



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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In the Matter of the Application of West Coast
Gas Company (U910G) for Approval of
Program Years 2021-2026 Low-Income
Assistance Program Budgets.

Application 20-03-014

And Related Matters.

Application 20-05-014

Application 20-05-015

Application 20-05-016

Application 20-05-017

Application 20-06-004

**REPLY COMMENTS OF THE ENERGY EFFICIENCY COUNCIL (EEC) AND FREE ENERGY SAVINGS
COMPANY LLC ON THE SMJU PROPOSED DECISION ON THE LOW-INCOME ASSISTANCE
PROGRAMS AND GOALS, YEARS 2021-2026**

October 11, 2021

Allan H Rago for
The Energy Efficiency Council (EEC)
Free Energy Savings Company LLC
4751 Arrow Highway
Montclair, CA 91763
909-281-3531 (ph.)
909-445-0446 (fax)
arago@qcsca.com

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REPLY COMMENTS OF THE ENERGY EFFICIENCY COUNCIL (EEC) AND FREE ENERGY SAVINGS COMPANY LLC ON THE SMJU PROPOSED DECISION ON THE LOW-INCOME ASSISTANCE PROGRAMS AND GOALS, YEARS 2021-2026

I. INTRODUCTION

In accordance with Rule 14.3 of the Commission's Rules of Practice and Procedure, the Energy Efficiency Council ("EEC") and the Free Energy Savings Company LLC, dba Quality Conservation Services ("Free Energy" or "QCS"), collectively "EEC" unless otherwise indicated, respectfully submit our Reply Comments on the Proposed Decision of ALJ Tran to the applications of West Coast Gas Company (West Coast), Southwest Gas Corporation (Southwest Gas or SWG), PacifiCorp, Liberty Utilities LLC (Liberty), Golden State Water Company/Bear Valley Electric Service Division (Bear Valley), and Alpine Natural Gas Operating Company No. 1 LLC (Alpine), collectively known as the Small Multi-Jurisdictional Utilities (SMJUs), for Approval of Energy Savings Assistance and California Alternate Rates for Energy Programs and Budgets for 2021-2026 Program Years.

The Energy Efficiency Council is a nonprofit trade organization comprised of Energy Efficiency Service Providers, consultants, and specialty contractors throughout California. EEC membership includes a mix of Community-Based Organizations (CBO's), Woman, and Minority-Owned Businesses, Nonprofit Organizations, and Private Contractors who specialize in providing residential energy efficiency education and installation services statewide for low to moderate income ratepayers through the Commission's energy programs. Free Energy is a

member of EEC and an active ESA Contractor serving SMJU (specifically, Southwest Gas) low-income families.

The EEC appreciates the work put into this proposed Decision by ALJ Tran, Energy Division staff, the SMJU utilities, and intervenors. The quality of that work can be inferred from the very small number of actual changes requested or disagreements with the PD filed in the four sets of Opening Comments submitted.

II. DISCUSSION

EEC Reply to Opening Comments of BVES, Liberty, and Alpine (B/L/A)

Bear Valley Electric Service, Inc. ("BVES"), Liberty Utilities (CalPeco Electric) LLC ("Liberty"), and Alpine Natural Gas Operating Company No. 1, LLC ("Alpine"), California's smallest utilities participating in CARE/ESA programs, filed opening comments on the PD requesting corrections in the CARE budgets and requesting a 30-day extension in preparing a joint advice letter setting up the two-tier ESA delivery system.

EEC has no objection to the requested CARE-related corrections requested.

While EEC believes that the Decision's improvements for treating the low-income families of the SMJUs should not be delayed, the 30-day delay in the design and implementation is not unreasonable. We ask that the SMJUs move quickly to implement the Decision's expansion of savings measures installed and eligibility for those measures be implemented no later than July 1, 2022, when all utilities are to switch to minimum income eligibility of 250% of FPL.

EEC notes that among the BVES/Liberty/Alpine Opening Comments and requested actions, there was no mention concerning the need for or burden imposed of the PD's requirement for quarterly reporting. Nor did the gas-only Alpine voice any issue with just considering the electrification measures as demonstrated in the Commission-approved pilots.

This is not to say that any of these support such actions, only that they did not consider them important enough to mention them in their opening comments.

EEC Reply to Opening Comments by Pacificorp

Pacificorp filed opening comments on the PD requesting changes to eliminate quarterly reporting and to eliminate transparency reporting for SMJUs that do not directly engage with ESA Contractors. PacifiCorp also requested clarifications concerning the CARE program.

EEC has no objections to the CARE-related clarification requests but does think the requested changes are inappropriate.

Pacificorp's requested PD change to eliminate the quarterly reporting based upon its being burdensome for such a small company, and not providing the information desired is at best premature. The listing and format of the quarterly-supplied information to be included is yet to be developed by the ED. If any party believes the information requested should be changed, it should be addressed at that time. Moreover, we note that none of the other SMJUs thought the issue of quarterly reporting of sufficient importance to include in their own Opening Comments. Moreover, several are much smaller than Pacificorp and do not have the ability to call on the resources of a massive parent company to supply the reporting or IT support available to Pacificorp.

Pacificorp's requested PD change to limit the reporting of solicitation and contracting practices to only those utilities who directly hire such contractors would massively and undesirably reduce the usefulness of such information. We point out that this ruling already covers many other utilities that do not hire contractors directly. This includes the PG&E program, California's largest program, and Southwest Gas's program, the largest of the SMJU programs. Each of them hires administrators who hire the ESA contractors, many of whom may hire their own subcontractors. The utilities, including Pacificorp, are the entities entrusted with

overseeing the various ESA programs, and it is important to learn how they select and contract with the actual service providers.

III. CLOSING

We recognize all the work that has gone into this Decision and appreciate the opportunity to offer these reply comments.

Respectfully submitted,

We recognize all the work that has gone into this Decision and appreciate the opportunity to offer these reply comments.

Respectfully submitted,

/s/ Allan Rago

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