



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Examine the )  
Commission's Post-2008 Energy Efficiency )  
Policies, Programs, Evaluation, Measurement )  
and Verification, and Related Issues. )

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Rulemaking 09-11-014  
(Filed November 20, 2009)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS ON  
ADMINISTRATIVE LAW JUDGE FARRAR'S PROPOSED DECISION REGARDING  
CONTINUATION OF FUNDING FOR ENERGY EFFICIENCY PROGRAMS**

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Dated: **December 5, 2011**

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

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**I.**

**INTRODUCTION**

Pursuant to Rule 14.3 of the California Public Utilities Commission (Commission or CPUC) Rules of Practice and Procedure, Southern California Edison Company (SCE) hereby submits these opening comments on Administrative Law Judge (ALJ) Farrar’s Proposed Decision Regarding Continuation of Funding for Energy Efficiency Programs (Proposed Decision).

**II.**

**COMMENTS**

SCE supports the Proposed Decision’s proposal to increase Procurement Energy Efficiency funding to replace Public Goods Charge funding during 2012, at currently authorized levels. This action will ensure uninterrupted delivery of SCE’s approved energy efficiency programs for the remainder of the 2010-2012 cycle, and will not have any effect on customer

rates. SCE also appreciates the Proposed Decision's affirmation of each investor-owned utilities' (IOUs) proposed approaches to the mechanics of this change, which allows each IOU to make the needed modifications to ensure a simple transition in accounting for 2012.

In addition, in reply comments on the September 28, 2011 Ruling,<sup>1</sup> SCE partially supported DRA's proposal to use any unspent, uncommitted funds from previous cycles prior to increasing procurement funding to cover the public goods charge. The Proposed Decision does not address this proposal. At this juncture, in order to maintain the currently authorized rate levels for the 2010-2012 program cycle, SCE proposes that the Final Decision direct the IOUs to use any unspent, uncommitted funds from prior cycles as part of the energy efficiency bridge applications that will be implemented starting in 2013. Any unspent, uncommitted funds will offset the cost of the programs proposed for the bridge period.

### **III.**

#### **CONCLUSION**

SCE hereby submits its opening comments on the Proposed Decision and appreciates the opportunity to provide this input to the Commission's decision-making processes.

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<sup>1</sup> Assigned Commissioner's Ruling and Scoping Memo Regarding Continuation of Funding for Energy Efficiency Programs, dated September 28, 2011.

Respectfully submitted,

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*/s/ Larry R. Cope*

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