

From: Baker, Simon
Sent: 4/18/2011 6:39:02 PM
To: Ramaiya, Shilpa R (/o=PG&E/ou=Corporate/cn=Recipients/cn=SRRd);
ABesa@SempraUtilities.com (ABesa@SempraUtilities.com);
don.arambula@sce.com (don.arambula@sce.com)
Cc: Fogel, Cathleen A. (cathleen.fogel@cpuc.ca.gov); Clinton, Jeanne
(jeanne.clinton@cpuc.ca.gov)
Bcc:
Subject: IOU interpretation of IOU authority and Commission direction on new pilot
programs

Don, Shilpa, Athena,

I am writing to seek feedback from your companies regarding your assessment of your responsibilities and authority for new pilot projects initiated during the 2010-2012 energy efficiency program cycle but not explicitly approved or directed in D. 09-09-047.

As you know, D. 09-09-047 explicitly authorized IOU implementation of at least nine pilot programs (OP 19, p. 372), and instructed IOUs to submit pilot program summaries via Advice Letter within 120 days of adoption of the decision. Ordering Para 20 outlines the ten informational elements that these Pilot Summaries were to contain.

In addition, dicta at 4.3.1 (page 49) directs utilities to provide information on these ten elements for pilot projects approved in D. 09-09-047 and "for all future proposed pilot projects."

Our questions are, then:

- 1) What authority do IOUs see yourselves as having to initiate pilot projects not explicitly approved in D. 09-09-047 during the 2010-2012 program cycle?
- 2) What notification requirements regarding initiation of such pilot projects do your companies see yourselves as having for the 2010-2012 program cycle?
- 3) What approvals do your companies see yourselves as needing prior to pursuit of pilot projects not explicitly approved in D. 09-09-047, from either Energy Division or the Commission, for the 2010-2012 period, if any?
- 4) How do your companies define pilot project?
- 5) How do your companies define "trial studies" or similar "tests" of program design elements or concepts, differently from pilot projects, if at all?
- 6) What requirements do you see yourselves as having regarding the initiation, notification and approval of "trial studies," or similarly named tests or program concepts or designs, for "trial studies" not explicitly approved in D. 09-09-047, during the 2010-2012 program cycle?

We would like to hear your companies' responses on these issues within ten business days.

I will also have these questions posted on EEGA as a formal data request.

Much thanks,
Simon