

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Examine the Commission's Post-2008 Energy Efficiency Policies, Programs, Evaluation, Measurement, and Verification, and Related Issues	Rulemaking 09-11-014 (Filed November 20, 2009)
--	---

**COMMENTS OF THE UTILITY REFORM NETWORK TO
ASSIGNED COMMISSIONER'S RULING ON DRAFT STRATEGIC LIGHTING PLAN**

Cynthia K. Mitchell
Energy Economics Inc.
530 Colgate Court
Reno, Nevada 89503
Phone: (775) 324-5300
Email: ckmitchell@sbcglobal.net

Marybelle C. Ang
Staff Attorney
The Utility Reform Network
115 Sansome Street, Suite 900
San Francisco, CA 94104
Phone: (415) 929-8876
Fax: (415) 929-1132
Email: mang@turn.org

July 16, 2010

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Examine the Commission's Post-2008 Energy Efficiency Policies, Programs, Evaluation, Measurement, and Verification, and Related Issues	Rulemaking 09-11-014 (Filed November 20, 2009)
--	---

**COMMENTS OF THE UTILITY REFORM NETWORK TO ASSIGNED
COMMISSIONER'S RULING ON DRAFT STRATEGIC LIGHTING PLAN**

III. INTRODUCTION

Pursuant to the June 25, 2010 *Assigned Commissioner's Ruling on Draft Strategic Lighting Plan* (ACR), The Utility Reform Network (TURN) submits these Comments. TURN supports the specific goals, strategies and milestones articulated in the lighting chapter for transformation of the lighting market in California. Moreover, TURN

II. THE LIGHTING CHAPTER SHOULD PROVIDE MILESTONES FOR THE STATEWIDE LIGHTING MARKET TRANSFORMATION (LMT) PROGRAM, AS WELL AS SOME FRAMEWORK FOR COLLABORATION WITH IOUs.

TURN commends Energy Division's efforts to develop a more comprehensive vision and strategy for transforming California energy efficiency lighting market. TURN agrees that creating partnerships to better understand and influence end users is an essential building block to the overall strategy.

TURN recommends that the lighting chapter also contemplate greater collaboration between IOUs, Energy Division and the California Energy Commission in implementing lighting market transformation goals. In particular, it has become apparent

that the IOU-led Statewide Lighting Market Transformation (LMT) program requires additional guidance and accountability under the Strategic Plan. In fact, TURN is concerned that the successful implementation of lighting efficiency goals by 2020 may be jeopardized by the failure to establish appropriately specific goals and milestones for IOUs.

D.09-09-047 (“Decision Approving 2010 to 2012 Energy Efficiency Portfolios and Budgets”) sets forth the Commission’s expectations that (1) while Energy Division was developing the Strategic Lighting Plan, the IOUs would submit comprehensive plans and updates on key lighting technologies, and (2) the Statewide Lighting Market Transformation Program would “work closely with Energy Division” and “offer periodic opportunities for expert, government agency and public input on plans, including pilot projects.”¹

As the June 1, 2010 Statewide LMT Report demonstrated, minimal headway has been made in the LMT program. Although these Comments focus on the specific goals, strategies and milestones in the lighting chapter, transforming the lighting market requires some assurance that the IOUs are making consistent progress towards strategic goals. Instead of providing annual plans for the implementation of lighting solutions in each key market segment, for example, the IOUs’ June 1st report merely promised to “gather information” to develop lighting solution plans.² Instead of providing “LMT pipeline plans for key lighting technologies” identifying “funding, partnerships and needed coordination with ... Workforce Education and Training, Codes and Standards, DSM Coordination and Integration, Marketing, Education and Outreach, Research and Technology and Local Governments”³, the IOUs as of June 2010 had yet to develop any such plans. Similarly, the IOUs’ progress to date has been minimal in providing the Commission a “prioritized list of key lighting technologies, systems, and strategies” and a status update on the “design and development of at least one LMT pilot project for each market segment.”⁴ Thus, TURN recommends setting key milestones to guide the IOUs

¹ D.09-09-047 at 145.

² Southern California Edison, Pacific Gas and Electric Company, Southern California Gas Company, and San Diego Gas and Electric Company, *Statewide Lighting Market Transformation Report*, June 1, 2010, pages 3-4.

³ D.09-09-047 at 149.

⁴ D.09-09-047 at 144.

towards the implementation of the strategic goals as well as a framework for Energy Division and CEC to offer input for the Statewide LMT program design and plans.

III. LIGHTING CHAPTER APPROPRIATELY PROMOTES GOALS AND IMPLEMENTATION STRATEGIES FOR OTHER ADVANCED LIGHTING TECHNOLOGIES.

TURN supports the Strategic Plan’s vision of phasing out CFL subsidies to make way for other high-efficiency lighting products. The Strategic plan already outlines a number of recommendations to achieve this. However, according to Figures 1 through 4 below, it appears that IOUs’ heavy reliance on CFLs for GWh energy savings continues. In fact, a comparison of lighting category key measure group savings by GWh Energy and MW Demand on a 2006-2008 (ED-evaluated) and a 2010-2012 (IOUs-forecasted) basis, indicates that when all CFL categories are combined, CFLs still constitute the majority of lighting savings. Additional milestones need to be developed to ensure that a timely and satisfactory shift to other advanced lighting technologies occurs.

Figure 1: Net GWh Savings from Lighting by Measure Group 2006-2008 ED Ex-post M&V

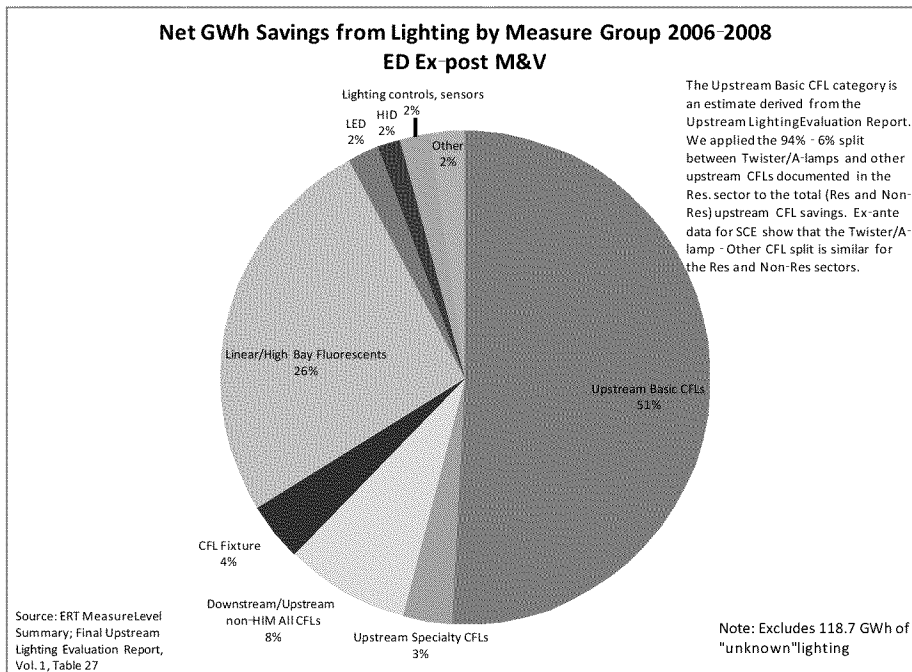


Figure 2: Net GWh Savings from Lighting by Measure Group 2010-2012 IOUs' Forecast Savings

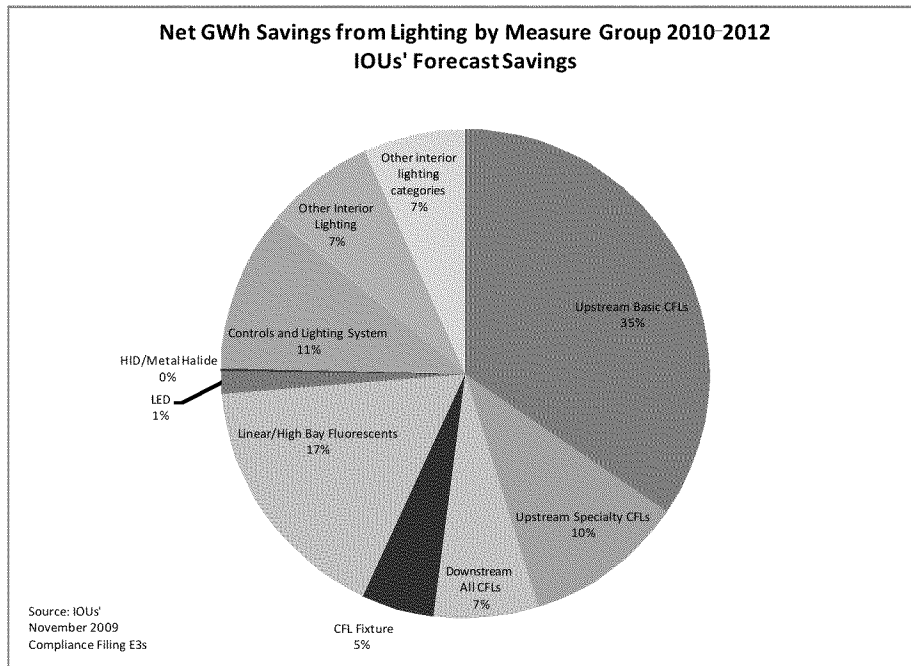


Figure 3: Net MW Savings from Lighting by Measure Group 2006-2008 ED Ex-post M&V

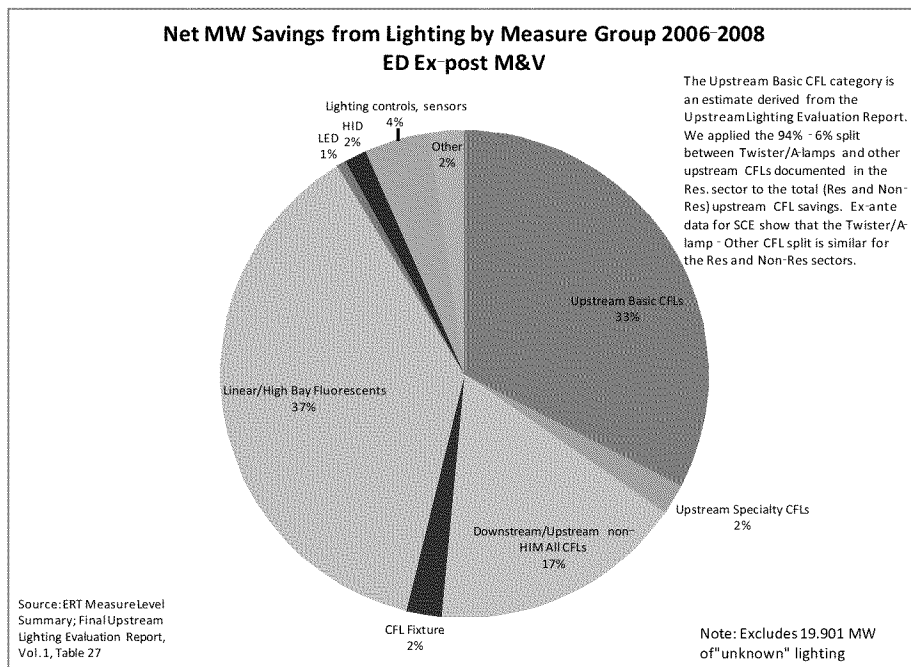
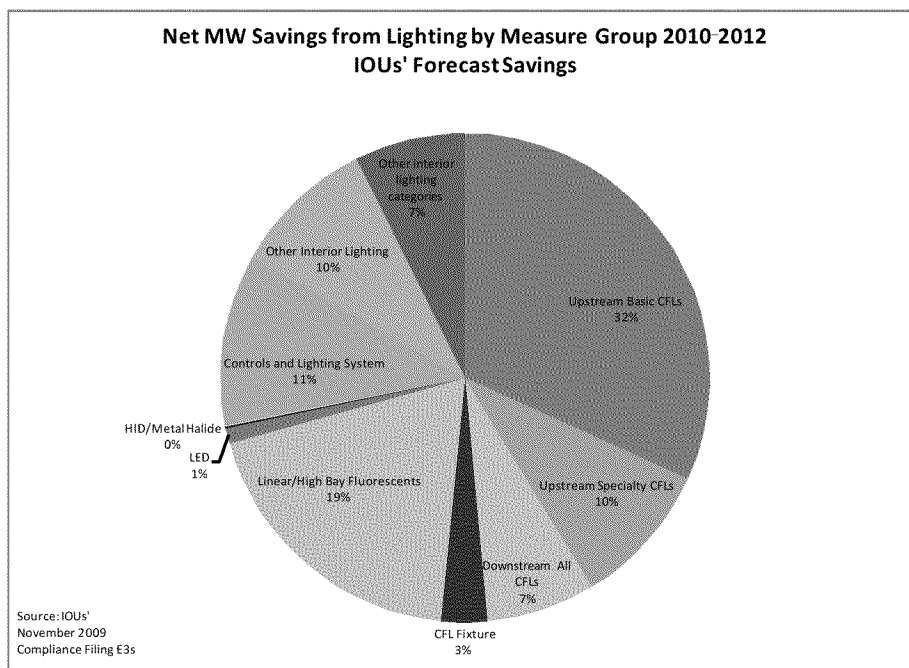


Figure 4: Net MW Savings from Lighting by Measure Group 2010-2012 IOUs' Forecast Savings



IV. CONCLUSION

TURN appreciates the opportunity to provide these comments and looks forward to continuing to work with the Commission on transforming California's lighting market.

Date: July 16, 2010

Respectfully submitted,

By: /s/ Marybelle Ang

Marybelle C. Ang

Staff Attorney

The Utility Reform Network
115 Sansome Street, Suite 900
San Francisco, CA 94104
Phone (415) 929-8876
Fax: (415) 929-1132
Email: mang@turn.org