BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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

And Related Matters

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

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

SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) RESPONSE TO MOTION OF VENTURA COUNTY ON BEHALF OF THE 3C-REN, TRI-COUNTY REGIONAL ENERGY NETWORK, FOR APPROVAL OF ITS RESIDENTIAL ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN AND BUDGET

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Dated: March 3, 2017
BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Pursuant to Rule 11.1(e) of the California Public Utility Commission’s (Commission) Rules of Practice and Procedure and in compliance with Administrative Law Judge (ALJ) Julie A. Fitch’s Email Ruling Partially Granting IBEW Motion for Extension of Time issued on February 15, 2017, Southern California Edison (SCE) hereby submits its Response to the Motion of Ventura County on behalf of the Tri-County Regional Energy Network (3C-REN) for Approval of its Residential Energy Efficiency Rolling Portfolio Business Plan and Budget (Business Plan).
I.

INTRODUCTION

SCE respectfully requests the Commission withhold 3C-REN’s Business Plan proposal until the Commission:

- Evaluates 3C-REN’s new programs and services against the criteria established in D.12-11-015;
- Disallows 3C-REN from offering programs and services that are duplicative of SCE’s (or other program administrators’) current or planned program offerings; and
- Requires 3C-REN to clearly define sources of funding for non-energy efficiency activities.

Finally, as discussed below, the Commission should deny 3C-REN’s request to continue to fund the EmPower program as SCE does not believe this program has demonstrated to be an effective program.

II.

DISCUSSION

A. 3C-REN Proposed Activities Are Duplicative of SCE’s Current or Planned Program Offerings

The Commission ruled in D.16-08-019 that “REN programs, and therefore administrative expenses, will only be funded to the extent that they are determined by the Commission to provide value (or promise of value) to ratepayers in terms of energy savings and/or market transformation results for efficiency.” The Commission also ruled that REN program “proposals will continue to be evaluated against the criteria established in D.12-11-015, which includes three areas: activities that utilities cannot or do not intend to undertake; pilot activities where

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D.16-08-019, p. 11.
there is no current utility program offerings, and where there is potential for scalability to a broader geographic reach, if successful; and pilot activities in hard to reach markets, whether or not there is a current utility program that may overlap.”\textsuperscript{2} 3C-REN’s proposal fails to meet the above criteria established by the Commission. First, 3C-REN states that the Tri-County Region (the county of Ventura, San Luis Obispo County and Santa Barbara Country) is not well-served and programs are needed because the “utility workforce education and training programs are nearly absent, and there are no substantial local government partnerships (LGPs) for residential customers in the Region.” The Tri-County Region currently has substantial workforce education and training (WE&T) activities\textsuperscript{3} and four Local Government Partnerships\textsuperscript{4} that provide energy efficiency resources for municipal facilities, Strategic Plan support, and customer outreach. As such, new non-resource activities proposed by 3C-REN are not needed unless 3C-REN can show how their efforts are not duplicative of currently existing services and that they will provide more value than existing activities.

In addition, 3C-REN proposes programs and efforts that are duplicative of SCE’s current or planned program offerings. Below is a list of 3C-REN’s proposed program offerings that are duplicative of SCE’s current program offerings:

\begin{itemize}
\item \textsuperscript{2} Id.
\item \textsuperscript{4} The four Local Government Partnerships in the area are Ventura County Energy Leader Partnership, South Santa Barbara Energy Leader Partnership, North Santa Barbara Energy Watch Partnership, and San Luis Obispo County Energy Watch.
\end{itemize}
1. **3C-REN’s Residential Direct Install**: 3C-REN proposes to utilize a Direct Install program to offer a series of low cost measures to homeowners and renters.\(^5\) However, this effort is already being made through SCE’s Middle Income Direct Install Program which delivers cost-effective EE measures through contracted installers to eligible homeowners and renters throughout SCE’s service territory.\(^6\)

2. **3C-REN’s Single-Family and Multi-family Multi-Measure Program**: 3C-REN proposes to develop a range of simple upgrade packages to be offered to homeowners by contractors through the Single-Family and Multifamily Multi-Measure Programs.\(^7\) However, this effort is already being made through Statewide programs such as Single-Family and Multi-Family Energy Upgrade California (EUC) programs.\(^8\) The EUC program offers homeowners EE measures and services to improve the energy efficiency in homes using EUC certified independent local contractors.

3. **3C-REN’s Residential Valuation Tools**: 3C-REN proposes to deploy valuation tools to build awareness of EE benefits and drive deeper energy retrofits.\(^9\) However, this effort is already offered through SCE’s Enhanced Energy Advisor Tool (EEAT).\(^10\) EEAT is SCE’s on-line energy survey and engagement tool that provides customized energy savings recommendations and engagement features such as energy saving tips.

4. **3C-REN’s Regional Assistance to Building Departments and Jurisdictions**: 3C-REN proposes to establish an “Energy Code Coach” to provide ongoing technical assistance for building departments and to create streamlined processes

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\(^5\) 3C-REN Business Plan, pp. 45-47.
\(^6\) See AL 3465-E.
\(^7\) 3C-REN Business Plan, pp. 45-48.
\(^8\) See AL 3465-E.
\(^9\) 3C-REN Business Plan, pp. 45-51.
\(^10\) See AL 3465-E.
and code compliance tools including support for an online permitting program. However, this service is already offered by SCE through the Statewide Codes and Standards Program (EnergyCodeAce), the Statewide Reach Code Program, SCE’s Local Government Strategic Plan Support Program, and SCE’s WE&T Title 24 trainings. EnergyCodeACE is one stop website that provides tools, training, and resources for compliance with Title 24 and Title 20 standards. The Statewide Reach Code program and Local Government Strategic Plan Support provides financial and technical assistance (including cost effectiveness calculators) to local governments that wish to adopt local codes that are stricter than Title 24. Lastly, WE&T Title 24 trainings provide resources to local jurisdictions on proper implementation and compliance with Title 24.

As discussed above, REN proposals will be evaluated based on the criteria determined in D.12-11-015, which includes activities utilities cannot or do not intend to undertake and pilot activities in hard to reach markets. In addition, the Commission encouraged RENs to carefully coordinate with other program administrators to minimize overlaps and gaps. Rather than providing programs that are already being offered by SCE or another program administrator, SCE encourages 3C-REN to leverage existing tools and technologies and fill gaps where there are no current utility (or other program administrator) programs being offered or target hard to reach markets.

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12 SCE Amended Business Plan, EnergyCodeAce (p. 208), Reach Code (p. 234), Local Government Strategic Plan Support (p. 186), WE&T Title 24 training (p. 297).
14 D. 12-11-015, p. 17.
15 D.16-08-019, p. 11.
B. **3C-Ren Should Clearly Define Sources of Funding for Non-EE Activities**

3C-REN discusses implementing low cost solar and energy storage solutions as well as other non-energy efficiency activities.\(^{16}\) However, it is unclear what sources of funding will be used to support non-energy efficiency activities proposed in the business plan. If evaluations find REN programs effective and the Commission authorize 3C-REN to become a new REN, SCE recommends that 3C-REN provide a budget that identifies the breakdown between IOU energy efficiency funds and all other non-IOU funds, so that EE funds are not inappropriately used to fund non-EE activities.

C. **The Commission Should Discontinue the EmPower Program**

3C-REN proposes to continue to operate the EmPower Central Coast (EmPower) program.\(^{17}\) However, as detailed in SCE’s Annual Budget Advice Letter filed on September 1, 2016, SCE recommends the Commission approve termination of the EmPower program. The EmPower program is a continuation of financing programs originally supported by American Recovery and Reinvestment Act (ARRA) stimulus funding in 2011 and 2012, and implemented by local governments. The program was created to streamline the process of attaining low-cost, unsecured loans; qualifying third-party contractors; and providing utility rebates to help homeowners overcome the high upfront cost and confusion associated with making home energy upgrades. EmPower was also meant to coordinate with and enhance the participating utilities’ Energy Upgrade California program (“EUC Program”) by driving customer participation. However, the EmPower program has not generated significant savings within the EUC program nor has it generated a significant amount of loan activity. Although 3C-REN argues that EmPower has received 119 loan applications and have closed 64 loans through 2016,\(^{18}\) SCE’s analysis of EmPower’s self-reported program results shows lower loan activity than REN

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\(^{16}\) 3C-REN Business Plan, pp. 9, 21.
\(^{17}\) 3C-REN Business Plan, pp. 1-2.
\(^{18}\) Santa Barbara, San Luis Obispo and Ventura Counties Joint Protest of Advice Letter 3465-E.
alleges. As a result, EmPower itself requested to modify the program’s objective from a finance program to a marketing and outreach program, as discussed in 3C-RENs Business Plan. SCE declined this modification because the program was approved as a finance program. Because the Commission, in D.16-08-019, ruled that it will only fund programs to the extent they are determined by the Commission to provide value (or the promise of value) to ratepayers in terms of energy savings and/or market transformation results for energy efficiency (EE) and because the EmPower program has not yet demonstrated effectiveness, SCE proposed in its Annual Budget Advice Letter filed on September 1, 2016, to discontinue this program upon the expiration of the Program Agreement on March 31, 2017.

III.

CONCLUSION

SCE appreciates the opportunity to provide this Response to the Motion of Ventura County on behalf of the Tri-County Regional Energy Network (3C-REN) for approval of its Residential Energy Efficiency Rolling Portfolio Business Plan and Budget. SCE respectfully requests the Commission to consider SCE’s Response before approving 3C-REN’s Business Plan and Budget.

19 3C-REN Business Plan, p. 1. “Requests to make significant program modifications have been denied by the IOUs.”
20 D.16-08-019, p 11.
Respectfully submitted,

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A.17-01-017

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 SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) RESPONSE TO MOTION OF VENTURA COUNTY ON BEHALF OF THE 3C-REN, TRICOUNTY REGIONAL ENERGY NETWORK, FOR APPROVAL OF ITS RESIDENTIAL ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN AND BUDGET on all parties identified on the attached service list A.17-01-013 et al. Service was effected by one or more means indicated below:

- Transmitting the copies via e-mail to all parties who have provided an e-mail address.
- Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand or by overnight courier to the offices of the Assigned ALJ(s) or other addressee(s).

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