	name of filing	description	orig issue	
filing 3/16/07	WEM Comment Procedural Strategy	accommodate CCAs p. 3	CCAs	issue Collab
3/16/07	WEM Comment Procedural Strategy	transition to renewables - like CCAs are planning p. 6-7	CCAs	Collab
3/16/07	WEM Comment Procedural Strategy	Increase comprehensiveness, c/e, MT w/CSO - staff wants to reduce # of programs but CSO reduces need for oversight. Explain simple fair swift selection vs. 1.5 year portfolio planning. p. 7-8	CSO	Strategies
3/16/07	WEM Comment Procedural Strategy	ensure EE as resource - coordinate w/ CAISO and procurement as ALJ proposed. What metrics do they need? Staff assumes it is - but it really is "embedded" as discussed in LTPP. DRA noted wild variations in treatment of EE from 0 to 100% pp. 3-4	ee as resource	EM&V/R RIM
3/16/07	WEM Comment Procedural Strategy	need location - p. 6	ee as resource	EM&V/R RIM
3/16/07	WEM Comment Procedural Strategy	target peak - lighting vs. a/c - what changes needed in E3 and TRC? IOU conflicts of interest - profits rely on growth - p. 6	ee as resource	EM&V/R RIM
3/16/07	WEM Comment Procedural Strategy	Proposed one year extension of current programs because EM&V needs to catch up with program planning, and to make up for delay in contracting with third parties and partnerships. p. 2.	EM&V	2006-08
3/16/07	WEM Comment Procedural Strategy	noted no 18-mo report p. 2	EM&V	Reports
3/16/07	WEM Comment Procedural Strategy	need simpler calculators - E3 and TRC too complex - not transparent p. 4	EM&V	EM&V
3/16/07	WEM Comment Procedural Strategy	Proposed one year extension of current programs because EM&V needs to catch up with program planning, and to make up for delay in contracting with third parties and partnerships. p. 2.	program planning	2006-08
3/16/07	WEM Comment Procedural Strategy	Staff proposal notes TPPs and partnerships - more cost-effective - WEM recommends increase TPPs - p. 7	TPPs	TPPs
7/2/07	WEM Reply re goals	need 80% redux emissions - p. 2	climate	Strategies
7/2/07	WEM Reply re goals	CPUC should stand firm - goals are easy p. 4	CPUC authority	Goals

1/2/01	WEM Reply re goals	PG&E anti-competitive, refusing to sign TPP and partnerships - p. 3	delay signing contracts	2006-08
7/2/07	WEM Reply re goals	PG&E demands reduce goals or change the rules so Calif. can continue to be national leader p. 4	extortion	Goals
7/2/07	WEM Reply re goals	2002-03 potential may have been manipulated - p. 5	gaming	Potential
7/2/07	WEM Reply re goals	request hearings on IOU false claims, gaming & manipulation	gaming	Goals
7/2/07	WEM Reply re goals	goal should be to defer/displace supplies p. 7	-goal	Goals
7/2/07	WEM Reply re goals	IOUs want to reduce goals p. 2	goals	Goals
7/2/07	WEM Reply re goals	too much iou discretion in program planning - but they want still more - p. 3	IOU control	Collab
7/2/07	WEM Reply re goals	or grab credit from others' work p. 2	IOUs grab credits	Collab
7/2/07	WEM Reply re goals	PG&E wants to county savings from LG efforts - p. 3	IOUs grab credits	Attributio n
7/2/07	WEM Reply re	let IOUs fail p. 4		Goals
	guais		1 (111	
7/2/07	goals WEM Reply re goals	Staff report notes cities have ways to achieve greater savings, e.g. time of sale EE upgrades - p. 2	LGs	Partnershi ps
	WEM Reply re			ps
7/2/07	WEM Reply re goals WEM Reply re	achieve greater savings, e.g. time of sale EE upgrades - p. 2 increase funding, oppose	LGs misuse of EE	ps 2006-08
7/2/07 7/2/07 7/2/07	WEM Reply re goals WEM Reply re goals WEM Reply re goals WEM Reply re	achieve greater savings, e.g. time of sale EE upgrades - p. 2 increase funding, oppose municiplatization p. 6 should take away programs if IOUs miss goals p. 4 PG&E complains "lack of potential" p .2	LGs misuse of EE penalties	ps 2006-08 Goals
7/2/07 7/2/07 7/2/07	WEM Reply re goals WEM Reply re goals WEM Reply re goals	achieve greater savings, e.g. time of sale EE upgrades - p. 2 increase funding, oppose municiplatization p. 6 should take away programs if IOUs miss goals p. 4	LGs misuse of EE penalties	ps 2006-08 Goals Potential
7/2/07 7/2/07 7/2/07 7/2/07	WEM Reply re goals	achieve greater savings, e.g. time of sale EE upgrades - p. 2 increase funding, oppose municiplatization p. 6 should take away programs if IOUs miss goals p. 4 PG&E complains "lack of potential" p .2 potential actually understated - p. 2 2002-03 potential study - gas savings &	LGs misuse of EE penalties potential	ps 2006-08 Goals Potential Potential
7/2/07 7/2/07 7/2/07 7/2/07 7/2/07	WEM Reply re goals	achieve greater savings, e.g. time of sale EE upgrades - p. 2 increase funding, oppose municiplatization p. 6 should take away programs if IOUs miss goals p. 4 PG&E complains "lack of potential" p .2 potential actually understated - p. 2 2002-03 potential study - gas savings & solar water heaters ignoredp. 5 2002-03 "voluntary" study by PG&E,	LGs misuse of EE penalties potential potential	ps 2006-08 Goals Potential Potential Potential
7/2/07 7/2/07 7/2/07 7/2/07 7/2/07 7/2/07	WEM Reply re goals WEM Reply re	achieve greater savings, e.g. time of sale EE upgrades - p. 2 increase funding, oppose municiplatization p. 6 should take away programs if IOUs miss goals p. 4 PG&E complains "lack of potential" p .2 potential actually understated - p. 2 2002-03 potential study - gas savings & solar water heaters ignoredp. 5 2002-03 "voluntary" study by PG&E, w/CEC & EF - p. 5 lots ommitted from 2006 study - only	misuse of EE penalties potential potential	ps 2006-08 Goals Potential Potential Potential Potential
7/2/07 7/2/07 7/2/07 7/2/07 7/2/07 7/2/07	WEM Reply re goals	achieve greater savings, e.g. time of sale EE upgrades - p. 2 increase funding, oppose municiplatization p. 6 should take away programs if IOUs miss goals p. 4 PG&E complains "lack of potential" p .2 potential actually understated - p. 2 2002-03 potential study - gas savings & solar water heaters ignoredp. 5 2002-03 "voluntary" study by PG&E, w/CEC & EF - p. 5 lots ommitted from 2006 study - only allowed current IOU measures - p. 6 difference from Secret Surplus - vs. 2002 & 2006 - wide range of industrial in EF	misuse of EE penalties potential potential potential potential potential	ps 2006-08 Goals Potential Potential Potential Potential Potential
7/2/07 7/2/07 7/2/07 7/2/07 7/2/07 7/2/07 7/2/07	WEM Reply re goals WEM Reply re	achieve greater savings, e.g. time of sale EE upgrades - p. 2 increase funding, oppose municiplatization p. 6 should take away programs if IOUs miss goals p. 4 PG&E complains "lack of potential" p .2 potential actually understated - p. 2 2002-03 potential study - gas savings & solar water heaters ignoredp. 5 2002-03 "voluntary" study by PG&E, w/CEC & EF - p. 5 lots ommitted from 2006 study - only allowed current IOU measures - p. 6 difference from Secret Surplus - vs. 2002	misuse of EE penalties potential potential potential potential potential potential	ps 2006-08 Goals Potential Potential Potential Potential Potential Potential

7/11/07	WEM Comment on 2009-11 programs & Strategies	recommend wait until CCAs included p. 5	CCAs	Collab
7/11/07	WEM Comment on 2009-11 programs & Strategies	CSO - short program cycle p. 6	cycle	Strategies
7/11/07	WEM Comment on 2009-11 programs & Strategies	endorse conservation education (like the old FYP) p. 7	education	education
7/11/07		EE displaces baseload - raises costs p. 4		EM&V/R RIM
7/11/07	_	need more timely EM&V p. 6	EM&V	EM&V
7/11/07	_	recommend use internet monitoring p. 6	EM&V	EM&V
7/11/07	_	current goals only 1/2 % of growth p. 3	goal	Goals
7/11/07		1	HVAC etc.	BBEES
7/11/07	WEM Comment on 2009-11 programs & Strategies	higher gas costs so more potential - p. 3	HVAC etc.	BBEES
7/11/07		residential only 3% of portfolios - need more equity p. 4	residentia 1	Strategies
7/11/07	_	WEM recommends implementers take the lead in strategic planning - recommend CSO. P. 5	Strategic Plan	Strategies
7/23/07	_	mandate code compliance p. 12	C&S	C&S
7/23/07		CCAs and EE - status of various CCAs - predict they will issue RFPs 2009, should be able to access funds p. 5		Collab

7/23/07 WEM Comment EE CFL market transformed p. 6 **CFLs** EM&V Portfolio Composition, Development Rules, **PRGs** 7/23/07 WEM Comment EE Collaboration requires independent collabora Collab Portfolio administration; IOUs undermine it p. 14- tion Composition, 15 Development Rules, **PRGs** 7/23/07 WEM Comment EE recommend "clustering" - implementers collabora Collab Portfolio at center p. 15-16 tion Composition, Development Rules, **PRGs** 7/23/07 WEM Comment EE CPUC should mandate programs & **CPUC** 2009-11 Portfolio strategies p. 2 authority Composition, Development Rules, **PRGs** 7/23/07 WEM Comment EE IOUs stonewall - TPP/LG contracts, **CPUC** 2009-11 OBF; CPUC ordered OBF pilot & Portfolio authority Composition, refrigerator recycling p. 2 Development Rules, **PRGs** 7/23/07 WEM Comment EE CPUC should enforce the basics - due **CPUC** 2009-11 Portfolio dates, contract signing, keep goals the authority same - don't reduce. P. 15 Composition, Development Rules, **PRGs** 7/23/07 WEM Comment EE CSO - long summar p. 3-4 **CSO** Strategies **Portfolio** Composition, Development Rules, **PRGs** 7/23/07 WEM Comment EE should be more programs, not fewer **CSO** Strategies Portfolio Composition, Development Rules, **PRGs** 7/23/07 WEM Comment EE IOUs should not be in chare of education education & training - inappropriate to control Portfolio schools - better: TPPS LGs and Composition, Development Rules, professional educators p. 11 **PRGs**

7/23/07 WEM Comment EE Should evaluate IOU Training Centers - education education Portfolio cf other educational alternatives. Need more systematic EE education p. 11-12 Composition, Development Rules, **PRGs** 7/23/07 WEM Comment EE work w/ licensing boards - requiring education education continuing ed in EE for license renewal Portfolio Composition, p. 11-12 Development Rules, **PRGs** 7/23/07 WEM Comment EE IOU education = marketing & selfeducation Portfolio promotion p. 12 Composition, Development Rules, **PRGs** 7/23/07 WEM Comment EE address peak & coordinate w ee as EM&V/R Portfolio procurement — extensive quotes from resource RIM procurement hearings; pp. 7-10 Composition, Development Rules, **PRGs** 7/23/07 WEM Comment EE location data available but not revealed - ee as EM&V/R prevents redlining, ensures equity; Portfolio resource RIM Composition, should allow EE bidding into RFOs p. 8-Development Rules, 9 **PRGs** 7/23/07 WEM Comment EE Con Ed program p. 10 EM&V/R ee as **Portfolio** resource RIM Composition, Development Rules. **PRGs** 7/23/07 WEM Comment EE improve EM&V - produce measurements EM&V 2004-05 on 2004-05, compare IOUs v TPPs - p. 5 Portfolio Composition, Development Rules, **PRGs** 7/23/07 WEM Comment EE long term measures = long term benefits EM&V Lifecycle Portfolio p. 6 Composition, Development Rules, **PRGs** 7/23/07 WEM Comment EE savings degradation should be measured EM&V Lifecycle Portfolio p. 6 Composition, Development Rules, **PRGs**

7/23/07	WEM Comment EE Portfolio Composition, Development Rules, PRGs	EM&V needs to be more timely; inexplicable delays in 2004-05 evaluations p. 13	EM&V	2004-05
7/23/07		should be penalties for IOU delays or interference w LGP contracts	LGPs	Partnershi ps
7/23/07	WEM Comment EE Portfolio Composition, Development Rules, PRGs	TPPS must market out of their ownprogram funds; IOUs have off-budget marketing p. 12	MEO	Third Parties
7/23/07	WEM Comment EE Portfolio Composition, Development Rules, PRGs	Recommend expand OBF; require PG&E to offer it	OBF	OBF
7/23/07	WEM Comment EE Portfolio Composition, Development Rules, PRGs	PRGs should have power to make IOUs produce data p. 14	PRGs	Advisory
7/23/07	WEM Comment EE Portfolio Composition, Development Rules, PRGs	power imbalance - PRGs v IOUs. P. 15	PRGs	Advisory
7/23/07	WEM Comment EE Portfolio Composition, Development Rules, PRGs	IOUs hand-pick PAG/PRGs - creates financial conflicts of interest	PRGs	Advisory
7/23/07		CPUC should require PRGs to perform financial review or hire consultant (spreadsheets)	PRGs	Advisory
10/9/07		many substantial contributions listed		2009-11
4/1/08	WEM Comment EM&V & Policy Manual	CCAs & EE - CPUC required minimum amount for CCA areas, p. 5	CCA	Collab
4/1/08	WEM Comment EM&V & Policy Manual	CFLs are helpful but not the way IOUs have used them p. 4	CFLs	EM&V

4/1/08	WEM Comment EM&V & Policy Manual	IOUs are not good collaborators p. 4	collabora tion	
4/1/08	WEM Comment EM&V & Policy Manual	WET should be allocated to program budgets to extent they train IOU workers; TPPs generally train their own	education	education
4/1/08	WEM Comment EM&V & Policy Manual	workers out of program budgets pp. 2-3 Training centers should be audited and compared with other educational isntitutions. Need new EM&V for these funds p. 3	education	education
4/1/08	WEM Comment EM&V & Policy Manual	Recommend convene a process to coordinate procurement w/ EE bring - including location of savings, season/time, location of spending -p. 5	ee as resource	EM&V/R RIM
4/1/08	WEM Comment EM&V & Policy Manual	geographical equity of EE funding for different areas of state p. 6	equity	Collab
4/1/08	WEM Comment EM&V & Policy Manual	MEO should be part of program budgets; FYP budget should be apportioned to programs to extent they market specific programs p. 2	MEO	Strategies
4/1/08	WEM Comment EM&V & Policy Manual	New attribution questions - IOUs want credit. IOUs attacked NTG concept at workshop - shortfalls in savings 2004-5 due to NTG as well as exaggerations in CFLs p. 4	NTG	EM&V
4/25/08	WEM Comment re Goals	IPCC p. 3	climate	Strategies
4/25/08	WEM Comment re Goals	Discuss issues raised in procurement re "embedded EE" -D0712052 only credited 20% of goals as resource p. 2, 4	ee as resource	EM&V/R RIM
	WEM Comment re Goals WEM Comment re Goals	WEM opposes revising goals until EE coordinating with procurement p.3 Itron assumes short-lived measures will be replaced by the customer - this is contrary to CPUC policies p. 5		EM&V/R RIM Lifecycle
4/25/08	WEM Comment re Goals	PG&E refused to accept that demand is being reduced p. 3	goals	Goals
4/25/08	WEM Comment re Goals	Itron report predated CPUC discussion of EE as resource p. 3	goals	Goals
4/25/08	WEM Comment re Goals	Itron assumes C&S is equal to IOU programs p. 4	goals	Goals
	WEM Comment re Goals	Should address actual peak, not a formula p. 5	peak	Peak
4/25/08	WEM Comment re	Should consider local peak p. 5	peak	Peak
6/11/08	Goals			

6/11/08 WEM Comment re Goals re 6/2 Ruling	cpuc should provide a process for others to apply to administer ee programs p. 7	admin	Rules
6/11/08 WEM Comment re Goals re 6/2 Ruling	mandate code compliance p. 4	C&S	C&S
6/11/08 WEM Comment re Goals re 6/2 Ruling	mandate code compitance p. 1	delay	2006-08
6/11/08 WEM Comment re Goals re 6/2 Ruling	06-07 delays - quarterly reports show only 12% pp. 5-6 (extensive discussion) coordination of energy efficiency goals with procurement is essential - D0712052 credited only 20% of EE goals as resources - however WEM told at the 6/9/08 All Party meeting that it is	signing contracts ee as resource	EM&V/R RIM
6/11/08 WEM Comment re Goals re 6/2 Ruling	"not on the agenda" p. 12 more timely measurement needed; quarterly reports raise serious questions		EM&V
6/11/08 WEM Comment re	about utility performance p. 5	EM&V	EM&V
Goals re 6/2 Ruling 6/11/08 WEM Comment re Goals re 6/2 Ruling	need more timely EM&V p. 5 measure certification and recommissioning needed. P.11	EM&V EM&V	EM&V
6/11/08 WEM Comment re Goals re 6/2 Ruling	ensure measures performing p. 11	EM&V	EM&V
6/11/08 WEM Comment re		goals	Goals
Goals re 6/2 Ruling 6/11/08 WEM Comment re Goals re 6/2 Ruling	ED proposes gross goals p. 3 IOUs complaing "changing rules midstream" - they prevented change @ start of cycle p. 8	goals	Goals
6/11/08 WEM Comment re	2004-05 exaggerations gave CPUC false	goals	Goals
Goals re 6/2 Ruling 6/11/08 WEM Comment re Goals re 6/2 Ruling	impression they were meeting goals P.8 LGs have new EE options - need independence p. 5	LGs	Partnershi ps
6/11/08 WEM Comment re Goals re 6/2 Ruling	local governments should not be subservient to utilities - testified at 6/9/08 All Party meeting about problems IOUs causing LGS - failure to communicate, failure to respect democratic processes, blind to concerns & values of constituents, e.g. more GHG reductions. IOUs stifling infrastructure development p. 12	LGs	Partnershi ps
6/11/08 WEM Comment re Goals re 6/2 Ruling	net-to-gross should be preserved p.7	NTG	EM&V
6/11/08 WEM Comment re Goals re 6/2 Ruling	staff paper lacks appropriate analysis; many flawed studies; new paradigm p. 3	potential	Potential
6/11/08 WEM Comment re Goals re 6/2 Ruling	gas savings - Solar water heaters p. 9-10	SWH	2009-11

12/14/08 WEM comment PG&E Motion re UCD	At the PHC, WEM noted that total PG&E LGP budget was \$100m - only 2/3 of LGP requests - would only run 2 of 3 yrs, crippling the infrastructure LGs are attempting to build. WEM recommended extend same opp to all LGs. P. 4	LGs	Partnershi ps
12/14/08 WEM comment PG&E Motion re UCD	UCD "Direct Access"; eligibility limited to the amount it pays into the fund. P.2	UCD	UCD
12/14/08 WEM comment PG&E Motion re UCD	Statewide Inst'l Partnership includes UCD, but PG&E singling out UCD for special treament not offered to others in the partnership. P.2	UCD	UCD
12/14/08 WEM comment PG&E Motion re UCD	UCDprojects already included in PG&E portfolios p. 3	UCD	UCD
12/14/08 WEM comment PG&E Motion re UCD	WEM concerned possibly related to misuse of funds to oppose mincipalization p.3	ucd	UCD
1/25/10 WEM comment on PD UCD	PD modifies PG&E proposal by requiring them to offer similar accelerated incentives to similarly situation customers. P. 2 - PD, p. 1	UCD	UCD
1/25/10 WEM comment on PD UCD	WEM believes there are a large no. of similarly situated customers (i.e. Direct Access customers who have significant savings opps in this cycle). PG&E should make them aware of this opportunity. P.3	UCD	UCD
1/25/10 WEM comment on PD UCD	If Direct access customers take advantage of this opporutnity, it oculd harm bundled customers by diverting funding. P. 4	UCD	UCD
1/25/10 WEM comment on PD UCD	If UCD repays funds, CPUC should ensure that \$ will go to bundled customers, not PG&E p. 3	UCD	UCD