

**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)

**COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 M)
TO ASSIGNED COMMISSIONER RULING AND SCOPING MEMO, PHASE II**

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Dated: October 8, 2010

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I. INTRODUCTION

In accordance with the September 22, 2010 *Assigned Commissioner Ruling and Scoping Memo, Phase II* (Phase II ACR), Pacific Gas and Electric Company (PG&E) submits the following comments and responses to the Commission's questions regarding the existence of appropriate safeguards to prevent misuse of energy efficiency funds in a way that adversely affects CCA programs.¹

PG&E submits that adequate safeguards are currently in place to address concerns regarding the potential for misuse of EE funds. The Commission addressed this issue recently, both in its approval of the Investor-Owned Utilities' (IOUs) 2010-2012 energy efficiency portfolio applications in D.09-09-047, and then again in adopting Resolution E-4250, which order the IOUs not to use energy funds in a manner that would discourage or interfere with a local government's efforts to consider becoming a Community Choice Aggregator (CCA) or for the purpose of inducing a local government not to participate in a CCA. PG&E has incorporated these directives into its company practices and is in compliance with these Commission directives.

¹ See Phase II ACR at p. 8

II. COMMENTS AND RESPONSES TO QUESTIONS PRESENTED IN THE ACR

Question 1: How might utilities use energy efficiency funds in a way that would discourage or interfere with a local government's efforts to consider or to become a CCA? Responses to this question should focus on structural aspects of program rules, rather than offering anecdotal instances of alleged abuses.

In prehearing proposals and reply comments in this proceeding, some parties suggested that from a structural program perspective, the potential for misuse of funds exists with respect to the linking of provision of efficiency programs and services to a local government's decision to pursue CCA opportunities. For example, Marin Energy Authority (MEA) advanced some hypotheticals stating that the Commission should adopt safeguards to ensure that (1) IOUs do not withhold PGC funds or service from CCAs or indirectly from their customers or communities; and (2) IOUs do not attempt to sway local government's consideration of CCA opportunities with PGC funds.² In addition, the Commission in the aforementioned D. 09-09-047 and Resolution E-4250 referenced factual situations that might relate to use of EE funds.

PG&E does not agree that the structural aspects of current rules governing EE local government programs would permit such misuse, because EE local government related programs are subject to open solicitation as well as strict public reporting requirements. Further, Energy Division is intimately involved in both the selection of local governments during portfolio planning and continues to be involved in the implementation, more so now than ever before. As such, PG&E believes that adequate safeguards are currently in place to address concerns regarding the potential for misuse of EE funds.

Question 2: Please identify each specific safeguard in existing Commission Decisions that protects against possible utility misuse of energy efficiency funds to discourage or interfere with a local government's efforts to consider or to become a CCA.

a. D.09-09-047

² March 15, 2010 *Proposal Of Marin Energy Authority Regarding Administrative Law Judge's Ruling Setting Prehearing Conference* at p. 3. MEA also suggested that additional safeguards may be necessary based on an anecdotal reference to a solar customer who was told that the California Solar Initiative program was not available to CCA customers. PG&E confirmed with both MEA and the CPUC that CCA customers remain eligible for these incentives.

The Commission recently addressed this very issue in D.09-09-047, Decision Approving 2010-2012 Energy Efficiency Portfolios and Budgets, issued on October 1, 2010, in Application 08-07-021. In that proceeding, the Commission found no evidence in the record to support allegations of misuse of EE funds. However, the Commission included an Ordering Paragraph in D.09-09-047 clarifying that:

Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company shall not use energy efficiency funds in any way which would discourage or interfere with a local government's efforts to consider becoming, or to become, a Community Choice Aggregator.³

b. RESOLUTION E-4250

In addition to the Commission Order in D.09-09-047, Energy Division Staff addressed this issue and provided guidance in Resolution E-4250, issued April 13, 2010, which ordered that:

The utilities cannot offer to provide, or provide, any goods, services, or programs to a local government, or to the electricity customers within that jurisdiction, on the condition that the local government not participate in a CCA, or for the purpose of inducing the local government not to participate in a CCA.⁴

This Resolution has been adopted since the time the parties submitted their prehearing proposals and reply comments on this issue in the instant EE Rulemaking 09-11-014.

PG&E has adopted and incorporated the directives of D.09-09-047 [OP 39] and Resolution E-4250 [OP 4] into its company practices.

c. PROPORTIONAL SHARE LEGISLATION

As discussed in D. 03-07-034, AB 117 itself provides safeguards to protect against potential misuse of energy efficiency funds in situations where a CCA chooses not to implement energy efficiency programs. Specifically, the “proportional share” provision of the statute states,

³ D.09-09-047 at OP 39.

⁴ Resolution E-4250, OP 4 (issued April 13, 2010). On May 13, 2010, PG&E filed the *Application Of Pacific Gas And Electric Company For Rehearing Of Resolution E-4250* (Petition for Rehearing). In the Petition for Rehearing, PG&E did not assert that it would constitute legal error to apply the prohibition in OP 4 to the use of the ratepayer-funded Public Goods Charge funds at issue here.

in part:

(c) If a community choice aggregator is not the administrator of energy efficiency and conservation programs for which its customers are eligible, the commission shall require the administrator of cost-effective energy efficiency and conservation programs to direct a proportional share of its approved energy efficiency program activities for which the community choice aggregator's customers are eligible, to the community choice aggregator's territory without regard to customer class.⁵

d. CALIFORNIA PUBLIC UTILITIES CODE SECTION 453(a)

In addition to the safeguards existing in the statute and Commission decisions that address energy efficiency funding and CCA specifically, California Public Utilities Code Section 453(a) also generally prohibits subjecting a corporation or person to a prejudice or disadvantage with respect to service:

No public utility shall, as to rates, charges, service, facilities, or in any other respect, make or grant any preference or advantage to any corporation or person or subject any corporation or person to any prejudice or disadvantage.

Question 3: Why, or why not, are the existing safeguards adequate? Please be specific in responding to this question.

PG&E respectfully submits that the existing safeguards discussed above are sufficient to address concerns regarding the potential for misuse of energy efficiency funds. The Commission has now addressed the issue of an IOU potentially linking the provision of energy efficiency programs and services to a local government's decision to consider CCA opportunities in two different forums, and has ordered the IOUs not to use energy efficiency funds in such a manner. PG&E has incorporated these Commission directives into its practices and communicated them to the relevant personnel who participate in EE or CCA activities.

With respect to the second hypothetical raised by MEA—that the IOUs should not be permitted to withhold PGC funds or service from CCAs or indirectly from their customers or

⁵ California Public Utilities Code § 381.1(c).

communities—AB 117 has built-in a safeguard to protect against precisely such activity. As discussed above, California Public Utilities Code §381.1(c) specifically provides that where a CCA chooses not to implement energy efficiency programs, the administrator is required to direct a “proportional share” of services to the CCA’s territory.

Question 4: What specific additional safeguards, if any, are needed to protect against misuse of energy efficiency funds to discourage or interfere with a local government’s efforts to consider or to become a CCA?

PG&E submits that no additional safeguards are necessary in light of the Commission’s directives in D. 09-09-047 and Resolution E-4250 and PG&E’s implementation of those directives. The Commission has now clearly addressed parties concerns over potential misuse of energy efficiency funds and has specifically ordered the IOUs not to engage in such practices on two separate occasions.

Question 5: How should the Commission, or its staff, enforce any applicable safeguards?

Through its oversight role, the Commission has the tools necessary to enforce the applicable safeguards as it deems appropriate. The Commission has the authority to enforce its own decisions and resolutions and to resolve any specific claims of misuse of energy efficiency funds in violation of D.09-09-047 and Resolution E-4250.

In addition, Energy Division has access to relevant IOU records to oversee an IOU’s compliance with the relevant Commission decisions. PG&E expenditures recorded in the energy efficiency balancing account are subject to CPUC audit. PG&E understands that CPUC auditors work closely with the Energy Division to define the scope of the EE audits and can choose to focus on specific areas, as desired. In addition, monthly, quarterly, and annual reports are provided to the CPUC and posted on the CPUC’s Energy Efficiency Groupware Application (EEGA) for public review. Monthly reports contain program level data, while the quarterly and annual reports provide detail by measure and include a breakout of expenditures by EE cost categories (admin, marketing, implementation, incentive). Other relevant information is available to Energy Division through Data Requests.

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is 77 Beale Street, San Francisco, California 94105.

I am readily familiar with the business practice of Pacific Gas and Electric Company for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing.

On October 8, 2010, I served a true copy of:

**COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 M)
TO ASSIGNED COMMISSIONER RULING AND SCOPING MEMO, PHASE II**

[XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for **R.09.11.014** with an email address.

[XX] By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed on the official service list for **R.09.11.014** without an e-mail address.

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

Executed in San Francisco, California on October 8, 2010.

/s/

ANNABEL STRIPLIN

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