

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)
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**REPLY COMMENTS OF THE UTILITY REFORM NETWORK ON THE PROPOSED
DECISION ON EVALUATION, MEASUREMENT, AND VERIFICATION OF
CALIFORNIA UTILITY ENERGY EFFICIENCY PROGRAMS**

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I. INTRODUCTION

Pursuant to Rule 14.3 of the California Public Utilities Commission (Commission)’s Rules of Practice and Procedure, The Utility Reform Network hereby submits reply comments in response to comments on Commissioner Grueneich’s September 28th Proposed Decision on Evaluation, Measurement, and Verification of California Utility Energy Efficiency Programs (PD). TURN supports the PD’s objectives for EM&V and the Commission’s efforts to seek a collaborative and transparent forum for addressing EM&V-related challenges.

II. DISCUSSION

A. Directing the Commission’s Policy and Planning Division (PPD) to facilitate a workshop series satisfies the Commission’s goal of establishing a forum in which stakeholders can work collaboratively to improve energy efficiency EM&V.

Southern California Edison (SCE) proposes to rely on an entity, a “broader group of California organizations that work with energy efficiency EM&V”¹ to provide the forum for

¹ SCE’s Comments on the Proposed Decision on EM&V of California Utility Energy Efficiency Program, p. 2.

discussions in California on EM&V. SCE would like to see such a group consist of “the California Energy Commission, publicly-owned utilities with substantial EM&V experience, and a representative with EM&V expertise from each of several stakeholder groups.”² TURN views this suggestion as yet another attempt to fashion a more amenable environment for framing and evaluating IOUs’ progress in energy efficiency. Pacific Gas and Electric Company (PG&E) goes even further, proposing a “technical team, comprised of representatives from Energy Division, the IOUs and industry experts, to review impact evaluations ... as to the amount of savings achieved pursuant to the established protocol”.³

TURN points out that the PPD-led workshops ordered in Paragraph 6 of the PD are intended to provide the collaborative forum for developing the 2013-2015 EE EM&V Plan and addressing challenges to EM&V objectives. The PD states that these workshops are “designed to address those challenges collaboratively and transparently”⁴ and will be “the vehicle through which stakeholders collaboratively prepare the 2013-2015 Energy Efficiency EM&V Plan.”⁵ The PD also provides for the technical expertise that SCE and PG&E emphasize in their comments; it authorizes the PPD to contract with qualified technical experts and to leverage Energy Division’s EM&V contractors as well to support the workshop. As such, there is no further need for a separate entity to achieve what the PPD-facilitated workshops aim to do, nor would a separate impact evaluation review group comprised of IOU representatives, as suggested by PG&E, ensure *independent* measurement and verification of ratepayer-funded energy efficiency programs.

² Id. at 2 [emphasis added].

³ Pacific Gas and Electric Company’s Comments on the Proposed Decision on Evaluation, Measurement, and Verification of California Utility Energy Efficiency Programs, p. 6 [emphasis added].

⁴ PD at p. 26.

⁵ Id. at 32.

- B. While TURN agrees that the workshop will and should provide a forum for addressing additional EM&V issues “that need to be addressed in preparing the 2013-2015 Energy Efficiency EM&V Plan,” the Commission should limit the scope of the workshops to matters that are absolutely necessary in preparing the 2013-2015 EM&V Plan.**

PG&E seeks to incorporate efforts to finalize a Risk/Reward Incentive Mechanism for the 2013-15 program cycle into the EM&V workshop series. This proposal concerns TURN as it may end up burdening resources and time that should be reserved for solidifying a timely EM&V plan for the proposed energy efficiency programs. Similarly, PG&E desires to use additional workshop time to re-explore the feasibility of applying Experimental Design for the EM&V of California’s Whole House Retrofit Program. As the PD makes clear, the Commission is “committed” to now exploring *how* (not *whether*) Experimental Design should be applied in the 2013-2015 program cycle. D.10-04-029 already instructed Energy Division to develop a protocol to measure and count savings from comparative usage programs using the Experimental Design methodologies; the Joint Energy Division/IOU Evaluation Plan for 2010-2012 includes a review of best practices in this area and the development of a protocol and method. Thus, TURN recommends against backpedaling on this matter, and against adopting PG&E’s modifications to the PD’s discussion (on page 35) of Experimental Design.

III. CONCLUSION

TURN appreciates the opportunity to provide these comments and looks forward to continuing to work with the Commission towards making EM&V a more effective tool in reaching California’s consumption and GHG reduction goals.

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Respectfully submitted,

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