

**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,)	Rulemaking 09-11-014
and Verification, and Related Issues)	(Filed November 20, 2009)
_____)	

**REPLY COMMENTS OF THE CITY & COUNTY OF SAN FRANCISCO ON
ASSIGNED COMMISSIONER'S RULING**

In accordance with the July 2, 2010 Assigned Commissioner's Ruling, (ACR Ruling), the City and County of San Francisco (the City) respectfully files these reply comments. The ACR Ruling invited parties to file comments and reply comments on a second series of questions related to evaluation, measurement, and verification (EM&V) practices for the period post-2012. An earlier Assigned Commissioner Ruling and Scoping Order sought comments and reply comments on an initial set of questions.

The City's comments are as follows:

- 1) The City joins other parties in again stressing the need for workshops with expert presentations to adequately support a thoughtful evaluation and revision to the EM&V structure.
- 2) The City welcomes and supports the comments filed by the California Energy Commission (CEC), in its letter in response to the ACR, stressing the need for a more comprehensive statewide view, and the need for close coordination and collaboration between the CEC and the California Public Utilities Commission (CPUC).
- 3) The City agrees with those comments that highlight the need for a closer examination of the Northwest Energy Efficiency (NEEA) process with experts from NEEA present to provide for a better understanding of the program and the best way to adapt the best practices from NEEA to California.

- 4) The City supports a broad-based working group structure that can provide a holistic perspective of the role and impact of utility programs on energy consumption and market transformation in California and to advise the Commission on appropriate EM&V protocols.

I. WORKSHOPS WITH EXPERT PRESENTERS ARE NEEDED TO SUPPORT A THOUGHTFUL EVALUATION AND REVISION OF THE EM&V PROCESS.

In the initial comments, and the opening comments to the ACR Ruling, a number of disparate parties, including the City, concurred that key EM&V issues cannot be resolved through a series of paper comments. The City once again joins other parties in stressing that a review of EM&V would benefit from an analysis and white paper presenting recommendations by an independent consultant under the direction of the Energy Division (ED), in consultation with the CEC and the California Air Resources Board (CARB), followed by workshops and then written comments. The initial questions asked and comments filed to date could be used to frame the analysis, white paper and discussions. EM&V issues are too complex to be adequately addressed through a series of written questions and answers. Moreover, the written questions and answers structure and short timeframes for responses disadvantage small players with limited resources, but an important stake in the outcome of EM&V efforts, including local governments.

II. A MORE COMPREHENSIVE STATEWIDE VIEW IS NEEDED, AS WELL AS CLOSE COORDINATION AND COLLABORATION AMONG THE CPUC, THE CEC AND THE CALIFORNIA AIR RESOURCES BOARD.

The City supports the comments filed by the CEC, in its letter response to the ACR, stressing the need for a more comprehensive statewide view, and the need for close coordination and collaboration between the CEC and the CPUC. The California Long Term Energy Efficiency Strategic Plan (the Strategic Plan) recognized that a comprehensive energy efficiency plan for California would have to be significantly broader than the energy efficiency programs fielded by the IOUs, and identified and addressed key roles by other important groups of stakeholders in California. The CEC's

letter stresses the need to expand EM&V to recognize this reality and to incorporate a more comprehensive vision of the drivers of energy efficiency and their relative and combined impact. The City strongly supports this observation, as well as the CEC's recommendations, which would improve efforts to provide more reliable forecasts of demand-side resource impacts and would support effective evolution and implementation of the Strategic Plan.

The City notes with concern the CEC's description of the lack of a well documented, comprehensive record of energy efficiency programs and results from the prior ten years. Given the very substantial level of investment in energy efficiency by ratepayers, at a minimum, a useful record of results should be available.

The City also enthusiastically supports the CEC's call for continued and closer collaboration between the CPUC and the CEC. As the CEC correctly points out, the CEC 1) is in charge of key aspects of energy efficiency, such as state building and appliance standards, and also 2) plays a unique role in promoting energy efficiency by municipal utilities. The City agrees with the CEC that collaboration by the respective expert staffs of the CEC and Energy Division would result in a more robust understanding of EM&V needs. Such collaboration could begin with the analysis and white paper suggested above, to form the basis of more focused workshops on EM&V.

Finally, the City notes the need for close coordination with the California Air Resources Board (CARB). Given that greenhouse gas reduction has become at least as important with respect to energy efficiency as reducing overall energy service costs, it is important to ensure that EM&V efforts provide results that support the need to document achievement of the state's greenhouse gas reduction requirements.

III. THE ENERGY DIVISION SHOULD ORGANIZE A WORKSHOP ON THE NEEA PROCESS WITH EXPERTS FROM NEEA PRESENT.

The City concurs with the Natural Resources Defense Council (NRDC) and other parties that California could be well served by adopting best practices from the NEEA process and that workshops that include NEEA experts are necessary to ensure that best practices are adapted to California needs. First, it is unlikely that any process can be imported wholesale without any changes to account for local requirements. But just as

importantly, it is necessary that all stakeholders have an opportunity to thoroughly understand and buy into any changes. In addition to substantive benefits, part of the benefit NEEA provides is a process that is generally well respected in the Northwest. In contrast, California currently lacks an adequate consensus on the EM&V process and outcomes. In order for any improvements from NEEA to be imported effectively, stakeholders should be given the opportunity to adequately understand and vet new ideas.

IV. THE CITY SUPPORTS A BROAD-BASED WORKING GROUP STRUCTURE TO ADVISE THE COMMISSION ON APPROPRIATE EM&V PROTOCOLS.

The City sees value in a working group process that provides opportunities for more input into EM&V matters by experts, and a more meaningful opportunity by all stakeholders, including small players such as local governments, to participate effectively in EM&V matters. However, in order for such process to work effectively, truly independent experts must be recruited and paid in a manner that does not make them beholden to the IOUs. The City supports true greater transparency.¹ In addition, a key consideration in the development of any working group process should be ensuring that all key stakeholders are able to participate effectively.

¹ The City opposes the call by Southern California Edison to return all EM&V to IOU control. Moreover, in establishing a working group, the Commission must be realistic about the limited ability of many parties to participate effectively in such process without some form of paid expert support, and should ensure that the working group process does not become an avenue for the IOUs to undermine Energy Division control of impact evaluations.

V. **CONCLUSION.**

The City welcomes the opportunity to submit these reply comments.

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July 23, 2010

CERTIFICATE OF SERVICE

I, **PAULA FERNANDEZ**, declare that:

I am employed in the City and County of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action. My business address is City Attorney's Office, City Hall, Room 234, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102; telephone (415) 554-4623.

On July 23, 2010, I served: **REPLY COMMENTS OF THE CITY & COUNTY OF SAN FRANCISCO ON ASSIGNED COMMISSIONER'S RULING** by electronic mail on Proceeding No. R09-11-014.

The following addressees without an email address were served:

- BY UNITED STATES MAIL:** Following ordinary business practices, I sealed true and correct copies of the above documents in addressed envelope(s) and placed them at my workplace for collection and mailing with the United States Postal Service. I am readily familiar with the practices of the San Francisco City Attorney's Office for collecting and processing mail. In the ordinary course of business, the sealed envelope(s) that I placed for collection would be deposited, postage prepaid, with the United States Postal Service that same day.

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

Executed July 23, 2010, at San Francisco, California.

/s/
PAULA FERNANDEZ



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TOP OF PAGE
BACK TO INDEX OF SERVICE LISTS