BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Examine the Commission's Energy Efficiency Risk/Reward Incentive Mechanism. **(U 39 M)**	**R.09-01-019** **(Issued January 29, 2009)**

REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 M) ON THE ALTERNATE PROPOSED DECISION OF COMMISSIONER PEEVEY REGARDING THE RISK/REWARD INCENTIVE MECHANISM EARNINGS TRUE-UP FOR 2006-2008

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I. INTRODUCTION

In accordance with California Public Utilities Commission Rule of Practice and Procedure 14.3, Pacific Gas and Electric Company (PG&E) submits Reply comments on the Alternate Proposed Decision of Commissioner Peevey Regarding The Risk/Reward Incentive Mechanism (RRIM) Earnings True-Up for 2006-2008 (Peevey APD).

II. IF THE COMMISISON APPLIES THE EX POST INSTALLATION RATE FOR COMPACT FLOURESCENT LIGHTBULBS (CFLS), IT SHOULD EXPLICITLY AUTHORIZE THE IOUS TO CLAIM SAVINGS IN THE NEXT INCENTIVE CLAIM FOR BULBS REBATED, BUT NOT YET INSTALLED BEFORE THE END OF 2008

Southern California Edison Company (SCE) comments that it is illogical to apply *ex ante* assumptions to mitigate against large swings in potential earnings resulting from uncertain *ex post* inputs, but then apply an *ex post* installation rate for CFLs, which is equally flawed.[1/] PGE agrees that the *ex post* installation rate does not account for all bulbs rebated in the 2006-2008 program. In fact, the *ex post* installation rate for CFLs provides credit for only 57 out of every 100 residential CFLs and 63 out of every 100 non-residential CFLs that PG&E rebated using 2006-2008 program funds, simply because they were incented and placed into the stream of commerce in close proximity to the conclusion of the 2006-2008

1/ SCE Opening Comments, p. 7-9.

program cycle, but had not yet been installed prior to the close of the cycle.[2/] Savings from these CFLs will not evaporate just because that had not yet been installed before the end of 2008.[3/]

The real issue is not that the *ex post* installation rate does not account for bulbs that had not yet been installed by the close of 2008. The real issue is one of Commission policy. If the Commission is going to apply the *ex post* verification rate, which effectively denies the IOUs the ability to claim savings for those bulbs in the program cycle in which they were sold (in this case 2006-08) then the Commission must allow the IOUs to receive credit for their energy savings when they are installed in accordance with established Commission policy in D.05-04-051.[4/] Yet, the ED fails to attribute these savings to the 2009 program in its Draft Energy Efficiency Evaluation Report for the 2009 Bridge Funding Period.

Failure to allow the IOUs to receive savings and associated benefits for those bulbs in the next incentive claim runs askew of Commission policy and constitutes an arbitrary penalty for which there is no justification. Therefore, in its final decision on the 2006-2008 True-Up, the Commission should explicitly authorize the IOUs to include savings and associated benefits in their next incentive claim for bulbs incented within the 2006-2008 program, but which had not yet been installed prior to the conclusion of the 2006-2008 cycle. Further, any pending and future Energy Division analysis on program accomplishments (such as those pending on 2009 programs) should be revised to reflect these savings and benefits.

III. THE COMMISSION SHOULD CREDIT 100% OF SAVINGS FROM 2006-2008 CODES AND STANDARDS (C&S) ACTIVITY TOWARDS THE MINIMUM PERFORMANCE STANDARD (MPS) AND PERFORMANCE EARNINGS BASIS (PEB)

The Peevey APD cites to D.10-04-029 and acknowledges that the Commission has changed its policy and now counts 100% of C&S savings resulting from pre-2006 advocacy toward MPS savings goals.[5/]

2/ PG&E Opening Comments, p.8-9.

3/ Energy Division's own Upstream Lighting Program Evaluation Report, Volume 1 (Feb. 8, 2010) explicitly acknowledged that 97% of residential CFLs rebated through PG&E's 2006-2008 program cycle will be installed within two years of the program cycle's conclusion and found that 19% of non-residential CFLs rebated through PG&E's 2006-2008 program had not yet been installed by the conclusion of the cycle. Nevertheless, the savings generated by these bulbs are excluded from 2006-2008 program accomplishments by virtue of applying the *ex post* installation rate.

4/ D.05-04-051, p.55 "[W]e will require that the savings and resource benefits associated with installations completed in a given year, regardless of the year in which any given installation was funded, will be counted towards the performance basis for that program cycle."

5/ Peevey Alternate, p. 58-60; FoF 24.

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The Peevey APD then notes that all the IOUs had already exceeded the MPS when only 50% of C&S savings resulting from pre-2006 advocacy had been credited. Therefore, the APD concludes that increasing the amount of C&S savings from pre-2006 advocacy to savings goals would have no further effect on the MPS.[6/] While that analysis is correct with respect to the MPS, the Commission should nevertheless update the table in Appendix A to the Peevey Alternate to properly reflect 100% of C&S savings as opposed to 50%.

Where the Peevey analysis deviates from established Commission policy—or at the very least is overbroad—is its statement that "C&S savings only impact the assessment of utility performance relative to the minimum performance standard but do not factor into the calculation of the Performance Earnings Basis…"[7/] While this may be true with respect to savings resulting from pre-2006 advocacy (as reflected in the APD's citation to D.05-09-043) it is not true of C&S savings resulting from post-2005 advocacy."[8/] The Commission should correct the Peevey APD to confirm that all C&S savings resulting from post-2005 advocacy count toward the PEB.

Specifically, with respect to the 2006-08 True-Up, the Commission failed to credit PG&E with savings from Tier II lighting standards enacted as a result of advocacy that took place in the 2006-2008 cycle. In D.09-12-045, the Commission noted PG&E's claim that savings from these Tier II lighting standards should be included in PEB for the interim Verification Report.[9/] The Commission assured PG&E that these savings would be credited in the True-Up:

> this source of data was not updated in the interim report because the requisite updated information was not yet available, but that Energy Division would incorporate the updated information for 2008 in its final Performance Basis Report to be produced in 2010. Accordingly, we find this explanation satisfactory for purposes of determining interim incentive earnings. Since the requisite data will be incorporated for purposes of the 2010 true-up, the utilities will be made whole for the effects of any updated data that may change the incentive earnings amount.[10/]

6/ *Id.*

7/ *Id.* at p. 59.

8/ The Commission made this clear in D.07-09-043, where it reviewed its findings in D.05-09-043 with respect to PEB and stated "[o]n a forward looking basis, we directed that savings from C&S advocacy work undertaken in 2006 and beyond would be counted when calculating either net resource benefits ("performance basis") or cost-effectiveness (TRC or PAC tests)." D.07-09-043, p. 144 citing D.05-09-043, p.132-33 and attachment 10 thereto.

9/ D.09-12-045, p.65-66.

10/ *Id.*

In accordance with D.09-12-045, the Commission should include 100% of the savings from these Tier II lighting standards in the PEB for the 2006-2008 True-up.

IV. SCENARIO 3, TEMPLATE 6 CONFLICTS WITH COMMISSION POLICY, WHICH EXCLUDES INCENTIVE COSTS FROM PEB

Despite the fact that the Commission has soundly rejected its proposal already, TURN re-argues that incentives should be included as program costs when calculating the PEB.[11] The Commission's previous rejection of TURN's proposal was not based on some hypothetical uncertainty regarding the total amount of incentives in light of the existence of claw-back as TURN claims. In fact, as is the case today, even if a claw-back had remained in place, the IOUs would have still been eligible to receive additional incentives in the True-up, over and above their interim earnings, which would not to be counted as PEB costs pursuant to D.07-09-043. Nor is the inclusion of the amount incentive amounts themselves as costs in PEB calculations required by any of the statutes TURN references.[12/]

Rather, in rejecting TURN's proposal, the Commission described it as "nonsensical" and "circular" stating that, "[i]t is akin to saying that we will share a quarter of a pie with you, but before we slice it into 4 pieces, we will first remove a quarter."[13/] PG&E agrees that it is indeed circular to set up a system to provide incentives for good performance and then penalize the IOUs for having earned incentives by reducing their future incentives. The Commission should, again, reject TURN's proposal and should not rely on Scenario 3, Template 6 as TURN proposes.

V. THE COMMISSION SHOULD NOT APPLY A 5% SHARED SAVINGS RATE

DRA's comments illustrate a bias against the concept of EE incentives notwithstanding the nature of the issues pending before the Commission. DRA simply claims that the Commission should apply the results of the Final Evaluation Report and continues to refer to its findings as "independently verified." DRA does not even acknowledge, let alone address the uncertainties and sensitivities in the Final Evaluation Report findings that the PD and both APDs in this proceeding have acknowledged do exist.

11/ TURN's Opening Comments, p. 5-7.

12/ Neither P.U. Code § 381(c), §454.5(b) (9)(C), nor §454.55 discuss or address PEB calculations.

13/ D.07-09-043, p. 154.

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Nor does DRA acknowledge or respond to the finding in the APD that it was unreasonable to expect the IOUs to make the sort of mid-course adjustment that the *ex post* values suggest may have been necessary. Even if PG&E had taken immediate action to modify programs in October 2007, based on the release of NTG information of 2004-2005 programs that may not have been relevant or applicable to 2006-2008 programs, those changes would have not taken effect until mid-2008 given that IOUs work with many vendors with long-lead times. Even SCE, who TURN hails as an example of the IOUs' ability to make meaningful mid-course corrections, was not able to avoid severe reductions to its net savings resulting from application of final *ex post* NTG updates.

Rather than address these critical issues, DRA proposes further reduction of the shared savings rate. Nothing whatsoever in the record in this proceeding supports adoption of a 5% shared savings rate, other than DRA's desire to reduce the IOUs' incentive earnings as much as possible.

VI. CONCLUSION

For the foregoing reasons, and consistent with the Joint Utility Scenario, the Commission should modify the Peevey Alternate as proposed herein and in PG&E's Opening Comments, and authorize $62.6 million in additional earnings for PG&E for in the 2006-2008 True-Up.

Respectfully submitted,

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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.

On December 13, 2010, I served a true copy of:

REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY ON THE ALTERNATE PROPOSED DECISION OF COMMISSIONER PEEVEY REGARDING THE RISK/REWARD INCENTIVE MECHANISM EARNINGS TRUE-UP FOR 2006-2008 – R. 09-01-019

[**XX**] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service lists for R. 09-01-019 with an e-mail 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 lists for R. 09-01-019 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 on this 13th day of December, 2010, at San Francisco, California.

/s/

PAMELA J. DAWSON-SMITH

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