BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Application of Southern California Edison
Company (U 338-E) for Approval of Energy
Efficiency Rolling Portfolio Business Plan.

A.17-01-013
(Filed January 17, 2017)

A.17-01-014
A.17-01-015
A.17-01-016
A.17-01-017

And Related Matters

SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) REPLY COMMENTS TO
VARIOUS PARTIES’ COMMENTS ON REVISED SECTOR-LEVEL METRIC
PROPOSALS AND COMMENTS ON ENERGY EFFICIENCY AND DEMAND
RESPONSE INTEGRATION OPTIONS

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Dated:  July 31, 2017
# SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) REPLY COMMENTS TO VARIOUS PARTIES’ COMMENTS ON REVISED SECTOR-LEVEL METRIC PROPOSALS AND COMMENTS ON ENERGY EFFICIENCY AND DEMAND RESPONSE INTEGRATION OPTIONS

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I.

INTRODUCTION

Pursuant to, and in compliance with, the Scoping Memo and Ruling of Assigned
Commissioner and Administrative Law Judges (ALJ), dated April 14, 2017, the ALJ’s Ruling
Modifying Schedule, issued on June 9, 2017, and the ALJ’s Ruling Requesting Comments on
Energy Efficiency and Demand Response Integration Options, issued on June 30, 2017 (EE /DR
Ruling), Southern California Edison Company (SCE) respectfully submits its Reply Comments
to various parties’ comments on: (1) the revised sector-level metrics proposals filed on July14,
2017; and (2) the California Public Utilities Commission’s (Commission’s or CPUC’s) Energy
Division Staff Proposal (Staff Proposal) on “Limited Integration of Demand Response and
Energy Efficiency Activities” (Attachment A of the EE/DR Ruling), discussions included in the
June 26, 2017 workshop on this topic, and the specific questions included in Section 2 of the EE/DR Ruling.¹

SCE’s reply comments on revised sector-level proposed metrics are addressed in section II of this filing, and its reply comments to comments on Staff Proposal to integrate, on a limited basis, certain EE and DR programs are addressed in section III.

II. REPLY COMMENTS TO PARTIES’ COMMENTS TO REVISED SECTOR-LEVEL METRICS PROPOSAL

A. “Time Elapsed” Metrics Have Limited Benefits and Should Not Be Required

ORA recommends that Program Administrators (PAs) should also include “Business Plan Indicators (BPIs) that will provide context to the utility PAs’ progress toward their third party targets.”² Specifically, ORA proposes using metrics that measure the time elapsed between the (1) release of a request for proposals (RFPs) and bidder responses, (2) bidder responses and selection of contractor, (3) and selection of contractor and contract execution. ORA proposes such metrics to measure progress towards third-party targets.³ These metrics proposed by ORA would have limited benefits because they focus solely on the RFP process, rather than the results or output of the RFP and will not reflect on a PA’s progress towards the third-party targets. In addition, gathering such information for multiple RFPs and bids is burdensome for the PAs. For these reasons, SCE recommends that the Commission not require metrics, baselines, or targets

¹ In addition to SCE, the following parties filed Opening Comments to the Revised Sector-Level Metrics Proposal and/or Comments to Attachment A of the EE/DR Ruling: California Energy Efficiency Alliance (CEA), California Efficiency and Demand Management Council (CEDMC), Coalition for Energy Efficiency (CEE), CodeCycle, LLC, Ecobee, Inc., Local Government Sustainable Energy Coalition (LGSEC), Marin Clean Energy (MCE), Office of Ratepayer Advocates (ORA), Pacific Gas and Electric (PG&E), Robert Bosch, LLC (Bosch), Small Business Utility Advocates (SBUA), Southern California Gas Company (SoCalGas), and The Utility Reform Network (TURN).
² ORA Comments, pp. 2-7.
³ Id.
for “Time elapsed between RFP release and bidder responses,” “Time elapsed between bidder responses and selection of winner,” and “Time elapsed between selection of winner and contract execution” as proposed by ORA.

B. **SCE Has Updated the Baseline and Targets for the Disadvantage Communities and Hard-to-Reach Metrics**

ORA states that SCE “provided a Baseline and Targets for ‘First year annualized ex ante electric and demand savings’ that are an order of magnitude lower than the same totals calculated only for Hard to Reach and Disadvantaged Communities.”

4 In SCE’s July 24, 2017 Opening Comments, SCE amended its July 14, 2017 Revised Sector-Level Metrics Proposal filing to update the baseline and targets for the Disadvantage Communities and Hard-to-Reach Markets metrics and other items.

5 SCE recommends that the Commission use SCE’s updated Revised Sector-Level Metrics Proposal filed on SCE’s July 24, 2017 for evaluation and consideration in this proceeding.

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4 ORA Comments, p. 7.

5 See Attachment A of SCE’s Opening Comments on Revised Sector-Level Metric Proposals and Response to Administrative Law Judge’s Ruling Requesting Comments on Energy Efficiency and Demand Response Integration Options, filed on July 24, 2017.
C. Proposed Workforce Education and Training (WE&T) Metrics are Unnecessary and Burdensome

CEE proposes metrics to measure (1) whether disadvantaged communities have access to jobs created by the Business Plans,\(^6\) (2) outcomes of WE&T programs,\(^2\) (3) that EE measures are installed by an adequately trained and qualified workforce,\(^8\) and (4) meaningful implementation of Assembly Bill (AB) 802 meter-based verification goals.\(^9\) The proposed CEE metrics are overly cumbersome and unnecessary for the WE&T program and the EE portfolio to be effective. The WE&T program has a history of educating contractors about the importance of

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\(^6\) CEE proposes the following specific metric: The percentage of incentives verified to have been installed by contractors that have demonstrated a commitment to provide middle class career pathways to workers from low-income, minority and disadvantaged communities (e.g., through adoption of workforce diversity and inclusion goals or through a contractual agreement to hire through state-certified apprenticeship programs, community colleges or other local or state organizations that have a proven track record of training and providing career opportunities to workers from low-income households and disadvantaged communities and those with barriers to employment.). CEE Comments, p. 4.

\(^2\) CEE proposes the following specific metrics: The percentage of WE&T program participants that meet the definition of disadvantaged workers; The number of new worker participants that go on to graduate from individual partners’ occupational programs (e.g., apprenticeship programs or community college degrees); For existing workers, the number of projects related to the WE&T training on which an incumbent participant has been employed within 12 months of completing the WE&T training; full time employment and income outcomes for WE&T program participants. CEE Comments p. 7.

\(^8\) CEE proposes the following specific metrics:

**Overall Metric**: Percentage of incentives verified to have been installed by a skilled and trained workforce. Verification should be based on compliance with one of the Don Vial Center Workforce Guidance Plan recommendations for increasing engagement of skilled and trained workforce, such as requiring installers to be journeymen with relevant occupational training and experience and holding relevant specialty certifications, or to be supervised-enrollees of state-approved apprenticeship programs or accredited occupational degree programs.

**Short-Term Metrics**: Adopt workforce standards for all midstream and downstream lighting control and HVAC measures; identify all other program energy efficiency measures requiring special skills and training in order to achieve energy outcomes and ensure safety.

**Mid-Term Metrics**: Adopt workforce standards for 50% of energy efficiency measures with moderate installation complexity and 100% of energy efficiency measures with high skill complexity.

**Long-Term Metrics**: Adopt workforce standards for 100% of energy efficiency measures with moderate or high installation complexity. CEE Comments, p. 9.

\(^9\) CEE Comments, p. 11.
quality installations and identifying emerging training needs before the passage of Senate Bill 350 and AB 802.

CEE’s proposed metrics incorrectly suggest that the purpose of the WE&T program is to specifically create jobs, create job access, or create career tracks. Rather, the WE&T program “focuses on educating and training people to perform the jobs needed to reach California’s clean energy goals.”\textsuperscript{10} The two goals identified for WE&T in the California Long-Term Energy Efficiency Strategic Plan are: (1) establish EE education and training at all levels of California’s educational systems, and (2) ensure that minority, low income, and disadvantaged communities fully participate in training and education programs at all levels of the DSM and EE industry.\textsuperscript{11} Metrics proposed by CEE go beyond the scope of the WE&T program. The metrics that require tracking of whether EE measures are installed by an adequately trained and qualified workforce are unnecessary because all contractors participating in EE programs are expected to be appropriately licensed, fulfill their legal obligation, and pass local jurisdiction inspections for code and safety compliance. Moreover, creating data to develop the baselines or targets for the proposed metrics would be costly and difficult to collect, track, accurately verify, and report. Therefore, SCE recommends that the Commission not adopt the metrics proposed by CEE.

D. Dedicated Infrastructure For Local Government Programs is Unnecessary

LGSEC states that the IOUs’ Revised Sector-Level Metrics Proposals “highlight the current lack of a consistent definition for the Public Sector . . .”\textsuperscript{12} and that the “LGSEC BP Proposal is designed to remedy this situation and fits well with the Commission’s Common Metrics initiative.”\textsuperscript{13} LGSEC further states that, “A dedicated, infrastructure for local

\begin{footnotesize}
\textsuperscript{11} \textit{Id.}
\textsuperscript{12} \textit{Id.}
\textsuperscript{13} \textit{Id.}
\end{footnotesize}
government programs would be the only entity with the ability and incentive to provide the statewide consistency when developing and operationalizing new, statewide Common Metrics.”

SCE disagrees that creating a “dedicated, infrastructure for local government programs” is necessary to address the perceived lack of a consistent public sector definition. Rather, the key is to develop a clear definition of the Public Sector. Once the Public Sector has been clearly defined, all PAs would be able to report based on the common set of Public Sector metrics developed. And even if the proposed infrastructure were created, LGSEC will still need to discuss with multiple parties the appropriate public sector definitions so that there is consistency with other metrics, which includes ensuring that there is no double counting that occurs among sector metrics. SCE recommends the Commission disregard LGSEC’s comment that developing consistent definitions for metrics requires the creation of a “dedicated, infrastructure for local government programs.”

E. **PAs Should Not Share Confidential and Historical Program Participation Data**

LGSEC proposes that the “Commission direct the four IOUs to compile and share prior program participation data with LGC (Local Government Commission) (or any entity that becomes the PA for the new statewide local government program administration) to support new program participation metrics.” MCE made a similar request in its Revised Submission, requesting an “order directing PG&E to share its prior program participation data with MCE.” PG&E objects to MCE’s request because “the request would be overly broad” and “would not be an efficient use of ratepayer resources.” SCE agrees with PG&E that sharing program participation data should be denied if the request is overly broad and does not support new

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14 Id.
15 LGSEC Comments, p. 5.
16 Id. at p. 6.
17 MCE Revised Metrics Proposal, p. 4.
18 PG&E Comments, p. 5.
program participation metrics. In addition, requests that require sharing confidential customer information without customer consent should also be denied. As such, SCE recommends the Commission reject LGSEC’s proposal directing the IOUs to provide PAs confidential and historical program participation data.

F. **Parties Should Not Arbitrarily Set Baselines and Targets for Metrics**

While discussing SCE’s methodology for developing metrics for small, medium, and large customers, SBUA recommends that “the numbers may need to be adjusted to reflect differences in the needs and potential of small, medium, and large businesses.” SBUA further recommends “that the Commission require SCE to set at least a 5% target and to consider and examine the more ambitious target of 10% for long-term penetration for small commercial customers.” Parties should not arbitrarily set baselines and targets for metrics. As stated by SBUA, “targets should be justified by some research.” Here, SBUA’s recommended long-term penetration target for small business commercial customers to 10 percent is not justified or supported by any research, compared to SCE’s targets for small, medium and large business on the growth expected in the Commercial sector which are based on the 2015 Navigant Potential Study. SCE recommends that the Commission disregard SBUA’s comment and approve SCE’s Revised Sector-Level Metrics Proposal.

III. **REPLY COMMENTS ON LIMITED INTEGRATION OF DEMAND RESPONSE (DR) AND ENERGY EFFICIENCY (EE) ACTIVITIES**

SCE appreciates the opportunity to file Reply Comments to various parties’ comments on the limited integration of DR and EE activities. Numerous comments either align or do not

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19 SBUA Comments, pp. 5-6.
20 *Id.*
21 *Id.* at 6.
conflict with SCE’s position, and thus SCE limits its reply comments to just a few points of concern.

A. **ORA Comment Regarding Removal of Certain Programs from the EE and DR Portfolios Should Not Be Adopted.**

In its comments, ORA recommends that several programs currently authorized as part of the PAs’ portfolios should be considered for removal from the EE and DR proceedings as limited integration of EE and DR moves forward.\(^{22}\) ORA further states that programs that should be considered for removal are those that are “not clearly ‘integration’ activities, appear to be extended pilots, or have had significantly varying funding levels throughout the years.”\(^{23}\) Specifically, along with other programs, ORA suggests, without explanation, that SCE’s Integrated DSM Marketing program falls within this category of programs that should be considered from removal. SCE recommends against removing its Integrated DSM Marketing program from IDSM funding. The program focuses on education and outreach about how EE and DR interact and can be used together to help a customer manage their energy usage and bills. In addition, because there is not yet a single goal and funding source for EE and DR, integrated funding enables PAs to fund education and outreach that spans the two resources.

B. **MCE’s Request to Receive Funds to Support Its Costs of Integrating DR Programs with EE Programs Is Not Justified**

MCE states that it plans to launch its own DR programs and deliver them in conjunction with the delivery of its EE programs.\(^{24}\) MCE asserts the Commission should allocate funds to it to support its costs of integrating its DR programs into EE program delivery, even though MCE’s

\(^{22}\) ORA Comments, pp. 12-13.

\(^{23}\) *Id.*

\(^{24}\) MCE Comments, pp. 4-5.
DR programs will not be Commission-funded.\textsuperscript{25} MCE does not explain what it means by additional costs “to integrate the DR program with EE program delivery” nor does it explain why it should be allowed to use ratepayer funds to integrate DR programs that are not Commission-funded with existing, Commission-funded EE programs.\textsuperscript{26} Therefore, the Commission should reject MCE’s proposal. If the Commission does authorize integration funding for MCE or other community choice aggregators, they should be held to the same cost-effectiveness requirements as the IOUs to validate that ratepayer funds are returning value.

IV. CONCLUSION

SCE appreciates the opportunity to provide its Reply Comments on revised sector-level proposed metrics and on the Commission’s Energy Division Straw Proposal on Limited Integration of Demand Response and Energy Efficiency Activities and the specific questions included in Section 2 of the EE/DR Ruling.

\textsuperscript{25} Id.
\textsuperscript{26} Id. at p. 4.
Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission’s Rules of Practice and Procedure,
I have this day served a true copy of the SOUTHERN CALIFORNIA EDISON COMPANY’S
(U 338-E) REPLY COMMENTS TO COMMENTS ON REVISED SECTOR-LEVEL
METRIC PROPOSALS AND RESPONSES TO ADMINISTRATIVE LAW JUDGE’S
RULING REQUESTING COMMENTS ON ENERGY EFFICIENCY AND DEMAND
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address, including:

julie.fitch@cpuc.ca.gov
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Executed on July 31, 2017, at Rosemead, California.

/s/ AnnMarie Lett
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