

**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 PROPOSED DECISION
REGARDING RISK/REWARD INCENTIVE MECHANISM
REFORMS**

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December 13, 2010

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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 the following reply comments on the Proposed Decision (PD) Regarding Risk/Reward Incentive Mechanism (RRIM) Reforms. The CPUC should adopt this PD only after incorporating the proposed revisions PG&E included in its opening comments filed December 6, 2010, summarized here for convenience:

- Correct legal and policy error by authorizing an incentive claim for the 2009 program year as contemplated in D.07-09-043;
- Eliminate the bias against primarily agricultural, industrial, and commercial projects (and Whole House) by allowing for incentives for customized projects and reconfirming existing energy savings policies for other programs;
- Calculate the Performance Earnings Basis (PEB) based on the Program Administrator Cost (PAC) test instead of the Total Resource Cost (TRC). The TRC test is inconsistent with CPUC policy objectives and inappropriately applies a more stringent test to energy efficiency resources than supply-side resources;
- Revise the incentives cap to \$350 million statewide as the PD overcompensates the reduced risk based on faulty and incomplete data. The PD should specify individual IOU incentive caps as follows: PG&E \$140 million, SCE \$156 million, SoCalGas \$15 million, and SDG&E \$39 million;
- Preserve the 12% earnings rate. The PD incorrectly calculates its proposed earnings rate, which, when corrected, is actually higher than the current 12%;

- Revise the holdback amount to 10%. The proposed 50% holdback is based on a full ex post true-up (not the financial audit and verification installation adjustment adopted elsewhere in the PD). Therefore, a 10% holdback is more than adequate even given the contentious 2006-08 results;
- Remove the burden of the final claim from Energy Division and ensure a smooth earnings cycle by bifurcating the final claim in two parts: the first that would be treated like all other interim claims with a 10% holdback and a second that would resolve all holdbacks from prior years;
- Include simple, non-controversial language in the PD addressing the possibility of four-year (or longer) cycle. The PD should state that if a program cycle is extended beyond three years, the cap will be increased by 1/3 of the original cap for the cycle for each additional year and that the final claim to resolve all prior year holdbacks will occur in the year in which the next cycle begins.

PG&E replies to opening comments filed by The Utility Reform Network (TURN) and Natural Resources Defense Council (NRDC) herein. In summary, (1) supply-side comparability of energy efficiency should be restored in the PD through revisions to the cap and shared-savings rates and (2) new rules for non-resource programs suggested by TURN are without merit and should be rejected.^{1/}

II. REPLY COMMENTS

A. Energy Efficiency Should Not be Treated As a Second-Class Resource; Supply-Side Comparability in the PD Must be Restored Via the Cap and Shared-Savings Rate

In its comments, NRDC presents an analysis of supply-side comparability of the energy efficiency programs similar to the cap calculation in the RRIM decision for post-2005 programs (D.07-09-043).^{2/} NRDC finds that supply-side comparability would have produced \$390 million earnings on supply-side investments.^{3/} NRDC's analysis also finds that when using the

^{1/} PG&E does not respond to issues presented by Women's Energy Matters (WEM) and Division of Ratepayer Advocates (DRA) who presented issues outside the scope of this PD, but that are pending elsewhere in energy efficiency proceedings, such as inclusion of community choice aggregators and independent verification of ex ante values, among others.

^{2/} NRDC, p. 8-9.

^{3/} NRDC, p. 9.

methodology from D.07-09-043, the associated shared-savings rate should be 12-15% for the post-2008 period.^{4/}

The PD's far lower \$189 million cap and 5.4% shared savings rate effectively treats energy efficiency as a second-class resource in comparison to supply-side alternatives. With energy efficiency first in the loading order, a cap and shared-savings rate that is far lower than supply-side comparability sends the wrong message to utilities and would be inconsistent with Commission and State policy.

While the PD tries to adjust the cap and shared-savings rate to reflect revised risk, it goes too far and removes all resemblance to supply-side comparability. NRDC proposes an excessive risk reduction of approximately 20% while PG&E proposes a reduction of 10% off the supply-side comparable value of \$390 million. PG&E's proposed reduced cap of \$350 million is 22% lower than the 2006-08 program cap of \$450 million and well below supply-side comparability. Further, NRDC's analysis shows that the shared-savings rate should be 12%-15% to ensure supply-side comparability. PG&E's own analysis, as presented in its opening comments, found that the rate should be 13.5% based on the methodology used in D.07-09-043, and proposed that the current 12% rate be continued.

Supply-side comparability should be restored in the PD to send the right message to utilities that energy efficiency is the preferred resource. Anything less can only lead utilities and investors to conclude that the Commission does not view energy efficiency investments as on par with supply-side resource investments. As stated in its opening comments, PG&E's proposal for a \$350 million cap and 12% shared-savings rate is consistent with the Commission's stated objectives and the PD should be revised accordingly.

B. TURN's Proposed New Rules for Non-Resource Programs Would Again Create a Disincentive for Utilities to Pursue Non-Resource Program and Thus, Undo the Very Reason Why the PD Proposes to Change the Existing Framework

In its comments, TURN proposes new rules for non-resource programs. TURN expresses concern over administrative and general expenses being allocated disproportionately to non-resource programs given that they would no longer negatively impact the Performance Earnings Basis (PEB) (and thus, utilities would not be dis-incented to spend funding on these programs).^{5/}

^{4/} NRDC, p. 13.

^{5/} TURN, p. 3.

TURN's concern is without merit and should be rejected. First, TURN fails to acknowledge non-resource programs will naturally have a proportionally higher share of administrative and generally expenses than resource programs because non-resource programs do not have incentives. For example, a residential program with a budget of \$200 million may have an incentive budget of \$150 million, with marketing, program management/direct implementation, and administrative expenses comprising the remaining amount. In this case, the broadly-defined A&G as TURN deems it would be 25%. However, in an Education and Training program, TURN would broadly define 100% of the expenses as A&G given that it is a non-resource program and has no incentives.

Second, TURN's proposal to rectify its concern "by either requiring that the same percentage of A&G costs be allocated to each category or by assigning all A&G costs to resource programs" would skew true program costs. In fact, TURN's proposal would ask utilities to skew program costs toward resource programs with the sole objective of reducing potential earnings and further, it would incent utilities to spend less on non-resource programs to lessen this negative impact to earnings. This would create an objective that is precisely the opposite of why a carve-out for non-resource programs is being put forth in the PD: to remove the disincentive for utilities to spend on non-resource programs that currently negatively impact its potential earnings. Further, it ignores the reality that non-resource programs will have higher A&G than resource programs by their very nature. The Commission's existing annual audit of energy efficiency expenses, fund-shifting restrictions adopted in D.09-09-047, quarterly reporting requirements, and the nearly three-year detailed review of PG&E's 2010-12 program budgets prior to approval (along with stakeholders including TURN) should be more than adequate to ensure that program costs are not skewed disproportionately as TURN alleges will occur.

Third, TURN argues that removing non-resource program costs from the earnings calculation will provide an inaccurate picture of portfolio cost-effectiveness and that it must include them per statutory requirements.^{6/} These statements are misguided. PG&E already includes all portfolio costs (resource and non-resource) in measurement of its portfolio's cost-effectiveness. The PD solely addresses the basis for earnings which may or may not be the same as the basis for portfolio cost-effectiveness.^{7/} TURN does not cite any statute that addresses the basis for earnings

^{6/} TURN, p.4.

^{7/} For example, costs of the emerging technologies program were not included in the 2006-2008 mechanism calculations per D.07-09-043, but they were included in the portfolio cost-effectiveness calculations.

calculations. The Commission can choose to motivate certain behaviors by incenting them or removing previously-adopted disincentives as was the case with non-resource programs. TURN's request is without merit and should be rejected.

III. CONCLUSION

For the foregoing reasons, PG&E will support adoption of the Proposed Decision on RRIM Reforms provided that the changes set forth in PG&E's opening and reply comments are included.

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 (U 39 M)
ON THE PROPOSED DECISION REGARDING RISK/REWARD INCENTIVE
MECHANISM REFORMS – 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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Last updated: December 10, 2010

CPUC DOCKET NO. R0901019

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Last Updated: December 10, 2010

CPUC DOCKET NO. R0901019

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