

**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)

**REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 M)
IN RESPONSE TO ASSIGNED COMMISSIONER'S RULING
SOLICITING COMMENTS**

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December 10, 2010

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OF THE STATE OF CALIFORNIA**

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I. INTRODUCTION

Pursuant to the *Assigned Commissioner's Ruling Soliciting Comments* (ACR) issued November 17, 2010, in the above-referenced proceeding, Pacific Gas and Electric Company hereby submits these reply comments on the questions set forth in the ACR related to the Energy Division White Paper and Proposal on the 2010 Energy Efficiency Goals Update and Related Matters dated November 4, 2010. Opening comments were filed by PG&E, California Energy Efficiency Industry Council (CEEIC), Division of Ratepayer Advocates (DRA), Local Government Sustainable Energy Coalition (LGSEC), Natural Resources Defense Council (NRDC), Proctor Engineering (Proctor), Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E), and The Utility Reform Network (TURN).

II. EXECUTIVE SUMMARY AND OVERVIEW

Upfront program certainty and predictability is fundamental in order to assure the desired impact of energy efficiency programs. Proposals to continually redesign the programs while they are underway divert valuable time and resources away from program efforts. Accordingly, allowing for the continual redesign of fundamental program features is not in the interest of

California’s energy consumers. Furthermore, mid-cycle changes can confuse customers and vendors and disrupt marketing efforts. While most parties support the Energy Division’s “Option B” proposal to extend the 2010-2012 Energy Efficiency (EE) portfolio cycle by one year and to transition to a four-year program cycle, a few parties – namely, DRA, TURN, and LGSEC – indicate that it is premature to make this decision and propose a number of substantive changes and additional process steps for the current portfolio cycle.¹ As CEEIC states in its comments, it is important for the Commission “to quickly resolve the threshold issue of program cycle timing posed in the ACR” in order to “ensure that the pre-cycle portfolio planning process under any option...can proceed on schedule and allow for an on-time start of the next program cycle.”² The Commission should reject DRA, TURN, and LGSEC’s call for delay. Addressing all redesign proposals for the current cycle would likely consume many months of additional time and substantially distract current program implementation efforts.

Most parties agree that, in extending the current program cycle to 2013, the Commission needs to consider a number of fundamental issues such as the 2013 EE program budget, mid-cycle funding adjustments, 2013 EE goals and values, extension of the 2010-2012 RRIM to 2013, and determination of the 2014-2017 RRIM in advance of portfolio planning. Most parties also agree that, in order to avoid further delays and uncertainty, the Commission must develop a roadmap and timeline to address these issues, as well as related issues about the next EE program cycle. PG&E urges the Commission to resolve these fundamental issues quickly and decline to re-visit the myriad issues raised by TURN – such as the future role of IOUs in EE program administration, and potential realignment of existing EE portfolios for increased

¹ See, e.g., LGSEC Comments, p. 2 (“it is not clear that the Commission needs to render an opinion now on changing the current program cycle, or expanding the next cycle to four years.”).

² CEEIC Comments, p. 3.

cost-effectiveness – which will only serve to distract attention from and delay implementation of the next EE program cycle.

III. RESPONSE TO QUESTIONS

1. Are the stated pros and cons associated with Option A accurate and complete? If not, what changes or additions would parties make?

Parties do not have substantial comments about Option A.

2. Are the stated pros and cons associated with Option B accurate and complete? If not, what changes or additions would parties make?

While most parties were generally supportive of Option B, all parties indicate that the Commission should address specific issues related to the proposed one-year extension and four-year cycle and urge the Commission to do so on an expedited basis. Please see discussion of Questions 5, 7 and 8 below for further explanation.

3. Are the estimated timelines associated with Option A and Option B reasonable with regard to the timing of (a) a goals/portfolio guidance decision, (b) preparation of portfolio applications, (c) review/approval of portfolio applications, and (d) implementation of the portfolio decision?

Parties generally did not give much consideration to Option A or its timelines. Parties also generally agreed that, even with Option B’s one-year extension, the schedule for implementation of Option B would need to be actively managed. As SCE points out, because “Energy Division has not yet begun work to update the 2010 energy efficiency goals...the possibility of project delays could be looming.”³ PG&E concurs with SCE’s request that the Commission should “allow sufficient time for proper program planning, thereby assuring alignment with the energy efficiency goals and successful program operationalization.”⁴

³ SCE Comments, p. 6.

⁴ SCE Comments, p. 7.

CEEIC states that “[a]ny updates in policy direction for the next portfolio cycle must be developed and finalized concurrently with the updated goals so that the goals decision also includes portfolio policy guidance,” and that the “goals update...must be coordinated closely with the work being conducted by the California Energy Commission and Demand Analysis Working Group (DAWG), as noted by the Energy Division White Paper (p. 2-3).”⁵ CEEIC also notes that “policy guidance for the next cycle must be ‘frozen’ during the process of portfolio development in order to focus stakeholder resource on maximizing actual program savings,” and that “the Commission should avoid introducing changes in policy guidance partway through the portfolio development process.”⁶ PG&E agrees with CEEIC’s suggestion (echoed by SCE) to coordinate the goals updates with the DAWG and supports freezing policy guidance during portfolio development.

NRDC also supports the general timeline for Option B and recommends: “Outlining a clear timeline up front is critical to ensure that all policy issues are addressed with sufficient time for public process as well [as] for proper integration into program planning. In addition, it is extremely important that the timeline in R.09-11-014 be closely coordinated with the timeline needed to accomplish the objectives of the concurrent Risk Reward Incentive Mechanism (RRIM) R.09-01-019 proceeding or its successor. Since the RRIM defines in part the metrics on which the IOUs’ performance will be judged (e.g. portfolio net benefits), it is essential to settle the basic incentive mechanism design in advance of the portfolio planning process to avoid the uncertainty and resulting controversies we encountered this round.”⁷ PG&E agrees with NRDC’s comments and strongly urges the Commission to keep these principles in mind as it proceeds with this rulemaking.

⁵ CEEIC Comments, p. 7; *see also* SCE Comments, p. 6.

⁶ CEEIC Comments, pp. 7-8.

⁷ NRDC Comments, pp. 7-8.

Contrary to these other parties' comments, TURN indicates that it would only support Option B "if it is modified to include a mid-term portfolio correction mechanism or review process to realign the portfolios toward improved prospective cost effectiveness."⁸ TURN asserts that "[to extend] the 2010-2012 portfolio period by a year only makes sense if the Commission ensures that the additional time is put to good use in terms of addressing the problems that have led to the Commission finding itself in the position of needing to consider such an extension. TURN urges the Commission to use that time to pursue two critical steps to improve the prospects of success for this portfolio period, and to revisit now the question of the appropriate utility role in the administration of future ratepayer-funded energy efficiency programs."⁹ PG&E disagrees with these recommendations, which are discussed in response to Question 6 below.

TURN also suggests that the Commission direct the Energy Division to use the first half of 2011 to conduct a public process that would focus on how to realign the existing portfolios to increase prospective cost-effectiveness and the remainder of 2011 would then be available to the utilities to realign their existing portfolios in a manner consistent with the outcome of this mid-term review.¹⁰ PG&E strongly opposes this approach. Such a public process would distract parties from focusing on current program cycle implementation, resulting in a continuation of the debate regarding the controversial 2006-2008 evaluation results. It would also take limited resources away from other critical path efforts need to lock down statewide energy goals, cost effectiveness inputs, EM&V plans, Strategic Plan updates, DEER and other assumptions in advance of portfolio development for the next program cycle. If the IOUs were forced to redesign their portfolios using new values in 2011, the Energy Division would also need to revise

⁸ TURN Comments, p. 12

⁹ TURN Comments, p. 5.

¹⁰ TURN Comments, p. 5.

how the statewide goals are set first, to align goals with the new potential from the new values – a process that would take at least a year. By the time the portfolios could then be redesigned, the program cycle would be over.

TURN's proposal also ignores the Commission policy that the measure ex ante values established for use in planning and reporting accomplishments for 2010-2012 should be frozen based upon the best available information at the time the 2010-2012 activity is starting.¹¹ The final 2006-2008 EM&V results were not available until the 1st quarter of 2010 and continue to be contested by the IOUs and other parties. The IOU Portfolios were planned and approved in accordance with Energy Division guidance based on the frozen DEER values and other planning assumptions that are being considered in A.08-07-021.¹² Any revisions to the values should be made in accordance with the Commission's approved protocols for the 2010-2012 program cycle.

PG&E does agree that it is important to monitor the effectiveness of its programs on an ongoing basis during the program cycle, whether or not the cycle is extended for another year. This is the function of EM&V process evaluations, and the work done by IOU staff responsible for delivery and management of the Statewide and local energy efficiency programs. These programs are being monitored and reviewed through a number of statewide teams and other initiatives promoting best practices and other program improvements. This ongoing effort is important to assure effective program delivery in the current program cycle and for the planning improvements in the next program cycle.

¹¹ D.09-09-047, *mimeo* p. 390, Ordering Paragraph 48.

¹² Joint IOU Petition for Modification of D.09-09-047.

4. One disadvantage of Option B is that a four-year portfolio cycle could mean longer persistence of programs that are performing poorly in the view of some parties. What, if any, specific procedures (e.g., trigger mechanisms) or review processes (e.g., formal or informal) do parties suggest to mitigate these concerns?

In its opening comments, PG&E suggested that program budgets may need to be adjusted, that the fund-shifting rules and reporting requirement should remain in place through the remainder of the portfolio cycle, and that the Commission should clarify that any unspent 2010-2012 program funds as of December 31, 2012 may be applied for program implementation in 2013.¹³

While CEEIC offers no specific procedures, it echoes PG&E's comments and argues that IOUs should be able to "(a) discontinue programs that are not effective, (b) expand programs that are effective, and (c) add new programs and concepts as new or advanced technology, systems or behavior approaches become available," and that "administrators must be able to make these mid-cycle adjustments with minimal approval requirements, if any, from the Commission."¹⁴

Similarly, NRDC recognizes "the potential for unintended consequences" as a result of the extended program cycle, and while it continues to support fund shifting rules, it recommends "that the CPUC develop a simple template for fund shifting requests, including the funds to be shifted, the associated savings gained by the shift, as well as an explanation for the request...[along with] a summary explanation of the shifted funds-to-date" as part of the interim progress report.¹⁵ PG&E and the other IOUs are already working to with Energy Division to complete the template for reporting fund shifting on the Energy Efficiency Groupware Application (EEGA), as directed in Decision 09-09-047 (Ordering Paragraph 43.e).

¹³ PG&E Comments, p. 5.

¹⁴ CEEIC Comments, p. 8.

¹⁵ NRDC Comments, p. 5.

In contrast, LGSEC argues: “Should the program be expanded, four years would be too long to be involved with a program that is not working, or to wait to introduce an innovation. Local governments must be able to participate in the discussion of whether programs are effective and how, or to adjust programs to make them more effective.”¹⁶ Accordingly, LGSEC proposes that the Commission “consider an annual meeting to review overall portfolio status, conducted with input from all third party implementers and local government partners” and that “the Commission should ensure that energy efficiency staff visits the energy efficiency programs being implemented, in the field.”¹⁷ PG&E agrees that local governments must be able to participate in discussions of whether programs are effective and how programs could be made more effective. PG&E and the other IOUs already meet frequently with local government partners to collaborate on program initiatives. The Commission may wish to consider consolidating efforts to assess program effectiveness and utilize existing meetings and discussion forums where possible.

SoCalGas and SDG&E note that “Priority must be given to process evaluations to provide timely feedback to program implementers so that they can make mid-course corrections to poorly performing programs or if necessary, discontinue such programs, and shift funds for such programs to those which are more successful.”¹⁸ PG&E concurs with this suggestion.

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¹⁶ LGSEC Comments, p. 4.
¹⁷ LGSEC Comments, pp. 6-7.
¹⁸ SoCalGas & SDG&E Comments, p. 4.

5. Do parties concur with the following Energy Division recommendations associated with Option B?

a. Adopt an extension through the end of 2013 for the 2010-2012 efficiency programs; and

b. Adopt four-year portfolio cycles on a going forward basis, beginning with a 2014-2017 portfolio cycle.

In its opening comments, PG&E concurred with both of the Energy Division's recommendations described above, subject to certain modifications and clarifications. As noted above, most parties also supported this recommendation. NRDC supports extending the current program cycle through 2013, but recommends expanding future program cycles to five, not four, years.¹⁹ (PG&E addresses the option of a five-year cycle in response to Question 6 below.)

In contrast, DRA supports the one-year extension of the current EE cycle through 2013 but "is not prepared to support either continuation of the current three-year cycle or moving to a four-year program cycle on a permanent basis."²⁰ TURN concurs with DRA's assessment.²¹ LGSEC states that it "is not prepared to issue an opinion on Option B until more information is available,"²² and argues that the Commission "should take the next six months to examine the issues identified with an expansion of the program cycle" before deciding either to extend the current cycle by one year or to adopt the four-year portfolio cycle going-forward.²³

PG&E disagrees that the Commission should delay this decision. As CEEIC states, the Commission should "quickly resolve the threshold issue of program cycle timing posed in the ACR" in order to "ensure that the pre-cycle portfolio planning process under any option...can

¹⁹ NRDC Comments, p. 2.

²⁰ DRA Comments, p. 1.

²¹ TURN Comments, p. 13.

²² LGSEC Comments, p. 7.

²³ LGSEC Comments, p. 2.

proceed on schedule and allow for an on-time start of the next program cycle.”²⁴ However, LGSEC raises an interesting point to be considered in the evaluation of ongoing and future programs: that is, some programs may have a natural cycle that does not fall into a prescribed program cycle, whether it be three, four or five years but are worth offering. PG&E would be glad to discuss this further as part of the ongoing dialogue with its local government partnerships.

LGSEC suggests that Commission “should also consider synchronizing Demand Response...with the CEC and legislative requirements identified in the White Paper when deciding on the length of program cycles.”²⁵ While PG&E is not prepared at this time to synchronize its energy efficiency program cycle with demand response, the Commission should note that extending the current energy efficiency program cycle by one year increases the period of time for which any funding gaps could exist (i.e., from a one year period to a two year period). For example, the LIEE and DR applications, both scheduled to be filed next year, would need to include a request for two years of Integrated Demand-Side Management (IDSM) funding. The CPUC should acknowledge this and ensure that appropriate guidance and allowance are provided for in those proceedings.

6. Are there other options the Commission should consider, other than Options A and B? What are the pros and cons of these options?

NRDC proposes “that changing to a 5 year program cycle would yield significant benefits for both the CPUC’s planning process and for the effectiveness of the energy efficiency programs.”²⁶ While a five-year cycle would provide program stability and lower transaction

²⁴ CEEIC Comments, p. 3.

²⁵ LGSEC Comments, pp. 5-6.

²⁶ NRDO Comments, p. 2.

costs for IOUs and its partners, it limits the opportunity for major course correction. This is a disadvantage since energy efficiency programs and technologies will evolve over time.

SCE does not propose any alternatives to Option B, but proposes several suggestions for strengthening the option, including that “the fourth year funding requirement be “comparable to a year’s worth of funding in the 2010-2012 cycle,” which will “come from SCE’s ratepayers less any unspent, uncommitted funds that are available at the beginning of the fourth year.”²⁷ PG&E agrees that it is important to clarify the level of funding available for 2013 as early as possible but no later than mid-2011 for program continuity purposes.²⁸ However, PG&E disagrees with SCE’s proposal to reduce the funding by unspent, uncommitted funds. As discussed in PG&E’s opening comments (at p. 3), the CPUC should clarify that any unspent 2010-2012 program funds at the end of 2012 be applied for program implementation in 2013, rather than reduce funding available in 2013, as would occur under SCE’s proposal. PG&E’s proposed treatment would be consistent with the current process where funding unspent within one year of the cycle is carried automatically to the next year within that cycle (for example, unspent funds in 2010 are available for use in 2011, and so forth within the cycle). Since the CPUC is considering a four-year cycle, any unspent funds at the end of 2012 would naturally be available for use in 2013 per the current rules. Provided that the 4-year cycle is adopted, any unspent uncommitted funds available at the end of 2013 will be available to reduce the amount of EE funding in rates for the next program cycle.

DRA proposes that, before adopting Option A or B, the Commission should “look at other options that limit the role of the Utilities in delivering energy efficiency programs, such as

²⁷ SCE Comments, p. 10.

²⁸ In its Opening Comments (p. 6, fn. 3), PG&E also noted that 2013 funding needs to be determined in the third quarter of 2012 for ratemaking purposes.

third party administration.”²⁹ TURN echoes this point in its comments.³⁰ It is neither appropriate nor a good use of the Commission’s limited time to re-visit this fundamental program administration issue. Rather, the Commission should devote its available time for evaluation of the current program and the updating of goals for the next program cycle.

LGSEC “suggests deferring a decision until the end of Q2 of 2011, when more progress will have been made on all of the issues raised by the White Paper.”³¹ LGSEC claims that “Deciding now, rather than six months from now, provides no real advantage because there will still be time before 2013 to undertake the inevitable disruptions of amending goals, budgets, and contracts.”³² LGSEC also argues that “there is no assurance that the portfolio application and review process will conform to any given pre-set schedule, given recent history.”³³ PG&E disagrees. As stated previously, even with the one-year extension, there is much to be accomplished in the next several months. The only assurance that the portfolio application and review process will conform to a reasonable schedule is for the Commission to establish a timetable and specific targets. LGSEC’s suggestion would be to simply admit defeat now and resign oneself to continued delays. Such an outcome is not in the public interest.

7. Is Energy Division’s proposal to update or incorporate each of the following cost-effectiveness data inputs or methodologies, prior to commencing potential and goals studies, reasonable?

a. Data updates including natural gas prices, electricity prices, and temperature profiles by climate zone, per the Commission’s March 2010 Report to the Governor and Legislature pursuant to Pub. Util. Code Section 2827(c)(4);7

b. New methodology for generation capacity cost, per the Commission’s AB 920 Report;

²⁹ DRA Comments, p. 1.
³⁰ TURN Comments, p. 8.
³¹ LGSEC Comments, p. 8.
³² LGSEC Comments, p. 9.
³³ LGSEC Comments, p. 9.

c. New avoided cost for avoided Renewable Portfolio Standard (RPS) purchases, per the Commission’s AB 920 Report; and

d. Update to avoided carbon costs, per the most recent Market Price Referent (MPR).

In its opening comments, PG&E agreed that the proposals described above seem reasonable, as long as (1) such updates or information do not result in further delays and (2) parties have the opportunity to review and comment on the result of such updates. Most parties similarly support the Energy Division’s proposed updates but request further clarification on specific issues. For example, CEEIC argues that a “more thorough review of possible alternative cost-effective updates ...should be conducted as the first order of business considered next in this proceeding under Option B,” and suggests possible revisions or updates to cost-effectiveness approaches.³⁴ PG&E acknowledges CEEIC’s suggestion to review cost-effective updates and believes that a discussion prior to the 2014-2017 cycle to address this topic would be appropriate.

DRA “supports improving the cost effectiveness tests so that they better reflect the value of long-term energy savings,” and “disagrees with the White Paper’s characterization of cost-effectiveness as a ‘barrier’ to improving energy efficiency programs.”³⁵ PG&E acknowledges DRA’s suggestion to improve cost effectiveness tests and believes that further discussion is warranted at a later time.

NRDC also agrees that the cost effectiveness methodologies for EE should be updated prior to initiating the potential study and goals analysis and support moving from the current methodology to the one presented in the Energy Division whitepaper, including specifically the proposal to update the avoided costs to include the avoided costs of meeting the 33% RPS.³⁶ However, NRDC points out that the white paper references a new and different E3 methodology

³⁴ CEEIC Comments, pp. 12-14.

³⁵ DRA Comments, pp. 2-3 (internal footnote omitted).

³⁶ NRDC Comments, p. 8.

for integrating avoided RPS costs, and urges the Commission to further clarify the avoided RPS cost methodology.³⁷ PG&E agrees with NRDC that further clarification of the methodology for integrating RPS avoided costs is necessary prior to implementation, and PG&E reserves the right to provide additional comments after such methodology clarification is provided.

TURN also raises questions regarding the data input updates and other information presented in Energy Division’s whitepaper, and it proposes workshops to allow Energy Division “to more fully explain the basis for its conclusions.”³⁸ PG&E supports this proposal as a necessary preparatory step to developing the 2014-2017 program cycle.

8. Energy Division views the Strategic Plan update ordered in D.08-09-040 and the Strategic Action Plan Progress Report called for in June 2011 pursuant to D.09-09-047 as complementary. Will jointly addressing the Commission’s orders for a Strategic Plan update and a Strategic Action Plan Progress Report effectively provide stakeholders, including parties to this proceeding, sufficient guidance?

In its opening comments, PG&E had no objection to jointly addressing the Commission’s orders for a Strategic Plan update and a Strategic Action Plan Progress Report, provided that consolidation of these efforts will result in an equally effective result relative to producing the update and report separately.³⁹

LGSEC argues that local governments “could be much more aggressive on meeting the goals of the Strategic Plan if their proposals were not submitted to the utilities but directly to the Commission.”⁴⁰ As noted above with respect to TURN’s questioning of the IOUs’ role as EE administrators, the current structure of EE administration is not within the scope of the ACR, and it is unnecessary and inappropriate for the Commission to revisit this issue now.

³⁷ NRDC Comments, p. 8.

³⁸ TURN Comments, p. 14.

³⁹ PG&E Comments, p. 9.

⁴⁰ LGSEC Comments, p. 11.

NRDC urges the Commission to establish a timeline for release of the final Strategic Plan Action Plans, in order to “allow the utilities and stakeholders to have a clear understanding of which plans and related tasks will be expected to be used for program planning purposes.”⁴¹ NRDC also recommends that all near-complete drafts be served to the EE listservs with opportunity for comment before finalizing the documents.⁴² PG&E agrees with NRDC’s suggestion to establish a timeline for release of the final Strategic Action Plans.

IV. CONCLUSION

As described in PG&E’s opening comments and reiterated herein, PG&E supports a one-year extension of the current 2010-2012 portfolio cycle but urges the Commission to provide timely resolution on certain key issues. PG&E strongly opposes DRA’s, LGSEC’s, and TURN’s recommendations, which would only further delay the EE portfolio planning process and add uncertainty and contentiousness. Such an outcome is not in the public interest.

Respectfully Submitted,

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Dated: December 10, 2010

⁴¹ NRDC Comments, p. 9.

⁴² NRDC Comments, p. 9.

CERTIFICATE OF SERVICE BY U.S. MAIL OR 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 Pacific Gas and Electric Company, Law Department, PO Box 7442, San Francisco, CA 94120.

On the **10th day of December 2010**, I caused to be served true copies of:

**REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 M)
IN RESPONSE TO ASSIGNED COMMISSIONER'S RULING SOLICITING
COMMENTS**

on the official service list for **R.09-11-014** by electronic mail for those who have provided an e-mail address and by U.S. mail for those who have not.

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

Executed on the **10th day of December, 2010**.

/s/

René Anita Thomas

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