



DRA

*Division of Ratepayer Advocates
California Public Utilities Commission*

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July 19, 2011

Julie Fitch, Director
CPUC, Energy Division
Attention: Tariff Files, Room 4005
505 Van Ness, Avenue
San Francisco, CA 94102

Re: Division of Ratepayer Advocates' Response to
Southern California Edison Advice Letter 2599-E, 2010-2012 Los Angeles
County and Huntington Beach Strategic Plan Pilots

The Division of Ratepayer Advocates (DRA) writes this response in support of Southern California Edison Company's (SCE) Advice Letter 2599-E requesting approval of the 2010-2012 Los Angeles (LA) County and Huntington Beach Local Government Partnership Strategic Plan Pilots. The two joint pilot programs are (1) expanding the existing LA County Enterprise Energy Management System (EEMIS) for participating municipalities and (2) developing local government energy efficiency resources plan and guidebooks.

Local governments (LGs), representing diverse constituencies, population sizes, and energy use patterns in varying climate zones, are in a unique position to design programs that are both innovative and tailored to specific regional conditions and requirements. Because LGs operate on a smaller scale than investor-owned utilities (IOUs), LGs are also well-positioned to take risks associated with increased innovation and to integrate demand side resources such as energy efficiency, demand response, and renewables, another goal of California's Strategic Plan. Despite these strengths, LGs vary widely in resource availability, training and expertise. The programs outlined in SCE Advice Letter 2599-E take an important first step towards local government initiatives to coordinate at the regional level and share resources that would fill this gap, thereby strengthening LG energy efficiency (EE) efforts and California's energy efficiency goals as laid out in the Commission's Portfolio Decision, D.09-09-047 and California's EE Strategic Plan.

The EEMIS, currently used by LA County, would be expanded to enable other LGs to measure their energy use, supporting efforts to establish baselines, EE goals, and track progress in reducing energy use. Plans and guidebooks developed by LA County and Huntington Beach would provide further resources to support other LG efforts in

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Southern California. If proven successful, these resources could be deployed to other cities and counties across California.

DRA believes the LG coordination effort that begins with the LA County and Huntington Beach proposals in SCE AL-2599 is a model that shows great potential for direct LG-administered programs at the regional level for the next cycle. DRA requests that this advice letter be approved expediently.

If you have any questions regarding this response, please contact:
Monisha Gangopadhyay at 415-703-1417; mgb@cpuc.ca.gov.

Sincerely,

/s/ LINDA SERIZAWA

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Service List A.08-07-021 et al.