

Rulemaking 09-11-014
Joint Workshop Report – CCA Access to Energy Efficiency Programs
(10-15-10 DRAFT for Participant Review)

This Joint Workshop Report responds to the direction given to parties in the proceeding in the Assigned Commissioner Ruling and Scoping Memo, Phase II issued September 22, 2010.

This workshop report has been prepared by the participants in the September 27, 2010 workshop regarding procedures for CCAs to apply to administer energy efficiency and conservation programs. To the extent possible, this report reflects consensus of the parties, and in instances where consensus was not reached, the report clarifies party positions. Parties also have the opportunity to file separate comments to the report on October 29, 2010, and reply comments on November 4, 2010.

The following parties who participated in the workshop decline to take a position on report:

[list parties if any]

This report is broken into three general sections:

Part 1 - Brief Summary of Workshop Discussion

Part 2 - Relevant State Statute/CPUC Policy Decisions

Part 2 – Response to Question Addressed to Parties

- General Principles associated with EE funds collected in CCA jurisdictions
- General Principles associated with specific options
- Option A - CCA applies for EE funding through the IOU portfolio third-party program (IOU Joint Proposal)
- Option B - CCA submits request to administer EE programs using IOU-collected EE funds to CPUC, independent of the IOU portfolio with certain IOU-collected EE funds passed through to CCA (CCA Joint Proposal)
- Option C - Option A is adequate; however, if CPUC wants to consider further options, PG&E proposes that CCAs could apply for EE funding through local coordinated model (PG&E Alternate Proposal)

Part 3 - Appendices

- Appendix A – Detailed summary of workshop prepared by WEM
- Appendix B – List of workshop participants
- Appendix C – Energy Division presentation

Please note that unless stated otherwise, when using the term administrator throughout this report, it refers to the broad definition pursuant to D. 03-07-034 that defined administrator as any party that receives funding for and implements EE programs pursuant to Section 381 (Attachment A, p.1).

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Part 1: Summary of Outcome of 9/27/10 Workshop

1- Brief Summary of Workshop Discussion

The workshop followed the outline included in the September 22, 2010 assigned commissioner ruling. The major topic areas covered were:

- (1) Review of applicable statutory and regulatory rules that apply to a CCA administering EE funds;
- (2) Overview of EE funding sources;
- (3) Through what process could a CCA apply to administer a share of EE program funding sources; and
- (4) A brainstorming session into the technical issues and questions that would need to be resolved.

Parties agreed that only the electric portion of the IOU-collected Energy Efficiency funds should be considered in the discussion, as the gas portion is not relevant to CCA service.

The electric “non-bypassable” public purpose program (PPP) charges recover the public goods charge (PGC) and procurement portions of EE funding. Both funding sources are components of the PPP line item on customer bills. The gas portion is recovered through gas PPP surcharges. If the CCA is authorized to implement EE program services as part of the IOU portfolio, there would be no change in ratemaking, as the IOUs would recover the total authorized EE funding request in customer rates.

The workshop participants had extensive discussions, but no resolution regarding how to account for funds collected by IOUs via the EE PGC and procurement mechanisms, and, whether the CCA was eligible to utilize the both the PGC and procurement charges, if the CCA was authorized a portion of PPP EE funding through a separate request to the CPUC. Parties also noted that if “statewide programs” and other local programs that may be part of the IOU EE portfolios were to be accessed by a CCA customer, that the mechanism adopted by the Commission would need to take this into account.

The workshop participants, led by Steve Roscow of the Energy Division, reviewed the history of stated policies regarding how a CCA could request funds to administer CCA programs. Through that history, it was noted that the existing rules stated in D.03-07-034 were written at a time when the CPUC was the entity that administered EE programs.

In 2003, the CPUC administered EE programs; third party program implementers applied to the CPUC through a competitive bid process; selection was made by Energy Division/CPUC; third parties contracted with IOUs.

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Since 2005, the IOUs administer EE programs; third party programs implementers apply to the IOUs through a competitive bid process, the selection criteria is developed by IOUs with input from Energy Division and PRG; selection made by IOUs with ED and PRG review; third parties contract through IOUs.

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Part 2 – Relevant State Statute/CPUC Policy Decisions

For purposes of implementing Section 381.1, an “administrator” is any party that receives funding for and implements EE programs pursuant to Section 381. (D.03-07-034, Attachment A, p.1)

“[CPUC] will apply the same procedures and criteria for review that we now apply to all Third Party applicants for energy efficiency program funding, including EM&V requirements. CCA shall refer to Commission orders and its energy efficiency policy manual in making requests for Section 381 funding.” (D.03-07-034, p.10)

P.U. Code 381.1 (a) and (b)

(a) No later than July 15, 2003, the commission will establish policies and procedures for any party, including, but not limited to, a local entity that establishes a community choice aggregation program, may apply to become administrators for cost effective energy efficiency and conservation programs established pursuant to Section 381. In determining whether to approve an application to become administrators the commission shall consider the value of program continuity and planning certainty and the value of allowing competitive opportunities for potentially new administrators. The commission shall weigh the benefits of the party’s proposed program to ensure that the program meets the following objectives:

- (1) Is consistent with the goals of the existing programs.
- (2) Advances the public interest in maximizing cost effective electricity savings and related benefits.
- (3) Accommodates the need for broader statewide or regional programs

(b) All Commission audit and reporting requirements established by the commission pursuant to Section 381 and other statutes shall apply to the parties chosen as administrators under this section.

P.U. Code 381.1 (c)

If a CCA is not the administrator of energy efficiency and conservation programs for which its customers are eligible, the CPUC shall require the administrator of cost effective energy efficiency and conservation programs to direct a proportional share of its approved EE program activities for which the CCA’s customers are eligible, to the CCA’s territory without regard to customer class.

[add others as relevant]

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Part 3: Question to Be Addressed by Parties

Are the procedures set forth in D. 03-07-034, by which any party, including a CCA, may apply to administer cost-effective energy efficiency and conservation programs, adequate or do changes need to be made?

General Principles associated with all Options Presented in this Report

The following general principles should guide CPUC policy and procedures regarding CCA requests to administer EE programs using IOU-collected energy efficiency funds:

Parties supporting: [add]

- CCA's should be allowed the opportunity to administer EE programs, however not all CCAs may wish to provide EE programs in their territory, and should not be required to do so
- EE programs should be customer-focused, support effective use of EE public funds, and be well-integrated with statewide and other broad-reaching existing programs.
- Customers should have access to all EE program rebates and services provided in their service territory that are funded by non-bypassable PPP charges (with controls in place to avoid double dipping where a customer would receive more than one electric rebate check for the same installed measure or service, or to avoid funding overlaps or excessive funding for one area that would be inefficient or mis-use of public funds), including:
 - Program Administrators are accountable to relevant governing agency for specified results (e.g. meeting savings goals, furthering portions of the Strategic Plan)
 - CCA programs shall provide data on cost effectiveness regarding their programs to the CPUC and other relevant state agencies for the purposes of tracking energy efficiency efforts in California.
 - Application of cost effectiveness tests, program evaluation and other CPUC oversight (e.g. audits, reporting, etc.) consistent with statute and as determined by CPUC.
 - EE Programs should forward the CPUC goals of statewide program coordination and stakeholder collaboration
 - Commission and Energy Division should provide oversight in review and selection of the CCA's request for EE program funding; and the Commission is the final authorizing entity.

The following are principles for which consensus cannot be reached, along with identification of the party that supports that position.

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General Principles associated with Option B – CCA Submits Request to Administer EE Programs Using IOU-Collected EE funds to CPUC, independent of the IOU Portfolio

Parties supporting: CCSF, SJVPA, MEA [add others]

The following general principles should guide CPUC policy and procedures regarding Option C where the CCA submits a request to administer EE programs using IOU-collected energy efficiency funds to the CPUC, independent of the IOU portfolio with certain IOU-collected EE funds passed through to CCA:

- **CPUC should be the authorizing entity.** Incumbent IOU should not be part of the approval path – but as per usual CPUC process, could provide comments.
- **CCA's may submit first request to CPUC at any time, and ongoing administration should require CCA filings on same cycle CPUC-regulated administrator.** Timing of CCA filings would allow CCAs to ensure rates are sufficient to maintain their energy efficiency offerings, and would give CPUC-regulated administrators opportunity to appropriately reflect funding availability and customer base in its planning and CPUC-approval processes.

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Option A: CCA Applies for EE Funding through the IOU Portfolio Third-Party Program

Parties supporting: PG&E, SCE, SDG&E, SCG, [add others]

The existing rules are adequate as the CCA can apply for EE funds through the IOUs existing third party program on a competitive bid basis.

“[CPUC] will apply the same procedures and criteria for review that we now apply to all Third Party applicants for energy efficiency program funding, including EM&V requirements. CCA shall refer to Commission orders and its energy efficiency policy manual in making requests for Section 381 funding.” (D.03-07-034 p.10)

Energy Efficiency Policy Manual V 4.0, p. 10 and D.03-07-034 state that the CPUC will apply the same procedures and criteria to CCAs that are applied to all third party applicants for EE program funding, including EM&V requirements.

D.04-01-032, p. 6 states that CCAs will not be treated any differently than any other parties.

D.05-12-041, Conclusions of Law, Number 2 states “Although relevant portions of AB117 do not confer general regulatory oversight of CCAs, the Commission has the authority to exercise limited jurisdiction over non-utilities in furtherance of their regulation of public utilities, including resource adequacy.”

Guidelines for Funding EE Applications

- Any party that has been established by local authorities as a CCA pursuant to Section 331.1 may apply for energy efficiency funding subject to the guidelines, criteria, schedules and EM&V that apply to third parties as set forth in the Policy Manual and Commission rulings and orders.
- The Commission will consider the value of program continuity and planning certainty and the value of allowing competitive opportunities for potentially new administrators (implementers).
- The Commission will weigh the benefits of each party’s proposed program to ensure that the program meets the following objectives:
 - Is consistent with the goals of the existing programs established pursuant to Section 381.
 - Advances the public interest in maximizing cost-effective electricity savings and related benefits.

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- Accommodates the need for broader statewide or regional programs.
- CCAs are able to apply for energy efficiency program funding consistent with the timing of Commission authorized solicitations for energy efficiency proposals.
- The Commission may adjust the share of energy efficiency program activities directed to a CCA's territory to promote equity and cost effectiveness.
- The Commission can maintain energy efficiency programs targeted to specific locations where needed to avoid or defer transmission or distribution system upgrades regardless of whether the loads in that location are served by the CCA or an electrical corporation.

Benefits of Third Party Model:

- A balanced portfolio
- Adherence to established CPUC EM&V rules
- CPUC oversight to ensure ratepayers have a full offering of programs for both CCA and IOU programs
- Recourse for revenue recovery in case of non-compliance or misuse
- EE portfolio application is subject to a final decision by the Commission
- No added billing or accounting costs

The existing third party process for CCAs to access EE funds has not proven to be ineffective.

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Option B: CCA Applies for EE Funding through an Application Independent of the IOU Portfolio with Certain IOU-collected EE funds passed through to CCA

Parties supporting: CCSF, SJVPA, MEA [add others]

The simplest and preferred approach for CCA administration of energy efficiency programs within their territories would be to coordinate with a third-party general administrator of energy efficiency in California. The proposal below is designed to further the state's interest in energy efficiency and work with the existing framework.

Option B provides the following benefits:

- Ensures state's interest in promoting energy efficiency in California
- Protects ratepayer interest and ensures no cross-subsidy from CCA customers to IOU customers (via reductions in IOU procurement costs).
- Independent from IOU approval or forcing competition between CCA's or other local governments.
- Leverages community-based local government oversight.

Process for CCA Request

The following is an outline of a process designed to ensure that the State's interest in energy efficiency are appropriately safeguarded, while maintaining the distinct position the CCA has as an entity that is not regulated by the CPUC. This process mimics the procedure followed by the CPUC in certification of CCA Implementation Plans.

- CCA submits "Intent to manage energy efficiency programs" to CPUC energy division (and serves submission to appropriate service lists)
- CPUC energy division staff reviews submission
- CPUC solicits input from interested parties (input served to service lists)
- CCA responds to comments
- CPUC staff may seek additional data from CCA or relevant parties
- CPUC determines if submission is adequate in detail and scope, and if so deemed, directs the appropriate disposition of funds by relevant IOU.
- IOU would submit necessary advice letters to adjust rates or tariff sheets, as appropriate. (Tariff adjustments would be required to authorize IOUs to transfer energy efficiency funds to an authorized CCA administrator)

Elements to be included in CCA Submission

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To be consistent with existing Public Utilities Code (PU Code Section 381) and direction from D.03-07-034, the following elements shall be included in a successful CCA “Intent to manage energy efficiency programs” submission to the CPUC. The CPUC review will ensure that these elements are satisfactorily covered in the CCA submission.

- Description of CCA program goals (GHG, as well as MW and MWh) and basis for determining savings
 - IOUs system load profiles would not necessarily apply to specific CCA program.
 - Discussion of how CCA programs fit within the CPUC’s strategic plan and are designed to achieve long term energy efficiency results.
- Discussion of how CCA programs are cost effective for CCA procurement profile – discussion of CCA oversight (from applicable governing agency) to ensure spending of customer funds achieves energy savings
- Discussion of how CCA program offerings would interact with statewide programs.
 - Mechanisms for adjusting utility remittances based on appropriate share of cost for statewide programs (appropriate calculated portion of funds collected from CCA eligible customers would be retained by IOUs for use in programs that CCA customers would be eligible to participate).
- Funding Level sought –
 - Funding level would be equal to total proposed program amount, less calculated amounts to be retained by IOU for use in programs for which CCA customers would be eligible. If the funding level calculation determines that the sum of amount to be retained by the IOUs and the amount remitted by the IOUs to the CCA is less than the total EE funds collected from CCA customers, the balance would be credited back to CCA customers.
 - If funding from PGC is insufficient to cover CCA program costs, CCA should describe rate mechanism the CCA would employ to fully fund the program (or identification of other funding sources, if not from CCA rates).
- Overall budget for CCA EE program shall be clearly identified.
 - Proposed method for calculating CCA responsibility for statewide and upstream program costs
- Overall budget for CCA EM&V activities
- Description of how the CCA EE administrator will incorporate generally accepted EM&V protocols into its evaluation and planning processes.
- Description of accounting mechanisms that shall be utilized to ensure energy efficiency funds are appropriately segregated from CCA general operating revenues (and that funds will be utilized solely for energy efficiency programs and associated EM&V). Discussion of accounting

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mechanism shall include discussion of audit protocols that the CCA shall have in place.

- CCAs shall include relevant reports on energy efficiency activities that have been made public by the CCA.

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Option C: Option A is Adequate; However, if CPUC Wants to Consider Further Options, PG&E Proposes that CCAs Could Apply for EE Funding through Local Coordinated Model

Parties supporting: PG&E, [add others]

Another option for the Commission to consider is for a CCA to apply for EE funding through a “Local Coordinated Model” based on the existing Local Government Partnership (LGP) Program with the direct involvement of Energy Division, or its representative, in the negotiations of program design and requested funding by the CCA. The LGP program and the Local Coordinated Model would be negotiated amongst the IOU, Energy Division, and the CCA (this differs from the competitive third party process to which the CCAs have expressed concern).

The CCA would be allowed to apply for funding through one of the routes Option A or C as specified by the CPUC prior to the solicitation depending on the IOU area. Applying via both routes would result in customer confusion and possible double-dipping where a customer would receive more than one rebate check for the same installed measure or service, or to avoid funding overlaps that would be inefficient or excessive in one area, or mis-use of public funds. Under Energy Division oversight, the IOU is responsible for ensuring coordination with the remainder of its portfolio. In addition, in the event that both a CCA and a LGP apply to implement programs for the same service area, the IOU and Energy Division will either arrange a solution with all entities or choose the better entity to run the program, subject to final approval by the Commission.

The IOU would include the agreed to program/funding request in its EE portfolio application that would be subject to a final decision by the Commission.

Eligibility¹

- Governments (City and Counties)
- Government Associations (including Joint Powers Authorities)
- Quasi-Government Organizations (non-profits that work directly with governments, government associations, and statewide associations)
- CCAs that are currently providing and billing procurement services to customers

Overview

¹ The eligibility shown below was agreed to by IOUs and Energy Division for the 2009-2011 (now 2010-2012) EE Portfolio LGP program solicitation – with the CCA bullet added for the purpose of this Option.

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- Local Coordinated-Model based on existing LGP program structure.
- IOU to work with CCA, LGP local partner and other local stakeholders to develop plan for implementing energy efficiency programs in region (e.g., within County)
- Local portfolio to be established that includes a combination of CCA/local partner-implemented programs and IOU programs (Mass Market Downstream Rebates, Calculated Rebates, Third Party Programs, etc.)
- Local coordinated model submitted to CPUC for approval.
- IOU establishes contract with CCA/local partner to help implement local portfolio.

Elements of Local Coordinated-Model Proposal

- Local Coordinated-Model budget broken down by external/internal funds (or as adjusted by CPUC for future program cycles):
 - CCA/Local Partner - Admin/Marketing/Implementation (AMI Non-Incentives)
 - CCA/Local Partner – Incentives (Direct Install and Rebates)
 - IOU – AMI Non-Incentives
 - IOU – Incentives (Core Rebates, Third Party Programs)
- Program Implementation Plan (Channels, Customer Segments, Outreach Strategy, Reporting, etc.)
- Integration/Coordination Plan, including outreach efforts
- Consistency with the CPUC’s guidelines and Strategic Plan

Criteria for CCA/Local Partner-Implemented Programs²

- Cost effectiveness
- Success in past EE or related projects
- Demonstrated commitment through energy champion, long-term staff assignment or other
- Priority on achieving energy savings in municipal buildings/city energy infrastructures
- Likelihood of success of proposed coordinated-model
- Integrated and comprehensive approach
- Commitment to short and long term energy savings goals and strategies

Review/Decision Making Process

Scoring criteria, selections, and Program Implementation Plans (PIPs) reviewed by:

- Peer Review Group, which includes TURN, NRDC, other
- Energy Division (as ex officio member)
- Division of Ratepayer Advocates (as ex officio member)
- California Energy Commission (as ex officio member)

² The criteria shown below was agreed to by IOUs and Energy Division for the 2009-2011 (now 2010-2012) EE Portfolio LGP program solicitation and is subject to refinement for the next program cycle solicitation.

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Energy Division provides a representative, or an independent reviewer to participate in any program negotiations and decision making process for a Local Coordinated-Model plan involving the CCA.

Benefits of Coordinated Model

- Ensures CCA customers received fully range of offering available through IOU's portfolio.
- Limits customer confusion by offering seamless, coordinated offerings in region.
- Encourages cost effective program marketing and implementation by avoiding the creation of parallel/patch-work of program offerings.
- Promotes program comprehensiveness (installation of both electric and gas measures) with joint IOU/CCA customers.
- Leverages IOU's existing CPUC reporting infrastructure.
- Leverages IOU's existing program management infrastructure used for implementing LGPs.
- Eliminates CPUC's need to establish new infrastructure for administering CCA's directly.
- Facilitates integration across IOU energy efficiency portfolio.
- Based on proven collaborative LGP model used to successfully delivered energy efficiency services to a local region.
- Allows for integration with other Demand-Side Management options, including California Solar Initiative, Demand Response, Low-Income, Self-Generation Incentive, Dynamic Pricing, etc.
- No added billing or accounting costs

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Part 3 – Appendices

Appendix A –Summary of workshop (prepared by WEM, with edits to be provided)

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Appendix B – List of workshop participants and additions per parties’ requests

Party Name	Name	Email	Phone
CPUC/ED	Steve Roscow	Scr@cpuc.ca.gov	(415) 703-1189
CPUC/ED	Ann Premo	awp@cpuc.ca.gov	916-928-4700
CPUC/DRA	Diana Lee	dil@cpuc.ca.gov	415-703-4342
CPUC/DRA	Ke Hao Ouyang	kho@cpuc.ca.gov	415-703-4342
CPUC/DRA	Kim Mahoney	kmb@cpuc.ca.gov	415-703-2376
CPUC/ED	Carlos Velasquez	los@cpuc.ca.gov	415- 703-1124
SDG&E/SCG	Athena Besa	ABesa@semprautilities.com	858-654-1257
SDG&E/SCG	Frank Spasaro	FSpasaro@semprautilities.com	213-244-3648
SDG&E/SCG	Joy Yamagata	jyamagata@semprautilities.com	858-654-1755
SDG&E/SCG	Steve Patrick	sdpatrick@semprautilities.com	213-244-2954
PG&E	Mike Klotz	M1ke@pge.com	415-973-7565
PG&E	Shilpa Ramaiya	srrd@pge.com	415-973-3186
PG&E	Sandy Lawrie	slda@pge.com	415-973-2494
PG&E	Susan Buller	smb4@pge.com	415-973-3710
PG&E	Leif Christiansen	lmcm@pge.com	415-973-8643
PG&E	Ila Homsher	imh2@pge.com	415-973-3288
PG&E	Maril Pitcock	mxwl@pge.com	415-973-9944
PG&E	Mary Jung	myj1@pge.com	415-973-1601
PG&E	Betsy Krieg	Blk1@pge.com	415-973-0016
SCE	Sheila Lee	Sheila.lee@sce.com	626-633-3059
SCE	Greg Haney	Gregory.haney@sce.com	626-476-7680
SCE	Larry Cope	larry.cope@sce.com	626-302-2570
SCE	Don Arambula	Don.arambula@sce.com	
SCE	Nancy Jenkins	Nancy.Jenkins@sce.com	
CCSF	Mike Campbell	mcampbell@sfgwater.org	415-554-1693
CCSF	Cal Broomhead	Cal.broomhead@sfgov.org	415-355-3706
CCSF	Ann Kelly	Ann.kelly@sfgov.org	415-355-3720
NRDC	Lara Ettenson	lettenson@nrdc.org	415-875-6100
TURN	Marybelle Ang	mang@turn.org	415-248-8441
TURN	Cynthia Mitchell	Cynthiakmitchell@gmail.com	775-324-5300
Marin Energy Authority	Elizabeth Rasmussen	erasmussen@marinenergyauthority.org	415-464-6022
City of Cerritos	Tom Clarke	tkcconsulting@aol.com	916-712-3961
WEM	Barbara George	wem@igc.org	415-457-1737
KRCD	Cristel Tufenkjian	ctufenkjian@krcd.org	559-237-5567
Efficiency Council	Matt O’Keefe	mokeefe@efficiencycouncil.org	925-337-0498
Green for All	Vien Truong	vien@greenforall.org	510-967-7783
MMOB	Megan Matson	megan@themmob.org	415-497-2320
Tyler and Assoc	Craig Tyler	craigtyler@comcast.net	510-326-7493
Braun Blaising McLaughlin, P.C.	Scott Blaising	blaising@braunlegal.com	(916) 682-9702 (916) 712-3961 (cell)
	Samuel Golding	Samuel.v.golding@gmail.com	408-309-4026
	Theresa Coleman	theresalynncoleman@yahoo.com	415-756-0690

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Appendix C – Energy Division Workshop Presentation Materials

[add from Steve Roscow]

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