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

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| Order Instituting Rulemaking to Examine the Commission's Post-2005 Energy Efficiency Policies, Programs, Evaluation, Measurement and Verification, and Related Issues. | R.06-04-010<br>(Issued April 13, 2006) |

# AMENDED PETITION FOR MODIFICATION OF DECISION 07-09-043 BY PACIFIC GAS AND ELECTRIC COMPANY (U 39 M), SOUTHERN CALIFORNIA EDISON COMPANY (U 338 E), SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M), AND SOUTHERN CALIFORNIA GAS COMPANY (U 904 G)

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Dated: November 7, 2007

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**OF THE STATE OF CALIFORNIA**

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On October 31, 2007, Pacific Gas and Electric Company (PG&E), Southern California Edison Company (Edison)**,** San Diego Gas and Electric Company (SDG&E), and Southern California Gas (SoCalGas) filed a petition to modify Decision 07-09-043 to increase the ability of the decision to make energy efficiency a core part of the utility business. The petition sought to clarify and modify how the results of the *ex post* measurement and verification studies to be completed in 2010 will be applied in the context of the Commission's newly adopted energy efficiency risk /reward incentive mechanism, and to make changes to the incentive mechanism that will permit predictable earnings (or penalties) from energy efficiency programs that can be valued by the investment community. In two places, at pages 2-4 and 14-16 of the petition, petitioners recommended specific language changes to the text on page 12 and Ordering Paragraph 2(e) of Decision 07-09-043. Unfortunately, the proposed changes did not fully capture that the minimum performance standard of the adopted shareholder incentive mechanism has two components – an overall minimum performance standard and one tied to the three metrics of kilowatts, kilowatthours, and therms. This amended petition corrects that oversight, and adjusts the recommended changes in the text on page 12 and Ordering Paragraph 2(e) of Decision 07-09-043. Other than those changes (now on pages 3, 4, 15 and 16) and this introductory paragraph, this amended petition is identical to the original petition.

With these changes, the incentive mechanism will fully encourage the use of energy efficiency over traditional supply resources by allowing utilities to book any earnings received without having to simultaneously create a reserve because of the uncertainty of having to return any interim incentives. The incentive mechanism can then truly serve as a model for the rest of the country.

This petition requests modification to reduce the likelihood that interim earnings will have to be paid back and increase the certainty for recognition of any earnings by the investor community. The shareholder incentive Decision 07-09-043 allows utilities to earn 70 percent of any rewards or penalties in each interim claim based on verified installation of measures and costs with the remaining 30 percent to be held back until the year following completion of a program cycle, when it will be trued up based on final evaluation, measurement and verification (EM&V) studies. It opens the possibility of full payback of any interim reward amounts if the EM&V studies show that a utility no longer meets the program cycle minimum performance standard of 80% for any individual metric (kW, kWh or therms) or an overall average of 85% of the Commission's energy efficiency goals. While the actual risk of full payback of the interim reward amounts is unknown, the existence of such repayment risk is a key factor in the ability of the utilities to book earnings. The risk currently exists in the incentive mechanism at a sufficient level to impact the recognition of earnings due to the inability of the utilities to predict the effects of the EM&V studies. The uncertainty associated with the *ex post* measurement of energy savings, particularly regarding the subjectivity of the net-to-gross ratio is so great that under the current mechanism no earnings can probably be booked until the conclusion of the fourth-year true up. Wall Street has also noted the uncertainty, when analysts for Citibank and Lehman Brothers issued statements in the wake of the Commission's shareholder incentive decision. In a report on PG&E, Citigroup observed of the decision:

> "In our view, the incentive otherwise loses its practical effectiveness as a tool for the CPUC to reward the company for achieving efficiency goals. If the costs/benefits are not readily transparent to the capital markets the company effectively loses the feedback mechanism that makes the efficiency savings valuable to

> the company." (Citigroup report on PG&E Corp., September 25, 2007)

Lehman Brothers said that PG&E:

> "…may experience claw back of revenue once a program is completed and needs to conduct such energy efficiency programs essentially "in the dark" as to the amount of revenue that will ultimately be realized. This creates both a disincentive to push the programs and an accounting problem in regards to when revenue from said programs can actually be booked, given under the current order its uncertain nature." (Lehman Brothers report on PG&E Corp., September 25, 2007.)

While these observations are about PG&E, they are equally applicable to Edison, SDG&E and SoCalGas.

Specifically, petitioners request modification of the following parts of Decision 07-09-043:

Text, page 12, 16th line: Change the sentence "We do not restrict the final true-up process, as some parties propose." to "We do not restrict the final true-up process, except if the interim earnings claims, based on verified measure installations and costs and *ex ante* energy savings and demand reduction calculations, result in a utility meeting the 85% minimum performance standard for earnings (80% for SoCalGas), but the final true-up calculation, based upon *ex post* energy savings and demand reductions, results in that utility meeting less than 80% for any individual savings metric or less than 85% for the average savings threshold but greater than 65% of the Commission's goals, that utility will continue to achieve earnings at the 9% shared-savings rate. In addition, as long as a utility continues to exceed the 65% of savings goals threshold on an *ex post* basis, it will not be required to pay back any interim incentives earned."

Text, page 121, first sentence, last paragraph: Change the sentence to: "For the reasons stated above, we do not restrict the true-up adjustment in the final claim, except insofar as a utility meets the minimum performance standard for the interim claim based on verified measure installations and costs, and *ex ante* savings assumptions, but falls within the 65 to 85% of energy saving goals as a result of the true up. In that circumstance, the utility will continue to earn at the 9% shared-saving rate. In addition, as long as a utility continues to exceed the 65% of savings goals threshold on an *ex post* basis, it will not be required to pay back any interim incentives earned."

Finding of Fact 110: Change to: "The possibility of refunding earnings already claimed may present certain problems for the utilities with respect to financial reporting. However, these problems are effectively addressed in today's decision by 1) limiting payout of initial claims(s); 2) allowing utilities to continue to earn at the 9% shared-savings rate if interim *ex ante* results are above the 85% minimum performance threshold (80% for SoCalGas) and *ex post* results remain above the 65% penalty threshold; 3) eliminating the possibility of refunding earnings adopted in the interim claims; and 4) deducting any over-collections from future earnings claims, as suggested by PG&E and others in the proceeding."

Finding of Fact 111: Delete "unrestricted."

Ordering Paragraph 2.a): The first sentence should be changed to: "To be eligible for earnings, SDG&E, PG&E and SCE shall meet the following minimum performance standard (MPS) for the energy efficiency portfolio as a whole, on an *ex ante* basis:"

Ordering Paragraph 2.b) should add the phrase "on an *ex ante* basis" to the end of the sentence.

Ordering Paragraph 2.e): Add a new subpart (2) as follows: "If the MPS is met utilitizing *ex ante* assumptions, but the *ex post* EM&V results take an individual metric below the 80% threshold or take the overall portfolio results to between 65% and 85% of the Commission-adopted savings goals, the utility shall continue to earn at the first tier sharing rate of 9% and shall not return any interim claims.

Attachment 8, figures 1 and 2, would also need to be modified to show either that the curves and calculations apply to the *ex ante* calculation of incentives or penalties, or a separate set of curves would have to be developed to show the *ex post* modification.

**BACKGROUND**

Decision 07-09-043 established an incentive mechanism for utilities to earn incentives or incur penalties based on their efforts to successfully implement energy efficiency programs over two three-year funding cycles (2006-2008 and 2009-2011). The decision establishes a number of tiers that determine the amount of incentive or penalty. The utilities designed and implemented their programs using the best-available information to ensure cost-effective, successful programs, using the Commission's adopted energy-saving goals, and the commonly-accepted estimates for energy savings, usually from the Database for Energy-Efficient Resources (DEER) sponsored by the Public Utilities Commission and the California Energy Commission.

Decision 07-09-043 establishes interim claims, wherein a utility can claim 70% of the applicable reward, based on actual installation of energy efficiency measures, actual program costs and *ex ante* calculations of the energy savings. The final 30% of the reward is held back until a subsequent true-up is done in the year following the end of the 3-year program cycle and is based on the results of *ex post* measurement studies conducted by consultants to the Energy Division.

The tiered structure of the incentive mechanism results in some significant cliffs, particularly between the 9% shared-savings rate incentive and the no-earnings deadband at 85% of the Commission's energy savings goals. As it stands now, if a utility successfully implements 85.1% of the Commission's goals, using the *ex ante* assumptions employed when the programs were being designed, it will earn 70% of the resulting reward calculation. For example, if the net societal benefits of the Commission's goals equate to $400 million at 100% of the goals, and the utility achieves 85.1% of the goal (assuming, for purposes of this simplified example, that the cost-effectiveness of the programs implemented is proportional to those assumed in the numerical calculation of the value of the goals at 100%), it will be entitled to an interim claim of $21.44 million ($400 million X 9% X 70% X 85.1%). However, if the *ex post* results, determined up to three years later, show a tiny drop in actual savings compared to estimated savings, to 84.9% of the Commission's goal, the impact on the utility will be huge. Not only will the utility get no earnings from the true-up claim, it will have to pay back the $21.44 million it received in the interim claim, even though customers and society still received $340 million in net benefits.

That aspect of the incentive mechanism poses a huge risk to utilities, sufficient to make it difficult for them to recognize interim rewards as earnings because there is no reasonable assurance that they will be able to keep the earnings until the results of the *ex post* measurement are known. One of the goals of the utilities and the Commission is to make energy efficiency a base part of the utilities' business. Regular, predictable, reportable earnings or penalties based on the utilities' efforts are a significant part of that goal.

The single greatest risk in the *ex* post measurement is the net-to-gross ratio. Although there are risks associated with other aspects of *ex post* measurement, there is a long, stable history of measurement that tends to reduce uncertainty. The net-to-gross ratio is a measure of the percentage of energy savings that is directly attributable to a utility's energy efficiency programs. For example, a net-to-gross ratio of 0.75 indicates that three-fourths of the gross savings of an energy-saving measure are directly the result of the utility's program. To put it another way, it would mean that one-fourth of the measures would have been installed without any utility program. In theory, the net-to-gross ratio should go down because of "free riders," those who participate in a utility's program but who would have installed the measure in any event, and go up for "free drivers," those who install energy efficiency measures or undertake efficient practices as a result of the program, but who choose not to receive the financial incentives of the program. To date, the Commission has chosen not to try to measure the effect of free drivers, also known as spillover, because of the speculative nature of such measurement. See Decision 05-09-043, Finding of Fact 27 (although the Commission has indicated it may reexamine the issue in the future).

The net-to-gross ratio serves three purposes:

1. For shareholder incentive calculations, it only permits utilities to claim savings under a shared-savings mechanism that are the result of the utility's programs.

2. By restricting shareholder incentives to savings directly attributable to utility programs, it provides motivation to utilities to focus program spending on programs that will achieve results that would not otherwise have occurred.

3. The net-to-gross ratio should be a factor in determining what measures to incent customers to buy. The lower the net-to-gross ratio, the more that measure is becoming a mainstream measure that people would buy without additional inducement. At some point, when the net-to-gross ratio becomes low enough, incentives may no longer be important in customers' decisions to adopt the measure and the utility could let the market take over.

The net-to-gross ratio is less important for resource planning, since gross energy savings will determine whether and when new power plants need to be built and how much power and energy to buy.

Under the shareholder incentive mechanism in place from 1994 to 1997, the Commission established protocols for measurement of energy savings, including the net-to-gross ratio. The last version of the pre-1998 protocols is found at the California Measurement Advisory Committee website at: http://calmac.org/events/PROTOCOL.pdf. Table 5 of the Protocols, at page 13, indicates that net energy savings are to be derived by comparing energy usage of a participating group of utility customers with a control group, although during the years those protocols were in effect, utilities obtained some waivers to enable them to use participant surveys to calculate the net-to-gross ratio.

Beginning with the 1998 programs, the Commission shifted the focus of energy efficiency programs from resource procurement to market transformation. Shareholder incentives were based more on accomplishing market transformation tasks than achieving direct energy savings and, in 2002, were eliminated entirely until Decision 07-09-043. As a result, very little work was done on the development and refinement of net-to-gross ratios after measurement of the pre-1998 programs. Most net-to-gross information is a decade or more old. The currently-approved net-to-gross ratios are contained in DEER and can be found at the Commission's website at:

http://eega.cpuc.ca.gov/deer/Ntg.asp

The Commission used these net-to-gross ratios in developing energy-saving goals, and the utilities used them in planning their 2006-2008 energy efficiency programs.

As part of the return to resource procurement as the primary objective of energy efficiency and the possibility of the return of utility shareholder incentives, the Commission held a workshop on development of "Future Commission Policies on Energy Efficiency Program Evaluation, Measurement, and Verification: Performance Basis and Measurement/Verification Protocols Associated with Resource Programs." The workshop was widely attended by representatives of the utilities, EM&V market participants, the Division of Ratepayer Advocates, the California Energy Commission, the Natural Resources Defense Council, and the League of Women Voters. The June 10, 2004 workshop report[1] noted, at page 5[2]:

> Participants agree that the *ex-post* measurement of NTG, EUL, and IMC should not be used to recalculate the program performance basis, but that *ex-post* measurement of program administrative costs and measure installations should be. Participants disagree, however, on whether the *ex-post* measurement of energy and demand savings should be used to recalculate the program performance basis.

Decision 05-04-051, at <u>mimeo</u> pages 44 to 54, Findings of Fact 29 to 34, and Ordering Paragraph 8, the Commission concluded, after considerable discussion:

> As discussed in this decision, the performance basis for resource programs implemented in 2006 and beyond shall be subject to the following:…
> c. As a general policy, *ex post* reevaluation of per unit kWh, kW and therm savings through appropriate load impact studies. An exception to the general policy may be appropriate for measures and/or programs for which there are well-established *ex ante* values with a high degree of confidence, and low external sources of variability that could influence the energy savings. – Decision 05-04-061, Ordering Paragraph 8(c).

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[1] Found at: http://www.cpuc.ca.gov/static/energy/electric/energy+efficiency/ee+policy/performance+basis+workshop+report_6-10-04.doc

[2] NTG is net-to-gross, EUL is expected useful life, and IMC is incremental measure cost.

The discussion in the text of Decision 05-04-051 notes that the Commission has used two different methods for treating the results of *ex post* measurement and verification studies: applying them prospectively only for planning future energy efficiency programs and resource planning during the years 1990-1993 and 1998-2005; and applying them both prospectively and retroactively for the earnings calculations for utility shareholder incentives for energy efficiency accomplishments during the years 1994-1997. In reaching its conclusion, the Commission's consideration relied heavily on the fact that during 1994-1997, the *ex post* measurement and verification results actually increased the net energy savings over most of those years, thereby enabling the Commission to conclude that the application of *ex post* measurement and verification results did not result in systematic overestimations of new benefits on a statewide basis. Decision 05-04-051, at mimeo pages 45-48.

Decision 05-09-043 then clarified that the *ex post* true up for the performance basis would apply to the net-to-gross ratio, but not measure expected useful lives or incremental measure cost, thus adopting the consensus recommendations of the June 2004 workshop group on expected useful lives and incremental measure costs, but overruling the consensus on the net-to-gross ratio.

In June 2006, the Commission issued new EM&V protocols, found at: http://www.cpuc.ca.gov/static/energy/electric/energy+efficiency/em+and+v/evaluatorsprotocols_final_adoptedviaruling_06-19-2006.doc.

The new protocols, at Table 3 on page 36, identify several different ways of measuring net-to-gross, involving: (1) comparison of participant and nonparticipant consumption data; (2) participant self-report; (3) other self-report methods, including such things as policy and paper review, interviews with vendors, and Title 24 review of standard buildings and stocking practices; and (4) "Triangulation" using combinations of the various approved methods. One of the reasons why the methods have been expanded is the difficulty, after nearly 30 years of energy efficiency programs, of finding nonparticipant groups, particularly customers who have never participated, in the nonresidential sector.

The calculation of the *ex post* net-to-gross ratios introduce several unknowns from those developed many years ago. First, because of the difficulty of identifying nonparticipant groups, the net-to-gross studies will be much more reliant on subjective interviews with vendors and purchasers, who generally can be expected to have a bias toward identifying themselves as the primary driver of the purchase. Second, the net-to-gross ratio is also a measure of the success of a program. The more a measure becomes a normal, accepted part of the marketplace, the lower the net-to-gross ratio will be. With the much higher goals set by the Commission and the more intense efforts by the utilities, the most successful programs could end up punishing the utilities by resulting in a lower net-to-gross ratio.

**DECISION 07-09-043 SHOULD BE MODIFIED TO ELIMINATE THE POTENTIAL FOR A MAJOR REDUCTION IN EARNINGS RESULTING FROM A SMALL CHANGE IN THE *EX POST* MEASUREMENT RESULTS WHILE STILL PROVIDING THE OPPORTUNITY FOR BOOKABLE EARNINGS FOR DILIGENT PROGRAM IMPLEMENTATION AND SUCCESS IN ACHIEVING THE STATE'S ENERGY EFFICIENCY PROGRAMS**

The utilities have been diligently working to implement the Commission's goals for the 2006-2008 programs for nearly two years now, based on the assumptions and forecasts that underlay both the establishment of the Commission's ambitious energy efficiency goals and the program plans established to achieve those goals. The utilities are fully prepared to achieve incentives and absorb penalties based on their efforts to market and implement the programs, and get a verified number of energy efficiency measures and practices into place.

After fifteen years of measurement, the utilities are confident that the estimations of energy savings per measure are reasonably close to the actual energy savings that will be realized. The fact that the *ex post* measurement results were reasonably close to the *ex ante* forecasts of energy savings was a significant factor in Decision 05-04-051's conclusion that *ex post* evaluations of per unit kWh, kW and therm savings are appropriate for use for the performance earnings basis for energy efficiency shareholder incentives. Decision 05-04-051 at mimeo pages 44-54 and Ordering Paragraph 8(c).

What the utilities are really concerned about is the uncertainty arising from the subjective aspect of the net-to-gross ratio and the resulting uncertainty that may prevent the utilities from recognizing incentives as a regular part of their base business.

1. The net-to-gross ratio is by far the most subjective aspect of measurement and evaluation. After many years of energy efficiency programs, it is very difficult to find a nonparticipant group. Participant self-reports essentially ask the question: "Would you have purchased and installed this measure without the utility energy efficiency program?" The answer can vary greatly depending on how the question is phrased, to whom it is asked, other factors affecting the participant's willingness to reveal their true motivations, and how long after the event the question is asked. There are instances where the ultimate consumer may not even be aware that the utility program was a major cause in the consumer's decision to purchase an energy efficient product. For example, a consumer can go to a retailer and buy compact fluorescent lights at $1.50 each when, without the utility program, the lights would have cost $3 each. If the consumer would not have purchased those lights at $3 each, will the utility get credit for the purchase in calculating the net-to-gross ratio? Asking vendors what factors caused their customers to buy a certain product has an even greater risk of bias. Vendors will naturally be motivated to stress their contribution and minimize others. In the case of participating businesses, the interviewee may not even be the same person that originally approved the project due to attrition or promotion. The net-to-gross results may be significantly affected by the time delay between a participant's action and the study. How well will participants remember why they took a particular action several years in the past?
2. The net-to-gross ratio is almost entirely outside the control of the utilities. If done properly, the net-to-gross ratio reflects the state of the market during and after the program. Utilities cannot use anything other than the best information available at the time their programs are designed and implemented, which they did. Highly successful programs, which increase the public's awareness and acceptance of the measure, will actually result in a lowered net-to-gross ratio than a program which is less successful.

Utilities will be essentially punished for their greatest successes. Contrary to the assertion in at mimeo page 171 of Decision 07-09-043, the utilities have little opportunity now, almost two-thirds of the way through this program cycle, to make major adjustments to their portfolios after marketing and printed materials have been created and marketed in the media, in response to measurement studies that are just now being completed for the 2004 and 2005 programs. The final studies for the 2006-2008 program cycle will not be completed for several years.

3. The net-to-gross is being unfairly applied. In theory, the calculation of the net-to-gross ratio should include the discounting of "free riders" (i.e., those who take advantage of utility programs, but who would have taken the energy-efficient action even in the absence of the program) and the addition of "spillover" (i.e., those who did not participate in the utility program, but who took action because of the utility program). Under the new incentive mechanism, the utilities' performance earnings basis will be reduced for free riders, but will receive no credit for spillover effects because of the speculative, subjective nature of any attempts to quantify spillover benefits. Decision 05-04-051, at mimeo page 31.[3] The calculation of spillover is not so different from the calculation of free riders.

Although the net-to-gross ratio has a direct effect on a utility's performance earnings basis, it does not affect the societal goals of energy efficiency. When a customer installs an energy efficiency measure or takes efficient actions, society still receives the same benefit, reducing the need for additional power plants, using less fossil fuel and reducing greenhouse gases. While the net-to-gross ratio is an important consideration in gauging whether a particular market sector is sufficiently transformed such that additional customer financial incentives are less needed and energy efficiency program funding should be transferred to another market

[3] Although Decision 07-10-032, addressing energy efficiency program planning for the 2009-2011 period, at mimeo pages 123-128, would have the Commission and parties relook at aspects of the issue of spillover savings, any outcome would not apply to the 2006-2008 period, and is very uncertain.

sector or measure, the savings are still there, for the benefit of society. The net-to-gross ratio is a more important factor for future planning than past actions.

Utilities must be able to recognize, or book, incentives on a regular basis for accounting purposes in a manner that can be expected and anticipated by the investment community. Otherwise earnings from energy efficiency programs are not truly on par with generation resources in the minds of investors. As the incentive mechanism is currently adopted, if the utilities do not have sufficient certainty, consistent with Financial Accounting Standards Board directives, that the incentives will be earned, they cannot be booked until after the end of the program cycle when the final adjustments have been determined. If the incentives are not booked at regular intervals, they would result in a one time earnings adjustment that would likely be excluded from operating earnings, which are the basis for a company's financial valuation. The uncertainty could result in a higher cost of financing. As a consequence, the utilities would not receive the full benefit of these shareholder incentives from the financial markets.

Because of the uncertainty associated with the net-to-gross factor, for which the final results will not be known until 2009 or 2010 when the Energy Division's measurement consultants issue their reports, it is unlikely that the utilities will be able to timely book any incentives earned without having to simultaneously reserve against that amount, because of the uncertainty over whether the utilities will have to return any interim earnings or meet the final minimum performance standards because of this one factor. Unless the Commission grants this petition for modification, the value of any energy efficiency earnings as a systematic part of the utility's basic business earnings will be seriously degraded.

**MODIFICATION REQUESTED**

The best available information was used to develop the utility programs and the Commission's adopted energy efficiency goals, including assumptions about the net-to-gross ratio for each measure or class of measures. The utilities have been implementing the current cycle of energy efficiency programs for nearly two years now, including marketing, acting in reliance on the best available information at the time of program development, selecting energy efficiency measures, and implementing those programs. The utilities are, and should be, fully responsible for running the programs and ensuring the Commission's goals are met. However, the substantial uncertainty about the net-to-gross ratios selected by the Energy Division's measurement consultants, to be released after the end of each program cycle[4], and to be retroactively applied to the performance earnings basis for the previous program cycle[5], makes it unlikely that the utilities will be able to book any interim incentives without simultaneously having to set up an offsetting reserve. Because final results cannot be known until well after the three-year program cycle is completed, it is very difficult to make meaningful prospective portfolio program changes to mitigate any net-to-gross changes recommended by Energy Division's consultants.

Accordingly, to permit energy efficiency to become a regular, systematic part of the utilities' financial earnings and penalties reporting, petitioners request that Decision 07-09-043 should be modified to allow utilities to determine performance towards the minimum performance standard based upon the *ex ante* estimates which best reflect the available information at the time of program filings. This would eliminate the single greatest impediment to the recognition of any incentive rewards – the danger that a highly successful program will be entitled to no earnings and have to give back any interim earnings because of subjective net-to-gross results that are worsened because of the success of the program. The use of *ex ante* estimates for determining the minimum performance standard eliminates the all-or-nothing point at 85% of the Commission's energy saving goals in the recalculation of savings between the *ex ante* and *ex post* measurement calculations.

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[4] Two years into this program cycle, studies are just now beginning to be released for results from the 2004 and 2005 programs. Given the effort that is needed to design, market and implement programs, it is very difficult to make major program changes mid-stream and still have any hope of meeting the Commission's goals.

[5] Because of the timing of the Energy Division's *ex post* measurement studies, to be released in 2009 or 2010, unless the studies are released earlier, the earliest prospective application of the new net-to-gross ratios would be for the 2012-2014 program cycle.

If the petition is granted, utilities will still have to meet the 85% savings threshold, using *ex ante* energy-savings assumptions and actual measure installations and measure costs, to be eligible for any earnings at all. But if the *ex post* results take the utility below the 80% goal for any individual savings metric or below the 85% average savings threshold (but still above the 65% threshold, below which there would be no earnings and the potential for penalties), the utility would continue to earn at the 9% shared-savings rate of the *ex post* net benefits. In addition, any interim payments earned by the utilities would not be subject to repayment if *ex post* earnings are determined to be less than the interim payments previously collected.

If the petition is granted, the utilities would still earn based on their *ex post* accomplishments. The only change is that once the minimum performance standard for earnings is met on an *ex ante* basis, which is all the utilities can know while they are implementing their programs, they won't lose everything because of a small change in the *ex post* results. With this change, the utilities will have a much greater chance of being able to book any earnings as they are earned, and thereby go far to making energy efficiency an integral part of their base business.

Accordingly, petitioners request that Decision 07-09-043 be modified as follows:

Text, page 12, 16th line: Change the sentence "We do not restrict the final true-up process, as some parties propose." to "We do not restrict the final true-up process, except if the interim earnings claims, based on verified measure installations and costs and *ex ante* energy savings and demand reduction calculations, result in a utility meeting the 85% minimum performance standard for earnings (80% for SoCalGas), but the final true-up calculation, based upon *ex post* energy savings and demand reductions, results in that utility meeting less than 80% for any individual savings metric or less than 85% for the average savings threshold but greater than 65% of the Commission's goals, that utility will continue to achieve earnings at the 9% shared-savings rate. In addition, as long as a utility continues to exceed the 65% of savings goals threshold on an *ex post* basis, it will not be required to pay back any interim incentives earned."

Text, page 121, first sentence, last paragraph: Change the sentence to: "For the reasons stated above, we do not restrict the true-up adjustment in the final claim, except insofar as a utility meets the minimum performance standard for the interim claim based on verified measure installations and costs, and *ex ante* savings assumptions, but falls within the 65 to 85% of energy saving goals as a result of the true up. In that circumstance, the utility will continue to earn at the 9% shared-saving rate. In addition, as long as a utility continues to exceed the 65% of savings goals threshold on an *ex post* basis, it will not be required to pay back any interim incentives earned."

Finding of Fact 110: Change to: "The possibility of refunding earnings already claimed may present certain problems for the utilities with respect to financial reporting. However, these problems are effectively addressed in today's decision by 1) limiting payout of initial claims(s); 2) allowing utilities to continue to earn at the 9% shared-savings rate if interim *ex ante* results are above the 85% minimum performance threshold (80% for SoCalGas) and *ex post* results remain above the 65% penalty threshold; 3) eliminating the possibility of refunding earnings adopted in the interim claims; and 4) deducting any over-collections from future earnings claims, as suggested by PG&E and others in the proceeding."

Finding of Fact 111: Delete "unrestricted."

Ordering Paragraph 2.a): The first sentence should be changed to: "To be eligible for earnings, SDG&E, PG&E and SCE shall meet the following minimum performance standard (MPS) for the energy efficiency portfolio as a whole, on an *ex ante* basis:"

Ordering Paragraph 2.b) should add the phrase "on an *ex ante* basis" to the end of the sentence.

Ordering Paragraph 2.e): Add a new subpart (2) as follows: "If the MPS is met utilitizing *ex ante* assumptions, but the *ex post* EM&V results take an individual metric below the 80% threshold or take the overall portfolio results to between 65% and 85% of the Commission-adopted savings goals, the utility shall continue to earn at the first tier sharing rate of 9% and shall not return any interim claims.

Attachment 8, figures 1 and 2, would also need to be modified to show either that the curves and calculations apply to the *ex ante* calculation of incentives or penalties, or a separate set of curves would have to be developed to show the *ex post* modification.

## ILLUSTRATION OF THE EFFECT OF ELIMINATING THE POTENTIAL FOR REPAYMENT OF INTERIM INCENTIVE PAYMENTS

One of the changes requested in this petition for modification of the elimination of the potential for repayment of part of interim incentive payments if the *ex post* measured savings drop considerably from the *ex ante* assumptions of savings. Attached to this petition are tables and descriptions analyzing the effect of this change. As the tables indicate, it would take a significant drop in energy savings to a significant portion of the portfolio before the repayment possibility becomes an issue. It becomes a factor mainly when the *ex ante* calculation of net benefits is over 100% of the Commission's goals, and the *ex post* calculation goes below 100% of goals, because of the drop in the incentive shared-savings rate from 12% of net benefits to 9%. While the risk of payback of the interim reward amounts is unknown, the existence of such repayment risk affects the ability of the utilities to book earnings. The attached tables provide a range of scenarios which provide the impacts of a drop in shared-savings rates from the interim claim to the final claim. The utilities support the 30% holdback of incentive claims until the final true-up, as adopted in Decision 07-09-043, in that it captures reasonably foreseeable potential adjustments from EM&V, as illustrated by the tables. The petition's request to eliminate some of the uncertainty of the interim payments is not intended for (and will not result in) the utilities benefiting from undeserved earnings. Instead, it is intended to send a strong signal to the financial community that the incentive mechanism is real, that there is utility shareholder value in investing in energy efficiency, and California is serious about making energy efficiency the preferred energy resource.

## CONCLUSION

Decision 07-09-043 should be modified to eliminate the cliff built into the shareholder incentive mechanism that can result in small changes in the measured savings from the interim *ex ante* calculation of net benefits to the *ex post* result.

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With the requested modification, the energy efficiency incentive risk/reward mechanism should be able to operate as intended and encourage the use of energy efficiency over traditional generation resources through the next two program cycles and until the Commission conducts its next overall review of the shareholder incentive mechanism.

Respectfully submitted,

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Dated: November 7, 2007

# ATTACHMENT

This Petition for Modification requests the energy efficiency incentive mechanism decision be modified to provide the opportunity for utilities to recognize earned shareholder incentives while maintaining a low risk to ratepayers. The tables below provide the Commission with two important points of information regarding the ability of the utilities to manage portfolios during the cycle to minimize the differences between the interim earnings claims and the final, measured earnings claims:

1) **Portfolio Diversification**

   The utility portfolios should continue to maintain a level of diversification such that any reductions in net-to-gross ratios (the largest risk factor, as discussed in this Petition for Modification) to individual program elements should minimize the impact to the entire portfolio. That is, the more diverse the sources of your energy savings, the less likely it is that you would have enough downward adjustments across the program elements in the portfolio.

   **Table 1** below shows the how changes to the largest-producing elements in the utility portfolios affect the portfolio savings as a whole. This analysis is based upon the data utilized to adopt the energy efficiency shareholder incentive mechanism. This analysis reflects the 3-year cycle of savings. The mix of programs would be expected to change over time as the utilities receive evidence to make changes to the portfolio. The utilities will continue to respond to market conditions, including updates to net-to-gross ratios, during the cycle in order to maximize net savings. Such increases to the savings from such programs would further increase portfolio diversity. **Table 1** shows that even with significant changes to the program elements which represent major contributors to the portfolios, the effect on the remainder of the portfolios is minimized.

**Table 1 - Portfolio Diversification**

**SCE**

**Top 5 Elements**

| -- Elements are defined as supported by individual net-to-gross ratios | Energy Savings (Net Annual kWh) | % of Portfolio kWh Savings | Scenario 1: Reduce Top 5 Elements by 15% | Scenario 2: Reduce Top 5 Elements by 20% |
|---|---|---|---|---|
| Express Efficiency Strategy | 582,843,115 | 18% | 495,416,648 | 466,274,492 |
| CFLs - Grocery | 294,133,445 | 9% | 250,013,429 | 235,306,756 |
| Standard Performance Contract Strategy | 252,660,462 | 8% | 214,761,393 | 202,128,370 |
| Lighting Fixtures | 235,939,570 | 7% | 200,548,635 | 188,751,656 |
| Nonresidential Direct Installation Strategy | 233,454,889 | 7% | 198,436,656 | 186,763,911 |
| Total Savings - Top 5 Elements | 1,599,031,482 | 48% | | |
| Total Savings - Portfolio | 3,312,717,359 | | | |
| Ex Post Change to the Energy Savings of the Top Programs of: | | | 15% | 20% |
| Equals an Ex Post Portfolio Energy Savings Change of: | | | 7% | 10% |

**SDG&E**

**Top 5 Elements**

| -- Elements are defined as supported by individual net-to-gross ratios | Energy Savings (Net Annual kWh) | % of Portfolio kWh Savings | Scenario 1: Reduce Top 5 Elements by 15% | Scenario 2: Reduce Top 5 Elements by 20% |
|---|---|---|---|---|
| Upstream Lighting Program | 283,453,347 | 29% | 240,935,345 | 226,762,677 |
| Energy Savings Bids | 169,459,500 | 17% | 144,040,575 | 135,567,600 |
| Small Business Super Saver | 157,572,849 | 16% | 133,936,922 | 126,058,279 |
| Express Efficiency Rebate Program | 51,424,283 | 5% | 43,710,640 | 41,139,426 |
| 3P KEMA HVAC Training, Installation and Maint. | 50,049,164 | 5% | 42,541,789 | 40,039,331 |
| Total Savings - Top 5 Elements | 711,959,142 | 73% | 605,165,271 | 569,567,314 |
| Total Savings - Portfolio | 973,520,284 | | | |
| Ex Post Change to the Energy Savings of the Top Programs of: | | | 15% | 20% |
| Equals an Ex Post Portfolio Energy Savings Change of: | | | 11% | 15% |

**PG&E**

**Top 5 Elements**

| -- Elements are defined as supported by individual net-to-gross ratios | Energy Savings (Net Annual kWh) | % of Portfolio kWh Savings | Scenario 1: Reduce Top 5 Elements by 15% | Scenario 2: Reduce Top 5 Elements by 20% |
|---|---|---|---|---|
| Residential CFLs | 426,358,196 | 14% | 362,404,467 | 341,086,557 |
| Commercial T8/T5 | 262,919,428 | 9% | 223,481,514 | 210,335,542 |
| Interior High Bay Lighting | 144,132,357 | 5% | 122,512,503 | 115,305,886 |
| Commercial CFLs | 125,872,926 | 4% | 106,991,987 | 100,698,341 |
| Industrial Process | 58,334,000 | 2% | 49,583,900 | 46,667,200 |
| Total Savings - Top 5 Elements | 1,017,616,907 | 34% | 864,974,371 | 814,093,526 |
| Total Savings - Portfolio | 3,005,170,000 | | | |
| Ex Post Change to the Energy Savings of the Top Programs of: | | | 15% | 20% |
| Equals an Ex Post Portfolio Energy Savings Change of: | | | 5% | 7% |

**SCG**

**Top 5 Elements**

| -- Elements are defined as supported by individual net-to-gross ratios | Energy Savings (Net Annual kWh) | % of Portfolio kWh Savings | Scenario 1: Reduce Top 5 Elements by 15% | Scenario 2: Reduce Top 5 Elements by 20% |
|---|---|---|---|---|
| Local Business Energy Efficiency Program | 18,080,999 | 28% | 15,368,849 | 14,464,799 |
| Express Efficiency Rebate Program | 11,409,123 | 17% | 9,697,754 | 9,127,298 |
| Savings By Design SCG SCE Program | 5,291,474 | 8% | 4,497,753 | 4,233,180 |
| Multi-Family Rebate Program | 5,150,642 | 8% | 4,378,046 | 4,120,513 |
| Home Efficiency Rebate Program | 4,689,314 | 7% | 3,985,917 | 3,751,451 |
| Total Savings - Top 5 Elements | 44,621,551 | 68% | 37,928,319 | 35,697,241 |
| Total Savings - Portfolio | 65,312,979 | | | |
| Ex Post Change to the Energy Savings of the Top Programs of: | | | 15% | 20% |
| Equals an Ex Post Portfolio Energy Savings Change of: | | | 10% | 14% |

## 2) <u>Probabilities of True-Up</u>

The current 30% holdback of earnings during an energy efficiency program cycle is sufficient to allow for regular earnings by the utilities, while tying a significant amount of earnings to the measurement studies. The ratepayer risk is minimized by holding back these earnings until completion of the measurement studies, offering a diverse mix of programs, and administering the portfolio with the best available information regarding portfolio impacts. An analysis of the probability of adjustments to portfolio elements and to the resulting portfolio, as shown in **Table 1**, would need to be reviewed with scenarios which provide ranges of probabilities of such changes.

The risk of true-up is greatest where one assumes that in a given cycle, the 2nd interim claim is calculated at the highest earnings rate (12%), but that the true-up claim is calculated at the lower earnings rate (9%). This could occur when one of the metrics changes in the ex post claim from above the level which allows for earnings at the 12% level to that which only allows for earnings at the 9% level. The risk of true-up can be reviewed by looking at scenarios of changes to earnings and probabilities that such changes could occur. **Tables 2A, 2B, and 2C** provide risk scenarios at the highest levels for each IOU – that is where all earnings in the final claim are calculated at the lower, 9% level of earnings. Even though the utilities could well continue to earn at the 12% earnings rate in the true-up claim, for purposes of discussing risk this table ignores the possibility of earnings remaining at the 12% level in the final earnings claim and only looks at the "worst case" of scenarios where the earnings rate is at the 9% level and there is a reduced performance earnings basis. This lower earnings rate in the third earnings claim could occur, for instance, if one of the metrics (e.g., kW) were to fall below 95% of the CPUC goals, while the other metrics (e.g., kWh and therms) remain at or above 100% of goal.

The risk scenarios provide information, under multiple probabilities of changes to the expected claims, as to the risk of true-up. Under each scenario, there is, and should be, a probability that the utilities will have managed their portfolios to deliver the energy savings and Performance Earnings Basis calculated in the interim claims, even if the portfolio only meets the metrics to earn at the 9% level of earnings. While one cannot predict the risk of any particular level of true-up, by reviewing multiple scenarios and probabilities, using the adopted 30% earnings holdback, the risk of true-up at any level can be demonstrated. The tables provide scenarios up to a portfolio-wide reduction of 30% in the performance earnings basis from the 2nd interim claim to the final true-up claim. Such a reduction would only occur upon the reduction of a significant amount of the program elements across the portfolio. The lowest scenario assumes that it is just as likely that the utilities have under-forecasted the entire portfolio earnings by 30% as to have calculated correctly.

Table 2A for example, shows that at the lowest scenario assumes that it is just as likely that the utilities have under-forecasted the entire portfolio earnings by 30% as to have calculated correctly (50%/50% probability), the risk of true-up statewide for the 3-year period is $20 million. As such, the current holdback of 30% is an appropriate amount, in that it captures all reasonably forseeable potential adjustments, while still ensuring that the utilities have an opportunity to earn and realize earnings in the interim claims.

Scenarios:

1) 2$^{nd}$ Interim Earnings at 100% of CPUC goals
    a. A range of true ups in the 3$^{rd}$ claim from 10% to 30%
    b. A range of probabilities of each true up
2) 2$^{nd}$ Interim Earnings at 95% of CPUC goals
    a. A range of true ups in the 3$^{rd}$ claim from 10% to 30%
    b. A range of probabilities of each true up
3) 2$^{nd}$ Interim Earnings at 120% of CPUC goals
    a. A range of true ups in the 3$^{rd}$ claim from 10% to 30%
    b. A range of probabilities of each true up

**Table 2A: Statewide**

| 2nd Claim<br>At 100% of CPUC Goal | | | | |
|---|---|---|---|---|
| PEB | Earnings Rate | Earnings Amount | Claim 70% | Holdback 30% |
| $ 2,689 | 12% | $ 323 | $ 226 | $ 97 |

| 3rd Claim<br>Assume One Savings Metric Falls below 95% Threshold | | | |
|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim PEB | 3rd Claim True-Up Payment |
| 100% | 9% | $ 2,689 | $ 16 |
| 90% | 9% | $ 2,420 | $ (8) |
| 80% | 9% | $ 2,151 | $ (32) |
| 70% | 9% | $ 1,882 | $ (56) |

| Scenarios<br>(all scenarios at the 9% Level of Earnings) | | | | |
|---|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim True-Up Payment | Probability Scenarios | Weighted True-Up Payment |
| 100% | 9% | $ 16 | 90% | $ 14 |
| 90% | 9% | $ (8) | 10% | |
| 100% | 9% | $ 16 | 80% | $ 11 |
| 90% | 9% | $ (8) | 20% | |
| 100% | 9% | $ 16 | 70% | $ 9 |
| 90% | 9% | $ (8) | 30% | |
| 100% | 9% | $ 16 | 60% | $ 6 |
| 90% | 9% | $ (8) | 40% | |
| 100% | 9% | $ 16 | 50% | $ 4 |
| 90% | 9% | $ (8) | 50% | |
| 100% | 9% | $ 16 | 90% | $ 11 |
| 80% | 9% | $ (32) | 10% | |
| 100% | 9% | $ 16 | 80% | $ 6 |
| 80% | 9% | $ (32) | 20% | |
| 100% | 9% | $ 16 | 70% | $ 2 |
| 80% | 9% | $ (32) | 30% | |
| 100% | 9% | $ 16 | 60% | $ (3) |
| 80% | 9% | $ (32) | 40% | |
| 100% | 9% | $ 16 | 50% | $ (8) |
| 80% | 9% | $ (32) | 50% | |
| 100% | 9% | $ 16 | 90% | $ 9 |
| 70% | 9% | $ (56) | 10% | |
| 100% | 9% | $ 16 | 80% | $ 2 |
| 70% | 9% | $ (56) | 20% | |
| 100% | 9% | $ 16 | 70% | $ (6) |
| 70% | 9% | $ (56) | 30% | |
| 100% | 9% | $ 16 | 60% | $ (13) |
| 70% | 9% | $ (56) | 40% | |
| 100% | 9% | $ 16 | 50% | $ (20) |
| 70% | 9% | $ (56) | 50% | |

**Table 2B: Statewide**

| 2nd Claim At 95% of CPUC Goal | | | | |
|---|---|---|---|---|
| PEB | Earnings Rate | Earnings Amount | Claim 70% | Holdback 30% |
| $ 2,443 | 9% | $ 220 | $ 154 | $ 66 |

| 3rd Claim | | | |
|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim PEB | 3rd Claim True-Up Payment |
| 100% | 9% | $ 2,443 | $ 66 |
| 90% | 9% | $ 2,198 | $ 44 |
| 80% | 9% | $ 1,954 | $ 22 |
| 70% | 9% | $ 1,710 | $ - |

| Scenarios (all scenarios at the 9% Level of Earnings) | | | | |
|---|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim True-Up Payment | Probability Scenarios | Weighted True-Up Payment |
| 100% | 9% | $ 66 | 90% | $ 64 |
| 90% | 9% | $ 44 | 10% | |
| 100% | 9% | $ 66 | 80% | $ 62 |
| 90% | 9% | $ 44 | 20% | |
| 100% | 9% | $ 66 | 70% | $ 59 |
| 90% | 9% | $ 44 | 30% | |
| 100% | 9% | $ 66 | 60% | $ 57 |
| 90% | 9% | $ 44 | 40% | |
| 100% | 9% | $ 66 | 50% | $ 55 |
| 90% | 9% | $ 44 | 50% | |
| 100% | 9% | $ 66 | 90% | $ 62 |
| 80% | 9% | $ 22 | 10% | |
| 100% | 9% | $ 66 | 80% | $ 57 |
| 80% | 9% | $ 22 | 20% | |
| 100% | 9% | $ 66 | 70% | $ 53 |
| 80% | 9% | $ 22 | 30% | |
| 100% | 9% | $ 66 | 60% | $ 48 |
| 80% | 9% | $ 22 | 40% | |
| 100% | 9% | $ 66 | 50% | $ 44 |
| 80% | 9% | $ 22 | 50% | |
| 100% | 9% | $ 66 | 90% | $ 59 |
| 70% | 9% | $ - | 10% | |
| 100% | 9% | $ 66 | 80% | $ 53 |
| 70% | 9% | $ - | 20% | |
| 100% | 9% | $ 66 | 70% | $ 46 |
| 70% | 9% | $ - | 30% | |
| 100% | 9% | $ 66 | 60% | $ 40 |
| 70% | 9% | $ - | 40% | |
| 100% | 9% | $ 66 | 50% | $ 33 |
| 70% | 9% | $ - | 50% | |

**Table 2C: Statewide**

| 2nd Claim At 120% of CPUC Goal | | | | |
|---|---|---|---|---|
| PEB | Earnings Rate | Earnings Amount | Claim 70% | Holdback 30% |
| $ 3,673 | 12% | $ 441 | $ 309 | $ 132 |

| 3rd Claim Assume One Savings Metric Falls below 95% Threshold | | | |
|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim PEB | 3rd Claim True-Up Payment |
| 100% | 9% | $ 3,673 | $ 22 |
| 90% | 9% | $ 3,306 | $ (11) |
| 80% | 9% | $ 2,938 | $ (44) |
| 70% | 9% | $ 2,571 | $ (77) |

| Scenarios (all scenarios at the 9% Level of Earnings) | | | | |
|---|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim True-Up Payment | Probability Scenarios | Weighted True-Up Payment |
| 100% | 9% | $ 22 | 90% | $ 19 |
| 90% | 9% | $ (11) | 10% | |
| 100% | 9% | $ 22 | 80% | $ 15 |
| 90% | 9% | $ (11) | 20% | |
| 100% | 9% | $ 22 | 70% | $ 12 |
| 90% | 9% | $ (11) | 30% | |
| 100% | 9% | $ 22 | 60% | $ 9 |
| 90% | 9% | $ (11) | 40% | |
| 100% | 9% | $ 22 | 50% | $ 6 |
| 90% | 9% | $ (11) | 50% | |
| 100% | 9% | $ 22 | 90% | $ 15 |
| 80% | 9% | $ (44) | 10% | |
| 100% | 9% | $ 22 | 80% | $ 9 |
| 80% | 9% | $ (44) | 20% | |
| 100% | 9% | $ 22 | 70% | $ 2 |
| 80% | 9% | $ (44) | 30% | |
| 100% | 9% | $ 22 | 60% | $ (4) |
| 80% | 9% | $ (44) | 40% | |
| 100% | 9% | $ 22 | 50% | $ (11) |
| 80% | 9% | $ (44) | 50% | |
| 100% | 9% | $ 22 | 90% | $ 12 |
| 70% | 9% | $ (77) | 10% | |
| 100% | 9% | $ 22 | 80% | $ 2 |
| 70% | 9% | $ (77) | 20% | |
| 100% | 9% | $ 22 | 70% | $ (8) |
| 70% | 9% | $ (77) | 30% | |
| 100% | 9% | $ 22 | 60% | $ (18) |
| 70% | 9% | $ (77) | 40% | |
| 100% | 9% | $ 22 | 50% | $ (28) |
| 70% | 9% | $ (77) | 50% | |

**Table 2A: SCE**

| 2nd Claim<br>At 100% of CPUC Goal | | | | |
|---|---|---|---|---|
| PEB | Earnings Rate | Earnings Amount | Claim 70% | Holdback 30% |
| $ 1,199 | 12% | $ 144 | $ 101 | $ 43 |

| 3rd Claim<br>Assume One Savings Metric Falls below 95% Threshold | | | |
|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim PEB | 3rd Claim True-Up Payment |
| 100% | 9% | $ 1,199 | $ 7 |
| 90% | 9% | $ 1,079 | $ (4) |
| 80% | 9% | $ 959 | $ (14) |
| 70% | 9% | $ 839 | $ (25) |

| Scenarios<br>(all scenarios at the 9% Level of Earnings) | | | | |
|---|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim True-Up Payment | Probability Scenarios | Weighted True-Up Payment |
| 100% | 9% | $ 7 | 90% | $ 6 |
| 90% | 9% | $ (4) | 10% | |
| 100% | 9% | $ 7 | 80% | $ 5 |
| 90% | 9% | $ (4) | 20% | |
| 100% | 9% | $ 7 | 70% | $ 4 |
| 90% | 9% | $ (4) | 30% | |
| 100% | 9% | $ 7 | 60% | $ 3 |
| 90% | 9% | $ (4) | 40% | |
| 100% | 9% | $ 7 | 50% | $ 2 |
| 90% | 9% | $ (4) | 50% | |
| 100% | 9% | $ 7 | 90% | $ 5 |
| 80% | 9% | $ (14) | 10% | |
| 100% | 9% | $ 7 | 80% | $ 3 |
| 80% | 9% | $ (14) | 20% | |
| 100% | 9% | $ 7 | 70% | $ 1 |
| 80% | 9% | $ (14) | 30% | |
| 100% | 9% | $ 7 | 60% | $ (1) |
| 80% | 9% | $ (14) | 40% | |
| 100% | 9% | $ 7 | 50% | $ (4) |
| 80% | 9% | $ (14) | 50% | |
| 100% | 9% | $ 7 | 90% | $ 4 |
| 70% | 9% | $ (25) | 10% | |
| 100% | 9% | $ 7 | 80% | $ 1 |
| 70% | 9% | $ (25) | 20% | |
| 100% | 9% | $ 7 | 70% | $ (3) |
| 70% | 9% | $ (25) | 30% | |
| 100% | 9% | $ 7 | 60% | $ (6) |
| 70% | 9% | $ (25) | 40% | |
| 100% | 9% | $ 7 | 50% | $ (9) |
| 70% | 9% | $ (25) | 50% | |

**Table 2B: SCE**

| 2nd Claim At 95% of CPUC Goal | | | | |
|---|---|---|---|---|
| PEB | Earnings Rate | Earnings Amount | Claim 70% | Holdback 30% |
| $ 1,101 | 9% | $ 99 | $ 69 | $ 30 |

| 3rd Claim | | | |
|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim PEB | 3rd Claim True-Up Payment |
| 100% | 9% | $ 1,101 | $ 30 |
| 90% | 9% | $ 991 | $ 20 |
| 80% | 9% | $ 881 | $ 10 |
| 70% | 9% | $ 771 | $ - |

| Scenarios (all scenarios at the 9% Level of Earnings) | | | | |
|---|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim True-Up Payment | Probability Scenarios | Weighted True-Up Payment |
| 100% | 9% | $ 30 | 90% | $ 29 |
| 90% | 9% | $ 20 | 10% | |
| 100% | 9% | $ 30 | 80% | $ 28 |
| 90% | 9% | $ 20 | 20% | |
| 100% | 9% | $ 30 | 70% | $ 27 |
| 90% | 9% | $ 20 | 30% | |
| 100% | 9% | $ 30 | 60% | $ 26 |
| 90% | 9% | $ 20 | 40% | |
| 100% | 9% | $ 30 | 50% | $ 25 |
| 90% | 9% | $ 20 | 50% | |
| 100% | 9% | $ 30 | 90% | $ 28 |
| 80% | 9% | $ 10 | 10% | |
| 100% | 9% | $ 30 | 80% | $ 26 |
| 80% | 9% | $ 10 | 20% | |
| 100% | 9% | $ 30 | 70% | $ 24 |
| 80% | 9% | $ 10 | 30% | |
| 100% | 9% | $ 30 | 60% | $ 22 |
| 80% | 9% | $ 10 | 40% | |
| 100% | 9% | $ 30 | 50% | $ 20 |
| 80% | 9% | $ 10 | 50% | |
| 100% | 9% | $ 30 | 90% | $ 27 |
| 70% | 9% | $ - | 10% | |
| 100% | 9% | $ 30 | 80% | $ 24 |
| 70% | 9% | $ - | 20% | |
| 100% | 9% | $ 30 | 70% | $ 21 |
| 70% | 9% | $ - | 30% | |
| 100% | 9% | $ 30 | 60% | $ 18 |
| 70% | 9% | $ - | 40% | |
| 100% | 9% | $ 30 | 50% | $ 15 |
| 70% | 9% | $ - | 50% | |

**Table 2C: SCE**

| 2nd Claim<br>At 120% of CPUC Goal | | | | |
|---|---|---|---|---|
| PEB | Earnings Rate | Earnings Amount | Claim 70% | Holdback 30% |
| $ 1,594 | 12% | $ 191 | $ 134 | $ 57 |

| 3rd Claim<br>Assume One Savings Metric Falls below 95% Threshold | | | |
|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim PEB | 3rd Claim True-Up Payment |
| 100% | 9% | $ 1,594 | $ 10 |
| 90% | 9% | $ 1,435 | $ (5) |
| 80% | 9% | $ 1,275 | $ (19) |
| 70% | 9% | $ 1,116 | $ (33) |

| Scenarios<br>(all scenarios at the 9% Level of Earnings) | | | | |
|---|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim True-Up Payment | Probability Scenarios | Weighted True-Up Payment |
| 100% | 9% | $ 10 | 90% | $ 8 |
| 90% | 9% | $ (5) | 10% | |
| 100% | 9% | $ 10 | 80% | $ 7 |
| 90% | 9% | $ (5) | 20% | |
| 100% | 9% | $ 10 | 70% | $ 5 |
| 90% | 9% | $ (5) | 30% | |
| 100% | 9% | $ 10 | 60% | $ 4 |
| 90% | 9% | $ (5) | 40% | |
| 100% | 9% | $ 10 | 50% | $ 2 |
| 90% | 9% | $ (5) | 50% | |
| 100% | 9% | $ 10 | 90% | $ 7 |
| 80% | 9% | $ (19) | 10% | |
| 100% | 9% | $ 10 | 80% | $ 4 |
| 80% | 9% | $ (19) | 20% | |
| 100% | 9% | $ 10 | 70% | $ 1 |
| 80% | 9% | $ (19) | 30% | |
| 100% | 9% | $ 10 | 60% | $ (2) |
| 80% | 9% | $ (19) | 40% | |
| 100% | 9% | $ 10 | 50% | $ (5) |
| 80% | 9% | $ (19) | 50% | |
| 100% | 9% | $ 10 | 90% | $ 5 |
| 70% | 9% | $ (33) | 10% | |
| 100% | 9% | $ 10 | 80% | $ 1 |
| 70% | 9% | $ (33) | 20% | |
| 100% | 9% | $ 10 | 70% | $ (3) |
| 70% | 9% | $ (33) | 30% | |
| 100% | 9% | $ 10 | 60% | $ (8) |
| 70% | 9% | $ (33) | 40% | |
| 100% | 9% | $ 10 | 50% | $ (12) |
| 70% | 9% | $ (33) | 50% | |

**Table 2A: PG&E**

| 2nd Claim<br>At 100% of CPUC Goal | | | | |
|---|---|---|---|---|
| PEB | Earnings Rate | Earnings Amount | Claim 70% | Holdback 30% |
| $ 1,058 | 12% | $ 127 | $ 89 | $ 38 |

| 3rd Claim<br>One savings metric falls below 95% threshold | | | |
|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim PEB | 3rd Claim True-Up Payment |
| 100% | 9% | $ 1,058 | $ 6 |
| 90% | 9% | $ 952 | $ (3) |
| 80% | 9% | $ 846 | $ (13) |
| 70% | 9% | $ 741 | $ (22) |

| Scenarios<br>(all scenarios at the 9% Level of Earnings) | | | | |
|---|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim True-Up Payment | Probability Scenarios | Weighted True-Up Payment |
| 100% | 9% | $ 6 | 90% | $ 5 |
| 90% | 9% | $ (3) | 10% | |
| 100% | 9% | $ 6 | 80% | $ 4 |
| 90% | 9% | $ (3) | 20% | |
| 100% | 9% | $ 6 | 70% | $ 3 |
| 90% | 9% | $ (3) | 30% | |
| 100% | 9% | $ 6 | 60% | $ 3 |
| 90% | 9% | $ (3) | 40% | |
| 100% | 9% | $ 6 | 50% | $ 2 |
| 90% | 9% | $ (3) | 50% | |
| 100% | 9% | $ 6 | 90% | $ 4 |
| 80% | 9% | $ (13) | 10% | |
| 100% | 9% | $ 6 | 80% | $ 3 |
| 80% | 9% | $ (13) | 20% | |
| 100% | 9% | $ 6 | 70% | $ 1 |
| 80% | 9% | $ (13) | 30% | |
| 100% | 9% | $ 6 | 60% | $ (1) |
| 80% | 9% | $ (13) | 40% | |
| 100% | 9% | $ 6 | 50% | $ (3) |
| 80% | 9% | $ (13) | 50% | |
| 100% | 9% | $ 6 | 90% | $ 3 |
| 70% | 9% | $ (22) | 10% | |
| 100% | 9% | $ 6 | 80% | $ 1 |
| 70% | 9% | $ (22) | 20% | |
| 100% | 9% | $ 6 | 70% | $ (2) |
| 70% | 9% | $ (22) | 30% | |
| 100% | 9% | $ 6 | 60% | $ (5) |
| 70% | 9% | $ (22) | 40% | |
| 100% | 9% | $ 6 | 50% | $ (8) |
| 70% | 9% | $ (22) | 50% | |

**Table 2B: PG&E**

| 2nd Claim At 95% of CPUC Goal | | | | |
|---|---|---|---|---|
| PEB | Earnings Rate | Earnings Amount | Claim 70% | Holdback 30% |
| $ 956 | 9% | $ 86 | $ 60 | $ 26 |

| 3rd Claim | | | |
|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim PEB | 3rd Claim True-Up Payment |
| 100% | 9% | $ 956 | $ 26 |
| 90% | 9% | $ 861 | $ 17 |
| 80% | 9% | $ 765 | $ 9 |
| 70% | 9% | $ 669 | $ - |

**Scenarios**
**(all scenarios at the 9% Level of Earnings)**

| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim True-Up Payment | Probability Scenarios | Weighted True-Up Payment |
|---|---|---|---|---|
| 100% | 9% | $ 26 | 90% | $ 25 |
| 90% | 9% | $ 17 | 10% | |
| 100% | 9% | $ 26 | 80% | $ 24 |
| 90% | 9% | $ 17 | 20% | |
| 100% | 9% | $ 26 | 70% | $ 23 |
| 90% | 9% | $ 17 | 30% | |
| 100% | 9% | $ 26 | 60% | $ 22 |
| 90% | 9% | $ 17 | 40% | |
| 100% | 9% | $ 26 | 50% | $ 22 |
| 90% | 9% | $ 17 | 50% | |
| 100% | 9% | $ 26 | 90% | $ 24 |
| 80% | 9% | $ 9 | 10% | |
| 100% | 9% | $ 26 | 80% | $ 22 |
| 80% | 9% | $ 9 | 20% | |
| 100% | 9% | $ 26 | 70% | $ 21 |
| 80% | 9% | $ 9 | 30% | |
| 100% | 9% | $ 26 | 60% | $ 19 |
| 80% | 9% | $ 9 | 40% | |
| 100% | 9% | $ 26 | 50% | $ 17 |
| 80% | 9% | $ 9 | 50% | |
| 100% | 9% | $ 26 | 90% | $ 23 |
| 70% | 9% | $ - | 10% | |
| 100% | 9% | $ 26 | 80% | $ 21 |
| 70% | 9% | $ - | 20% | |
| 100% | 9% | $ 26 | 70% | $ 18 |
| 70% | 9% | $ - | 30% | |
| 100% | 9% | $ 26 | 60% | $ 15 |
| 70% | 9% | $ - | 40% | |
| 100% | 9% | $ 26 | 50% | $ 13 |
| 70% | 9% | $ - | 50% | |

**Table 2C PG&E**

| 2nd Claim<br>At 120% of CPUC Goal | | | | |
|---|---|---|---|---|
| PEB | Earnings Rate | Earnings Amount | Claim 70% | Holdback 30% |
| $ 1,464 | 12% | $ 176 | $ 123 | $ 53 |

| 3rd Claim<br>One savings metric falls below 95% threshold | | | |
|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim PEB | 3rd Claim True-Up Payment |
| 100% | 9% | $ 1,464 | $ 9 |
| 90% | 9% | $ 1,318 | $ (4) |
| 80% | 9% | $ 1,172 | $ (18) |
| 70% | 9% | $ 1,025 | $ (31) |

| Scenarios<br>(all scenarios at the 9% Level of Earnings) | | | | |
|---|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim True-Up Payment | Probability Scenarios | Weighted True-Up Payment |
| 100% | 9% | $ 9 | 90% | $ 7 |
| 90% | 9% | $ (4) | 10% | |
| 100% | 9% | $ 9 | 80% | $ 6 |
| 90% | 9% | $ (4) | 20% | |
| 100% | 9% | $ 9 | 70% | $ 5 |
| 90% | 9% | $ (4) | 30% | |
| 100% | 9% | $ 9 | 60% | $ 4 |
| 90% | 9% | $ (4) | 40% | |
| 100% | 9% | $ 9 | 50% | $ 2 |
| 90% | 9% | $ (4) | 50% | |
| 100% | 9% | $ 9 | 90% | $ 6 |
| 80% | 9% | $ (18) | 10% | |
| 100% | 9% | $ 9 | 80% | $ 4 |
| 80% | 9% | $ (18) | 20% | |
| 100% | 9% | $ 9 | 70% | $ 1 |
| 80% | 9% | $ (18) | 30% | |
| 100% | 9% | $ 9 | 60% | $ (2) |
| 80% | 9% | $ (18) | 40% | |
| 100% | 9% | $ 9 | 50% | $ (4) |
| 80% | 9% | $ (18) | 50% | |
| 100% | 9% | $ 9 | 90% | $ 5 |
| 70% | 9% | $ (31) | 10% | |
| 100% | 9% | $ 9 | 80% | $ 1 |
| 70% | 9% | $ (31) | 20% | |
| 100% | 9% | $ 9 | 70% | $ (3) |
| 70% | 9% | $ (31) | 30% | |
| 100% | 9% | $ 9 | 60% | $ (7) |
| 70% | 9% | $ (31) | 40% | |
| 100% | 9% | $ 9 | 50% | $ (11) |
| 70% | 9% | $ (31) | 50% | |

**Table 2A: SDG&E**

| 2nd Claim<br>At 100% of CPUC Goal | | | | |
|---|---|---|---|---|
| PEB | Earnings Rate | Earnings Amount | Claim 70% | Holdback 30% |
| $ 297 | 12% | $ 36 | $ 25 | $ 11 |

| 3rd Claim<br>One savings metric falls below 95% threshold | | | |
|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim PEB | 3rd Claim True-Up Payment |
| 100% | 9% | $ 297 | $ 2 |
| 90% | 9% | $ 267 | $ (1) |
| 80% | 9% | $ 238 | $ (4) |
| 70% | 9% | $ 208 | $ (6) |

| Scenarios<br>(all scenarios at the 9% Level of Earnings) | | | | |
|---|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim True-Up Payment | Probability Scenarios | Weighted True-Up Payment |
| 100% | 9% | $ 2 | 90% | $ 2 |
| 90% | 9% | $ (1) | 10% | |
| 100% | 9% | $ 2 | 80% | $ 1 |
| 90% | 9% | $ (1) | 20% | |
| 100% | 9% | $ 2 | 70% | $ 1 |
| 90% | 9% | $ (1) | 30% | |
| 100% | 9% | $ 2 | 60% | $ 1 |
| 90% | 9% | $ (1) | 40% | |
| 100% | 9% | $ 2 | 50% | $ 0 |
| 90% | 9% | $ (1) | 50% | |
| 100% | 9% | $ 2 | 90% | $ 1 |
| 80% | 9% | $ (4) | 10% | |
| 100% | 9% | $ 2 | 80% | $ 1 |
| 80% | 9% | $ (4) | 20% | |
| 100% | 9% | $ 2 | 70% | $ 0 |
| 80% | 9% | $ (4) | 30% | |
| 100% | 9% | $ 2 | 60% | $ (0) |
| 80% | 9% | $ (4) | 40% | |
| 100% | 9% | $ 2 | 50% | $ (1) |
| 80% | 9% | $ (4) | 50% | |
| 100% | 9% | $ 2 | 90% | $ 1 |
| 70% | 9% | $ (6) | 10% | |
| 100% | 9% | $ 2 | 80% | $ 0 |
| 70% | 9% | $ (6) | 20% | |
| 100% | 9% | $ 2 | 70% | $ (1) |
| 70% | 9% | $ (6) | 30% | |
| 100% | 9% | $ 2 | 60% | $ (1) |
| 70% | 9% | $ (6) | 40% | |
| 100% | 9% | $ 2 | 50% | $ (2) |
| 70% | 9% | $ (6) | 50% | |

**Table 2B: SDG&E**

| 2nd Claim<br>At 95% of CPUC Goal | | | | |
|---|---|---|---|---|
| PEB | Earnings Rate | Earnings Amount | Claim 70% | Holdback 30% |
| $ 269 | 9% | $ 24 | $ 17 | $ 7 |

| 3rd Claim | | | |
|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim PEB | 3rd Claim True-Up Payment |
| 100% | 9% | $ 269 | $ 7 |
| 90% | 9% | $ 242 | $ 5 |
| 80% | 9% | $ 215 | $ 2 |
| 70% | 9% | $ 188 | $ - |

| Scenarios<br>(all scenarios at the 9% Level of Earnings) | | | | |
|---|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim True-Up Payment | Probability Scenarios | Weighted True-Up Payment |
| 100% | 9% | $ 7 | 90% | $ 7 |
| 90% | 9% | $ 5 | 10% | |
| 100% | 9% | $ 7 | 80% | $ 7 |
| 90% | 9% | $ 5 | 20% | |
| 100% | 9% | $ 7 | 70% | $ 7 |
| 90% | 9% | $ 5 | 30% | |
| 100% | 9% | $ 7 | 60% | $ 6 |
| 90% | 9% | $ 5 | 40% | |
| 100% | 9% | $ 7 | 50% | $ 6 |
| 90% | 9% | $ 5 | 50% | |
| 100% | 9% | $ 7 | 90% | $ 7 |
| 80% | 9% | $ 2 | 10% | |
| 100% | 9% | $ 7 | 80% | $ 6 |
| 80% | 9% | $ 2 | 20% | |
| 100% | 9% | $ 7 | 70% | $ 6 |
| 80% | 9% | $ 2 | 30% | |
| 100% | 9% | $ 7 | 60% | $ 5 |
| 80% | 9% | $ 2 | 40% | |
| 100% | 9% | $ 7 | 50% | $ 5 |
| 80% | 9% | $ 2 | 50% | |
| 100% | 9% | $ 7 | 90% | $ 7 |
| 70% | 9% | $ - | 10% | |
| 100% | 9% | $ 7 | 80% | $ 6 |
| 70% | 9% | $ - | 20% | |
| 100% | 9% | $ 7 | 70% | $ 5 |
| 70% | 9% | $ - | 30% | |
| 100% | 9% | $ 7 | 60% | $ 4 |
| 70% | 9% | $ - | 40% | |
| 100% | 9% | $ 7 | 50% | $ 4 |
| 70% | 9% | $ - | 50% | |

**Table 2C: SDG&E**

| 2nd Claim At 120% of CPUC Goal | | | | |
|---|---|---|---|---|
| PEB | Earnings Rate | Earnings Amount | Claim 70% | Holdback 30% |
| $ 408 | 12% | $ 49 | $ 34 | $ 15 |

| 3rd Claim One savings metric falls below 95% threshold | | | |
|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim PEB | 3rd Claim True-Up Payment |
| 100% | 9% | $ 408 | $ 2 |
| 90% | 9% | $ 367 | $ (1) |
| 80% | 9% | $ 326 | $ (5) |
| 70% | 9% | $ 286 | $ (9) |

| Scenarios (all scenarios at the 9% Level of Earnings) | | | | |
|---|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim True-Up Payment | Probability Scenarios | Weighted True-Up Payment |
| 100% | 9% | $ 2 | 90% | $ 2 |
| 90% | 9% | $ (1) | 10% | |
| 100% | 9% | $ 2 | 80% | $ 2 |
| 90% | 9% | $ (1) | 20% | |
| 100% | 9% | $ 2 | 70% | $ 1 |
| 90% | 9% | $ (1) | 30% | |
| 100% | 9% | $ 2 | 60% | $ 1 |
| 90% | 9% | $ (1) | 40% | |
| 100% | 9% | $ 2 | 50% | $ 1 |
| 90% | 9% | $ (1) | 50% | |
| 100% | 9% | $ 2 | 90% | $ 2 |
| 80% | 9% | $ (5) | 10% | |
| 100% | 9% | $ 2 | 80% | $ 1 |
| 80% | 9% | $ (5) | 20% | |
| 100% | 9% | $ 2 | 70% | $ 0 |
| 80% | 9% | $ (5) | 30% | |
| 100% | 9% | $ 2 | 60% | $ (0) |
| 80% | 9% | $ (5) | 40% | |
| 100% | 9% | $ 2 | 50% | $ (1) |
| 80% | 9% | $ (5) | 50% | |
| 100% | 9% | $ 2 | 90% | $ 1 |
| 70% | 9% | $ (9) | 10% | |
| 100% | 9% | $ 2 | 80% | $ 0 |
| 70% | 9% | $ (9) | 20% | |
| 100% | 9% | $ 2 | 70% | $ (1) |
| 70% | 9% | $ (9) | 30% | |
| 100% | 9% | $ 2 | 60% | $ (2) |
| 70% | 9% | $ (9) | 40% | |
| 100% | 9% | $ 2 | 50% | $ (3) |
| 70% | 9% | $ (9) | 50% | |

**Table 2A: SCG**

| 2nd Claim At 100% of CPUC Goal | | | | |
|---|---|---|---|---|
| PEB | Earnings Rate | Earnings Amount | Claim 70% | Holdback 30% |
| $ 135 | 12% | $ 16 | $ 11 | $ 5 |

| 3rd Claim Assume The Single Savings Metric Falls below 95% Threshold | | | |
|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim PEB | 3rd Claim True-Up Payment |
| 95% | 9% | $ 128 | $ 0 |
| 90% | 9% | $ 121 | $ (0) |
| 80% | 9% | $ 108 | $ (2) |
| 70% | 9% | $ 94 | $ (3) |

| Scenarios (all scenarios at the 9% Level of Earnings) | | | | |
|---|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim True-Up Payment | Probability Scenarios | Weighted True-Up Payment |
| 95% | 9% | $ 0 | 90% | $ 0 |
| 90% | 9% | $ (0) | 10% | |
| 95% | 9% | $ 0 | 80% | $ 0 |
| 90% | 9% | $ (0) | 20% | |
| 95% | 9% | $ 0 | 70% | $ 0 |
| 90% | 9% | $ (0) | 30% | |
| 95% | 9% | $ 0 | 60% | $ (0) |
| 90% | 9% | $ (0) | 40% | |
| 95% | 9% | $ 0 | 50% | $ (0) |
| 90% | 9% | $ (0) | 50% | |
| 95% | 9% | $ 0 | 90% | $ 0 |
| 80% | 9% | $ (2) | 10% | |
| 95% | 9% | $ 0 | 80% | $ (0) |
| 80% | 9% | $ (2) | 20% | |
| 95% | 9% | $ 0 | 70% | $ (0) |
| 80% | 9% | $ (2) | 30% | |
| 95% | 9% | $ 0 | 60% | $ (1) |
| 80% | 9% | $ (2) | 40% | |
| 95% | 9% | $ 0 | 50% | $ (1) |
| 80% | 9% | $ (2) | 50% | |
| 95% | 9% | $ 0 | 90% | $ (0) |
| 70% | 9% | $ (3) | 10% | |
| 95% | 9% | $ 0 | 80% | $ (0) |
| 70% | 9% | $ (3) | 20% | |
| 95% | 9% | $ 0 | 70% | $ (1) |
| 70% | 9% | $ (3) | 30% | |
| 95% | 9% | $ 0 | 60% | $ (1) |
| 70% | 9% | $ (3) | 40% | |
| 95% | 9% | $ 0 | 50% | $ (1) |
| 70% | 9% | $ (3) | 50% | |

**Table 2B: SCG**

| 2nd Claim<br>At 95% of CPUC Goal | | | | |
|---|---|---|---|---|
| PEB | Earnings Rate | Earnings Amount | Claim 70% | Holdback 30% |
| $ 117 | 9% | $ 10.5 | $ 7.3 | $ 3.1 |

| 3rd Claim | | | |
|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim PEB | 3rd Claim True-Up Payment |
| 95% | 9% | $ 110.8 | $ 2.6 |
| 90% | 9% | $ 105 | $ 2.1 |
| 80% | 9% | $ 93 | $ 1.0 |
| 70% | 9% | $ 82 | $ - |

| Scenarios<br>(all scenarios at the 9% Level of Earnings) | | | | |
|---|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim True-Up Payment | Probability Scenarios | Weighted True-Up Payment |
| 95% | 9% | $ 3 | 90% | $ 2.6 |
| 90% | 9% | $ 2 | 10% | |
| 95% | 9% | $ 3 | 80% | $ 2.5 |
| 90% | 9% | $ 2 | 20% | |
| 95% | 9% | $ 3 | 70% | $ 2.5 |
| 90% | 9% | $ 2 | 30% | |
| 95% | 9% | $ 3 | 60% | $ 2.4 |
| 90% | 9% | $ 2 | 40% | |
| 95% | 9% | $ 3 | 50% | $ 2.4 |
| 90% | 9% | $ 2 | 50% | |
| 95% | 9% | $ 3 | 90% | $ 2.5 |
| 80% | 9% | $ 1 | 10% | |
| 95% | 9% | $ 3 | 80% | $ 2.3 |
| 80% | 9% | $ 1 | 20% | |
| 95% | 9% | $ 3 | 70% | $ 2.2 |
| 80% | 9% | $ 1 | 30% | |
| 95% | 9% | $ 3 | 60% | $ 2.0 |
| 80% | 9% | $ 1 | 40% | |
| 95% | 9% | $ 3 | 50% | $ 1.8 |
| 80% | 9% | $ 1 | 50% | |
| 95% | 9% | $ 3 | 90% | $ 2.4 |
| 70% | 9% | $ - | 10% | |
| 95% | 9% | $ 3 | 80% | $ 2.1 |
| 70% | 9% | $ - | 20% | |
| 95% | 9% | $ 3 | 70% | $ 1.8 |
| 70% | 9% | $ - | 30% | |
| 95% | 9% | $ 3 | 60% | $ 1.6 |
| 70% | 9% | $ - | 40% | |
| 95% | 9% | $ 3 | 50% | $ 1.3 |
| 70% | 9% | $ - | 50% | |

**Table 2C: SCG**

| 2nd Claim At 120% of CPUC Goal | | | | |
|---|---|---|---|---|
| PEB | Earnings Rate | Earnings Amount | Claim 70% | Holdback 30% |
| $ 206 | 12% | $ 25 | $ 17 | $ 7 |

| 3rd Claim Assume The Single Savings Metric Falls below 95% Threshold | | | |
|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim PEB | 3rd Claim True-Up Payment |
| 95% | 9% | $ 196 | $ 0 |
| 90% | 9% | $ 185 | $ (1) |
| 80% | 9% | $ 165 | $ (2) |
| 70% | 9% | $ 144 | $ (4) |

| Scenarios (all scenarios at the 9% Level of Earnings) | | | | |
|---|---|---|---|---|
| % of 2nd Claim PEB | 3rd Claim Earnings Rate | 3rd Claim True-Up Payment | Probability Scenarios | Weighted True-Up Payment |
| 95% | 9% | $ 0 | 90% | $ 0 |
| 90% | 9% | $ (1) | 10% | |
| 95% | 9% | $ 0 | 80% | $ 0 |
| 90% | 9% | $ (1) | 20% | |
| 95% | 9% | $ 0 | 70% | $ 0 |
| 90% | 9% | $ (1) | 30% | |
| 95% | 9% | $ 0 | 60% | $ (0) |
| 90% | 9% | $ (1) | 40% | |
| 95% | 9% | $ 0 | 50% | $ (0) |
| 90% | 9% | $ (1) | 50% | |
| 95% | 9% | $ 0 | 90% | $ 0 |
| 80% | 9% | $ (2) | 10% | |
| 95% | 9% | $ 0 | 80% | $ (0) |
| 80% | 9% | $ (2) | 20% | |
| 95% | 9% | $ 0 | 70% | $ (1) |
| 80% | 9% | $ (2) | 30% | |
| 95% | 9% | $ 0 | 60% | $ (1) |
| 80% | 9% | $ (2) | 40% | |
| 95% | 9% | $ 0 | 50% | $ (1) |
| 80% | 9% | $ (2) | 50% | |
| 95% | 9% | $ 0 | 90% | $ (0) |
| 70% | 9% | $ (4) | 10% | |
| 95% | 9% | $ 0 | 80% | $ (1) |
| 70% | 9% | $ (4) | 20% | |
| 95% | 9% | $ 0 | 70% | $ (1) |
| 70% | 9% | $ (4) | 30% | |
| 95% | 9% | $ 0 | 60% | $ (2) |
| 70% | 9% | $ (4) | 40% | |
| 95% | 9% | $ 0 | 50% | $ (2) |
| 70% | 9% | $ (4) | 50% | |

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL OR U.S. MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department B30A, 77 Beale Street, San Francisco, CA 94105.

I am readily familiar with the business practice of Pacific Gas and Electric Company for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing.

On the 7th day of November, 2007, I served a true copy of:

**AMENDED PETITION FOR MODIFICATION OF DECISION 07-09-043 BY PACIFIC GAS AND ELECTRIC COMPANY (U 39 M), SOUTHERN CALIFORNIA EDISON COMPANY (U 338 E), SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M), AND SOUTHERN CALIFORNIA GAS COMPANY (U 904 G)**

**[ X ]** By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for R.06-04-010 et al. with an e-mail address.

**[ X ]** By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to all parties on the official service lists for R.06-04-010 et al. without an e-mail address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 7th day of November, 2007, at San Francisco, California.

/S/

Linda S. Dannewitz

# THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Downloaded November 7, 2007, last updated on November 6, 2007

Commissioner Assigned: Dian Grueneich on April 17, 2006; ALJ Assigned: Kim Malcolm on February 1, 2007

ALJ Assigned: Meg Gottstein on April 17, 2006; ALJ Assigned: Steven A. Weissman on July 11, 2006

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Downloaded November 7, 2007, last updated on November 6, 2007

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Commissioner Assigned: Dian Grueneich on April 17, 2006; ALJ Assigned: Kim Malcolm on February 1, 2007

ALJ Assigned: Meg Gottstein on April 17, 2006; ALJ Assigned: Steven A. Weissman on July 11, 2006

## CPUC DOCKET NO. R0604010 CPUC REV 11-06-07

Total number of addressees: 267

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|---|---|
| Order Instituting Rulemaking to Examine the Commission's post-2005 Energy Efficiency Policies, Programs, Evaluation, Measurement and Verification, and Related Issues. | Rulemaking 06-04-010 (Filed April 13, 2006) |

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