



FILED

07-07-09

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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
(Filed July 21, 2008)

And Related Matters.

Application 08-07-022
Application 08-07-023
Application 08-07-031

**ADMINISTRATIVE LAW JUDGE’S RULING SEEKING COMMENTS
ON 2009-2011 PORTFOLIO EM&V**

This ruling seeks parties’ comments on an Energy Division straw proposal and recommendations for Evaluation, Measurement and Verification (EM&V) for the 2009 - 2011 energy efficiency program period. This ruling also seeks parties’ comments on other issues discussed and questions raised during the EM&V workshop held on June 17, 2009.

The Energy Division straw proposal and related documents are attached to this ruling, as follows:

<u>Attachment</u>	<u>Name</u>
A	Energy Division Straw Proposal on EM&V Issues for June 17 th EM&V Workshop
B	Energy Division Presentation: Workshop on Evaluation, Measurement and Verification for 2009-2011 Program Cycles
C	Revised Chapter F to Energy Division Straw Proposal on EM&V Issues for June 17 th EM&V Workshop
D	Energy Division Staff Notes, June 17, 2009 Workshop

These documents also may be found on the Energy Division website.¹ Parties may comment on these documents, the questions presented below, and/or any other issues related to EM&V for the 2009 – 2011 energy efficiency program period. The questions in this ruling are intended to help guide parties' comments rather than to solicit individual responses to each question.

Specific Questions Regarding Sections of the Energy Division Straw Proposal

A. Overall Goals of EM&V

1. Please comment on the "Overall Goals of EM&V" articulated on page 2 of the Energy Division straw proposal and/or provide alternative suggestions.

B. Respective Scopes of EM&V Responsibilities for Commission and Utility Staff

1. What types of EM&V projects should be funded to serve the goals of EM&V and what should be the order of priority for the EM&V projects?²
2. Which types of EM&V projects should the Commission staff and utilities be responsible for, respectively? How would this arrangement serve the stated purpose and goals of EM&V? How should the division of responsibility be decided?
3. Please comment on the proposal to modify the firewall between implementation and evaluation established in Decision (D.) 05-01-055 in Rulemaking (R.) 01-08-028.
4. What criteria should be used to determine projects that would benefit from joint Energy Division/utility management?

¹ http://www.cpuc.ca.gov/PUC/energy/Energy+Efficiency/EE+Workshops/060809_Evaluation+Measures+and+Verification.htm

² See suggestions in the inventory of activities in Appendix B and Appendix C to the Energy Division straw proposal, also posted as a spreadsheet on the Energy Division website.

C. Stakeholder Input Process and Approval of EM&V Projects

1. Please comment on the stakeholder input processes proposed in the Energy Division straw proposal and/or provide alternative suggestions.
2. What approval processes should be put into place for utility-managed EM&V projects?
3. What approval processes should be put into place for Energy Division-managed EM&V projects?
4. How should the stakeholder input process be structured to avoid lengthy delays?
5. What, if anything, should be exempted from the stakeholder review process, and why?

D. Cost-Effectiveness Calculations and Accomplishment Reporting

1. Please comment on the cost-effectiveness tool and accomplishment reporting processes proposed in the Energy Division straw proposal and/or provide alternative suggestions.
2. Please comment on the process for reviewing non-DEER³ measures proposed in the Energy Division straw proposal and/or provide alternative suggestions. How can this process be best streamlined to balance schedule and reliability?
3. What process should be used to update existing work papers?
4. Please comment on the process for adding new DEER measures proposed in the Energy Division straw proposal and/or provide alternative suggestions.
5. How should disagreements regarding the reasonableness of work papers be resolved?
6. How should disagreements regarding DEER estimates be resolved?

³ DEER: Database for Energy Efficiency Resources.

E. Proposed Process for Authorizing EM&V Budgets and Projects

1. Please comment on the process for planning and budgeting EM&V projects proposed in the Energy Division straw proposal and/or provide alternative suggestions. Please note that the ED Straw Proposal would lead to a final decision on EM&V plans and budget in November 2009, after the main decision on 2009 - 2011 energy efficiency portfolios. (See p. 7-8 of Straw Proposal).
2. Is an 8% funding level appropriate for the EM&V studies that are needed? What level of funding is appropriate? How should the funding level be determined? What process should be used for authorizing the overall EM&V budget and its allocation?

F. Data Availability, Data Quality Improvement, and Reporting

1. Please comment on the data quality problems and improvement recommendations provided in the detailed revision of the data quality section of the Energy Division straw proposal.

G. 2009 Bridge Funding Period

1. Please comment on the 2009 bridge funding period EM&V process provided in the Energy Division straw proposal.

I note that Energy Division's proposal regarding the firewall between implementation and evaluation (explained on page 5 of Attachment A to this ruling) and possibly other aspects of the Energy Division straw proposal would modify D.05-01-055 in R.01-08-028. To provide notice that the Commission may in this proceeding adopt changes that would modify D.05-01-055, this ruling with its attachments should be served on the service list in R.01-08-028. Any comments regarding possible changes to D.05-01-055 should be filed in this proceeding, not in R.01-08-028.

IT IS RULED that:

1. Parties may file in this proceeding comments on the documents attached to this ruling, the questions in this ruling, and other issues discussed at the June 17, 2009 workshop on EM&V no later than July 17, 2009.
2. Parties may file reply comments in this proceeding no later than July 27, 2009.
3. This ruling with attachments shall be served on the service list in Rulemaking 01-08-028.

Dated July 7, 2009, at San Francisco, California.

/s/ DAVID M. GAMSON

David M. Gamson
Administrative Law Judge

INFORMATION REGARDING SERVICE

I have provided notification of filing to the electronic mail addresses on the attached service list.

Upon confirmation of this document's acceptance for filing, I will cause a Notice of Availability of the filed document to be served upon the service list to this proceeding by U.S. mail. The service list I will use to serve the Notice of Availability of the filed document is current as of today's date.

Dated July 7, 2009, at San Francisco, California.

/s/ CRISTINE FERNANDEZ
Cristine Fernandez