

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 PACIFIC GAS AND ELECTRIC COMPANY (U 39 M)
TO ASSIGNED COMMISSIONER'S RULING ON DRAFT STRATEGIC LIGHTING
PLAN**

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Dated: July 16, 2010

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In accordance with the June 25, 2010 *Assigned Commissioner's Ruling On Draft Strategic Lighting Plan* (ACR) Pacific Gas and Electric Company (PG&E) submits the following comments.

I. INTRODUCTION

PG&E appreciates the Energy Division's collaborative effort in preparing the draft lighting chapter to the California Long-Term Energy Efficiency Strategic Plan (Strategic Plan), adopted in California Public Utilities Commission (Commission or CPUC) Decision 08-09-040. As envisioned by the draft lighting chapter, PG&E continues to promote innovative, transformational paths to meeting the state's energy savings and greenhouse goals. PG&E offers comments to the draft lighting chapter, which PG&E believes will promote greater efficiencies, and also requests specific changes to the draft chapter as presented herein.

The CPUC makes the overarching recommendation that:

To date, the utilities' lighting programs have primarily focused on widget swap-out strategies (such as replacing incandescent lamps with CFLs). Future efforts in lighting should focus on systems-based opportunities. (p. 6)

PG&E supports all paths toward greater levels of cost-effective efficiency, including systems-based opportunities. However, before stakeholders can focus primarily on a systems-based approach in lighting, the following needs to be examined:

1. Stakeholders need to develop a greater and deeper understanding of how technologies could work in conjunction with one another. This would involve market research, technology reviews, and pilot installations of more system approaches based on such research.

2. The CPUC, in conjunction with the stakeholders, needs to understand the incremental cost and benefit of additional measure installations in a systems-based approach. There may be cases where a systems-based approach provides additional energy efficiency, but ultimately makes the project non-cost-effective. Similarly, depending on how measures ‘play’ with each other, there may be situations where both the efficiency and the benefit have a multiplicative effect when installed together. Stakeholders should acknowledge and accept the trade-off that there may be instances when a systems-based approach is not the best approach and should not be utilized.

3. In order to encourage greater innovation, the current cost-effectiveness metric needs to be reexamined. Some technologies supporting systems-based approaches are new and costly, and PG&E would like to take advantage of them. However, the current cost-effectiveness metric does not support promotion of these new technologies. Since these new technologies are costly (and thus, the incremental measure cost is large), the net benefits from a Total Resource Cost (TRC), as measured today, are typically not positive. This means that society as a whole is not benefiting from the installation, even though additional energy savings have resulted. In some cases, PG&E may be successful in convincing a customer to install more expensive technology since doing so will ultimately be cheaper for the customer than doing a separate project later, when the technology becomes less costly (and more cost-effective). However, this would negatively impact PG&E’s portfolio cost-effectiveness. Since the CPUC set forth a target TRC of 1.5 in D.09-09-047, the current makeup of the TRC does not necessarily support further incorporation of new technologies and thus, the current cost-effectiveness should be reexamined in order to allow for greater success and acceptance of systems-based approaches.

II. COMMENTS ON SPECIFIC PROPOSALS BY GOAL

A. Goal 1 – Policy for Transformation

i. Strategy 1-3 suggests using AB 811-authorized mechanisms such as Property-Assessed Clean Energy (PACE) bonds. PG&E welcomes the opportunities afforded by AB 811-authorized mechanisms such as PACE bonds. Unfortunately, federal support has been withdrawn from AB 811 and PACE programs, and Fannie Mae and Freddie Mac do not currently recognize the priority lien such programs' loans place on homes that participate. PG&E proposes that until these options are federally supported with proper financial backing, we use this time to design evaluation methodologies that take advantage of creative mechanisms that either have, or can secure, the proper backing.

ii. Strategy 1-3 calls for identification and elimination of barriers to on-bill financing and third-party financing in IOU program offerings. More analysis should be done on on-bill financing and third party financing programs. Lighting-only projects typically have a two-to-five year Extended Useful Life; thus, they aren't good candidates to loan money on. Further, financing programs should be used to promote comprehensive energy efficiency projects, per the CPUC's policy direction, not just lighting-only projects.

iii. Strategy 1-3 says to "advocate to raise above Title 24 (including lighting) required to receive funding from California Solar Initiative to 30%" – in other words, energy savings from lighting would have to be 30% more than what Title 24 calls for to receive such funds. The CPUC should perform analysis of the costs/benefits and feasibility of such a step and determine 30% provides the reasonable breaking point between costs and benefits before considering adopting that standard.

iv. Strategy 1-4 lists as a goal, the development and implementation of voluntary manufacturing and labeling standards that include sustainability indices. PG&E agrees. However, before developing a new system, the Commission and stakeholders should work together to ensure that the system is coordinated and consistent with existing national and industry labeling efforts (e.g., DOE Lighting Facts).

B. Goal 2 – Lighting Best Practices

i. The statement of the overall goal reads: “Define and advance best practices for design, installation, operation and maintenance of integrated systems to achieve sustainable lighting solutions for all spaces.” The phrase “best practices” should be modified to read “cost-effective best practices” to ensure the best use of ratepayer funds. Integrating cost-effectiveness into the practices of utility programs is essential as cost-effectiveness is an indicator of a program’s success. Some of the best practices suggested in the chapter are not cost-effective and as such should not be pursued.

ii. Strategy 2-1 identifies creating web-based pattern books for market segments that represent at least 60% of the total lighting use. PG&E strongly encourages investigating the costs/benefits of web-based pattern books and studies that show they will be used before immediately committing to their creation.

C. Goal 3 – Drive End User Demand

i. In general, there is a large amount of market uncertainty at present. Before investing ratepayer funds for steps that include campaigns and education programs, we should first evaluate the cost-effectiveness of such campaigns and education programs and allow them to be designed using market research data to ensure ratepayer funds are put to best use.

D. Goal 4 – Integrated RD&D Network

i. Consistent with PG&E’s earlier comments, the goal should be to deliver solutions that are cost-effective and that are shown to be effective based on market research. As a result, PG&E suggests the overall goal should read “Develop research, development and demonstration (RD&D) networks to create, test, and deliver the *cost-effective, market-based* lighting solutions needed to transform California’s lighting market and achieve ZNE goals.” (suggested added text in *italics*)

III. CONCLUSION

PG&E looks forward to working with the CPUC as a partner to continue to transform the lighting market in California. The CPUC should continue to emphasize that the Strategic Plan is a living document where specific strategies will be revised when market or political factors change (e.g., leveraging of any new federal efforts). Engaging in projects strongly based on market data is the best

way to achieve the goal of lighting market transformation. PG&E also recommends that the Commission employ cost-effective strategies in pursuing its transformation goals to ensure the best use of ratepayer dollars.

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CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is 77 Beale Street, San Francisco, California 94105.

I am readily familiar with the business practice of Pacific Gas and Electric Company for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing.

On July 16, 2010, I served a true copy of:

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[XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for **R.09-11-014** with an email address.

[XX] By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed on the official service list for **R.09-11-014** without an e-mail address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed in San Francisco, California on July 16, 2010.

/s/
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