



APRIL 13, 2012

**PROPOSED DECISION PROVIDING GUIDANCE ON 2013-2014 ENERGY EFFICIENCY PORTFOLIOS AND 2012 MARKETING, EDUCATION, AND OUTREACH (RULEMAKING 09-11-014)**

PROPOSED PD MODIFICATIONS

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**Recommended Changes to the PD**

• **Local Government Regional Networks**

- Issue: Authorizes local governments to independently administer regional EE pilots
  - o Local governments submit proposals in the form of Program Implementation Plans (PIPs) for review and selection by Commission
  - o Co-managed by Commission and investor-owned utilities (IOUs)
- Proposed Solution:
  - o Local government regional pilots unnecessarily duplicate existing programs offerings and increase administration costs.
  - o If adopted, a process needs to be established for bid submission, review, contract, and award for regional pilots
  - o Currently, PG&E uses the Innovator Pilots Program to solicit ideas from local governments.
  - o Commission should review our administration of contracts, not co-manage
- Select Parties' Comments:
  - o NRDC and NAESCO support utility-administration of regional pilots
  - o LGSEC, CCSE, and City and County of San Francisco support regional pilots
  - o Sierra Business Council wants to be eligible for regional pilots
  - o 20 parties had no comments on this topic

• **Marketing Education and Outreach**

- Issue: Unilaterally awards California Center for Sustainable Energy (CCSE) contract, which is an unprecedented award given CCSE didn't bid or provide qualifications
- Proposed Solution:
  - o Request for Proposal (RFP) process should be established to review qualifications and select new implementer
  - o Statewide marketing should be used for general awareness and local marketing should drive participation in programs.
- Select Parties' Comments:
  - o CCSE and CCSF support an implementer for ME&O, and the IOUs do not support the process for selecting an implementer
  - o 28 parties did not provide comments on this specific point

- **Financing**

- Issue: Requires the IOUs to propose full program design and rollout in their applications, prior to engaging the consultant or garnering learnings from pilots
- Proposed Solution:
  - PD should be revised to allow the utilities to propose full financing programs **after** completion of the pilots, the consultant’s analysis and additional market research so that the new programs will be based on the findings.
- Select Parties’ Comments:
  - IOUs and DRA believe schedule is ambitious and more time is needed for pilots
  - 11 parties commented on various aspects of the finance programs
  - 21 parties had no comments on this topic

- **Energy Savings Goals**

- Issue: Goal set at more than 100% of the achievable market potential
  - With the addition of decay recovery to the goals, PG&E goals are in excess of 100% of achievable market potential as shown below:

	2013	2014
GWh	153%	182%
MW	185%	215%
MMTherms	106%	104%

- Proposed Solution:
  - Goals should not be set at more than 100% of achievable market potential
  - Decay should be eliminated for measures installed prior to 2010
  - Potential Study should be revised consistent with these objectives

**Procedural Changes**

- Issue: Additional guidance pending for IOU applications
  - Additional Assigned Commissioner Ruling
  - Templates for PIPs; budget and cost effectiveness table requirements; and application outline including page limit guidelines
- Proposed Solution:
  - If all additional guidance is available on April 19, applications can be filed on July 2
  - PD should be revised to delay the deadline to file IOU applications to a date that is at least 75 days after receipt of the final ruling to allow for the possibility that not all additional guidance is available by April 19
  - Alternatively, to avoid delaying the applications, the Commission could forgo issuing additional guidance and instead direct the utilities to collaborate on common formats, thus allowing application preparation to commence immediately