

From: Ramaiya, Shilpa R  
Sent: 4/1/2011 1:54:00 PM  
To: Klotz, Michael (Law) (/O=PG&E/OU=Corporate/cn=Recipients/cn=MIKe); Fogel, Cathleen A. (cathleen.fogel@cpuc.ca.gov); Redacted  
Redacted; Yamagata, Joy C. (JYamagata@semprautilities.com); Besa, Athena (ABesa@semprautilities.com); Gaines, Mark (MGaines@SempraUtilities.com); Patrick, Steve (SDPatrick@semprautilities.com) (SDPatrick@semprautilities.com)  
Cc: Baker, Simon (simon.baker@cpuc.ca.gov); Clinton, Jeanne (jeanne.clinton@cpuc.ca.gov)  
Bcc:  
Subject: RE: Data request re: Gas PPP sweep

Jeanne, Simon, Cathy,

We're looking through the questions now and identifying data sources. We'll let you know by Tuesday morning whether we are able to get you a high-quality response to any of your questions by the due date.

I've also included Mike Klotz and Steve Patrick on this email.

Thanks.

Shilpa

**From:** Fogel, Cathleen A. [mailto:cathleen.fogel@cpuc.ca.gov]  
**Sent:** Friday, April 01, 2011 12:50 PM  
**To:** Gaines, Mark; Yamagata, Joy C.; Besa, Athena; Ramaiya, Shilpa R; Redacted  
**Cc:** Clinton, Jeanne; Baker, Simon  
**Subject:** Data request re: Gas PPP sweep  
**Importance:** High

Greetings All,

Jeanne Clinton requested that the Energy Efficiency Planning section submit this data request re the gas PPP sweep on her behalf. This has been formally submitted on EEGA, and is also detailed below.

Due to the urgency of this issue, Energy Division's requested reply date for this information is April 11, 2011. We hope that you can meet this date,. However, it is important that the data provided is of high quality. Please let us know if this reply date would jeopardize the quality of your response.

For PG&E, please also forward this to Mark Klotz.

Best wishes,

Cathy Fogel

Energy Efficiency Planning Section

Climate Strategies Branch, Energy Division

California Public Utilities Commission

[cf1@cpuc.ca.gov](mailto:cf1@cpuc.ca.gov)

ph: 415-703-1809

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This data request was prepared as follow-up to a March 24, 2011 meeting Energy Division held with the gas IOUs – Sempra and PG&E.

1. For each IOU and for the IOUs in aggregate, a) what is amount of previously authorized and as-yet-unexpended gas PPP funds forecasted to be *available in balancing accounts for EE programs* as July 1, 2011, the beginning of FY 2011-2012? b) Which balancing accounts are they? c) Under what Commission decisions or orders are these balancing accounts administered?

2. a) For each IOU and for the IOUs in aggregate, what is the total 12-month projection of gas PPP funds to be collected during FY 2011-2012 for *EE programs*? b) Is it \$176 million, \$190 million, or some other amount? C) Please distinguish, define, and describe the basis for the numbers specified above.
3. For each IOU and for the IOUs in aggregate, what is the total 12-month projection of gas PPP funds to be collected during FY 2011-2012 for *gas RD&D*?
4. For each IOU and for the IOUs in aggregate, what is the forecasted amount of previously-authorized and unexpended gas funds expected to be available on July 1, 2011, and also on December 31, 2011\* for (a) *LIEE* programs and (b) *CARE*? \*(the end of the currently-authorized 3-year LIEE and CARE cycles)
5. For each IOU and for the IOUs in aggregate, please provide data to complete the table below, or propose an equivalent format to convey this information. Please provide the data for the total gas PPP collections, as well as the individual components: (a) EE programs, (b) LIEE programs, (c) CARE, (d) RD&D, and (e) BOE administration fee. If appropriate, the table may be modified to include more detailed categories of information provided in the IOUs' Monthly Energy Efficiency reports filed pursuant to D.01-11-066, OP 10 (specifically Tables G-1, G-2, G-3, and G-4), as long as aggregated data corresponding to categories (a) – (e) above is presented. Please also specify the Commission decisions, orders, and/or approved advice letters under which the authority to collect and transfer these dollar amounts is granted for the current period shown. [If found useful, you may include 2009 to capture the start of the LIEE and CARE programs' current cycles.]

	2010				2011				2012			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Authorized collections (\$)												
Recorded collections (\$)												
Remittances paid to BOE (\$)												
Date of Remittance												
<b>Remittance received from BOE (\$)</b>												
Total												
Principal												
Interest												
Date of Remittance												
<b>Balance Due</b>												

6. a) For each IOU and for the IOUs in aggregate, how many full-time employee equivalents are currently supported by gas EE or R&D PPP funds (excluding LIEE)? b) What are the personnel costs for these employees that would normally be charged to gas-funded accounts for FY 2011-12? c) How many of these employees could the IOUs absorb into their organizations, under "worst-case" scenario projections of gas PPP funds available in FY 2011-2012?

7. a) Are you aware of how many CPUC employees are currently supported by gas EE or R&D PPP funds, including staff in Energy Division and the Division of Water and Audits? b) Please specify and cite relevant Commission decisions or orders. [Note: Energy Division will pose the same question to our own Fiscal Office.]
8. For each energy efficiency program currently funded through gas PPP funds for the 2010-12 cycle, what amount of a) 3-year authorized and b) expended-to-date program dollars are allocated to gas PPP funding sources?
9. a) What criteria do the IOUs use to allocate gas and electric funding sources at the program level? b) Please indicate whether this allocation is pursuant to any Commission decisions or orders, and if so, please identify. c) What flexibility, if any, do the utilities perceive they have in allocating program costs between electric and gas funds?
10. We asked two questions of the utilities in February, one as to any contracted or obligated gas funded payments for EE that were expected to be paid out during FY 2011-12, and the other to what extent these obligations had contractual language that would allow the contract, obligation, agreement to be suspended for reasons such as “regulatory out” or “subject to funding” clauses. Please advise if you would update that answer in any way, and if so, please provide an updated explanation of such obligations. Note: our summary of your answer at that time was:

“The three gas utilities (PG&E, SDG&E, SoCal Gas) have reported to the CPUC that they have entered into a total of 595 energy efficiency contracts for which payments are expected during the 2011-12 FY. These contracts include those that will improve the energy efficiency of small businesses, industrial customers, local governments, and residents, and those to measure and verify these improvements. The total estimated value of payments expected to be made on these encumbered contracts during the 2011-12 fiscal year is \$91,996,784.”

11. In any given month, what is the typical pipeline of customer incentive payments for which commitments have been made, but not yet paid, e.g. subject to installation and verification?

12. a) What is the estimated monthly expenditure of implied incentives obligations due to customer purchases of incentive-eligible products, appliances, or equipment, for those programs where there is no advance “application or reservation” system that would identify the actual funding obligations in advance (e.g. from “upstream incentive” programs or point-of-sale rebate programs)? b) How soon would it be necessary to stop offering gas-funded incentive programs if we wanted to have a “zero” obligation after June 30, 2011?

13. Please comment on the following possible rank order preference for allocating limited gas funds to programs with gas savings:

- a. If a small amount of gas funds is available, devote all uncommitted funds to SCG (since no option to shift funds to electric ratepayers)
- b. Programs that leverage limited-term federal stimulus funds (either all such programs, or just the most cost-effective?) [1][1]
- c. Geographic prioritization of programs for building-related gas EE measures, where programs could be offered for climate zones where greatest gas savings are expected.
- d. Programs that serve "lost opportunity" markets (e.g. where savings are attributed to purchase of high efficiency gas appliance, or high efficiency new building, where the opportunity for such high efficiency actions will be lost if not taken at the time of transaction), AND where these have a high benefit/cost ratio.
- e. Programs that have highest benefit/cost ratios for the ratepayer expenditure; additionally and within these, statewide programs could be prioritized over utility "local" programs.

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[1][1] using Program Administrator Test, as measure of leverage obtained from ratepayer funds)