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MARC LEVINE
ASSEMBLYMEMBER, TENTH DISTRICT

November 14th, 2013

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Michael Ferron
Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

Re: CCAs Should Not Be Limited Only to Electricity Energy Efficiency Programs

Dear Commissioner Ferron,

I am writing to you regarding The Proposed Decision (PD) Enabling Community Choice Aggregators (CCAs) to Administer Energy Efficiency (EE) Programs. I have significant concerns about the PD, the most prominent of which is the new restriction on CCAs to administer gas EE programs with funds allocated from the California Public Utilities Commission in accordance with Section 381.1(a)-(d) of the California Public Utilities Code.

Gas measures are an integral component of EE programs, and CCAs have offered innovative EE programs that achieve both gas and electricity savings. Section 381.1(a)(2) of the California Public Utilities Code indicates that the Commission should ensure that each CCA's proposed EE program "advances the public interest in maximizing cost-effective electricity savings and related benefits". Gas savings are deeply linked with electricity savings in EE programs, especially those that aim for comprehensive retrofits in accordance with state policy objectives. There is no doubt that gas savings are closely related to maximizing cost-effective electricity savings.

In addition, curtailing the ability of CCAs to administer both types of EE programs is anti-competitive and contravenes the intent of SB 790 (2011) to "foster fair competition" between electrical corporations and CCAs.

I urge you to continue to allow CCAs to administer gas EE programs with the ratepayers funds distributed through the Commission's EE rulemakings.

Sincerely,

MARC LEVINE
Assemblymember, 10th Assembly District