BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

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Application of Pacific Gas and Electric Company for Approval of 2024-2031 Energy Efficiency Business Plan and 2024-2027 Portfolio Plan. U 39 M.	Application No. 22-02-005
And Other Matters	Application No. 22-03-003 Application No. 22-03-004 Application No. 22-03-005 Application No. 22-03-007 Application No. 22-03-008 Application No. 22-03-011 Application No. 22-03-012 (Consolidated)

SOUTHERN CALIFORNIA GAS COMPANY'S (U 904 G) RESPONSE TO THE APPLICATION FOR APPROVAL OF SOUTHERN CALIFORNIA EDISON'S 2024-2031 ENERGY EFFICIENCY STRATEGIC BUSINESS PLAN AND 2024-2027 PORTFOLIO PLAN

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I. INTRODUCTION

Pursuant to California Public Utilities Commission (Commission or CPUC) Rule of Practice and Procedure 2.6(c), Southern California Gas Company (SoCalGas) respectfully files this Response to Southern California Edison's (SCE) 2024-2031 Energy Efficiency Business Plan.

II. BACKGROUND

As part of its Energy Efficiency Business Plan, SCE asks the Commission to phase down gas appliance incentives by not permitting energy efficiency funds to be spent on gas appliance incentives if similar electric measures are reasonably commercially available and demonstrate a reduction in greenhouse gas (GHG) emissions. While SoCalGas is supportive of the state's decarbonization efforts and believes that electrification, where it's affordable and achievable, is

one lever that can be pulled to reduce GHG emissions, this specific recommendation should not be adopted by the Commission for the reasons discussed further below.

The Commission issued Decision (D.) 21-05-031, which required the Investor-Owned Utilities (IOUs), Regional Energy Networks (RENs), and Community Choice Aggregators (jointly Program Administrators (PAs)) to file their 2024-2031 Business Plans consisting of an eight-year (2024-2031) strategic business plan and a four-year (2024-2027) portfolio plan (henceforth Business Plans) on March 4, 2022.[1] Energy Division prepared a template, per D.21-05-031 OP 6, which included a section for PAs to recommend new or modified energy efficiency policies.

Through its Business Plan policy recommendations, SCE proposes the Commission "phase down gas appliance incentives," in "that the Commission not permit energy efficiency funds to be spent on gas appliance incentives if a similar electric measure is reasonably commercially available and can demonstrate a reduction in greenhouse gas emissions."[2] SoCalGas notes that SCE's policy recommendation has no bearing on its own application or requests therein. Rather, the recommendation implicates the applications of other PAs who provide incentives for natural gas energy efficiency measures. SoCalGas believes that the energy efficiency Business Plan proceeding is not the appropriate procedural pathway for SCE to raise an issue that would not impact its own application. Further, the Commission should not adopt this recommendation because:

A. The recommendation ignores state law, goes against recently affirmed CPUC policy, and will hinder the state's ability to achieve climate goals;

B. The recommendation will exacerbate inequity and energy injustice and increase participant and non-participant bills; and

C. SCE's proposal did not demonstrate any greenhouse gas emissions reductions or otherwise provide or cite estimates of the impacts on program budgets, customer bills, energy savings, or total system benefits (TSB)

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[1] Per D.21-05-031, the 2024-2031 Energy Efficiency Business Plans were to be filed on February 15, 2022. At the request of SoCalGas and others, all PAs were granted a two-week extension via email to March 3, 2022.

[2] A.22-03-007, Exhibit SCE-01, pp. 53-55.

As California, the Commission, and IOUs seek to decarbonize their energy systems, it is important to encourage, not stifle, innovation. SCE's policy recommendation would effectively stifle, if not halt, innovation in gas appliances in California and impede progress toward decarbonizing the gas system at a time where innovation is needed more than ever. In addition, SCE's recommendation to phase down gas appliance incentives, if adopted, would reduce affordable energy efficiency options for customers and negatively impact competition in the marketplace. The proposal does not contemplate and address non-financial barriers to fuel-substitution and lacks analysis or evidence in support of its assertions. In the discussion below, SoCalGas provides additional information that the Commission should consider in reviewing SCE's proposal.

III. DISCUSSION

A. The Recommendation Ignores State Law, Goes Against Recently Affirmed CPUC Policy, and Will Hinder the State's Ability to Achieve Climate Goals

SCE's policy recommendation ignores multiple state laws, including the Public Utilities Code. Senate Bill (SB) 350[3] requires that the state double both electric and gas energy efficiency by 2030. Disallowing gas appliance incentives would reduce (if not eliminate) the CPUC's and gas utilities' ability to double energy efficiency pursuant to SB 350. Natural gas appliance incentives account for a meaningful portion of gas utilities' energy efficiency and GHG reduction savings – all of which are needed to meet SB 350 goals. Natural gas technologies are estimated to produce over 4 million therms and 23,000 Metric Tons of carbon dioxide equivalent (CO2e) savings in SoCalGas's 2024 proposed portfolio, approximately 13% of the total portfolio projection for both metrics (excluding Codes and Standards) for that year. SCE's recommendation also seemingly ignores the Commission's Decision implementing SB 1440 (D. 22-05-025),[4] which adopts biomethane procurement targets to reduce short-lived climate pollutant emissions. The SB 1440 decision requires gas utilities to procure biomethane produced from organic waste for their core customers, meaning the carbon impact of the gas system will decrease over time. If SCE's recommendation is adopted, it would hinder the State's

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[3] SB 350 Sec.2(a)(2) ("To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation").

[4] D.22-05-025 *available at* https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M454/K335/454335009.PDF.

ability to achieve SB 350 goals while ignoring that the gas system will continue to become more decarbonized over time. SoCalGas's mission is to build the cleanest, safest, most innovative energy company in America. It is working to achieve that vision through innovation, collaboration, and decarbonization.

Further, California Public Utilities Code (PUC) § 454.56 (b) states that "a gas corporation shall first meet its unmet resource needs through all available natural gas efficiency and demand reduction resources that are cost effective, reliable, and feasible." Natural gas appliance efficiency measures contribute to a cost-effective Resource Acquisition segment and are often more cost-effective than fuel substitution measures. As SCE implies in its proposal, natural gas appliances are reliable and feasible as they can operate reliably "for years, if not decades."[5] PUC §454.5 has a similar feasibility and reliability expectation for electric corporations. However, SCE fails to provide evidence of the reliability or feasibility of its planned fuel substitution measures. Heat pump water heaters (HPWH), for example, tend to have roughly half the expected useful lives than high efficiency tankless gas water heaters.[6] Furthermore, as detailed in this response, there are a host of challenges with replacing an electric technology for a gas technology and, in some cases, a replacement is not feasible for many home configurations due to their space requirements. To remove natural gas appliance energy efficiency incentives would then limit the ability for customers to choose the more efficient natural gas option, should they be unable or unwilling to choose an electric appliance.

SCE's recommendation to have the Commission treat natural gas energy efficiency measures differently than electric energy efficiency measures would also go against the Commission's recent adoption in D.21-05-031 of a new metric, TSB, for setting energy efficiency portfolio goals, beginning in 2024. This new metric reflects the "lifecycle energy, capacity, and GHG emission reduction benefits of a measure in dollar terms, in contrast to the separate energy and peak demand (*i.e.*, kilowatt-hour, kilowatt, and therm) goals" the Commission has traditionally adopted. In defining TSB as "the sum of the benefit that a measure

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5 A.22-03-007, Exhibit SCE-01, p. 54.

6 "Impact Evaluation of Water Heating Measures Residential Sector – Program Year 2019," California Public Utilities Commission (June 16, 2021), p. 23 *available at* http://www.calmac.org/publications/CPUC_Group_A_Report_Water_Heating_PY_2019_Final_CALMAC.pdf.

provides to the electric and natural gas systems," the Commission sets forth a path of valuation of energy efficiency measures equally – in real dollar benefits.

Lastly, removing natural gas appliance incentives could result in increased GHG emissions. As discussed below in section C, SCE did not provide any data or evidence that suggests it would be capable of incentivizing fuel-substitution measures at a meaningful scale if its proposal is adopted. There is a risk of a significantly lower decrease in emissions if electric utilities are not able to install fuel-substitution measures at a scale to compensate for the reduced installations of high efficiency gas appliances. For example, a Tier 2 Tankless Water Heater saves on average 0.51 tons of carbon dioxide (tCO2) per year over its measure life of 20 years, and a Tier 2 HPWH saves 0.81 tCO2 per year over its measure life of 10 years.[7] If SCE's proposal is adopted, for each incremental HPWH installed there could be a net decrease of 0.30 metric tons of emissions (0.81 – 0.51 = 0.30) per unit installed compared to a Tier 2 Tankless water heater. However, to the extent that the quantity of HPWHs installed do not equal or exceed the number of Tier 2 Tankless water heaters that would have been installed absent the policy change, there will be a net *increase* in emissions of 0.51 metric tons of CO2e per year per unit *that would have otherwise been installed* absent the policy change. SoCalGas's review of claim data for program year (PY) 2020 and preliminary data for PY 2021 shows that SCE incentivized a total of 333 HPWHs (including non-fuel substitution installations), compared to 34,991 tankless water heater installations for SoCalGas in that same time period. With the above net CO2 savings impact assumptions, an additional 22,000 fuel substitution HPWH measures would be required to be incentivized in a two-year period (an increase of over 6000% compared to SCE's total 2020 and 2021 HPWH incentives) in order to result in overall emissions reductions – otherwise such a proposal will actually result in an *increase in emissions* from water heater measures. These emissions estimates do not even account for the potential increase of hydrochlorofluorocarbon (HFC) refrigerants, which was identified by the California Energy Commission's 2021 Integrated Energy Policy Report as a "major source of building GHG

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[7] All calculations based on a 40-gallon gas storage water heater baseline, single family, climate zone 9, installation year 2024. Energy savings from WH Calculator v4.2, CO2 savings from the Fuel Substitution Calculator.

emissions."[8] Further, "as the state installs more heat pumps, the use of refrigerants will increase and could lead to greater emissions if work is not done to use lower Global Warming Potential (GWP) refrigerants and more effectively capture and recycle refrigerants at the end of useful life."[9] If this proposal is adopted, SCE should be required to report the net emissions impact of the policy change and offset any increase in emissions that may result from its failure to deliver GHG savings at the scale of the disallowed gas appliances.

B. The Recommendation Will Exacerbate Inequity and Energy Injustice and Increase Participant and Non-Participant Bills

SCE's recommendation fails to take into account the potential negative impacts that its proposal would have on customers in disadvantaged communities (DAC). Without evidence to review, SoCalGas expects that removing gas appliance incentives would disproportionately impact lower income families and customers in disadvantaged communities by limiting affordable energy efficient appliances. Over 50% of SoCalGas's 22 million customers are classified as Hard to Reach (HTR) and/or DAC. Many of these customers lack the financial means to upgrade to efficient appliances even with the rebates in place today. Fuel substitution (gas to electric) often requires significant upgrades (*e.g.* new wiring and electrical panels). According to a recent impact evaluation,[10] 65% of heat pump adopters required additional upgrades (wiring, plumbing, or electrical panels) to install the HPWHs and nearly one-fifth (19%) of heat pump water heater adopters indicated that they had to undertake an electrical panel upgrade. The evaluation found that the cost to replace an electrical panel averages $1,138, with a typical range of $498 to $1,781.[11] Of those that did not pursue fuel substitution, 47% cited concerns about increased operating costs and 29% cited concerns about electric panel upgrades.[12] HTR and DAC customers are less likely to have the means or time to choose to commit to fuel substitution installations or the expected increase in operating costs. Eliminating incentives for

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8 Final 2021 IEPR Volume I – Building Decarbonization, p. 59, *available at* https://efiling.energy.ca.gov/GetDocument.aspx?tn=241599.

9 *Id*. at 59.

10 "Impact Evaluation of Water Heating Measures Residential Sector – Program Year 2019," California Public Utilities Commission (June 16, 2021), p. 9 *available at* http://www.calmac.org/publications/CPUC_Group_A_Report_Water_Heating_PY_2019_Final_CALMAC.pdf.

11 *Id.* at 57. Further, the impact evaluation mentioned that current program estimates do not capture all costs to install HPWHs.

12 *Id.* at 9.

efficient gas appliances will not reduce these barriers and hardships for DAC and HTR customers, it will only reduce the choices available to customers.

SCE seems to assume that removing incentives for high efficiency gas appliances would compel customers to choose an incentivized electric alternative that requires fuel substitution. This assumption does not recognize that participation in incentive programs is voluntary *and* that removing incentives for efficient technologies does not remove the efficient technologies (nor their lower cost and lower efficiency baseline technologies) from the marketplace. Cheaper and less efficient gas appliance alternatives will still be available in the marketplace for purchase and installation by customers. If incentives for efficient gas appliances are eliminated, it would make the code minimum gas appliances more attractive to customers and put higher efficiency measures out of reach for many. Limiting affordable efficient options may further energy injustice in DACs as without an incentive, these customers will be more likely to choose to install code-minimum appliances which will result in higher energy bills than more efficient gas appliances. If SCE's policy recommendation is accepted, the Commission's "other equally or more important policy objectives" would be ignored while many customers served by all gas utilities, including those in DACs, would be left without support to reduce their current energy use, emissions, and energy bills. Instead, SCE would have these customers who cannot afford or do not want fuel substitution measures to "lock-in" new to-code, or slightly above code, natural gas equipment for the long term, rather than higher efficiency natural gas appliances that the gas energy efficiency portfolios incentivize today.

SCE's proposal risks harming customers in disadvantaged communities in other ways. Today, low- to middle-income households tend to pay a higher percentage of their discretionary income for energy bills than wealthier households. Higher energy burdens are not solely owed to lower incomes, but also relate to energy inefficiencies in the home and the time-of-use of energy. Under existing electricity and gas rate structures, replacing a gas-based technology with an electric-based technology will likely increase a household's expenditure on energy. This is because a household appliance like a stove or water heater's use pattern typically coincides with periods of peak-electricity demand when "the price premium for electrical energy can grow to a

factor of 12 times during peak hours (4PM-9PM)."[13] In contrast, gas prices fluctuate more on a season-by-season basis rather than a minute-by-minute basis.

SoCalGas estimates that this policy recommendation would actually result in increases in participant bills by $2.38 per month and non-participants (who would have otherwise participated in a gas incentive program) bills by $15.65 per month.[14] In the event that electric utilities do succeed in delivering fuel-substitution measures at the scale of natural gas appliance measures, it will also increase all ratepayer bills because fuel-substitution measures typically require greater incentives per unit than non-fuel substitution measures. This hardship will be borne by all ratepayers but will be particularly harmful to lower income customers.

C. SCE's Proposal Does Not Demonstrate any Net Greenhouse Gas Emissions Reductions or Otherwise Provide or Cite Estimates of the Impacts on Program Budgets, Customer Bills, Energy Savings, or Total System Benefits (TSB)

If adopted, SCE's proposal would impact a significant portion of the state's Energy Efficiency budgets. SCE, however, fails to provide any concrete data or evidence to support the merits of its proposal. The analysis is limited to the statement that "continuing incentives for replacement gas measures where electric alternatives are available will *likely* hinder the Commission's ability to reach California's GHG reduction targets."[15] SCE's proposal lacks estimates for forecasted budget/ratepayer impacts, costs, therm savings, electric load increase, cost effectiveness, TSB, and net CO2 emissions impacts. Nor does SCE's proposal provide evidence that the elimination of gas appliances incentives would (or could possibly) result in GHG emissions reductions in the State during this business plan period or beyond.

In addition, SCE fails to mention major barriers to fuel substitution, or if it considers incentives for natural gas appliances to be such a barrier. SCE's recommendation does not

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[13] "Utility Costs and Affordability of the Grid of the Future: An Evaluation of Electric Costs, Rates, and Equity Issues Pursuant to P.U. Code Section 913.1," California Public Utilities Commission, (February 2021), p. 8, *available at* https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2021/senate-bill-695-report-2021-and-en-banc-whitepaper_final_04302021.pdf.

[14] SoCalGas's estimate is based on current workpaper assumptions for a single family household in climate zone 9 with a 40 gal 0.58 UEF gas storage water heater (198 thm/yr), a Tankless Tier 2 gas water heater (102 thm/yr), and a HPWH Tier 2 (1372 kWh/yr), and SCE's Schedule D Tier 1 rate of $0.26/kWh and SoCalGas's GR rate of $1.66/thm.

[15] A.22-03-007, Exhibit SCE-01, p. 55 (emphasis added).

include an analysis of the expected increase in fuel-substitution electric measures as compared to the expected decrease in gas efficiency measures. SCE appears to assume that if there are no longer gas appliance incentives then customers looking to purchase replacement appliances would automatically opt to install a high efficiency electric alternative. This is not supported by evidence. The Impact Evaluation of Water Heating Measures (2021) found that in-kind replacement of a gas appliance with the electric equivalent is not always feasible or possible. The impact evaluation found that "the most important factor in deciding to claim a rebate for energy efficient equipment (cited by 81% of non-participants) was that the equipment did not require any changes to the home. HPWHs require up to seven feet of vertical clearance, 1,000 cubic feet of uncooled space, and a nearby drain to discharge the condensate."[16] Simply because an energy efficient appliance is "commercially available" does not mean it is a feasible solution for customers. Only providing energy efficiency incentives for electric appliances risks stranded savings from customers whose homes are incompatible with the technology, or who may simply not choose to substitute their appliance and opt to remain with a code-minimum gas appliance.

SCE's proposal would also affect customers served by a publicly-owned utility (POU) and/or an investor-owned gas utility if the electric utility did not have robust fuel substitution or energy efficiency measure incentives. SCE's proposal did not include analysis on the number of customers affected, the impacts to energy efficiency options for these customers, or the emissions impacts of eliminating gas appliance incentives in these areas. A significant number of SoCalGas customers receive electric service from POUs including those served by Los Angeles Department of Water & Power, City of Anaheim Public Utilities Department, Riverside Public Utilities, Burbank Water & Power, Pasadena Water & Power, Glendale Water & Power, among others. Under this proposal, these customers may not have any options for energy efficiency incentives for the affected appliances as the jurisdiction of POU energy efficiency incentives fall outside of the CPUC proceeding. In effect, this proposal would eliminate incentives for certain gas measures without insight into or control over incentives offered for equivalent electric measures.

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[16] "Impact Evaluation of Water Heating Measures Residential Sector – Program Year 2019," California Public Utilities Commission (June 16, 2021), p. 58 *available at* http://www.calmac.org/publications/CPUC_Group_A_Report_Water_Heating_PY_2019_Final_CALMAC.pdf.

SCE recommends using the upcoming Potential & Goals (P&G) study as a means to analyze the impacts of its proposal and the process to remove gas incentives.[17] The P&G study has not historically been used to determine measure eligibility or how Program Administrators use incentives, but rather to identify cost effective energy efficiency potential. SCE's proposal did not suggest a process by which the P&G study might study the removal of gas appliance incentives. However, SoCalGas agrees that the P&G study could be used to examine the net environmental and economic impacts of removing gas appliance incentives, especially for customers that reside in HTR and DACs.

SCE's recommendation states that "gas measures have a particularly long lifecycle which locks in gas consumption for years, if not decades, thereby restricting California's ability to electrify at the pace necessary to meet GHG targets."[18] SCE does not provide any quantitative analysis to support its claim that gas incentives would restrict California's ability to meet GHG targets. Additionally, SCE's proposal does not seek to eliminate gas appliances, rather it seeks to eliminate *incentives* for *efficient* gas appliances. As discussed, removing incentives for gas appliances does not equate to customers no longer buying gas appliances. Efficient gas appliances create energy efficiency and GHG emissions reduction benefits for years, if not decades, and often at a lower cost to ratepayers and participants than fuel substitution measures. If adopted, SCE's proposal would not result in the elimination of gas appliances, it would merely dissuade many customers from pursuing more efficient gas appliances and effectively lock-in a larger portion of code-minimum gas appliances in the state, for years, if not decades.

SCE states that "investment in the expansion of gas infrastructure conflicts with the State's energy and environmental priorities."[19] SCE's proposal, however, is not necessarily related to the expansion of gas infrastructure. In fact, the installation of energy efficient gas appliances instead of code-minimum gas appliances would reasonably lead to a decrease in investment in gas infrastructure over time, rather than an increase.

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[17] A.22-03-007, Exhibit SCE-01, pp. 53-54.

[18] "Impact Evaluation of Water Heating Measures Residential Sector – Program Year 2019," California Public Utilities Commission (June 16, 2021), p. 58 *available at* http://www.calmac.org/publications/CPUC_Group_A_Report_Water_Heating_PY_2019_Final_CALMAC.pdf.

[19] *Id*. at 55.

SCE states that offering gas appliance incentives is "a clear example of the misalignment between [energy efficiency] policy and the State's decarbonization goals."[20] SCE, however, presents no evidence for this claim. SoCalGas's analysis shows no such misalignment as evidenced by $16.0M TSB and over 122,000 metric tons of CO2e reductions for water heater measures alone in 2021 (89% of the Statewide (SW) TSB and 95% of the SW CO2e savings for Water Heating across both fuels).[21] SCE's recommendation did not include any analysis that compares the effectiveness of gas appliances versus their electric alternatives as decarbonization strategies on a cost per lifecycle CO2e savings basis. Without that type of analysis, there is no basis for the claim that gas incentives are misaligned with the State's decarbonization goals. Given the high costs associated with fuel substitution measures and the recent evaluation findings of low gross- and net- realization rates for fuel substitution program claimed gas savings,[22] relying on fuel substitution measures may not deliver emissions reductions at the level needed to achieve these goals. If SCE's policy recommendation is adopted, the energy efficiency portfolios would be leaving a substantial amount of potential energy savings and GHG emissions reductions on the table, all of which contribute to achieving California's energy efficiency and decarbonization goals.

IV. CONCLUSION

SCE's recommendation to phase down gas appliance incentives would effectively reduce affordable energy efficiency options for customers and stifle innovation and competition in the marketplace. SCE's recommendation is counter to state law and CPUC policy, may harm customers in disadvantaged communities, and lacks evidence in support of and analysis on the impacts of the change. While SoCalGas encourages the CPUC to not adopt SCE's recommendation outright, to the extent that the Commission wishes to explore this proposal further, SCE should first be required to submit an impact analysis that includes, at minimum: estimated impacts to PA budgets, customer bills, disadvantaged communities, and GHG emissions in addition to a thorough analysis of the economic and non-economic barriers to fuel-

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[20] *Id*.

[21] 2021 Q4 Claims as reported in the California Energy Data and Reporting System (CEDARS).

[22] "Group A Impact Evaluation PY2020 HVAC Fuel Substitution" California Public Utilities Commission (March 25, 2022), *available at* CPUC Group A HVAC Fuel Substitution Impact Evaluation PY2020 PDA Draft updated.pdf (energydataweb.com).

substitution measure adoption. SoCalGas appreciates the opportunity to provide this response to inform the Commission's consideration of SCE's application.

Respectfully submitted,

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