

**REQUEST OF SOUTHERN CALIFORNIA EDISON COMPANY FOR APPROVAL  
OF SUMMER 2000 ENERGY EFFICIENCY INITIATIVE**

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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

Application of SOUTHERN CALIFORNIA EDISON ) COMPANY (U 338-E) for Approval of Program ) Years 2000 and 2001 Energy Efficiency Plans, ) Budgets, and Performance Award Mechanism. ) _____ )	A. 99-09-049
Application of Pacific Gas and Electric Company ) for Approval of Program Years 2000 and 2001 ) Energy Efficiency Programs (U 39 M) ) _____ )	A. 99-09-050
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**REQUEST OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR APPROVAL  
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Dated: July 21, 2000

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**REQUEST OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)  
FOR APPROVAL OF SUMMER 2000 ENERGY EFFICIENCY INITIATIVE**

**I.**

**INTRODUCTION**

In compliance with Ordering Paragraph 86 of Decision (D.) 00-07-017, Southern California Edison Company (SCE) provides the California Public Utilities Commission (CPUC or Commission) with its proposal for implementation of the “second phase” of SCE’s Summer Energy Efficiency Initiative.<sup>1</sup> The energy efficiency and load management program activities proposed in this filing, taken

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<sup>1</sup> See D. 00-07-017, issued July 6, 2000, Ordering Paragraph 86, p. 272. The “first phase” of SCE’s proposed Summer Initiative consists of the load management programs proposed by SCE in Advice 1463-E, 1464-E, 1465-E and 1466-E. Those advice letters were filed before the Commission’s July 21 deadline for Summer Initiative filings and request expedited treatment/approval of the programs proposed therein so that SCE can implement them in time to have a significant peak mitigation impact as early as summer 2000 and beyond.

together with the load management programs described in the previously-filed advice letters that SCE has already submitted to the Commission,<sup>2</sup> represent the most reliable means to achieve the greatest reduction in electric demand and electric energy usage in the shortest amount of time using the carryover and reallocated funds identified by the Commission in D. 00-07-017.<sup>3</sup>

## II.

### **SCE's SUMMER INITIATIVE**

#### **A. Overview**

SCE has designed its Summer Initiative to be directly responsive to the Commission's request for programs that produce the greatest possible reduction in electric demand and energy usage in the shortest amount of time.<sup>4</sup> The load management activities we've proposed in this filing and in our previously-filed advice letters provide the Commission with a cost-effective, results-oriented response to California's near-term capacity shortfall. The energy efficiency proposals in this filing represent the most reliable and straight-forward means to rapidly capture the significant additional<sup>5</sup> near-term energy and capacity benefits of "resource acquisition" energy efficiency programs.

The load management programs and activities proposed in SCE's Summer Initiative are:

- The Swimming Pool Pump Tripper program;
- Emergency modifications to SCE's Air Conditioner Cycling program;

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<sup>2</sup> See, Advice 1463-E, filed 7/10/00 (Swimming Pool Pump Tripper program); Advice 1464-E, filed 7/10/00 (Emergency Modifications to SCE's Air Conditioner Cycling program); Advice 1465-E, filed 7/10/00 (Emergency Modifications to SCE's Commercial and Industrial Interruptible Program); and 1466-E, filed 7/11/00 (Emergency Modifications to SCE's Voluntary Power Reduction Credit program).

<sup>3</sup> See D.00-07-017, p. 203.

<sup>4</sup> Decision 00-07-017, Ordering Paragraph No. 86, p. 272.

<sup>5</sup> In D. 00-07-017, the Commission proposed that this Summer Initiative be implemented alongside and parallel to the utilities' PY 2000 programs. D. 00-07-017, p.199.

- Emergency modifications to SCE’s Commercial and Industrial Interruptible program;
- Emergency modifications to SCE’s Voluntary Power Reduction Credit program; and,
- The Cooperative Demand Response Initiative.<sup>6</sup>

The energy efficiency programs and activities proposed in SCE’s Summer Initiative are:

- The Enhanced Express Efficiency program;
- The Standard Performance Contracting Peak Demand Reduction program;
- The Residential Refrigerator Recycling program summer promotion; and,
- The Savings By Design Premium Incentive promotion.

SCE’s overall Summer Initiative will provide an on-peak demand reduction potential of 623 MW and 182,715 MWh of annualized energy savings over the summers of 2000 and 2001. Of this amount, the energy efficiency and load management programs and activities proposed in this filing represent 83 MW of the overall Initiative’s on-peak demand reduction total.

The programs and activities described in this filing represent \$11.734 million of SCE’s Summer Initiative budget. SCE’s overall Initiative budget is \$23.564 million as detailed in Table 1 of Attachment F to this filing.

**B. Focus of SCE’s Program Proposals**

SCE’s proposals are focused on achieving substantial peak reduction results – reliably and right now. To this end, SCE proposes to provide “limited-time-offer”

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<sup>6</sup> SCE requests authorization to implement the Cooperative Demand Response Initiative in this filing. SCE has already requested authorization to implement the other load management activities and programs in previously filed advice letters.

direct financial incentives for proven, peak-reducing energy efficiency technologies under both the expanded Express Efficiency (rebate) program<sup>7</sup> and the modified Standard Performance Contracting (SPC) program.<sup>8</sup> Refocusing both incentive programs on California's capacity shortfall, and aggressively promoting these programs, provides the best prospect for all market participants – customers, ESCOs, contractors, and SCE account management personnel alike – to maximize near-term peak reduction opportunities. Moreover, by utilizing successful programs that are already up and running as the backbone of the energy efficiency component of SCE's Summer Initiative, we ensure that the necessary administrative and delivery infrastructure for achieving rapid results is immediately available.

In SCE's service territory, the greatest energy efficiency opportunity for an accelerated effort to capture near-term reductions in electric demand and energy usage is in the commercial/industrial sector.<sup>9</sup> Simply put, large energy users offer the largest and most economical potential for demand and energy usage reduction. Accordingly, to maximize impact, the primary focus of the energy efficiency component of SCE's Summer Initiative will be on getting energy efficient hardware that reduces peak demand installed and operational in this market sector by June 1, 2001.<sup>10</sup>

Within the commercial/industrial market sector and in the time available, SCE's market analysis and program experience suggest that the greatest peak reduction impact from these energy efficiency programs will result from the

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<sup>7</sup> See, Attachment "A" for the complete description of Express Efficiency program expansion.

<sup>8</sup> See, Attachment "B" for the complete description of SPC program modifications.

<sup>9</sup> SCE is pursuing the significant load management opportunities that exist in the residential sector by implementing a Swimming Pool Pump Tripper program and expanding its existing Residential Air Conditioning Cycling program as part of the previously-filed load management elements of SCE's Summer Initiative. See, Advice 1463-E and Advice 1464-E.

<sup>10</sup> This focus on the commercial/industrial sector does not preclude energy efficiency opportunities within the Summer Initiative for residential customers. For example, the SPC program premium incentives will also be available for multi-family residential customers and the Refrigerator Recycling component of the Initiative (described later in this filing) will provide additional energy efficiency opportunities for residential customers.

accelerated installation of indoor lighting retrofits. SCE will provide direct financial incentives for the accelerated installation of energy efficient lighting and any other proven peak mitigation technologies under the Express Efficiency and/or the Standard Performance Contracting programs so that no significant peak reduction opportunities are overlooked. Other technologies promoted in these incentive programs will include, but not be limited to, energy efficient HVAC, refrigeration, motors and LED traffic signals, as long as they can be installed and operational by June 1, 2001. Load management technologies will also be promoted in these incentive programs.

SCE believes that the focused and direct strategy it has outlined above for getting peak-reducing, energy efficient hardware installed and operational by June 1, 2001 is the most reliable and expeditious means to effect substantial demand and energy usage reductions from the energy efficiency component of the Summer Initiative. Therefore, additional energy efficiency activities in SCE's Summer Initiative will be limited to: (1) a "summer promotion" strategy in the SCE's successful Refrigerator Recycling program to facilitate an acceleration of the capture of cost-effective savings for residential customers; and, (2) additional incentives for peak mitigating hardware installations in the new construction and renovation/remodeling markets through the SCE's Savings By Design program.

In addition to the energy efficiency activities proposed in this filing, SCE also proposes several load management programs. In this filing, SCE proposes implementation of a Cooperative Demand Response Initiative, which will allow SCE to directly facilitate customer energy cooperatives' participation in the ISO's Ancillary Services programs. In previous advice letter filings, SCE has proposed: (1) implementation of a Swimming Pool Pump Tripper program, which will provide incentives to pool owners and contractors for shifting pump load to off-peak hours; (2) emergency modifications to SCE's Voluntary Power Reduction Credit program,

which will increase the incentive to entice increased customer participation; and (3 and 4) emergency modifications to SCE's Air Conditioner Cycling program and Commercial and Industrial Interruptible program, which will reopen these programs to new customers.

**C. Proposal for Limited Expansion of Fund Shifting Flexibility**

In this Summer Initiative, both the Commission and SCE are focused on achieving the greatest possible reductions in demand and energy usage as soon as possible. If and as necessary to accomplish this objective, SCE will utilize its existing fund shifting authority to move funds between the SPC and Enhanced Express Efficiency program elements based on market response to both strategies.

In addition, SCE requests authorization for a limited expansion of its current fund shifting flexibility. For the Enhanced Express Efficiency (rebate) program and SPC Peak Demand Reduction Program (PDRP) described in this filing, SCE requests the ability to shift funds among the various programs within the nonresidential program area without the cumbersome restrictions imposed by current fund shifting program caps and minimums.<sup>11</sup> This will enable SCE to promptly and effectively respond to expected market demand for both the SPC Peak Demand Reduction and Enhanced Express Efficiency programs.

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<sup>11</sup> For example, under the current fund shifting restrictions, SCE would have to file an advice letter and await Commission approval before moving funds from Large Nonresidential Comprehensive Retrofit to Nonresidential Process – even if the funds budgeted for Nonresidential Process were fully subscribed with continuing strong market demand and the market exhibited little demand for Large Nonresidential Comprehensive. The significant regulatory lag inherent in this “file-and-wait” process seriously compromises SCE’s ability to maximize the peak mitigation results of the Summer Initiative.



### **III.**

## **OVERVIEW OF NEW SUMMER INITIATIVE ACTIVITIES AND PROGRAMS**

### **A. Enhanced Express Efficiency Program**

SCE proposes enhancements to the current Express Efficiency (rebate) program element. The Enhanced Express Efficiency program will make rebates available, including premium incentive levels, for all nonresidential customers. The premium incentive levels will be available to customers who install energy efficiency equipment that will reduce on-peak demand by June 2001. The premium incentives offered through Enhanced Express Efficiency will be available to eligible customers beginning September 2000 through June 2001. SCE's proposal for the Enhanced Express Efficiency program adds the following elements to the existing program: (1) increased customer eligibility to encompass the entire nonresidential market, including large customers, to maximize overall on-peak demand reduction opportunities; (2) premium incentives for demand reduction measures, including lighting, space conditioning, motors and LED traffic signals; (3) procedures for accelerated processing of incentives for projects with significant peak reduction potential; and (4) more comprehensive outreach activities by SCE personnel (including project-specific analysis and recommendations) to facilitate widespread customer participation and accelerated installation of peak mitigating energy efficient equipment. A complete program description is provided in Attachment "A" of this filing.

It is expected that the Enhanced Express Efficiency program element will produce an incremental increase of nearly 19 MW of on-peak demand reduction and approximately 140,215 MWh of annualized energy savings for the period September 2000 through June 2001.

**B. Standard Performance Contracting Peak Demand Reduction Program**

The Standard Performance Contracting (SPC) Peak Demand Reduction Program (PDRP) is a modified version of the existing SPC programs (Large, Small Business, and Multi-Family Residential SPC) intended to speed up customer adoption and installation of peak demand reducing equipment retrofit projects. Essentially, the PDRP will offer a peak kW incentive payment, in addition to the existing energy savings payment, for projects that are installed and operational by June 1, 2001. The PDRP version of the SPC will be offered for a limited time and will require installation of eligible peak demand reducing projects to be complete prior to summer peak demand season 2001. SCE will sponsor more comprehensive outreach and program support efforts to facilitate widespread and accelerated installation of equipment that captures peak mitigation opportunities. A complete program description is provided in Attachment “B” of this filing.

Higher incentive levels under the PDRP will be available to participants during 2000 and 2001. It is expected that the program element will produce an incremental increase of nearly 9 MW of on-peak demand reduction and approximately 19,000 MWh of annualized energy savings.

**C. Residential Refrigerator Recycling Program**

As part of the Summer Initiative, SCE plans to implement a “summer promotion” campaign to accelerate customer participation in the current refrigerator recycling program element, thereby capturing peak mitigating energy savings that might otherwise either not be captured or captured too late to impact the summer peak period. The residential Refrigerator Recycling program provides incentives to residential customers for the elimination of highly inefficient refrigerators and freezers, which reduces on-peak demand. The units are collected,

dismantled and all metal panels, components, and hazardous materials are recycled or disposed of in an environmentally safe manner. A complete program description is provided in Attachment "C" of this filing.

The additional activities for the PY2000 Residential Refrigerator Recycling program element have the potential of achieving an incremental increase in on-peak demand reduction of 3 MW of demand reduction and 17,500 MWh of annualized energy savings.

**D. Savings By Design Premium Incentive**

In addition to the current energy savings-derived incentives for new construction and renovation & remodeling projects currently offered through Savings By Design (SBD), SCE plans to incorporate a premium incentive of \$50 per kW for projects committed and completing construction/installation by June 1, 2001. Due to this abbreviated timeframe, projects are expected to include: (1) smaller projects that are nearing design completion but may accommodate specification change/adds; (2) quickly built prototype projects; and (3) a limited number of large, easily-constructed warehouse-type facilities. The premium incentive directly encourages the use of technologies that reduce on-peak demand, such as daylighting controls/systems and high efficiency HVAC units, by providing an increased incentive level. A complete program description is provided in Attachment "D" of this filing.

The nonresidential new construction and renovation/remodeling premium incentives will be available to participants during 2000 and 2001. It is expected that the program element will produce an incremental increase of approximately 3.0 MW of on-peak demand reduction and 6,000 MWh of annualized energy savings by June 2001.

**E. Cooperative Demand Response Initiative**

SCE proposes to include in the Summer Initiative the formation of a cooperative portfolio of responsive demand. SCE seeks funding to support the development and implementation of requisite energy settlement, energy information, and accounting systems to facilitate customer participation in the ISO's Ancillary Services (or successor) programs. In addition, SCE also seeks additional funding support to make necessary modifications to existing load management RTU technology to enable more customers to meet ISO load and scheduling requirements. Monetary incentives for participating customers are funded by the ISO's Ancillary Services programs, and include avoided costs. A complete program description is provided in Attachment "E" of this filing.

It is expected that the program element will facilitate a customer's ability to participate in the utility distribution company's or third party's demand responsiveness programs, which are expected to produce a potential peak load reduction of 50 MW.

**IV.**

**BUDGET AND FUNDING SOURCES**

SCE has allocated \$23.564 million of available Energy Efficiency Public Purpose Program (EEPPP) funds to SCE's Summer Initiative Proposal. This amount includes those EEPPP budgets identified in Advice 1463-E, 1464-E, and 1465-E. For those strategies presented in this filing, the budget is \$11.73 million. (i.e., \$4.670 million for PY2000 and \$7.065 million for PY2001). See Attachment F of this filing.

The EEPPP funds identified for SCE's Summer Initiative proposal consists of: (1) unspent, uncommitted, and unbudgeted PY1998 and PY1999 energy efficiency funds; and (2) PY2000 energy efficiency performance award budget. A

summary of these funds is shown in Attachment “F” of this filing. Unspent PY2000 California Board for Energy Efficiency budget will not be utilized. Those funds will be identified in a future filing to support additional Market Assessment and Evaluation activities during PY2000 and PY2001.

## V.

### **COST EFFECTIVENESS**

The Summer Initiative described in this filing is cost effective on an *ex ante* (before-the-fact) basis. SCE utilized the Total Resource Cost (TRC) test methodology in developing cost effectiveness estimates for the energy efficiency program strategies described herein. The TRC cost effectiveness methodology employed is consistent with the Commission-adopted Standard Practice Manual.<sup>12</sup>

The cost effectiveness computation of the energy efficiency initiative results in a TRC benefit-cost ratio of 3.08, utilizing the avoided cost streams and inputs adopted in Resolution E-3592.<sup>13</sup> The utilization of this conservative avoided cost stream provides a directly comparable benefit-cost ratio to those developed in SCE’s PY2000 program application. Utilizing a more current avoided cost stream, which includes the PX day ahead market zonal price, results in a benefit-cost ratio of 5.55. A summary of the cost effectiveness analysis along with these avoided cost streams are described in Attachment “G” of this filing.

The cost-effectiveness computation of the Cooperative Demand Response Initiative has been determined by a comparison of the benefits of providing demand-side resources during the summer peak hours to the costs of developing and delivering the programs. The benefits developed in this cost effectiveness calculation are used to approximate the value of available capacity during all peak

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<sup>12</sup> The Standard Practice Manual of Economic Analysis of Demand-Side Management Programs was developed by the California Public Utilities Commission and the California Energy Commission and has been utilized in the development and review of demand-side management programs since 1987.

<sup>13</sup> Resolution E-3592 dated April 1, 1999.

hours (i.e., the hours in which a Stage III outage is most likely to occur). A proxy value of \$500 per MWh, representative of the current energy price cap, was utilized in the calculation of total benefits at cap. These costs were compared to the program administrative and incentive costs incurred in the development and delivery of the program. The benefits of the program total \$13.05 million compared with program costs of \$1.750 million.

In addition to the resource value attributed to the Summer Energy Efficiency Initiative load reductions, the benefits of this Summer Initiative also include the customer value of uninterrupted service. SCE reported such value in its March 1999 Customer Value of Service Reliability Study, submitted as part of its Performance-Based Ratemaking Mid-term Review. This study provided a value of \$5.36 that residential customers would be willing to pay during a summer weekday to avoid an afternoon service interruption and \$97.00 that small commercial and industrial customers (annual peak demand of less than 1 megawatt) would be willing to pay during a summer weekday to avoid a one-hour afternoon service interruption. Although large commercial and industrial customers were not part of the value of service study, it could be reasoned that such customers would place an even higher value on uninterrupted service. Such interruptions could happen as the result of a Stage III outage. While we have not included a service reliability adder as part of this cost effectiveness showing, it is clear that the inclusion of this adder would further increase the cost effectiveness of this Summer Initiative.

## **VI.**

### **MEASUREMENT AND VERIFICATION**

SCE intends to provide verified results of the demand reductions associated with this program. These results will be reported in SCE's Annual Energy Efficiency Report along with the results of all SCE energy efficiency programs.

Brief descriptions of the specific studies and analyses that will be undertaken to produce these estimates are included in the detailed program descriptions.

## **VII.**

### **PERFORMANCE AWARD MECHANISM**

The Commission-adopted PY2000 performance award mechanism limits the performance award to 7% of SCE's annual energy efficiency program budget.<sup>14</sup> Consistent with the mechanism adopted for PY2000 in D.00-07-017, SCE proposes to include a portion of the PY2000 Summer Initiative budget for the purpose of establishing SCE's performance award cap. Specifically, SCE plans to incorporate the PY 2000 energy efficiency budgets for the Enhanced Express Efficiency, Refrigerator Recycling, and Savings By Design Premium programs into the calculation of SCE's PY2000 performance award cap.

For the purposes of earnings calculations, SCE's PY2000 energy efficiency program budget will increase from \$79.200 million to \$83.469 million, as shown in Table 2 of Attachment "A." As a consequence, SCE's overall cap will increase from \$5.544 million to \$5.843 million for PY2000. SCE will not include the Cooperative Demand Responsiveness Initiative described in this filing, nor the load management programs proposed in Advice 1463-E, 1464-E, or 1465-E as part of the mechanism.

The CPUC's adopted mechanism also requires SCE to apply PY2000 energy efficiency program expenditures towards achievement of the aggressive implementation component of the mechanism. SCE will apply the expenditures for the energy efficiency programs that are part of SCE's PY2000 Summer Initiative, including commitments, to the aggressive implementation component of its performance award mechanism.

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<sup>14</sup> D.00-07-017, Ordering Paragraph No. 79, p. 270.

As required by D.00-07-017, SCE will file an update to the PY2000 milestones and corresponding levels on August 6, 2000.<sup>15</sup> SCE will include the PY2000 Summer Initiative programs in its upcoming filing.

## **VIII.**

### **SUMMARY OF SCE's REQUEST**

Consistent with D.00-07-017, SCE requests that the Assigned Commissioner or Administrative Law Judge approve SCE's proposed Summer Initiative program activities and related requests included in this filing by August 21, 2000. SCE further requests that the Commission approve its previously filed load management advice letter by the dates set forth in those filings. Specifically, SCE requests authority to: (1) utilize unspent energy efficiency public purpose program funds to implement the Summer Initiative programs and activities described in this filing during PY2000 and PY2001; (2) modify the current fund shifting guidelines for the Standard Performance Contracting and Express Efficiency program elements as described herein; and (3) adopt the PY2000 energy efficiency performance award cap for SCE as modified by this filing to include the additional funding levels for the energy efficiency elements of the Summer Initiative.

## **IX.**

### **CONCLUSION**

SCE appreciates this opportunity to work closely with the Commission and other interested stakeholders to directly address California's need for substantial near-term demand and energy usage reductions. SCE believes that the load management and energy efficiency programs and activities proposed in our Summer Initiative filings offer the most reliable and expeditious means to achieve the Commission's objectives. We look forward to taking the next step in this

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<sup>15</sup> Ordering Paragraph No. 82, p. 271.



process when we develop and propose our PY 2001 energy efficiency program application.

With this in mind, SCE commends the Commission on the focused and efficient process it has brought to bear on fostering the Summer Energy Efficiency Initiative. SCE respectfully urges the Commission to institute a similarly streamlined and efficient process for the PY 2001 energy efficiency program planning process. As it stands now, the Commission must address which of the 33 issues it has identified for resolution will require the diversion of resources away from implementation of the crucial Summer Initiative programs to workshops, reports, etc. during the summer of 2000.<sup>16</sup> SCE hopes the Commission brings the same results orientation to making that decision as it has to this Initiative.

Respectfully submitted,

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July 21, 2000

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<sup>16</sup> Administrative Law Judge's Ruling Scheduling Workshop And Ordering The Filing Of Pre-workshop Statements, Attachment A.



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July 21, 2000

Docket Clerk  
California Public Utilities Commission  
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RE: A.99-09-049 et al.

Dear Docket Clerk:

Enclosed for filing with the Commission are the original and five copies of the **REQUEST FOR APPROVAL OF SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) SUMMER 2000 ENERGY EFFICIENCY INITIATIVE** in the above-referenced proceeding.

We request that a copy of this document be file-stamped and returned for our records. A self-addressed, stamped envelope is enclosed for your convenience.

Your courtesy in this matter is appreciated.

Very truly yours,

Laura A. Larks

LAL:jr:LW003682075.doc

Enclosures

cc: All Parties of Record  
(U 338-E)

