission to take expedited action on this Motion to mitigate any detrimental impact on the programs in 2009 as a result of insufficient funding, and to prevent the reduction of the programs, pending authorization for the 2009-2011 program cycle.

Dated this 11th day of August, 2009.

Respectfully submitted

By: *<u>/s/ Steven D. Patrick</u>*
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## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902 M) MOTION TO SHIFT UNSPENT, UNCOMMITTED FUNDS FROM PREVIOUS PROGRAM CYCLES TO ENSURE ADEQUATE FUNDING FOR IDENTIFIED 2009 ENERGY EFFICIENCY TRANSITION PROGRAMS—EXPEDITED TREATMENT REQUESTED** on all known interested parties of record in **A.08-07-021, A.08-07-022, A.08-07-023 and A.08-07-031** via email to those whose email address is listed in the official service list and via first-class mail to those whose email address is not available.

Copies were also sent via Federal Express to Administrative Law Judge David Gamson and Commissioner Dian Grueneich.

Dated at Los Angeles, California, this 11th day of August 2009.

*/s/ Marivel Munoz*
**Marivel Munoz**

**CALIFORNIA PUBLIC UTILITIES COMMISSION**
**Service Lists: A.08-07-021,022,023 and 031– Last Changed: August 6, 2009**

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