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July 1, 2011

Julie Fitch
Director, Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Joint IOU 2010 Benchmarking Report in Compliance with Decision 09-09-047

Dear Ms. Fitch,

Pacific Gas and Electric Company (PG&E) submits the attached "Joint IOU 2010 Benchmarking Report" on behalf of the California Investor Owned Utilities, PG&E, Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas) (collectively IOUs or Joint IOUs). The Joint IOU Report on 2010 benchmarking activity was prepared in compliance with Ordering Paragraph (OP) 24 of California Public Utilities Commission Decision 09-09-047.

Sincerely,

/s/

Sandy Lawrie
Principal Regulatory Case Manager
Regulation and Rates

cc: Jeanne Clinton, Energy Division
Pete Skala, Energy Division
Jeorge Tagnipes, Energy Division
Vanessa Anderson, PG&E
Jeff Gleeson, PG&E
Alyssa Cherry, SCE
Joy Yamagata, SDG&E/SoCalGas
Service Lists A.08-07-021 et al. and R.09-11-014

Joint IOU 2010 Benchmarking Report

I. Background

Decision (D.) 09-09-047, OP 24 directed Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SoCalGas) (collectively IOUs) to undertake benchmarking activities for commercial, local government, and new construction energy efficiency projects. This Decision also required the IOUs to submit a benchmarking report on 2010 activity by July 1, 2011.

OP 24 of D.09-09-047 included the following specific guidance on benchmarking reporting:

“The proposed Statewide New Construction energy efficiency programs of Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company are approved, with the following modifications:

(g) Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Southern California Gas Company shall benchmark buildings in all Savings By Design projects in the program cycle 2010-2012. Utilities should use data collected from the calendar year 2010 to report new and existing benchmarking data to the Energy Division and the service list by July 1, 2011.”

In December 2009,¹ SCE filed an advice letter seeking clarification on the benchmarking requirements in D.09-09-047. In May 2010,² the Energy Division rejected this advice letter, directing SCE to re-file this request via a Petition for Modification. In September 2010, the IOUs jointly filed a Petition for Modification of D.09-09-047, seeking modification and clarification around benchmarking directives (among other issues). In April 2011, the Commission issued D.11-04-005, providing further direction and clarification on benchmarking. While D.09-09-047 specifically required benchmarking reporting for new construction projects, D.11-04-005 stated:

“We reiterate OP 24(g) in D.09-09-047: “(The utilities) should use this data collected from the calendar year 2010 to report new and existing benchmarking data to the Energy Division and the service list by July 1, 2011.”

In the context of D.11-04-005, the IOUs believe the intent was to require a report on 2010 IOU benchmarking activity for all applicable sectors, not limited to new construction projects. Energy Division has confirmed this intent. As such, this report is inclusive of all commercial, local government, and new construction benchmarking activities.

This report includes a description of the statewide benchmarking achievements and individual IOU benchmarking achievements. In addition, this report includes a section on the IOUs' next steps and current strategy to achieve the 2010-2012 benchmarking goals, given the recent resolution of the IOUs' Petition for Modification on this issue.

¹ Advice 2417-E, filed December 14, 2009.

² Notification of rejection of Advice Letter 2417-E and need for petition for modification to Decision (D.) 09-09-047, dated May 12, 2010.

II. Statewide Coordination

The IOUs have developed a statewide utility benchmarking team that meets on a monthly basis to collaborate on development and implementation of benchmarking while increasing statewide alignment. In addition, in 2010, the IOUs:

- Benchmarked a total of 4,793 buildings
- Offered 47 customer benchmarking workshops with a total of 980 participants
- Offered an additional four workshops in areas served by more than one IOU: two workshops conducted jointly by SCE and PG&E; and two workshops conducted jointly by SCE and SoCalGas.
- Supported development of AB 1103 Implementation Regulations and Guidelines
 - Actively participated in the AB 1103 Working Group, providing subject matter expertise and advocating workable solutions to barriers
 - Provided input and support for AB 1103 Implementation Regulations and development of the AB 1103 Implementation Guidelines
- Integrated benchmarking elements into the Statewide Commercial Programs and Local Government Partnerships
 - Incorporated benchmarking elements into energy efficiency programs, including Continuous Energy Improvement, Retrocommissioning, large integrated audits, and other programs geared towards commercial customers
 - Provided resources to local government partners to support benchmarking of municipal buildings. These resources include benchmarking training sessions, fact sheets, and marketing materials to promote benchmarking in municipal and commercial facilities in local government partnership territories.
- Developed and expanded marketing, education, and outreach to encourage customers to benchmark and inform them of the value of benchmarking their buildings. IOUs collaborated to create and continue development of the following:
 - Benchmarking-specific marketing collateral, including fact sheets, instructional guides, and websites
 - Customer training programs
 - Training and resources for IOU employees, contractors, and partners
- Offered comprehensive technical support to assist all IOU customers using ENERGY STAR® Portfolio Manager (ESPM) and Automated Benchmarking Services (ABS). Contact information for benchmarking assistance is available on:
 - The IOU and ESPM websites
 - IOU benchmarking and other energy efficiency marketing collateral
- Continued development and upgrades for each IOU's ABS, which provide automated data transfer to ESPM that facilitates accurate and efficient

customer-driven benchmarking. This resulted in initiation and/or completion of projects to ensure all IOU ABS systems have the following functionality:

- Full automation and scalability of processes to provide historical and ongoing energy data
- Compliance with anticipated AB 1103 implementation regulations

III. IOU 2010 Progress

PG&E

In 2010, PG&E's benchmarking program was expanded to reach more customers and connect benchmarking with energy management next steps to improve building performance. These efforts resulted in more buildings benchmarked by PG&E customers in 2010 than in any previous year, and PG&E achieved recognition of its efforts through the 2010 ENERGY STAR Sustained Excellence award.

In addition to the statewide accomplishments noted above, specific PG&E benchmarking activities during 2010 included:

- Incorporation of benchmarking into its Green Communities program by developing workshops in collaboration with the Association of Bay Area Governments
- Inclusion of benchmarking in integrated marketing collateral, segment-specific fact sheets and websites, rebate catalogs, and sales presentations
- Expansion of the benchmarking training program with a new follow-on workshop to assist customers with energy management next steps
- Initiation of a comprehensive upgrade to PG&E's ABS
- 3,860 total buildings using ABS in PG&E's service area through December 31, 2010, including buildings that began benchmarking prior to 2010

2010 Benchmarking Progress

	Customers	Buildings	Meters/Service Accounts
2010	363	1,380	3,223

2010 Benchmarking Training

	Workshops Held	Participants
2010	26	360

SCE

SCE's benchmarking strategy is designed to engage commercial building owners/customers and educate them on the benefits available by benchmarking their building. In order to establish a strong foundation, SCE first trained and educated its customer contact personnel on the benefits of benchmarking, how to assist their customers' benchmarking efforts, the strengths of using Automated Benchmarking Services, and where their customers can receive hands-on training and technical support. SCE's benchmarking accomplishments also included:

- Development of SCE's benchmarking hands-on training workshop

- Implementation of seven hands-on customer benchmarking training workshops
- Training of over 150 SCE customer contact and support personnel
- Development and implementation of Automated Benchmarking Services
- Development of benchmarking proxy campaign strategy document

2010 Benchmarking Progress

	Customers	Buildings	Meters/Service Accounts
2010	52	425	527

2010 Benchmarking Training

	Workshops Held	Participants
2010	6	126

SDG&E

SDG&E's Benchmarking program was launched during the 2010-2012 Program Kick-off Meetings intended to introduce all customer contact employees to the rollout of new customer programs. This introduction was followed up by EPA ENERGY STAR Portfolio Manager training sessions. The training was developed to provide educational and outreach tools for employees and to offer guidance for employees when assisting customers through the Portfolio Manager process. Specific SDG&E benchmarking activities during the 2010 calendar year included:

- Implemented a marketing campaign to educate both internal employees and external customers regarding the benefits of energy performance benchmarking.
- Developed, distributed, and/or implemented the following marketing material:
 - Fact Sheet
 - 2010 workshop calendar and flyers
 - E-Blasts to customers to invite them to the hands-on laptop training sessions
 - Data collection sheets to make the process more customer-friendly
 - *Step-by-Step Guide to Benchmarking*
 - Benchmarking Help Desk for technical support
 - Website with links to the ENERGY STAR Portfolio Manager tool
- Benchmarking included in integrated marketing collateral for segment-specific fact sheets, rebate applications, and association presentations
- Successfully benchmarked 633 SDG&E customers with the help of 337 Portfolio Manager users

2010 Benchmarking Progress

	Customers	Buildings	Meters/Service Accounts
2010	633	1794	2711

2010 Benchmarking Training

	Workshops Held	Participants
2010	9	255

SoCalGas

In 2010, SoCalGas launched its benchmarking program via a series of 2010-2012 Program Kick-off Meetings intended to introduce all customer contact employees to the rollout of new customer programs, including benchmarking. This initial introduction was followed-up by EPA ENERGY STAR Portfolio Manager Benchmarking training sessions developed to provide educational and outreach resources for customer contact employees. The internal training supported the benchmarking initiative in that customer contact employees were prepared to assist customers in navigating through the Portfolio Manager benchmarking process. In addition to the aforementioned, specific SoCalGas benchmarking activities during the 2010 calendar year included:

- Implemented a benchmarking marketing campaign to educate customers regarding the benefits of energy performance benchmarking
- Developed, distributed and launched the following benchmarking marketing material:
 - Benchmarking fact sheet (describes what energy efficiency benchmarking is and its benefits)
 - 2010 benchmarking workshop calendar and flyers
 - E-Blasts to customers to invite them to hands-on benchmarking training sessions
 - Benchmarking data collection sheets to make the process customer-friendly
 - “Step-by-Step Guide to Benchmarking”
 - Benchmarking Help Desk for technical support
 - Benchmarking website with links to the ENERGY STAR Portfolio Manager tool
- Inclusion of benchmarking in integrated marketing collateral for segment-specific fact sheets, rebate applications, and association presentations
- Expansion of the benchmarking training program with a new follow-on workshop to assist customers with energy management next steps

Benchmarking Progress

	Customers	Buildings	Meters/Service Accounts
2010	115	1218	1340

Benchmarking Training

	Workshops Held	Participants
2010	6	239

IV. Next Steps: 2011-2012 IOU Benchmarking Strategy

Statewide

The IOU benchmarking strategy for 2011-2012 includes the following key components:

- Support AB 1103 implementation and outreach efforts
- Training and technical support for customers using ESPM and ABS
- Complete development and upgrades for IOU ABS systems
- Integration of benchmarking “extra value” points for Savings By Design – Design for Excellence award, in association with AIA, California Chapter
- Develop benchmarking proxy distribution and marketing campaign
- Evaluate operational benchmarking tools other than ESPM, including the CEC’s California Rating tool as it becomes available
- Evaluate energy benchmarking tools that rate asset value, including the CEC’s Building Energy Asset Rating System (BEARS) as it becomes available
- Work with Energy Division and IOU EM&V staff to analyze the relationship between program participation and benchmarking
- Support and active participation in Zero Net Energy Task Force initiatives
- Development and implementation of a new construction benchmarking strategy
- Collaborate with ED and the CEC to develop a statewide plan for the next energy efficiency portfolio period that will align benchmarking to meet the goals of the Long Term Energy Efficiency Strategic Plan

The IOUs note that D.11-04-005 sets numerical benchmarking requirements for the IOUs. Specifically, during the 2010-2012 program cycle, PG&E is required to benchmark 50,000 buildings, SCE is required to benchmark 50,000 buildings, and SDG&E is required to benchmark 20,000 buildings. There are no numerical requirements for SoCalGas. In order to achieve these aggressive goals, the IOUs will utilize (1) continued promotion of the ESPM tool and ABS, and (2) development and distribution of proxy benchmarks using available data. Distribution of proxy benchmarking data will enable the IOUs to benchmark a higher volume of buildings, without requiring customers to benchmark as a prerequisite to program participation. The proxy benchmarking data will also encourage customers to obtain a more comprehensive score by utilizing the ESPM tool, and to participate in ABS for ongoing benefits.

PG&E

In addition to implementation of the statewide strategy components listed above, specific PG&E benchmarking activities for 2011-2012 include:

- Development of an on-demand benchmarking training webinar
- Successful launch and deployment of ABS enhancement and upgrade projects
- Collaboration with the San Francisco Department of the Environment to help building owners value and comply with benchmarking requirements under the Existing Commercial Buildings Energy Performance Ordinance

SCE

In addition to implementation of the statewide strategy components listed above,

specific SCE benchmarking activities for 2011-2012 include:

- Coordination with the Building Operator Certification Program
- Integration of benchmarking educational materials with SCE's online integrated demand side management program application
- Establishment of a hotline to offer customer technical support
- Increasing workshops from seven in 2010 to a minimum of 20 in 2011
- Development and implementation of a new construction benchmarking strategy
- Enhancement of SCE.com' benchmarking web site

SDG&E

In addition to implementation of the statewide strategy components listed above, specific SDG&E benchmarking activities for 2011-2012 include:

- Enable ABS to function alongside EPA's planned changes to Portfolio Manager
- Provide segment-based benchmarking training

SoCalGas

In addition to implementation of the statewide strategy components listed above, specific SoCalGas benchmarking activities for 2011-2012 include:

- Development of statewide benchmarking proxy distribution and marketing campaign
- Coordination with the Building Operator Certification (BOC) alliance to inform program participants regarding benchmarking benefits and hands-on training opportunities at SoCalGas
- Development of benchmarking webinars for outreach to outlying regions