



BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking
Concerning Energy Efficiency Rolling
Portfolios, Policies, Programs,
Evaluation, and Related Issues

Rulemaking 13-11-005

**THE PUBLIC ADVOCATES OFFICE'S REPLY TO RESOURCE
INNOVATIONS' RESPONSE TO ITS MOTION FOR AN ORDER COMPELLING
DATA REQUEST RESPONSES**

PUBLIC VERSION

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I. INTRODUCTION

Pursuant to Public Utilities Code Section 309.5(e) and Rules 1.1, 1.4, 10.1, 11.1 and 11.3 of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure (Rules), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits this reply to the response¹ of Resource Innovations to Cal Advocates’ Motion to Compel responses to Cal Advocates’ August 16, 2023 Data Request.² Pursuant to Rule 11.1(f), Administrative Law Judges Kao and Fitch authorized Cal Advocates to file this reply via email on October 3, 2023.

Resource Innovations contends that it is not required to comply with Cal Advocates’ data request because it is a private corporation, not a regulated entity, and its administration of the California Market Transformation Administrator (CalMTA) contract is not within the scope of a formal proceeding.³ Resource Innovations also contends that Cal Advocates will not treat its data request responses as confidential.⁴

Resource Innovations is wrong. The information that the data request seeks is in furtherance of Cal Advocates’ statutory duties to advocate on behalf of California ratepayers.⁵ Resource Innovations acknowledges that it is a party to the open proceeding, Rulemaking (R.) 13-11-005.⁶ Though Resource Innovations attempts to distance itself from CalMTA, Resource Innovations acknowledges that it is responsible for the implementation of the CalMTA contract.⁷ Additionally, Resource Innovations claims that the process to approve and fund the administrator of the MTA was removed from the

¹ *Response of Resource Innovations, Inc. in Opposition to the Motion of the Public Advocates Office to Compel Data Responses*, September 28, 2023 (Resource Innovations Response).

² *Motion of the Public Advocates to Compel Data Responses from Resources Innovations (Public Version)*, September 18, 2023 (Cal Advocates Motion), Exhibit CA-01 September 6, 2023 Data Request. Note: this is the redacted version of the August 16th, 2023 Data Request that was provided as a courtesy to Resource Innovations. The questions are identical.

³ Resource Innovations Response at 2, 5, 9, 12, 13, 15, 18, 21, 22, 25-26.

⁴ Resource Innovations Response at 28.

⁵ Cal Advocates Motion at 6.

⁶ Resource Innovations Response at 21.

⁷ Resource Innovations Response at 19.

scope of R.13-11-005.⁸ This claim is neither supported by the enabling decision nor the Amended Scoping Memo and Ruling.⁹ Nevertheless, Resource Innovations spends the bulk of its response arguing that it need not respond to Cal Advocates' discovery because its contract administration was removed from the open "formal" proceeding and placed into an "informal" proceeding.¹⁰

While Resource Innovations may prefer to distance itself from CalMTA and avoid the Commission's scrutiny, its performance as the administrator of CalMTA falls squarely within the scope of R.13-11-005 and the Commission's regulatory jurisdiction. The costs associated with Resource Innovation activities would ultimately be paid by utility ratepayers; therefore it is necessary and prudent for the Commission, and Cal Advocates staff, to understand the basic nature of the costs and activities associated with the Resource Innovation contract. The Commission should direct Resource Innovations to respond to Cal Advocates' August 16 Data Request with substantive, complete, and accurate responses within 10 days of issuance of its ruling on Cal Advocates' Motion, utilizing General Order (GO) 66-D procedures for the submission of confidential information.

II. DISCUSSION

A. Resource Innovations' claim that is not required to respond to Cal Advocates' Data Requests is unfounded.

1. Contrary to Resource Innovations' assertions, it is a regulated entity.

Cal Advocates has the authority to "compel the production or disclosure of any information it deems necessary to perform its duties from *any entity regulated* by the

⁸ Resource Innovations Response at 5.

⁹ Decision (D.) 19-12-021, *Decision Regarding Frameworks for Energy Efficiency Regional Energy Networks and Market Transformation*, December 5, 2019, Ordering Paragraphs 6-9 at 90-91. Also see *Assigned Commissioner and Administrative Law Judges' Amended Scoping Memo and Ruling*, at 4-5 ("Other Issues" within scope include, "Implementation of the market transformation framework adopted in D.19-12-021" and "Oversight and continual development of the statewide administration of energy efficiency program[.]") in R.13-11-005 May 11, 2023. (*Amended Scoping Memo & Ruling*)

¹⁰ Resource Innovations Response at pp. 5, 9, 12, 13, 15, 21, 22, 25-26.

commission . . . ”¹¹ Resource Innovations seeks to avoid responding to Cal Advocates’ data request based on claims that 1) it is not a regulated entity, but rather a private corporation that contracted with Pacific Gas and Electric Company (PG&E) to implement the statewide MTA, and 2) it did not agree to be subject to Commission regulation when it responded to the MTA request for proposals or signed the contract with PG&E.¹² Despite this claim, Resource Innovations plans to bill PG&E against a contract, which is funded by ratepayer dollars, and worth approximately \$300 million.¹³

Though it may prefer otherwise, Resources Innovations is a regulated entity. “Market Transformation Administrator (CALMTA)” appears on the list of Commission regulated entities, which is updated daily.¹⁴ Resource Innovations submits Advice Letters to the Commission with the header “RI-CalMTA-2 (Resources Innovations, Inc.—California Market Transformation Administrator ID U-1399-E).”¹⁵ The CalMTA program is administered by Resource Innovations.¹⁶ Resource Innovations bills PG&E against the CalMTA contract.¹⁷ Resource Innovations dedicates staff to CalMTA

¹¹ Public Utilities Code Section 309.5(e), emphasis added. See *Administrative Law Judge’s Ruling Granting Cal Advocates Motion to Compel*, November 21, 2022; issued in R.22-03-016, *Order Instituting Rulemaking Proceeding to Consider Amendments to General Order 133; Administrative Law Judge and Assigned Commissioner’s Ruling Compelling Production of Documents*, September 13, 2021 at 2; issued in R.20-10-002, *Order Instituting Rulemaking to Consider Regulating Telecommunications Services Used by Incarcerated People*; and *Administrative Law Judge’s Ruling Denying the Motions of AT&T Wireless and Verizon Wireless to Quash and/or for Protective Order in Response to Public Advocates Office Data Requests*, August 3, 2020; issued in R.18-03-011, *Order Instituting Rulemaking Regarding Emergency Disaster Relief Program*.

¹² Resource Innovations Response at 18-21.

¹³ See D.19-12-021, Ordering Paragraph 7 at 90.

¹⁴ Attached here as Exhibit CA-08 is the CPUC “Regulated Entity List” as of October 3, 2023 at 26. This list is updated daily on the Commission’s Internal Oracle App “Almanac System.”

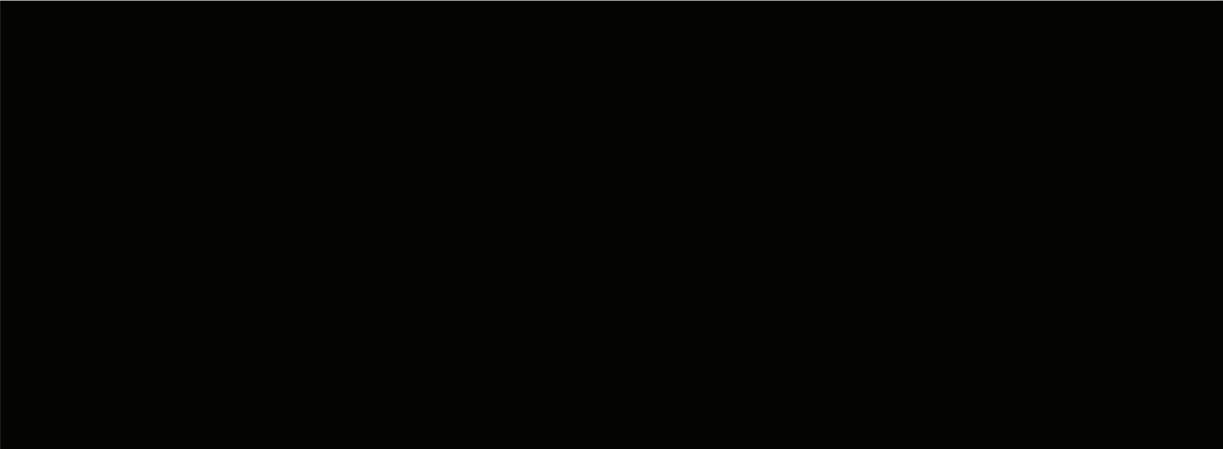
¹⁵ See Resources Innovations Advice Letter RI-CalMTA-2, July 31, 2023.

¹⁶ Available at: <https://calmta.org/calmta-frequently-asked-questions/>. Note byline at bottom: CalMTA is a program of the CPUC and is administered by Resource Innovations, Inc.

¹⁷ Advice Letter 4674-G/6747-E Pacific Gas and Electric Company ID U 39 M (approved on Nov. 23, 2022).

programs.¹⁸ Resource Innovations dedicates office space to CalMTA.¹⁹ Resource Innovations hosts the CalMTA website.²⁰ Thus, when the Commission regulates CalMTA it regulates Resource Innovations to the extent it performs the functions of CalMTA. To conclude otherwise would be asking the Commission to not use common sense.

Additionally, contracts with third-party entities, be they utilities or non-utilities, routinely contain standard language that make the contracting parties and their operations subject to Commission audits or investigations. As a part of the Commission, Cal Advocates has the same audit and investigation authority.²¹ << **Begin Confidential**>>



<< **End Confidential**>>

¹⁸ Note current and prior employment of CalMTA staff at Resource Innovations, Inc. in “Meet our staff” section of CalMTA website, available at: <https://calmta.org/meet-our-staff/>.

¹⁹ Note the same address on the cover page of Resource Innovations Response and the “Contact Us” section of CalMTA website, available at: <https://calmta.org/contact/>.

²⁰ See FAQ section of CalMTA website, available at: <https://calmta.org/calmta-frequently-asked-questions/>.

²¹ Public Utilities Code Sections 309.5(a) & (e).



Resources Innovations contends that granting Cal Advocates' motion based on its participation in the process of selecting the MTA and contract signing would be a "gross infringement on [its] due process rights" on claims that it was not informed that doing either would result in becoming a regulated entity.²⁶ In effect, Resource Innovations contends that the Commission has an affirmative duty to inform it of the law. Resource Innovations provides no authority for this contention. Moreover, as noted above, the contractual agreement Resource Innovations entered into informed Resource Innovations that it would need to submit to the Commission's audit and investigatory authority.²⁷ Hardly an infringement of due process, the checks and balances provided for in Commission-related contracts are the hallmark of a transparent government.²⁸ If an entity does not want to submit to the checks and balances of the Commission, it is free to do business elsewhere.

2. Resource Innovations' claim that it is not subject to the Commission's Rule 10.1 in R.13-11-005 13 is without merit.

Resource Innovations contends that administering CalMTA through the Advice Letter process frees it from the obligations of a party to a proceeding, including the obligation to submit to discovery pursuant to Rule 10.1.²⁹ Resource Innovations is wrong. The Advice Letter process is not to the exclusion of open proceedings. Whereas the purpose of the Advice Letter process is to propose a specific contract or budget on already agreed-upon terms, the purpose of an open proceeding is to evaluate a party's

²⁶ Resource Innovations Response at 20.

²⁷ Advice Letter 4674-G/6747-E Pacific Gas and Electric Company Company ID U 39 M (approved on Nov. 23, 2022) Exhibit 6, p. 170.

²⁸ If the Commission is to determine that Resource Innovations is not the appropriate party to answer these questions, then it should require PG&E — the statewide program administrator and fiscal agent for the MTA contract — to answer Cal Advocates' questions because the utility is prohibited from absolving itself of such nondelegable duties. Public Utilities Code Section 702; and *Snyder vs. SoCalEdison Co.*, 44 Cal. 2d 793 at HNs 6 & 9, Cal. Supreme Ct., (Jul. 1, 1955) ("Where the law imposes a definite, affirmative duty upon one by reason of his relationship with others, whether as an owner or proprietor of land or chattels or in some other capacity, such persons cannot escape liability for a failure to perform the duty thus imposed by entrusting it to an independent contractor.").

²⁹ Resource Innovations Response at 20-21.

performance pursuant to those terms through discovery and stakeholder input.³⁰ In support of its contention, Resource Innovations cites to Resolution E-4906 where utilities were required to submit new verification plans through the Advice Letter process in response to a decision modifying a previous decision which allowed for fossil-fuel backup generation. Cal Advocates had protested the utilities' Advice Letters at issue in this Resolution based on ineffective data collection methods in the proposed verification plans.³¹ By contrast to the case at hand where Cal Advocates seeks data about work that Resource Innovations completed and billed for in 2022-23, the utilities had not done the work nor billed for it in their proposed plan modifications in the Resolution. Resource Innovations also cites to a footnote in this Resolution referring to a Motion to Compel that Cal Advocates issued to contractors seeking data about the cost of implementing these methods of data collection. The footnote explains that the Commission had not ruled on the Motion, not that the Motion "has not been granted" as characterized by Resource Innovations.³²

Resource Innovations similarly overreaches when it attempts to limit Cal Advocates' discovery rights.³³ In fact, Cal Advocates' discovery rights pursuant to Rule 10.1 are expansive. Rule 10.1 authorizes Cal Advocates to "obtain discovery from *any* other party regarding *any* matter, not privileged, that is relevant to the subject matter in the pending proceeding, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence."³⁴ Numerous orders to compel have upheld Cal Advocates' discovery rights.³⁵

³⁰ General Order 96-B, Rule 5.1.

³¹ Resource Innovations Response, footnotes 38 and 40 at 12, citing Resolution E-4906 at 63-64.

³² Resource Innovations Response at 13, citing Resolution E-4906, [sic footnote 217].

³³ Resource Innovations Response at 11-12.

³⁴ CPUC Rules of Practice & Procedure, Rule 10.1, emphasis added.

³⁵ See *Administrative Law Judge's Ruling Granting Cal Advocates Motion to Compel*, November, 21, 2022, issued in R.22-03-016 *Order Instituting Rulemaking Proceeding to Consider Amendments to General Order 133*; See also *Administrative Law Judge and Assigned Commissioner's Ruling Compelling Production of Documents*, September 13, 2021 at 2; issued in R.20-10-002, *Order Instituting Rulemaking* (continued on next page)

Nonetheless, Resource Innovations attempts to minimize its party status so as to skirt the Rule 10.1 requirement that it must respond to other party's data requests. Specifically, Resource Innovations contends it only moved for party status to: 1) file a joint party proposal seeking a ruling soliciting comments on the Market Transformation Framework, and 2) file its own set of comments in response to this proposal.³⁶ However, Rule 10.1 provides, and Resource Innovations identifies, no exception based on claims of limited participation.³⁷

Resource Innovations further contends that the administration and implementation of the CalMTA contract is not the subject matter of R.13-11-005 because D.19-12-021 removed it from the formal proceeding.³⁸ This contention is also wrong. The Ordering Paragraphs in D.19-12-021 that Resources Innovations cites simply set forth PG&E's selection process for the MTA and the initial budget for the program. Moreover, the Amended Scoping Memo and Ruling in R.13-11-005 expressly includes the “[i]mplementation of the market transformation framework adopted in D.19-12-021” and “[o]versight and continual development of the statewide administration of energy efficiency program.”³⁹ Resource Innovations attempts to dismiss these issues because the Amended Scoping Memo listed them as “other issues,” but that does not make them any

to Consider Regulating Telecommunications Services Used by Incarcerated People citing *Gonzalez v. Superior Court* (1995) 33 Cal.App.4th 1539, 1546. (“[the Commission’s] discovery rule mirrors California’s, which is applied liberally in favor of discovery...”) also citing *Barry v. State Bar of California* (2007) 2 Cal 5th 318, 326; 2 Witkin, Cal Procedure (5th ed. 2008) Jurisdiction, §339, at 963 ([A] tribunal has the duty, and therefore the authority or power (jurisdiction), to decide in the first instance whether it has jurisdiction of the subject matter *and the parties...*”) (emphasis added). See also *Administrative Law Judge’s Ruling Denying the Motions of AT&T Wireless and Verizon Wireless to Quash and/or for Protective Order in Response to Public Advocates Office Data Requests*, August 3, 2020; issued in R.18-03-011, Order Instituting Rulemaking Regarding Emergency Disaster.

³⁶ Resource Innovations Response at 21-26.

³⁷ Providing such exceptions would allow parties and proxies to insert information into the proceeding record with scrutiny and open the door to a host of due process issues.

³⁸ Resource Innovations Response at 5.

³⁹ *Assigned Commissioner and Administrative Law Judges’ Amended Scoping Memo and Ruling*, at 4-5 (“Other Issues” within scope include, “Implementation of the market transformation framework adopted in D.19-12-021” and “Oversight and continual development of the statewide administration of energy efficiency program[.]”) May 11, 202 inR.13-11-005, Order Instituting Rulemaking Concerning Energy Efficiency Rolling Portfolios, Policies, Programs, Evaluation, and Related Issues.

less relevant to the “work [that] remains to address policy for other outstanding topics including financing programs …program review processes, and ongoing accounting and funding issues.”⁴⁰

Finally, Resources Innovations makes no claims that furnishing the information requested would be a burden that outweighs the likelihood that the information sought will lead to the discovery of admissible evidence.⁴¹ Courts have determined that the objecting party must make a factually particularized showing of hardship to sustain such objections.⁴² Not only has Resource Innovations not attempted to show hardship, according to fiscal agent PG&E, seeking this information directly from Resource Innovations would be the most “appropriate and efficient way” to get this information.⁴³

B. Resources Innovations fails to demonstrate that Cal Advocates would not adequately protect the confidentiality of information.

Resource Innovations claims that it need not respond to Cal Advocates’ questions because “Cal Advocates has not provided any means by which any response by Resources Innovations that is subject to confidentiality protection would be accorded and

⁴⁰ Amended Scoping Memo and Ruling at.3.

⁴¹ Commission Rules of Practice and Procedure, Rule 10.1.

⁴² [Mead Reinsurance Co. v. Superior Court \(1986\) 188 Cal.App.3d 313, 318](#) [demand for inspection of insurer's files deemed oppressive where uncontradicted declaration showed over 13,000 claims would have to be reviewed and requiring five claims adjusters to work full time for six weeks each]; and [West Pico Furniture Co. v. Superior Court \(1961\) 56 Cal.2d 407, 417-418](#) [trial court denied a motion to compel documents that would have required the answering party to search 78 of its branch offices. Yet even with this showing the California Supreme Court *reversed*, reasoning that while there was an indication that "some burden would be imposed on the respondent, Pacific Finance Loans, to answer the interrogatory, the extent thereof was not specifically set forth." The declaration also failed to indicate "any evidence of oppression," which "must not be equated with burden."].

⁴³ If the Commission determines that Resource Innovations is not the appropriate party to answer Cal Advocates’ questions, then it should require PG&E to answer the questions because the utility is prohibited from absolving itself of such nondelegable duties pursuant to *Snyder vs. So Cal Edison Co.*, 44 Cal. 2d 793 at HNs 6 & 9, Cal. Supreme Ct., (Jul.1, 1955) (“Where the law imposes a definite, affirmative duty upon one by reason of his relationship with others, whether as an owner or proprietor of land or chattels or in some other capacity, such persons cannot escape liability for a failure to perform the duty thus imposed by entrusting it to an independent contractor.”)

ensured that treatment” since it is not a public utility.⁴⁴ Resources Innovations attempts to validate its concern where it suggests that when Cal Advocates issued data requests containing references to Resource Innovation’s contract with PG&E, submitted in ALs 4674-G/6746-E in accordance with Public Utilities Code Section 583, it did not treat the contract as confidential.⁴⁵

Resource Innovations is wrong as a matter of both law and fact. As noted by Cal Advocates in its Motion to Compel, General Order 66-D provides the legal basis by which any response by Resource Innovations would be subject to confidentiality protection.⁴⁶ General Order 66-D applies to any “information submitter” that complies with the General Order’s requirements for identifying and submitting confidential material.⁴⁷ Consistent with the above, Cal Advocates has consistently maintained the confidentiality of Resource Innovations’ confidential material. Contrary to Resources Innovations’ intimations, the fact is, Cal Advocates only issued the data request to PG&E and Resource Innovations and was thus not required to redact confidential information in communications solely with the entities that created that confidential information. During the September 6 Meet and Confer meeting, Cal Advocates re-assured Resource Innovations that information submitted in accordance with General Order 66-D requirements would be treated as confidential in any materials made public by Cal Advocates. When Cal Advocate included the data request as Exhibit CA-01 in its Motion to Compel, Cal Advocates redacted the question that referenced confidential materials in the public version of its motion. Cal Advocates other data request questions stem from Resource Innovations — CalMTA’s presentation at the June 08, 2023 MTA advisory board meeting - a public meeting that is available to the public on Resource Innovations

⁴⁴ Resource Innovations Response at 28.

⁴⁵ Resource Innovations Response at 15-16. Cal Advocates routinely receives confidential information from Commission-regulated entities and treats it accordingly.

⁴⁶ Cal Advocates Motion at 9.

⁴⁷ General Order 66-D, Sec. 1. (1.6).

— CalMTA’s website.⁴⁸ Resource Innovations cannot simultaneously present this information to the public on its website and argue that this information becomes confidential when Cal Advocates references this same information in a data request.⁴⁹

III. CONCLUSION

Cal Advocates requests that the Commission compel Resource Innovations to provide substantive, complete, and accurate responses to all questions in Cal Advocates’ August 16 Data Request.

Respectfully submitted,

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⁴⁸ Cal Advocates provided Resource Innovations’ General Counsel with a courtesy call prior to filing the Motion to Compel to advise her that information made public in meetings or Resource Innovations—CalMTA’s website would not be treated as confidential in the Motion. Available at: <https://calmta.org/meetings-events/calmta-market-transformation-advisory-board-meeting/>.

⁴⁹ General Order 66-D.

EXHIBIT CA-08

CPUC Regulated Entities (October 9, 2023)

***Note url contains CPUC website and date has been updated since last shared
in Cal Advocates' September 18th Motion to Compel**

Regulated Utilities List

As of: October 9, 2023

Utility Name	Corporate Id Number	Utility Type
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	4438	CER
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	5253	CLC
MCIMETRO ACCESS TRANSMISSION SERVICES LLC	5253	IEC
MELVIN MOSE COBB, JR	1343	ESP
METROMEDIA ENERGY, INC.	1194	ESP
METRON SYSTEMS, INC.	1243	ESP
MHC ACQUISITION ONE, LLC	430	SWR
MHC ACQUISITION ONE, LLC	430	WTD
MICHELLE A. ODELL	1034	ESP
MIGUEL FLOREZ	1270	ESP
MINH VAN TRAN	1217	ESP
MIRANT AMERICAS ENERGY MARKETING, L.P.	1129	ESP
MITCHELL WILLIAM TORP	1130	ESP
MJ2 IP, LLC	1400	DVS
MJM TELECOM CORPORATION	7399	CLR
MJM TELECOM CORPORATION	7399	CLC
MJM TELECOM CORPORATION	7399	IEC
MJM TELECOM CORPORATION	7399	IER
MODESTO IRRIGATION DISTRICT	1151	ESP
MOMENTUM TELECOM, INC.	1247	ESP
MOULTON NIGUEL WATER DISTRICT	1113	ESP
MP ENERGY SERVICES, INC.	1107	ESP
MP2 ENERGY NE, LLC	240	ELC
MACDOEL WATER WORKS	6	WTD
MAGIC APPLE TECHNOLOGY, LLC	1631	DVS
MAGICJACK SMB, INC.	1429	DVS
MANSFIELD POWER AND GAS, LLC	1393	ELC
MARCO TECHNOLOGIES, LLC	1754	DVS
MARCONI WIRELESS HOLDINGS, LLC	4543	CER
MARIN CLEAN ENERGY	6	ELC
MARIN ENERGY AUTHORITY	939	ELC
MARKET TRANSFORMATION ADMINISTRATOR (CALMTA)	1399	ELC
MASERGY CLOUD COMMUNICATIONS, INC.	1191	DVS
MASSCOMM, LLC	7176	CLR
MAVEN IT, INC.	1611	DVS
MAXSIP TELECOM CORPORATION	4546	CER
MAXSIP TELECOM CORPORATION	7398	IER
MAYACAMA GOLF CLUB, LLC	435	SWR
MCLEOD USA TELECOMMUNICATIONS SERVICES, LLC	5712	IEC
MCLEOD USA TELECOMMUNICATIONS SERVICES, LLC	5712	CLC
MCMOR CHLORINATION, INC	292	SWR
MCMOR CHLORINATION, INC.	292	WTD
MEADOW VALLEY WATER WORKS	56	WTD
MECCHI WATER COMPANY	163	WTD