



115 Sansome Street, Suite 900
San Francisco, CA 94104

415-929-8876 o www.turn.org

Mark W. Toney, Ph.D., Executive Director

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August 10, 2010

Julie Fitch, Director
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: TURN's Analysis of Utilities' "60-Day Report" on Modifications to 2010-2012 Energy Efficiency Portfolios Based On Energy Division's 2006-08 EM&V Reports

Dear Ms. Fitch:

When the Commission issued D.07-09-043 (in R.06-04-010), it required the investor-owned utilities to respond in writing to the findings and recommendations included in the final report regarding 2006-2008 programs. The IOUs presented Energy Division with "Responses to EM&V Impact, Process, and Market Assessment Recommendations." As noted in the decision, the utilities' response is not tied to any earnings claims, but is to instead focus on "implementing the findings of the reports" and to "develop an action plan based on the evaluation results." (D.07-09-043, p. 136)

TURN has been an active participant in the formal and informal processes that have led to the issuance of ED's final report on the 2006-2008 programs (in addition to a number of additional energy efficiency-related matters at the CPUC). Our consultants on these matters (Cynthia Mitchell and the others with Energy Economics Inc.) have reviewed the ED final report and the utilities' 60-day report, and prepared the attached analysis (a cover report and four attachments). TURN wishes to share this information with the Energy Division staff working on these issues going forward, as well as the utilities and other participants in the energy efficiency proceedings before the Commission. To that end, we are serving these materials on the service lists for A.08-07-021 and R.09-11-014.

Thank you for your attention to these matters. Please let me know if you have any questions or comments about this matter.

Yours truly,

/s/

Robert Finkelstein
Legal Director

cc: Service list for A.08-07-021 and R.09-11-014