



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Examine the
Commission's Energy Efficiency Risk/Reward
Incentive Mechanism

R.09-01-019
(Filed January 29, 2009)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) RESPONSE TO TURN'S
APPLICATION FOR REHEARING OF DECISION 09-12-045**

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Dated: **February 12, 2010**

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I.

INTRODUCTION

Pursuant to Rule 16.1 of the California Public Utilities Commission (Commission) Rules of Practice and Procedure, Southern California Edison Company (SCE) submits this response to the Application for Rehearing of Decision 09-12-045 by The Utility Reform Network (TURN).

The Application for Rehearing of Decision 09-12-045 submitted by TURN must be rejected by the Commission as it fails to identify any legal error. TURN's primary concern is that D.09-12-045 adopts a 12% earnings rate instead of a 9% rate. However, the Commission discusses the use of 12% and explains its rationale for utilizing 12%. While TURN argues the use of 12% is legal error, the fact is Decision 09-12-045 was well-founded and consistent with California's energy policy as implemented by the Commission. That policy recognizes that regular and timely incentive payments are essential in order to elevate energy efficiency to an equal footing with supply-side resource options¹ and it is reasonable for this claim to measure

¹ D.08-12-059; Finding of Fact 3.

results with assumptions consistent with those used to establish goals.² To rehear D.09-12-045 would undo the significant progress that energy efficiency has made in California. TURN has argued its issues before and the Commission upon considering the facts, comments and arguments, has issued its decision in support of the second interim incentive payment.

As a result, TURN's Application must be rejected by the Commission.

II.

TURN'S APPLICATION TO REHEAR D.09-12-045 FAILS TO DEMONSTRATE LEGAL ERROR AND SHOULD BE DENIED

An Application for Rehearing must "set forth specifically the grounds on which the applicant considers the order or decision of the Commission to be unlawful or erroneous, and must make specific references to the record or law. The purpose of an Application for Rehearing is to alert the Commission to a legal error, so that the Commission may correct it expeditiously."³ TURN fails to demonstrate any legal error by the Commission in issuing D.09-12-059, but instead merely rehashes its disagreement with the Commission's outcome. Because TURN's Application fails to demonstrate legal error, it must be denied.

Further, TURN actually acknowledges that the Commission weighed the available information and addressed the concerns that parties presented in comments before issuing the Final Decision.⁴ The Commission agreed with some of TURN's arguments, but rejected others. Specifically, the Commission agreed with TURN's assessment of the proposed settlement. Additionally, the Final Decision included a provision to verify incremental measure costs, which was first brought up in TURN's comments on the Draft Decisions. TURN, however, is upset that the Commission chose to measure the utilities' achievements using assumptions consistent with those used to establish the goals. The Commission, after hearing the arguments and

² D.09-12-045 at pp. 65-67.

³ Rule 16.1(c).

⁴ TURN Application for Rehearing; dated January 28, 2010 at p. 6.

reviewing the information before it, determined that goals and achievements be calculated on consistent estimates and assumptions. In so doing, D.09-12-045 adopted a 12% sharing rate. The Commission considered all the information (including past decisions) and in its discretion determined that a 12% rate was just and reasonable to the ratepayer and fair to the utilities. The Commission properly considered the concerns of all parties and issued a Decision that considers the interest of the ratepayers and supports California's energy policy. TURN's mere disagreement with the outcome does not constitute legal error in D.09-12-045 and therefore TURN's Application should be summarily denied.

III.

THE INCENTIVES ADOPTED IN D.09-12-045 REFLECT A REASONED DECISION WHICH BALANCES THE INTERESTS OF THE UTILITIES AND THE RATEPAYERS

TURN's Application would result in an outcome that is counterproductive to the established energy policy of the Commission and the State. Such an outcome will jeopardize the value of energy efficiency as California's first resource in the loading order. This result would be untenable and as such should be summarily rejected by the Commission. TURN's Application is consistent with their long-standing position – that utilities should not be awarded any earnings for energy efficiency, no matter what level of energy efficiency the utilities achieve. TURN submitted a similar Application last year to rehear D.08-12-059 that relied on substantially similar arguments. In D.08-12-059, the Commission reiterated the significance of the ability to recognize and book incentive earnings on a regular basis as a means to motivate utility management to continue to pursue considerable amounts of energy efficiency. That Application is still pending action by the Commission and similarly should be rejected.

TURN's Application does not contain any meaningful rationale that should influence the Commission to rehear D.09-12-045. TURN argues that D.09-12-045 is at odds with D.07-10-

032 and D.08-12-047.⁵ However, TURN fails to acknowledge that the Commission can and often does adjust its position, as it did in this Decision, based on a well-founded finding that it is unfair and inappropriate to make an “apples to oranges” comparison for utility achievements.⁶ As stated above, D.09-12-045 did not contain any legal error and the Commission reviewed, considered and addressed all of the concerns presented by parties, including TURN’s, prior to its issuance. In D.09-12-045, the Commission fully considered all the comments of all the parties and the Commission reasonably exercised its discretion in authorizing a ruling to “balance the goals of fostering energy efficiency achievements while protecting ratepayers from paying for incentives that have not been earned.”⁷ Therefore, TURN’s Application is no more than another attempt to argue, once again, its continued unfettered opposition to utility incentive earnings from energy efficiency and as such should be rejected.

IV.

DECISION 09-12-045 RIGHTFULLY ADDRESSED THE SHARED SAVINGS RATE

The Commission rightfully recognized the controversy that embroiled the RRIM, whereby the Commission’s energy efficiency goals and the measurement of performance towards those goals is out of sync. To account for this discrepancy, Decision 09-12-045 relies upon an apples-to-apples comparison, as verified by the Energy Division, to calculate the IOU’s performance towards the minimum performance standard. The Commission showed that under a comparable set of metrics, SCE exceeded the aggressive energy efficiency goals, enough to qualify for a 12% shared savings rate. The Commission’s decision to correct for this discrepancy is fully supported by the record. In Decision 09-09-047, the Commission changed the paradigm of utility energy efficiency goal achievement. Specifically, the Commission established a policy for the 2010-2012 program cycle whereby ex ante assumptions that will be utilized to measure

⁵ TURN Application for Rehearing; dated January 28, 2010 at p. 10.

⁶ D.09-12-045, Finding of Fact 19 at p. 79.

⁷ D.09-12-045; Conclusion of Law 1 at p. 79.

goal achievement will be frozen for the duration of the program cycle. Additionally, on October 1, 2009, ALJ Pulsifer issued a Ruling entering specific scenarios developed by the Energy Division into the record. These scenarios included energy savings and earnings calculations relying on utility-reported ex ante assumptions.

The aforementioned Decision, Ruling, and associated party' comments were together a complete and supportable record in which the Commission relied upon in D.09-12-045. TURN's implication to the contrary is blatantly wrong, misleading, and not supported by the record. In TURN's current RRIM proposal, they even accommodate for the fact that a constantly moving goalpost is an unsustainable business model for energy efficiency.

V.

THE COMMISSION PROPERLY ACCOUNTS FOR THE INNACURACIES OF THE 2006-2008 VERIFICATION REPORT

The Commission recognized that the 2006-2008 Verification Report was not an accurate representation of utility energy savings accomplishments or earnings. Specifically, the 2006-2008 Verification Report ignored Commission-approved measurement studies, and instead relied on opinion and faulty modeling assumptions to derive its estimates. Such estimates did not represent the delivery approach or the effect of SCE's programs. For example, the Commission corrected for the net-to-gross ratio applied to SCE's Residential Lighting program to accurately reflect its implemented delivery approach. SCE's program had concerted effort to implement the program to penetrate hard-to-reach customers through focused distribution channels and not simply through big box retailers. TURN ignores this fact and disagrees because finding the right value led to a better portrayal of SCE's programs. Instead, TURN appears to seek out the lowest value, regardless of how inaccurate or inappropriate it is. The Commission should disregard TURN's attempts to do so and deny their Application for Rehearing.

VI.

CONCLUSION

SCE respectfully urges the Commission to reject TURN's Application for Rehearing of Decision 09-12-045. Decision 09-12-045 emphasizes the Commission's commitment to elevate energy efficiency by appropriately rewarding utilities for successful achievement of significant levels of energy savings while also using an "apples to apples" comparison for fairness to the ratepayer and utility. Failure to uphold that commitment would devalue the importance of energy efficiency and jeopardize the significant progress that energy efficiency has made as a cornerstone of California's energy policy. Further, TURN fails to show any legal error by the Commission and merely continues its crusade against any energy efficiency risk/reward incentives. TURN has made this same argument and objection for two years. The Commission should once again reject TURN's arguments and deny their Application for Rehearing.

Respectfully submitted,

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February 12, 2010

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) RESPONSE TO TURN'S APPLICATION FOR REHEARING OF DECISION 09-12-045 on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

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

Executed this **12th day of February, 2010**, at Rosemead, California.

/s/ ANDREA MORENO

Andrea Moreno

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