



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

**FILED**

07-10-09  
01:54 PM

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

**REPLY COMMENTS OF  
LOCAL GOVERNMENTS IN SOUTHERN CALIFORNIA  
ON ENERGY EFFICIENCY WORKSHOP ISSUES**

JODY S. LONDON  
Jody London Consulting  
P.O. Box 3629  
Oakland, California 94609  
Telephone: (510) 459-0667  
E-mail: [jody\\_london\\_consulting@earthlink.net](mailto:jody_london_consulting@earthlink.net)

For THE LOCAL GOVERNMENT  
SUSTAINABLE ENERGY COALITION

July 10, 2009

As directed in the June 9, 2009 Administrative Law Judge Ruling, the City of Irvine, the South Bay Cities Council of Governments, the County of Ventura, and the County of Los Angeles (“Governments”), all members of the Local Government Sustainable Energy Coalition (“LGSEC”), submit these reply comments on energy efficiency workshop issues. The Governments limit these reply comments to issues raised in the opening comments of Southern California Edison (“SCE”) and the Natural Resources Defense Council (“NRDC”), in particular on the issue of the interaction of ratepayer-funded programs with other funding sources.

### **Response to Southern California Edison**

Southern California Edison (“SCE”) states in its comments:

Funding from the American Recovery and Reinvestment Act (ARRA) should be leveraged and combined with the activities of local governments and other programs just as any other source of funding would be. Additionally, due to the short implementation period of the ARRA, SCE does not see any justification for prescribing new and different rules for crediting savings from existing program funds in the presence of federal stimulus funds.<sup>1</sup>

The Governments agree that there is no need for new rules for crediting savings. However, because local governments have the ultimate responsibility for expenditure of ARRA funds – just like utilities have this responsibility for public goods charge funds – local governments must be an equal partner with utilities when it comes to decisions for joint program implementation. The LGSEC and individual local governments have advocated for this for many years in this and predecessor dockets;<sup>2</sup> the introduction of ARRA funds, as well as other funding opportunities unique to local governments, brings this issue once again to the forefront.

---

<sup>1</sup> *Southern California Edison Company’s Comments On The Administrative Law Judge’s Ruling Seeking Comments On Workshop Issues*, June 29, 2009, p. 3.

<sup>2</sup> See most recently: *Comments of the Local Government Sustainable Energy Coalition on Energy Efficiency Workshop Issues*, June 29, 2009, pp. 9-10.

When using ARRA funds, local governments are being held to 10% administration costs. To the extent there are opportunities to leverage ARRA funds with ratepayer funds, the Governments would hope that the utilities can voluntarily commit to the same administrative limits. This would free up the maximum ratepayer funds for incentives.

There will be a certain degree of flexibility with ARRA funds. The Governments are pleased to see that SCE agrees on this point,<sup>3</sup> saying it would like to “maintain maximum flexibility to leverage available energy efficiency funding resources within existing program criteria.” This point also was made by the City and County of San Francisco and Efficiency First.<sup>4</sup>

As described in numerous earlier filings, local government partnerships ideally will allow each partner to take advantage of each other’s strengths. Local governments have a strong connection to the community and other local governments, planning and construction oversight, and ARRA funding. Utilities have data (consumption as well as program participation data), ratepayer money, and greater expertise in marketing and measurement and verification. Local governments would like to see a true partnership with the utilities that would blend these strengths into comprehensive programs, each of which has a single interface for the customer.

However, SCE’s proposed Energy Leader model does not sufficiently support this vision for true partnership and seamless integration of program efforts. Many local governments are finding the Energy Leader model to be overly restrictive. SCE in its June 29 comments referenced its assistance efforts to local governments to leverage ARRA funds, but the focus of

---

<sup>3</sup> LGSEC, *loc cit.*, p. 3.

<sup>4</sup> *Response Of The City & County Of San Francisco To The Administrative Law Judge’s Ruling Seeking Additional Record And Comments On Workshop Issues*, June 29, 2009, pp. 2-3; *Sustainable Spaces’ Comments In Response To Administrative Law Judge’s June 9, 2009 Ruling Seeking Additional Record And Comments On Workshop Issues*, June 29, 2009, p. 1.

this assistance has been solely on municipal facilities rather than energy efficiency needs and opportunities in the broader community. In the case of the City of Irvine, the proposed assistance consisted of a one-page letter with several outdated reports attached (see Attachment A). It did not include the type of data and program development information that would be helpful in crafting programs to mobilize the broader community. SCE has subsequently reiterated to the City verbally what programs may be available to assist in Irvine's community efforts, but has not made any movement toward a comprehensive and integrated approach.

In order to forge a genuine utility partnership and maximize the leverage potential of ARRA funds, Irvine had been hoping to remove the significant barriers to customer participation caused by multiple program resources and multiple marketing messages. Irvine would like to bundle the utility incentives with an AB 811 program. SCE has not been supportive of this approach, ostensibly because it is not consistent with the proposed "Energy Leader" model. Irvine has already accomplished a substantial amount of energy efficiency within its municipal facilities and now intends to concentrate on mostly community-scale energy projects with the ARRA funding. Specifically, Irvine would like to see SCE:

- Expand the parameters of the Energy Leader model to include strong utility partnership with the City to achieve the community-wide benefit that is referenced above;
- Adopt the EPA Portfolio Manager portal program that is currently functioning for PG&E customers in order to support the City's use of ARRA funding to implement Portfolio Manager training that will support compliance with AB 1103;
- Continue to pursue ways in which consumption and program participation data can be shared with the City in a useful format while still complying with CPUC rules.

## **Response to NRDC**

NRDC appears to suggest that local governments should be required to participate in utility programs before they can use ARRA funds.<sup>5</sup> This is contrary to the intent of the ARRA, which provides funds directly to local governments so they can design programs that meet local needs. NRDC's recommendations also disregard facts that are well-documented in this case: ARRA applies criteria different than those employed by the CPUC, and requires funds to be encumbered on a very tight schedule that is moving more quickly than the CPUC's schedule for approving these applications. Even the utilities do not make this recommendation. While the Governments appreciate NRDC's call for collaboration between utilities and local governments, its suggestions for how to facilitate that collaboration in the context of ARRA are not practical.

LGSEC and other parties also have already provided ample comments on the issue of credit for savings from programs that combine ARRA and ratepayer funds. NRDC suggests these savings should accrue to the utility. This may be a question of semantics. In opening comments, LGSEC recommends that savings accrue to the local government partnership. This is only fair because the local government has brought the ARRA funds to the project. Most partnerships for 2009-2011 are proposed to be resource programs, meaning they have hard savings goals. Ultimately, savings achieved by a partnership are credited to the utility, so the utility should enjoy the same opportunity for shareholder incentives.

---

<sup>5</sup> *Comments of NRDC In Response To Administrative Law Judge's Ruling Seeking Additional Record And Comments On Workshop Issues*, June 9, 2009, pp. 3-5.

Dated: July 10, 2009

Respectfully submitted,

By: 

Jody S. London

Jody London Consulting  
P.O. Box 3629  
Oakland, California 94609  
Telephone: (510) 459-0667  
E-mail: [jody\\_london\\_consulting@earthlink.net](mailto:jody_london_consulting@earthlink.net)

For THE LOCAL GOVERNMENT  
SUSTAINABLE ENERGY COALITION

**ATTACHMENT A**

**SCE LETTER OFFERING ASSISTANCE WITH FEDERAL STIMULUS FUNDS**



**Reducing your electrical consumption by 10%  
can save up to \$478,241\* and  
2,851,907 lbs. of GHG\* or more this year.**

June 2, 2009

Mr. Sean Joyce  
City Manager  
City of Irvine  
P.O. Box 19575  
Irvine, CA 92623-9575

*C. Wally  
Doug  
Brian*

Dear Mr. Joyce,

The American Recovery and Reinvestment Act of 2009 (Act) provides unprecedented opportunities for cities and counties to put energy saving projects into action. As part of the Act, the Department of Energy's (DOE) Energy Efficiency and Conservation Block Grant (EECBG) program will help create jobs, save costs and reduce greenhouse gas (GHG) emissions.

Southern California Edison (SCE) wants to ensure that the City of Irvine takes full advantage of our available programs and resources when implementing energy-related EECBG projects. In addition, we want to help the City of Irvine achieve maximum energy savings with cost efficiency and ease.

SCE is prepared to assist by:

- Helping you track programs (once defined) and providing the technical resources to assist in identifying your energy saving opportunities;
- Assisting you in making decisions about the most cost-effective projects to pursue; and
- Ensuring that your federal stimulus dollars are maximized by leveraging the energy efficiency incentives and rebates that we offer.

The City of Irvine has been allocated \$2,288,000 of EECBG funds. Applications are due to the DOE by June 25, 2009, so quick action is essential in order to take full advantage of this unique opportunity. Based upon an analysis of your 2008 energy usage, a 10% reduction in usage may save the City of Irvine \$478,241\* and result in a reduction of 2,851,907\* pounds of GHG annually. It may also qualify the City of Irvine for energy efficiency incentives of \$142,595\* or more.

The following attachments are included for your reference and to help you take action:

- An Energy Savings Profile displaying current electricity consumption data, proposed energy reduction targets, with estimated cost savings and GHG reductions;
- Existing energy efficiency opportunities for your facilities identified by SCE;
- Estimated costs for key measures\*\*; and
- Suggested components for an Energy Efficiency and Conservation Strategy.

Your assigned account representative, Rick Raskin, will contact your department staff within the next week to answer any questions. Should you wish to talk sooner, feel free to contact Rick Raskin at 714-973-5765.

Sincerely,

Steven K. Nelson  
Region Manager

*Doug / Brian Fisk* <sup>495</sup>

cc: Manuel Gomez, Director of Public Works  
Rick Raskin, SCE

\*This analysis is meant as an aid to assist you in establishing an electricity reduction target. Due to the complexity of energy usage, we cannot guarantee any level of savings. The information is based on actual 2008 historical energy consumption. Please ensure your understanding of the variables that can affect actual savings.

\*\* These cost estimates are based on the average costs for the top ten measures processed through the 2008 Program cycle. Actual costs may vary.

©2009 Southern California Edison. All rights reserved.

e to

106 to



## CERTIFICATE OF SERVICE

---

I, Jody London, certify that I have, on this date, served a copy of “Reply Comments Of Local Governments in Southern California 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 July 10, 2009 in Elko, Nevada.



---

Jody London

**Proceeding: A0807021 - EDISON - FOR APPROV**  
**Filer: Southern California Edison Company**  
**List Name: LIST**  
**Last changed: July 8, 2009**

**Proceeding: A0807022 - SOCAL GAS CO - FOR A**  
**Filer: Southern California Gas Company**  
**List Name: LIST**  
**Last changed: July 8, 2009**

**Proceeding: A0807023 - SDG&E - FOR APPROVAL**  
**Filer: San Diego Gas & Electric Company**  
**List Name: LIST**  
**Last changed: July 8, 2009**

**Proceeding: A0807031 - PG&E - FOR APPROVAL**  
**Filer: Pacific Gas and Electric Company**  
**List Name: LIST**  
**Last changed: July 8, 2009**

ddayton@cleanenergysol.com  
sesco@optonline.net  
mmoore@newportpartnersllc.com  
keith.mccrea@sablax.com  
donaldgilligan@comcast.net  
mharrigan@ase.org  
adam@agp-llc.com  
jimross@r-c-s-inc.com  
rockybacchus@gmail.com  
gtropsa@ice-energy.com  
ckmitchell1@sbcglobal.net  
spatrick@sempra.com  
dmahmud@mwdh2o.com  
nkarno@yahoo.com  
thamilton@icfi.com  
pwuebben@aqmd.gov  
larry.cope@sce.com  
monica.ghattas@sce.com  
cfpena@sempra.com  
liddell@energyattorney.com  
andrew.mcallister@energycenter.org  
dmano@enallasys.com  
etaylor@enallasys.com  
mlewis@ctg-net.com  
mike.rogers@greenhomesamerica.com

judi.schweitzer@post.harvard.edu  
rscott@cheers.org  
dale@betterbuildings.com  
wilkinson@es.ucsb.edu  
tam.hunt@gmail.com  
pcanessa@charter.net  
mtierney-lloyd@enercoc.com  
rsa@a-klaw.com  
JeffreyH@hellermanus.com  
RemiT@hellermanus.com  
bfinkelstein@turn.org  
hayley@turn.org  
marcel@turn.org  
dil@cpuc.ca.gov  
jeanne.sole@sfgov.org  
stephen.morrison@sfgov.org  
achang@nrdc.org  
cjn3@pge.com  
saw0@pge.com  
steven@moss.net  
jsqueri@gmsr.com  
edwardoneill@dwt.com  
jimflanagan4@mac.com  
ssmyers@att.net

jak@gepllc.com  
wbooth@booth-law.com  
jerryl@abag.ca.gov  
rknight@bki.com  
jody\_london\_consulting@earthlink.net  
hoerner@redefiningprogress.org  
swentworth@oaklandnet.com  
samuelk@greenlining.org  
TWhite@homeenergy.org  
john@proctoreng.com  
pmschwartz@sbcglobal.net  
tim@marinemt.org  
wem@igc.org  
hankryan2003@yahoo.com  
Rob@ConSol.ws  
jweil@aglet.org  
bill@jbsenergy.com  
elee@davisenergy.com  
mike@calcerts.com  
rnichols@navigantconsulting.com  
tcrooks@mcr-group.com  
eemblem@3eintinc.net  
chris@cuwcc.org

mboccardo@dolphingroup.org

glw@eslawfirm.com  
lmh@eslawfirm.com  
jparks@smud.org  
ljimene@smud.org  
bmatulich@egia.com  
cscruton@energy.state.ca.us  
kmills@cfbf.com  
rob@clfp.com  
bburt@macnexus.org  
steve@greenplumbersusa.com  
js@clearedgepower.com

tom@ucons.com  
gandhi.nikhil@verizon.net  
ameliag@ensave.com  
Clark.Pierce@us.landisgyr.com  
wjp4@bpconsulting.org  
CCole@currentgroup.com  
srassi@knowledgeinenergy.com  
staples@staplesmarketing.com  
mking@staplesmarketing.com  
nphall@tecmarket.net  
skihm@ecw.org  
gstaples@mendotagroup.net  
annette.beitel@gmail.com  
padib@apx.com  
jmeyers@naima.org  
pjacobs@buildingmetrics.biz  
bbarkett@summitblue.com  
mmcguire@summitblue.com  
bobbi.sterrett@swgas.com  
emello@sppc.com  
David.Pettijohn@ladwp.com  
tblair@mwdh2o.com  
bmcdonnell@mwdh2o.com  
AWilliamson@semprautilities.com  
HYao@SempraUtilities.com  
kwong@semprautilities.com  
kshore@semprautilities.com  
gclayborn@gmail.com  
nhernandez@isd.co.la.ca.us  
david@nemtzwow.com  
susan.munves@smgov.net  
jcluboff@lmi.net  
brad.bergman@intergycorp.com  
southlandreports@earthlink.net  
cyin@yinsight.net  
cdamore@icfi.com

dpape@icfi.com  
sculbertson@icfi.com  
don.arambula@sce.com  
tory.weber@sce.com  
devon@hartmanbaldwin.com  
Case.Admin@sce.com  
Jennifer.Shigekawa@sce.com  
Laura.Genao@sce.com  
Stacie.Schaffer@sce.com  
dwood8@cox.net  
rsperberg@onsitenergy.com  
jlaun@apogee.net  
ashley.watkins@energycenter.org  
CentralFiles@semprautilities.com  
irene.stillings@energycenter.org  
jennifer.porter@energycenter.org  
jyamagata@semprautilities.com  
sephra.ninow@energycenter.org  
CentralFiles@semprautilities.com  
bob.ramirez@itron.com  
rachel.harcharik@itron.com  
david.gordon@efm-solutions.com  
kjk@kjkammerer.com  
LukeH@enasys.com  
cneedham@edisonmission.com  
cperkins@energycoalition.org  
TFlanigan@EcoMotion.us  
sthompson@ci.irvine.ca.us  
sbarata@opiniondynamics.com  
mlong@anaheim.net  
cheryl.collart@ventura.org  
Jeff.Hirsch@DOE2.com  
dmatson@co.santa-barbara.ca.us  
hhuerta@rhainc.com  
pk@utilitycostmanagement.com  
atencate@rsgrp.com  
lcasentini@rsgrp.com  
jcelona@sbcglobal.net  
ann.kelly@sfgov.org  
abesa@semprautilities.com  
wblattner@semprautilities.com  
bruce.foster@sce.com  
pvillegas@semprautilities.com  
matt@sustainablespaces.com  
norman.furuta@navy.mil  
eric@ethree.com  
ichou@nrdc.org  
kgrenfell@nrdc.org  
lettenson@nrdc.org  
nlong@nrdc.org

andrew\_meiman@newcomb.cc  
andy.goett@paconsulting.com  
ann\_mccormick@newcomb.cc  
efm2@pge.com  
yxg4@pge.com  
John\_Newcomb@newcomb.cc  
filings@a-klaw.com  
LDRi@pge.com  
manuson.leif@epa.gov  
lhj2@pge.com  
matt\_sullivan@newcomb.cc  
nes@a-klaw.com  
sls@a-klaw.com  
SRRd@pge.com  
tmfry@nexant.com  
rekl@pge.com  
jared@efficiencyfirst.org  
sbuchwalter@icfi.com  
sdhilton@stoel.com  
thuebner@icfi.com  
vprabhakaran@goodinmacbride.com  
policy.solutions@comcast.net  
cem@newsdata.com  
lisa\_weinzimer@platts.com  
M1ke@pge.com  
slda@pge.com  
wmcguire@fypower.org  
bk7@pge.com  
jkz1@pge.com  
wcm2@pge.com  
regrelcpuccases@pge.com  
hxag@pge.com  
rafi@pge.com  
epetrill@epri.com  
andrew.wood3@honeywell.com  
sharon@emeter.com  
Mary@EquipoiseConsulting.com  
elowe@barakatconsulting.com  
tlmurray@earthlink.net  
singh70@gmail.com  
mistib@comcast.net  
ashish.goel@intergycorp.com  
grant.cooke@intergycorp.com  
jay.bhalla@intergycorp.com  
rfox@intergycorp.com  
sbeserra@sbcglobal.net  
ghamilton@gepllc.com  
michael.cheng@paconsulting.com  
cadickerson@cadconsulting.biz

alex.kang@itron.com  
Ann.Peterson@itron.com  
fred.coito@kema.com  
jenna.canseco@us.kema.com  
jennifer.fagan@itron.com  
jtiffany@ase.org  
john.cavalli@itron.com  
kathleen.gaffney@kema.com  
brbarkovich@earthlink.net  
Karin.Corfee@kema.com  
karl.brown@ucop.edu  
mrw@mrwassoc.com  
Bruce@BuildItGreen.org  
awatson@quest-world.com  
robertg@greenlining.org  
stevek@kromer.com  
craigtyler@comcast.net  
elvine@lbl.gov  
mwbeck@lbl.gov  
darmanino@co.marin.ca.us  
rita@ritanortonconsulting.com  
cpechman@powereconomics.com  
gthomas@ecoact.org  
mary.tucker@sanjoseca.gov  
esprague@consol.ws  
NancyKRod@conSol.ws  
bobho@mid.org  
joyw@mid.org  
gsenergy@sonoma-county.org  
tconlon@geopraxis.com  
garrick@jbsenergy.com  
bmfinkelor@ucdavis.edu  
rmccann@umich.edu  
mbhunt@ucdavis.edu  
dmahone@h-m-g.com  
mgillette@enemoc.com  
kenneth.swain@navigantconsulting.com  
kdusel@navigantconsulting.com

lpark@navigantconsulting.com  
david.reynolds@ncpa.com  
scott.tomashefsky@ncpa.com  
asloan@rs-e.com  
mclaughlin@braunlegal.com  
dgeis@dolphingroup.org  
ehbert@energy.state.ca.us  
jcastleberry@rs-e.com  
wynne@braunlegal.com  
klewis@energy.state.ca.us  
mharcos@rs-e.com

rsapudar@energy.state.ca.us  
bernardo@braunlegal.com  
pstoner@lgc.org  
wwester@smud.org  
vwood@smud.org  
jane@autocell.net  
richard@autocell.net  
rmowris@earthlink.net  
hgilpeach@scanamerica.net  
Dbjornskov@peci.org  
paul.notti@honeywell.com  
brian.hedman@quantecllc.com  
Sami.Khawaja@quantecllc.com  
janep@researchintoaction.com  
samsirkin@cs.com  
mbaker@sbwconsulting.com  
jbazemore@emi1.com  
john@enactenergy.com  
ppl@cpuc.ca.gov  
atr@cpuc.ca.gov  
aeo@cpuc.ca.gov  
cbe@cpuc.ca.gov  
cf1@cpuc.ca.gov  
cxc@cpuc.ca.gov  
crv@cpuc.ca.gov  
dmg@cpuc.ca.gov  
trh@cpuc.ca.gov  
flc@cpuc.ca.gov  
hcf@cpuc.ca.gov  
jbf@cpuc.ca.gov  
jl2@cpuc.ca.gov  
cln@cpuc.ca.gov  
jst@cpuc.ca.gov  
msj@cpuc.ca.gov  
jnc@cpuc.ca.gov  
jdr@cpuc.ca.gov  
jms@cpuc.ca.gov  
jci@cpuc.ca.gov  
keh@cpuc.ca.gov  
lp1@cpuc.ca.gov  
mmw@cpuc.ca.gov  
mkh@cpuc.ca.gov  
nfw@cpuc.ca.gov  
pw1@cpuc.ca.gov  
snr@cpuc.ca.gov  
smw@cpuc.ca.gov  
srm@cpuc.ca.gov  
tcx@cpuc.ca.gov  
tcr@cpuc.ca.gov  
zap@cpuc.ca.gov

ys2@cpuc.ca.gov  
ztc@cpuc.ca.gov  
awp@cpuc.ca.gov  
crogers@energy.state.ca.us  
agarcia@energy.state.ca.us  
msherida@energy.state.ca.us  
sbender@energy.state.ca.us