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# Energy Efficiency Providing Savings Assurance to the Market

May 2011



***Pacific Gas and  
Electric Company™***



# Proposed Decision Should be Revised

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Retroactive changes disrupt portfolio and implementers (3P, GP, Contractors, Retailers) causing revised programs and contracts

- Keep changes prospective
- Retroactive changes . Assurance to market

Arbitrary savings adjustments should not be allowed

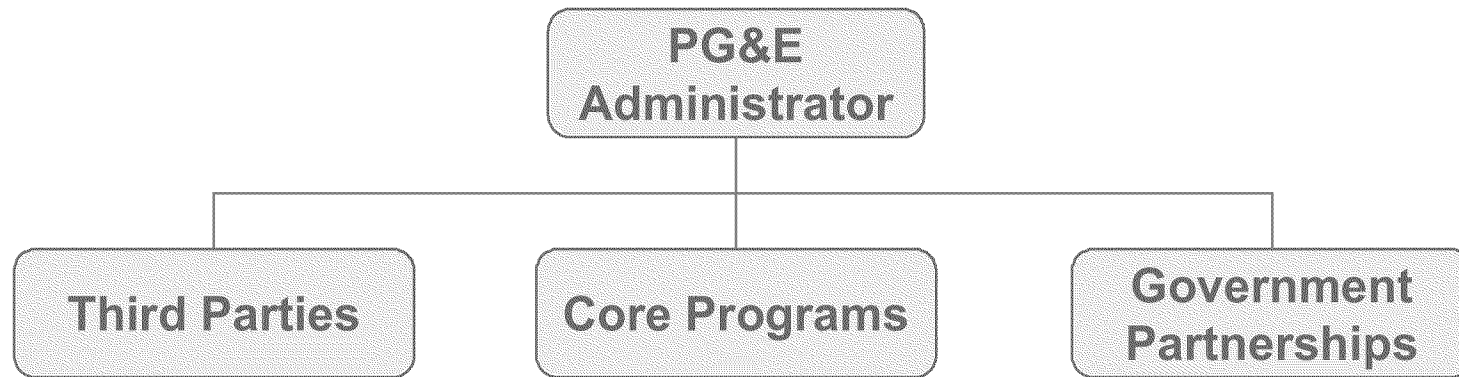
- Keep values consistent with studies
- Institute dispute resolution process

Do not create new reporting

- Revise post-decision compliance (60 days) to existing quarterly report

# Retroactive Changes Disrupt the Business Environment and Weaken Trust

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Retroactive changes negatively affect all stakeholders

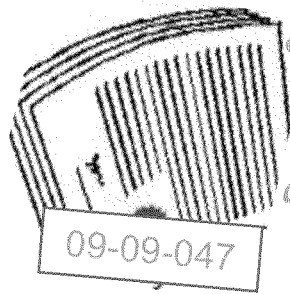
- Compromises trust with customers and contractors
- Increases costs
- Potentially delays and changes contracts
- Fails to recognize valuable energy efficiency

# Arbitrary Changes have No Place in EE

Energy savings should be based on best available information and standard engineering practices

- Need for Dispute Resolution
- Arbitrary cuts eliminate emerging technologies from EE portfolio
- Commission decision approved default values

CA Energy Efficiency Strategy



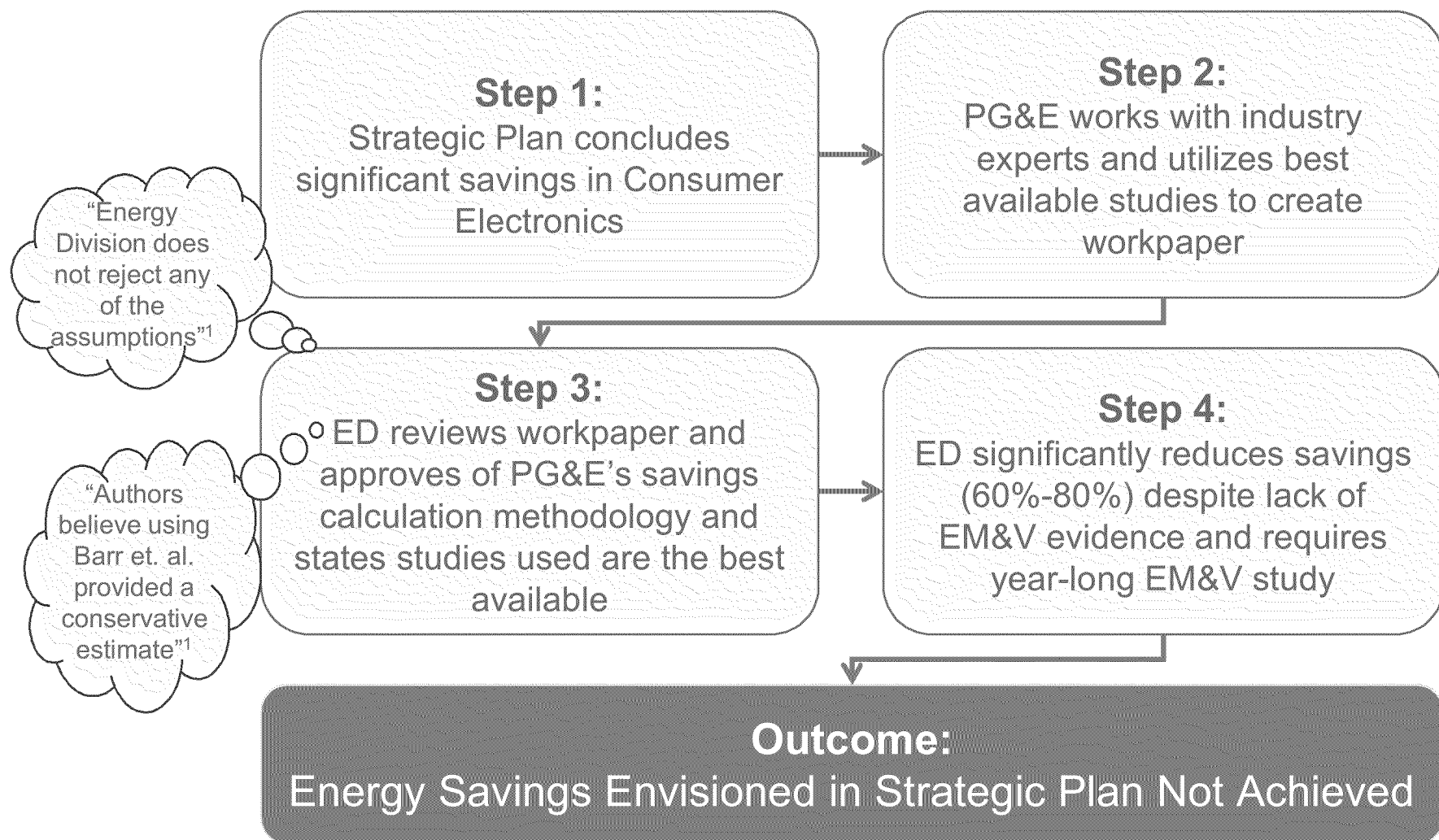
*“Values frozen at the time the activity is starting should be used”<sup>1</sup>*



**Pacific Gas and Electric Company**

1 - D. 09-09-047 pge. 356 “26. Measure ex ante values established for use in planning and reporting accomplishments for 2010-2012 should be frozen, based upon the best available information at the time the 2010-2012 activity is starting.”

# Consumer Electronics: An Example of Arbitrary Change



# Schedule for Incorporating New Changes

- Extend time to implement updated workpapers from 60 days (OP 3) to next regularly scheduled reporting quarter to mimic current process
- **Benefits** , Costs of upgrading the system for dual baselines (EUL/RUL)?

