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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

COMMENTS OF THE LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION ON ENERGY EFFICIENCY WORKSHOP ISSUES

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For THE LOCAL GOVERNMENT
SUSTAINABLE ENERGY COALITION

June 29, 2009

I. INTRODUCTION

In accordance with the June 9, 2009 Ruling of Administrative Law Judge Gamson, the Local Government Sustainable Energy Coalition[1] ("LGSEC") submits these comments on selected issues identified by the ALJ and staff of the California Public Utilities Commission ("Commission"). The LGSEC appreciates the efforts by the Commission to develop a thorough record and fully examine the proposals from the investor-owned utilities for 2009-2011 energy efficiency programs. The LGSEC recommends:

- ♦ The Commission allow ratepayer funds to be used in conjunction with funds from the American Recovery and Reinvestment Act ('ARRA" or "Federal Stimulus"). The Commission should not attempt to extend its authority and impose on non-ratepayer funded programs or projects the requirements that apply to ratepayer-funded programs.
- ♦ The Commission work toward establishment of an independent entity, as indicated in the *California Energy Efficiency Strategic Plan* ("Strategic Plan"), which will be responsible for determining when a market is transformed, among other things.
- ♦ The Commission should ensure there are regional energy offices throughout the State that can, among other functions, serve as clearinghouses on different goals like whole house or zero net energy, as well as availability of incentives.
- ♦ Utility-funded Resource Conservation Managers in local governments can help develop and take advantage of various financing programs. The Commission can require local entities to

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[1] The Local Government Sustainable Energy Coalition includes: the Association of Bay Area Governments, the Association of Monterey Bay Area Governments, the City of Berkeley, the City of Huntington Beach, the City of Irvine, the City of Pleasanton, the City and County of San Francisco, the City of Santa Monica, the County of Los Angeles, the County of Marin, the County of Ventura, the Energy Coalition, the South Bay Cities Council of Governments. Each of these organizations may have different views on elements of these comments, which were approved by the LGSEC's Board.

have energy efficiency and/or sustainability policies in place as a prerequisite for such a position, providing an incentive to local governments to adopt the State's goals.

- The Commission and other State agencies should adopt a radically different approach to reaching and educating decision makers on energy efficiency and sustainability issues. This approach should be tailored to each market sector.
- By requiring long-term plans for each local government partnership that align local government and utility goals, the Commission will be able to evaluate continuation of "evergreen" partnerships.
- The Commission must require that energy usage data be provided to local governments electronically.
- Any task forces the Commission establishes should be open to the public and should solicit input from stakeholders, including local governments.

II. RESPONSES TO QUESTIONS POSED BY THE ALJ AND ENERGY DIVISION

1. Should the 2006-2011 cumulative energy savings goals be modified with Database for Energy Efficiency Resources 2008 values as presented at the May 18, 2009 goals workshop? If so, do you favor the methodology presented in Slide 5 of the Presentation "Applying 2008 DEER Presentation - ED Staff,"1 (bottom row), which is based on the current 2009-2011 gross goals and results in a cumulative goals decrement for 2009-2011 of 20% (kwh) and 15% (KW) respectively?

LGSEC has no comment on this issue at this time.

2. How should ratepayer funding for energy efficiency programs best be combined and leveraged with energy efficiency funding from the American Recovery and Reinvestment Act (federal economic stimulus program) to support the energy efficiency activities of local governments? What principles or guidelines should the California Public Utilities Commission (CPUC) use in this combining and/or leveraging?

In addition to the comments below, the LGSEC concurs with the comments being put forward on this question by the City and County of San Francisco ("San Francisco"). The

LGSEC addressed coordination with ARRA in comments filed in March, as well as in comments filed on the utilities' amended applications.[2] LGSEC recommends the following guidelines:

1. To meet Stimulus Package criteria around job creation and sustainability, as well as energy savings and greenhouse gas reductions and fund leveraging, local governments must be able to pool these resources with other available funds, including ratepayer and public goods charge funds.
2. California will need to adopt simple rules and processes for how ratepayer and public goods charge funds are accounted for so that local governments are not stymied in their efforts to meet their responsibilities under the Stimulus Package. The ARRA requires local governments to obligate the Energy Efficiency Community Block Grant funds within 18 months, or forfeit the funds. If the federal Block Grant funds somehow get entangled in a CPUC-mandated dependency relationship with the ratepayer and public goods charge funds, local governments will not be able to meet their federal statutory deadline. The CPUC and other state agencies should not be entertaining any proposals that would create a dependency relationship between funding for ratepayer and public goods charge programs and other funds available to local governments, including Stimulus Package funds. Rather, these funds should be accessed and administered by local governments, who can leverage them to meet local needs.
3. Local government partnerships should receive credit for energy savings achieved through partnership programs. The utilities should receive credit only for those projects funded by

[2] *Comments of the Local Government Sustainable Energy Coalition on Synergies Between the 2009 Federal Stimulus Package and Public Goods Charge Programs*, March 11, 2009; *Comments of the Local Government Sustainable Energy Coalition on Amended Utility Applications for 2009-2001 Energy Efficiency Programs*, April 17, 2009.

ratepayer monies. This provides the utilities with the same opportunity for shareholder incentives for which they have always been eligible.

4. Any policies the Commission adopts regarding attribution of savings should <u>preserve the opportunity for local governments to voluntarily participate in nascent trading programs under cap and trade policies</u>, as an incentive for early action to reduce the impacts of climate change.

3. Please comment on the Energy Division proposals introduced at the June 3, 2009 workshop regarding the establishment of a framework and processes to track progress toward achievement of market transformation (for both specific market sectors and for specific technologies).2 What is the primary data needed for such a tracking process, how should it be collected and analyzed, and by which entities?

On the question of indicator information, determining when a market is transformed eventually must be the responsibility of an independent administrator, as envisioned in the *Strategic Plan*. For 2010 – 2011, the Commission should work with independent research entities such as the Lawrence Berkeley Laboratory, as a transition to an independent administrator. For the other questions posed with this item, the LGSEC has no comment at this time.

4. Should the Investor-owned Utilities (IOU)-proposed residential programs be expanded beyond the currently proposed small-scale "home performance" program to also include a "prescriptive whole house retrofit" program? If so, to what scale and with what program elements? What should be the appropriate roles of IOUs, contractors and other actors in home performance and prescriptive programs?

The LGSEC supports whole building approaches as a matter of principle. Based on our collective experience, we know that you often only get one opportunity to work in a building, for a variety of reasons including maintenance schedules, availability of funds, and tenant disruption. In response to the Energy Division question about matching specifics of a job to various incentives, this is exactly the function that a regional energy office can play and one of the reasons the LGSEC and its members have been advocating for regional energy offices for so many years. Evidence of the success of this approach can be seen with the California Center for Sustainable Energy, the Redwood Coast Energy Authority, the Ventura County Regional Energy Alliance, or the South Bay Environmental Services Center, all of which have established themselves as the central clearinghouse in their respective regions for information and services on energy efficiency and other sustainability issues. The Commission should be working with other state agencies and local governments to ensure all regions have this type of resource, and should direct the utilities to support regional approaches.

5. What is the best way to implement financing programs, including on-bill financing, for residential, small commercial, and institutional customers? What other financing approaches for energy efficiency programs should be adopted? What are the appropriate roles for utilities and ratepayer funds?

The LGSEC appreciates the interest from policy makers in financing programs that will make it easier for local governments and our constituents to participate in energy efficiency programs. Two of the biggest barriers for local governments themselves to participate more fully are: (1) understanding of the benefits of energy efficiency programs, and (2) cash to finance investments.[3] Local governments need staff positions that can operate as change agents within their organizations, advocating for energy efficiency programs, and then designing and implementing them. This is a critical piece of the "green jobs" infrastructure that is not often discussed, but is absolutely essential.

[3] *Public Agency Participation in Energy Efficiency Programs: Technology Transfer Feasibility Study*, Prepared by Jody London Consulting for the Southern California Edison – Southern California Gas – County of Los Angeles Energy Efficiency Partnership, December 2, 2005.

Many local governments are looking with great interest at opportunities such as AB 811, and are beginning to explore how they might participate. Having greater in-house expertise on these issues would greatly assist local governments in these efforts.

Something that has not been highlighted much in the current discussion is the need to educate both public and private sector financial officers about the benefits of energy efficiency from a budget standpoint. In the current fiscal crisis, reducing utility costs has become more important than ever. The LGSEC sees this need not only with financial officers, but with other key decision makers as well.

Whatever programs the Commission ultimately authorizes, the Commission and other state agencies, including the California Energy Commission and the California Air Resources Board, should consider a radically different approach to outreach that identifies by market sector the key organizations where decision makers within that sector go for information. The Commission should then work closely with those groups to provide speakers for meetings and conferences, content for newsletters, and otherwise be a resource. In the K-12 education sector for example, reaching Finance Officers would mean developing relationships with groups such as the California Association of School Business Officers and the Coalition for Adequate School Housing. In the private sector, many CFOs participate in Financial Executives International, which organizes regionally in chapters.

In terms of what is the best role for utility participation and the use of ratepayer funds, the LGSEC concurs with the comments put forth by San Francisco. In terms of AB 811 programs and other programs that are developed and implemented by local governments, it is not clear why or how there is a role for utility involvement. While it IS appropriate for utilities to offer incentives and rebates for technology installed under a municipally financed program, it is not clear that utilities have any place in the development of those programs.

6. How might the program performance metrics identified by the IOU program plans be improved? What are the characteristics of effective performance metrics and how frequently and via what process should program performance metrics be tracked, updated, and reported in order to ensure that utility programs are meeting their objectives and goals?

LGSEC has no comment on this issue at this time.

7. Given current saturation levels of basic Compact Fluorescent Lamps (CFLs)4 in California homes and retail outlets, what is the optimal level of funding for basic CFLs and/or the number of basic CFL bulbs to be included in IOU Upstream Lighting Programs during the 2009-2011 period? In what manner and by what date should funding for basic CFLs (for the residential sector distributed via Upstream Programs) be phased out? Please describe what other types of specialty CFL, super CFL and other advanced lighting programs should be scaled up during this same period, including possible targets for appropriate funding and incentive levels, energy savings, and distribution channels (residential and non-residential markets).

LGSEC has no comment on this issue at this time.

8. Should the scope of the proposed new energy efficiency marketing, education, and outreach (ME&O) brand be expanded to include other Demand-Side Management (DSM) options such as solar and demand response? Who are the key players that should be involved in advising and implementing the ideal statewide ME&O communications plan implementation? What is the range of tools that the new energy efficiency web portal should offer?

LGSEC concurs with the comments of San Francisco on this issue.

9. Given the potential value for industrial plant energy efficiency certification via a Continuous Energy Improvement (CEI) certification identified in the CEESP, are utility funding levels for this program too low (currently less than 0.5 % of total industrial program funds)? Please describe how the utility CEI programs can be improved and expanded, including the role that utility programs should have in supporting the development of voluntary/mandatory energy reduction targets. How might the workforce, education, and training network described in the utility industrial and agricultural program proposals be further developed to promote adequate workforce education and training for these sector-specific programs and technologies?

LGSEC has no comment on this issue at this time.

10. What should be the overarching objectives, coordination mechanisms, and priorities of the utility-proposed Statewide Integrated Demand Side Management Program? What should be its priorities and specific milestones and outputs during the 2009-2011 period?

LGSEC has no comment on this issue at this time.

11. Please provide feedback on two Energy Division proposals that: (a) all IOU commercial building programs, including government partnership programs, should integrate the use of benchmarking tools and information into their functioning during the 2009-2011 period; and, (b) that a statewide "Path to Zero" Task Force for commercial buildings should be established by the Energy Division and utilities during the 2009-2011 period, as called for in the CEESP.

The LGSEC has welcomed the integration of benchmarking tools and information even prior to the passage of AB 1103. We support this move if resources are made available to support this effort. For example, updating the U.S. EPA Portfolio Manager is a lengthy task that requires expert knowledge to ensure accuracy. For many local governments right now, we do not have the funds to support this type of resource, which is a task best performed by an in-house staff person.

LGSEC also supports the establishment of "Path to Zero" task force, as called for in the *Strategic Plan*. Individual LGSEC members may be interested in participating as formal members of the task force. We also encourage the Commission to ensure that the Task Force meetings are open to the public, and that the Task Force surveys beyond its immediate membership as it develops its recommendations.

12. Should utility Codes & Standards (C&S) Compliance Enhancement Program (CEP) activities be required to target measures that are not included in regular ongoing utility C&S advocacy work in order to avoid double counting? Should any savings resulting from CEP and/or Reach Codes sub-programs be deemed (rather than verified via fieldwork) pending verification (calculation adjustments as needed) by an independent evaluation entity as recommended in the Energy Division staff summary? Should utilities be permitted to or prohibited from claiming "gross" savings from C&S work that occurs outside utility service territories?

On the question of reach codes and who should get savings credit, when reach codes are developed by a local government partner, credit must be given to the partnership program, which ultimately flows to the utility. This acknowledges the contribution of local government to developing the code to start with. Otherwise, there will be additional competition between various programs as the utility's internal departments argue over whether an internal utility program or the partnership should get credit, which is not what we need. The focus must be on completing all feasible projects.

LGSEC also concurs with San Francisco on this question.

13. Please comment on issues specific to government partnerships raised by the Energy Division7, including providing specific suggestions on the format and content of utility provision of municipal facility and community energy use data (by building sector) requested by local governments, the development of web-based information on local government best practices, and specific strategies for more coordinated statewide work on municipal facilities, including streetlight and zero-net-energy building programs. Should the CPUC adopt rules - such as selection criteria - regarding geographic and income diversity for local government programs? Should one person be funded to coordinate and share best practices for local government energy efficiency on a statewide basis and if so, where should this person be housed?

In addition to the questions in the ALJ Ruling, we address here more specific questions posed by the Energy Division. On the issue of selection criteria for participation in local government partnerships, LGSEC suggests that the Commission should recognize local political will when evaluating local government entities that are eligible to participate. Several of the partnerships funded currently are regional programs that have evolved over several years, and which help educate smaller public entities about the benefits of energy efficiency, as indicated above. The Commission can create incentives for government entities to participate in partnership programs by directing the utilities to fund Resource Conservation Managers in larger government entities or groupings of smaller entities.[4] As recommended by LGSEC, one of the criteria for a local government to receive funding for a Resource Conservation Manager can be the establishment of energy efficiency, green building, and/or sustainability policies.

Energy Division asks how local governments and IOU administrators "can transparently and collaboratively present Energy Division and the Commission with detailed information" on

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[4] *Comments of the Local Government Sustainable Energy Coalition on Amended Utility Applications for 2009-2011 Energy Efficiency Programs*, April 17, 2009, pp. 11-13 and Attachment A.

specific questions. LGSEC has previously described the need for long-term plans for partnerships. LGSEC has recommended that the Commission require the utilities to consider local government long-term plans when developing the *California Energy Efficiency Strategic Plan.*

> Because many local governments already have existing long-term facilities and/or energy master plans, the utilities need to collaborate with each willing local government partnership on how to best integrate established local energy, development, and other sustainability goals into the statewide strategic plan. These long-term plans should be based on local market opportunities as well as the local government's facilities and/or energy master plans. Many local governments participating in partnerships have strategic plans to fully implement further energy efficiency, reach new target groups, collaborate with other local government or public agency resources, and expand program outreach. During the 2006-08 program cycle, local governments were and are developing and planning program elements for the future. It is logical that this internal planning should be done in collaboration with the utilities and in conjunction with their strategic plans. This would surely help with some of the well-publicized communication and coordination problems between the utilities and local governments and would improve the implementation of the Strategic Plan over the long term. …
>
> The partnership-specific strategic plans should be jointly developed by the local government partner and the utility, as discussed above. Any submittal from the utilities to the Commission that includes information about local government partnerships should include some form of written commitment from the local agencies and the utilities regarding their roles and responsibilities with respect to implementation of the plan. The Commission should direct the utilities to include within their statewide strategic plan the interim strategic plans jointly developed with each local government partner, and to jointly develop long-term strategic plans with each local government partner as an integral part of the Commission's strategic planning process. [5]

Developing Strategic Plans for each partnership also will aid in developing an "evergreen" clause for local government partnerships. With clear, jointly agreed upon milestones and expectations in place, which feed into both local government and utility long-term goals, it will be easier to measure and evaluate progress.

[5] *Comments of the LGSEC on Proposed Decision on 2009-2011 Energy Efficiency Programs*, October 9, 2007.

On the question of data for local governments, local governments need utility data for their communities that can be sorted, reformatted, and generally *manipulated electronically* to be able to coordinate programs and marketing to target specific categories of users in order to achieve greenhouse gas reductions goals more effectively. Local governments need disaggregated electronic data that show, for example, residents by geographic regions, businesses by NAIC categories, or individual tenant use within buildings. Local governments are attempting to create energy efficiency programs for their communities in much the same way utilities do and so need the data that utilities have at the same level of detail. If that is not exactly possible, local governments need the data to be as detailed and malleable as CPUC rules will allow. Attachment B of the April 17, 2009 comments in this docket by LGSEC is a very detailed description of local government data needs and reasons for those needs.

For the immediate future, having data uploaded electronically to data bases such as EPA's Portfolio Manager on an on-going basis in order to track and reduce greenhouse gas emissions will take advantage of this current on-line tool and help move us forward now. We have countless stories of local government entities, including school districts, requesting data from the utilities and having reams of paper arrive. In this era of technology, that is absolutely unacceptable. Likewise, building owners need the same kind of data for themselves in the same fashion (i.e., electronically and automatically uploaded into databases) in order to comply with SB 1103 in January 2010. Policies, procedures, and protocols need to be developed within 6-9 months to support local government efforts to comply with AB 32, the Global Warming Solutions Act. There should be a statewide system for accomplishing this goal. PG&E has a system in place where users can request data be uploaded to Portfolio Manager. This system could be adopted by the other utilities and built upon to achieve these goals.

It is critical to ensure that all local governments have resources and expertise in-house – through a regional energy office if the government entities are small – to establish, maintain, and analyze a platform in Portfolio Manager. There is no need to reinvent a program when the Federal government has already developed one. LGSEC also endorses the comments of San Francisco on this point.

14. Given that the number of permits for new home construction is at its lowest level in 10 years, and that the CEESP sets an interim milestone of 50% market penetration of above-code homes for 2011, should the utilities scale back funding parallel to the market or could increasing incentive levels (while keeping the same proposed budget) be the least cost path to achieving the CEESP target?

LGSEC has no comment on this issue at this time.

III. ADDITIONAL QUESTIONS FROM ENERGY DIVISION ON TOPICS WITHOUT PLANNED WORKSHOPS

On Workforce, Education, and Training

When looking at K-12 programs, the Commission and the utilities should target academy partnerships, which are supported by the California Department of Education and exist in selected public high schools. Many of them are focused on environmental issues, or have foci that are related.[6] Similarly, community colleges join with K-12 education in developing regional occupation programs. These programs allow high school students to gain credit at community colleges, as well as provide adult education. These programs also coordinate with workforce investment boards.

The Commission and other state agencies also must approach businesses and agencies in the energy industry to help train energy professionals. For example, there should be internships

[6] For example, among the academy partnerships in the Oakland Unified School District's many high schools are an environmental science academy, and new for 2009-2010, both an environmental technology academy and an international trade and transportation academy.

for high school students with regulatory agencies at the regional, state, and federal level to expose them to career opportunities. Similarly, businesses should sponsor interns. The Commission must provide guidance and resources that help these organizations develop and provide meaningful opportunities.

Dated: June 29, 2009

Respectfully submitted,

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For THE LOCAL GOVERNMENT
SUSTAINABLE ENERGY COALITION

CERTIFICATE OF SERVICE

I, Jody London, certify that I have, on this date, served a copy of "Comments Of The Local Government Sustainable Energy Coalition On Energy Efficiency Workshop Issues" on all known parties to A.08-07-021, A.08-07-022, A.08-07-07-023, and A.08-07-031 by transmitting an e-mail message with the document attached to each party named in the official service list, and by serving a hard copy on the Administrative Law Judge.

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

Dated June 29, 2009 in Oakland, California.

Jody London

Jody London

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