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) |
| And Related Matters                                                                                                           | A.17-01-014                             |
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SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) REPLY TO VARIOUS PARTIES’ FINAL COMMENTS ON ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN

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# SCE’S FINAL COMMENTS ON ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLANS

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ATTACHMENT A

ATTACHMENT B
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 (Filed January 17, 2017)

And Related Matters

SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) REPLY TO VARIOUS PARTIES’ FINAL COMMENTS ON ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN

I.
INTRODUCTION

Pursuant to, and in compliance with, the August 4, 2017 Administrative Law Judges’ Ruling Clarifying July 25, 2017 Ruling and Denying, in Part, Pacific Gas and Electric Company’s Motion to Amends its Application, Southern California Edison Company (SCE) hereby submits its reply comments to various parties’ Final Comments on Energy Efficiency (EE) Rolling Portfolio Business Plans (Reply Comments). SCE requests the Commission take the following actions regarding its Amended Business Plan:

- Approve SCE’s Amended Business Plan, including all related subsequent filings;
- Reject parties’ assertions that SCE’s Business Plan budget details are insufficient;
- Affirm that SCE’s proposed EE portfolio is cost-effective;
• Adopt The Utility Reform Network’s (TURN’s) recommendation to maximize the use of Normalized Metered Energy Consumption (NMEC) to evaluate applicable custom projects;
• Disregard the Office of Ratepayer Advocate’s (ORA’s) proposal to reject the downstream statewide pilots;
• Provide flexibility to modify the statewide program administration structure after the Commission’s Business Plan decision is issued;
• Adopt PG&E and SoCalGas recommendations to fully capture third-party costs;
• Reject proposals to require program administrators (PAs) to publish detailed bid evaluation criteria;
• Reject proposals to require the PAs to bid out programs to fill portfolio gaps;
• Authorize SCE to leverage the existing procurement Independent Evaluator (IE) process and Peer Review Group (PRG) rather than forming a new IE and PRG specifically for EE;
• Adopt the Business Plan metrics proposed by SCE and require PAs to continue to refine metrics after Business Plan is approved;
• Require that proposals for new metrics be vetted with parties and discussed at CAEECC sub-committee meetings;
• Reject ORA’s proposal to reduce SCE’s levelized costs of energy;
• Determine that annual metric reporting provides sufficient oversight during the 2018-2025 Business Plan period;
• Do not apply San Diego Gas & Electric Company’s (SDG&E’s) request for a separate EE balancing account for Statewide programs to SCE as SCE’s EE balancing account is sufficient to track and manage SCE’s programs, including statewide programs;
• Reject ORA’s proposal to deny the PAs the ability fund account representatives through the EE balancing accounts;
• Approve SCE’s proposed funding for LED street light incentives; and
• Reject proposals requiring adoption of additional workforce standards, or, in the
  alternative, establish an independent body to develop, with input from stakeholders,
  appropriate workforce standards.

II.

DISCUSSION

As stated in SCE’s Final Comments, after engaging in a lengthy and robust stakeholder
process, SCE submitted a Business Plan\textsuperscript{1} designed to achieve cost-effective energy savings,
expand innovative EE solutions, and drive toward market transformation.\textsuperscript{2} Following the
submission of the business plans, a substantial record was developed in this proceeding through
filed comments, data request responses, workshops, and various stakeholder meetings. While
SCE looks forward to working with the Commission and stakeholders to refine details of the
rolling portfolio process as the transition occurs, SCE strongly agrees with other parties such as
NRDC, CLEAResult, and the other PAs that the Commission should expeditiously approve the
business plans so that PAs can implement them without further delay.\textsuperscript{3}

Some of the parties would demand certainty and specificity about events that have not yet
occurred, without recognition that the business plans are meant to explain “at a high level of
abstraction how PAs will achieve the goals of the Commission’s strategic plan” that will be
refined through annual budget filings and implementation plans as the process unfolds.\textsuperscript{4}
Therefore, the Commission should accept the business plans as filed and “allow for bidding to
commence as soon as possible in the spirit of the rolling portfolio process to make improvements

\textsuperscript{1} See SCE Final Comments, pp. 3-5.
\textsuperscript{2} See A.17-01-013, SCE’s Amended Energy Efficiency Rolling Portfolio Business Plan For 2018-2025,
February 10, 2017, p. 8 (Business Plan or Amended Business Plan).
\textsuperscript{3} See NRDC Final Comments, pp. 2-3; see also CLEAResult Final Comments, p. 6.
\textsuperscript{4} See Decision (D.)15-10-028, Decision Re Energy Efficiency Goals for 2016 and Beyond and Energy
Efficiency Rolling Portfolio Mechanics, p. 43.
over time and to enable a more flexible ongoing process to program planning and implementation.\(^5\)

Most of the Final Comments repeat arguments that SCE has already addressed in previous filings. In these Reply Comments SCE highlights some key issues and responds to new issues rather than repeating arguments it has already addressed.\(^6\) SCE is also providing in Attachment A to its Reply Comments, Table A, which provides a reference list detailing the location of SCE’s positions and recommendations set forth in previous filings in this proceeding.

A. **SCE’s Proposed Business Plan Is Reasonable**

SCE has provided substantial detail in its business plan and subsequent filings that demonstrate its business plan budget is reasonable. SCE submitted a cost-effective, high-level business plan budget, in accordance with Commission guidance, and therefore the Commission should approve it.

1. **SCE Has Provided Sufficient Detail to Demonstrate the Reasonableness of its High-Level Business Plan Budget**

A few parties argue that the business plans do not conform to the Commission’s policy directives and lack a sufficient basis to determine their reasonableness.\(^2\) These allegations

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\(^5\) NRDC Final Comments, p. 2.

\(^6\) Although SCE has already responded that many of their arguments are not within the scope of this proceeding, GreenFan and Verified again devote a significant portion of their final comments rehashing unfounded legal and ethical allegations against certain IOUs, including SCE. See GreenFan and Verified’s Final Comments, pp. 5-11. SCE continues to disagree with the veracity of those allegations, and SCE notes that on October 3, 2017, ALJ Fitch issued an e-mail ruling granting SoCalGas’ motion to strike portions of GreenFan and Verified’s comments relating to this alleged “dispute.” ALJ Fitch stated, in part, that “[t]his proceeding is not the venue to adjudicate past disputes of the nature of those raised by the portion of GreenFan’s and Verified’s comments [related to those past disputes].” See Cover email for revised E-mail ruling granting SoCalGas motion to strike portions of comments filed by GreenFan Inc. and Verified Inc., October 3, 2017 e-mail from ALJ Fitch to Parties in A.17-01-013.

\(^2\) See ORA Final Comments, p. 2; NAESCO Final Comments, p. 3; TURN Final Comments, p. 2 (recommending that the Commission “reach only very tentative conclusions regarding the costs and benefits of the Business Plans given the uncertainty with which the PAs have forecasted those costs.
are either incorrect or not supported by any evidence, and therefore the Commission should reject them and accept the SCE’s Business Plan budget as filed.

ORA and the National Association of Energy Service Companies (NAESCO) specifically argue that SCE’s budgets lack sufficient basis for the Commission to determine whether they are reasonable. As discussed in its Final Comments and in its Amended Business Plan, SCE filed a cost-effective and reasonable high-level Business Plan budget. SCE acknowledges that the budget is an estimate, and SCE will provide more accurate annual budget forecasts in the annual budget advice letters as the Rolling Portfolio implementation unfolds, as contemplated by the Commission. Moreover, SCE has since provided a significant level of additional detail, in a format developed in conjunction with the parties, which far exceeds the required detail the Commission initially required of the PAs to support their business plan budgets. SCE also responded to several discovery requests from ORA, TURN, and other parties seeking additional detail on the business plan budget. SCE is concerned that no amount of budget information would be sufficient for ORA and NAESCO to support approval of its Business Plan budget, and their arguments are contrary to the Commission’s guidance that “[t]he business plan contains high-level budget estimates, and will result in a decision providing Commission guidance for PAs in preparing and Commission Staff in reviewing annual budget filings.”

If the Commission grants these parties’ request to reject SCE’s Business Plan

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8 See ORA Final Comments, pp. 2-5. See NAESCO Final Comments, pp. 3-5, NAESCO recommends that the Commission only approve the third-party solicitation proposals in the IOUs’ business plans.

9 See D.15-10-028, pp. 55-56 (noting that the decision on the business plan budgets “will establish a ‘ballpark’ figure for spending for the life of the business plan” and will not “establish a particular amount for cost recovery”).

10 See D.15-10-028, p. 62.
budget and requires it to re-file a new budget in early 2018,\textsuperscript{11} the implementation of the Rolling Portfolios will be further delayed. A rejection will also result in unnecessarily lengthy litigation of these high-level issues, which is contrary to Commission guidance and policy of establishing the Rolling Portfolios, to “reduce administrative burdens and other costs for the Commission, administrators, and program implementers, compared to the current triennial review process.”\textsuperscript{12}

2. **SCE’s Proposed EE Portfolio is Cost-Effective and Reasonable**

ORA attempts to support its contention that the Commission should reject SCE’s Business Plan budget by claiming that there is considerable doubt that the IOU PAs’ business plans will be cost-effective even in their first year.\textsuperscript{13} ORA’s Final Comments, however, confirm that SCE filed a cost-effective EE portfolio.\textsuperscript{14} SCE has also filed annual budget advice letters with cost-effective portfolios for 2017\textsuperscript{15} and 2018,\textsuperscript{16} per the Commission’s direction, which further demonstrate its EE portfolio’s cost-effectiveness in those years. In an effort to undermine these facts, ORA accuses SCE of “[i]nventing new, highly cost-effective measures which do not correspond to any actually existing workpapers or programs” that do not provide a sufficient

\textsuperscript{11} NAESCO proposes that the Commission require the PAs to file new business plan applications in the first quarter of 2018 and that the Commission should provide the IOUs with a “common, more detailed budget template.” NAESCO Final Comments, p.5. Such a requirement would be a waste of resources and is not necessary. SCE, however, does support TURN’s recommendation that the PAs update the supplemental budget templates and tables in the 2019 annual budget advice filing (to be filed September 1, 2018) to reflect the portfolio composition, operational impacts of D.16-08-019 requirements and additional policies adopted by the Commission. TURN Final Comments, p2.


\textsuperscript{13} See ORA Reply Comments p. 3.

\textsuperscript{14} ORA Final Comments, p. 4 (reproducing table showing a projected 1.0 or above cost-effectiveness ratio for SCE).

\textsuperscript{15} See Advice Letter 3465-E-B, Southern California Edison Company's 2017 Annual Energy Efficiency Program and Portfolio Budget Request, filed and approved on July 28, 2017, and effective on October 1, 2016. AL 3465-E-B replaced, in its entirety, SCE’s Advice 3465-E, filed on September 1, 2016, and AL 3465-E-A, filed on December 14, 2016.

\textsuperscript{16} See Southern California Edison Company’s 2018 Energy Efficiency Program and Portfolio Annual Budget Advice Letter, filed on September 1, 2017.
evidentiary basis for the Commission to find SCE’s portfolio cost-effective.\textsuperscript{17} ORA’s claim that these highly cost-effective measures are not supported is incorrect, because SCE provided detailed information in its Amended Business Plan supporting how it re-calculated the cost-effectiveness of its portfolio without codes and standards (C&S).\textsuperscript{18}

In its Amended Business Plan, SCE explained that when it discovered that it had incorrectly filed its cost-effectiveness calculation with C&S, SCE did not simply re-file the same portfolio without the C&S; rather, SCE appropriately re-evaluated its portfolio and made three categories of changes to ensure the portfolio’s continued cost-effectiveness without C&S. In sum, SCE (1) re-allocated budget from lower-TRC measures to higher-TRC measures, where necessary and appropriate; (2) increased its proposed funding in high-TRC measures to replace certain low-cost measures; and (3) reduced certain non-resource related costs, in order to increase the overall TRC.\textsuperscript{19} While recognizing that the portfolio budget is a high-level estimate only, SCE explained that its proposed adjustments were consistent with the Commission’s observation that, “EE is designed to be cost-effective as a whole portfolio, in which the cost of measures with a low TRC is offset in the portfolio by the higher savings of measures with high TRC.”\textsuperscript{20} Thus, ORA’s claim that SCE did not provide a sufficient basis for the Commission to find the business plan budget cost-effective is incorrect and should be rejected by the Commission.

In another attempt to undermine SCE’s filing of cost-effective budget, ORA asserts that it is concerned because “the entire statewide portfolio as implemented was not cost-effective in 2016 even though the 2016 reported savings utilized the prior set of avoided costs.”\textsuperscript{21}

\textsuperscript{17} See ORA Final Comments, p. 3.
\textsuperscript{18} See SCE’s Amended Business Plan, pp. 31-33; see also SCE’s Amended Energy Efficiency Rolling Portfolio Business Plan Application 17-01-013, pp. 2-5.
\textsuperscript{19} See SCE’s Amended Business Plan, pp. 31-33.
\textsuperscript{20} SCE’s Amended Business Plan, p. 32 (quoting D.14-10-046, p. 24).
\textsuperscript{21} See ORA Final Comments, p. 5.
SCE asserts that the Commission should approve SCE’s Business Plan if it finds that SCE has submitted a cost-effective portfolio, and the evidence demonstrates that it has. Not only has SCE filed a cost-effective budget proposal in its Amended Business Plan, but SCE also delivered an EE portfolio that met a cost-effectiveness threshold of 1.0 for 2016, as illustrated by ORA’s own table in its Final Comments. Thus, ORA’s more general argument that the Commission should look at past performance to reject the reasonableness of the PAs’ cost-effectiveness projections fails when applied to SCE. In sum, ORA has not offered sufficient evidence to support its claims. SCE submitted a cost-effective Business Plan, and as ORA's own table illustrates, delivered a cost-effective portfolio in 2016. Therefore, the Commission should approve SCE’s Business Plan budget as filed.

3. **TURN’s Recommendation for a 1.25 TRC Threshold Should be Rejected**

In its Final Comments, TURN reiterates its recommendation that the Commission require the PAs to meet a 1.25 cost-effectiveness threshold in their Annual Budget Advice Letters. As SCE described in its Final Comments, SCE’s proposed Amended Business Plan is cost-effective based on a TRC of 1.0, excluding the costs and benefits of C&S.

Particularly during this period of transition, while cost efficiencies may take some time to materialize, the Commission should continue to require a cost-effectiveness threshold of 1.0, as it did in D.14-10-046, rather than increasing the threshold to 1.25. At this late date, it

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22 See ORA Final Comments, p. 4.
23 See TURN Final Comments, pp. 10-11.
24 See SCE Final Comments, pp. 10-11. SCE recognized the ambiguity regarding the proper threshold in its 2018 Budget Advice Filing, but SCE continues to believe that a 1.0 TRC is appropriate. In D.14-10-046, the Commission noted that corrections to the cost-effectiveness calculations “will materially lower TRCs” and that “to the extent they drop below 1.0 we will require portfolio adjustments to exceed that minimum threshold.” D.14-10-046, p. 6, fn 3. The Commission also recognized, but did not resolve, what it called a “tension” between prior TRC expectation of 1.25 and the modified expectations made for 2015. *Id.*, p. 110 fn. 96. Then, in D.16-08-019, the Commission did not address this tension but referred generally to the requirement that the “utility portfolio…be cost-effective on its own, prior to consideration of the costs and benefits of the codes and standards activities.” D.16-08-019, pp. 30-31.
would be difficult for SCE to implement a portfolio with a cost-effectiveness ratio of 1.25 in 2018, and a 1.25 threshold is not likely achievable during the transition period to at least 60 percent third-party implementation of EE programs without major modifications and cuts to EE programs. Because SCE has demonstrated that its EE portfolio Business Plan is cost-effective based on current Commission guidance, TURN’s recommendation should not be adopted, and the Commission should not delay the approval of SCE’s Business Plan.

4. **SCE Supports TURN’s Recommendation to Maximize the Use of Normalized Metered Energy Consumption (NMEC) to Evaluate Applicable Custom Projects**

In its Final Comments, TURN makes several recommendations for policy changes to improve results from the Custom Projects Program. TURN states, “[t]he HOPPs framework adopted by the Commission in R.13-11-005 provides an example of where the Commission is moving towards this kind of framework, particularly for projects where savings are based on metered energy consumption.” TURN further “urges the Commission to consider tools for better aligning the utility’s interest in improved custom program realization rates with ratepayer interests in the same in R.13-11-005, where changes to ESPI and other broad policy issues are clearly within the scope.” While approval of the Business Plan is not contingent on TURN’s proposal being adopted by the Commission, SCE supports TURN’s recommendation to maximize the use of normalized metered energy consumption (NMEC). While SCE disagrees with the premise that the utilities do not have an interest in appropriately measuring savings for their custom projects, SCE agrees that the utilities should be allowed to maximize the use of NMEC to evaluate applicable custom projects. Using NMEC will simplify evaluation, measurement and verification (EM&V) for custom projects, where such an evaluation is feasible,

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26 See Reply of SCE to Various Parties’ Protests of Advice Letter 3654-E, pp. 3-5, filed September 1, 2017 (including detailed discussion regarding why the Commission should retain the 1.0 cost-effectiveness threshold during the transition to the Rolling Portfolio process).

27 See TURN Final Comments, p. 15.

28 See TURN Final Comments, pp. 15-16.
reduce EM&V costs, and allow for faster feedback and transparency of savings for customers and contractors. Using this method will also obviate the need for the ex-ante review process that causes delays and uncertainty for customers and contractors. Therefore, SCE supports TURN’s recommendation for the Commission to further evaluate the use of these tools in R.13-11-005.

B. **The Commission Should Reject ORA’s Request to Deny the Proposed Downstream Statewide Pilots**

In D.16-08-019, the Commission stated that downstream approaches at the customer level may be appropriate for a statewide administration framework, and that the PAs shall propose at least four downstream programs to be piloted on a statewide basis. SCE and the other IOUs complied with the Commission’s order by proposing four such programs at the customer-level. ORA supports MCE’s statewide pilot approach which focuses on “the administration of downstream programs,” and ORA further recommends that the Commission deny the IOU’s proposed downstream statewide pilots. The Commission should deny ORA’s proposals (and approve SCE’s pilot proposal), because ORA’s pilot recommendation is focused on program administration and therefore not consistent with OP 9 of D.16-08-019 which focused on customer-level downstream pilots.

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29 See D.16-08-019, OP 9, “Some, but not all, downstream (at the customer level) approaches may also be appropriate for a statewide administration framework even though individual program participation activities would still occur at a local level. The program administrators shall propose in their business plan filings at least four downstream programs to be piloted on a statewide basis and shall include a proposed lead administrator and other program details,” emphasis added, p. 111.


31 See ORA Final Comments, pp. 17-19.

32 See ORA Final Comments, pp. 16-18 (emphasis added).

33 In addition, in its Final Comments on p. 18, ORA “proposes that the Commission order an additional statewide downstream early commercialization pilot that would be designed to aid new and innovative technologies and programs into the portfolios and test whether they can be brought to scale.” The Commission should direct ORA to vet their early commercialization pilot proposal at CAEECC. Such direction would be consistent with the Administrative Law Judges’ Ruling.
C. Solicitations

This section provides SCE’s positions on parties’ comments related to competitive solicitations for EE programs. Specifically, several parties make recommendations for the third-party solicitations process and the independent evaluator (IE) and peer review group (PRG) processes.

1. SCE Supports the PG&E and SoCalGas Recommendations to Fully Capture Third-Party Costs

In its Final Comments, PG&E supports SoCalGas’ recommendation that the Commission clarify that a PA’s budgets for functional activities (i.e., contract management and customer outreach), as well as for RENs; CCAs; the Energy Division’s M&V; and statewide marketing, education, and outreach (ME&O) count toward the PAs’ compliance requirement that 60 percent of the EE budgets are dedicated to third-party programs. SCE agrees that any such costs incurred by a PA should be included as third-party program costs, and thus encourages the Commission to make the requested clarifications.

On a related note, PG&E also recommends a slight revision to the definition of “third party” to more accurately reflect the Commission’s intent that other entities – such as Commission staff and consultants, the California Energy Commission, and other stakeholders in collaboration with the PAs and/or the Commission – may be the entities proposing and designing programs but “are not under contract to an IOU.” However, as PG&E notes, these programs

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1. See PG&E Final Comments, pp. 6-7.
2. See PG&E Final Comments, pp. 6-7. Clarifying July 25, 2017 Ruling and Denying, in Part, Pacific Gas and Electric Company’s Motion to Amend Its Application, which denied PG&E’s motion to amend its business plan application because, in part, “D.16-08-019 specifically required that the statewide plans be discussed and vetted through the CAE ECC process,” p. 7.
3. In addition, PG&E’s “platform” concept includes activities that support the implementation of programs, such as work paper and measure development and management. See PG&E Final Comments, pp. 6-7. SCE does not use the term platform; however, SCE supports PG&E’s position that such activities should count towards a PA’s third-party requirements if they are performed by third parties as a result of a competitive solicitation process.
4. See PG&E Final Comments, pp. 11-12.
may ultimately be implemented and delivered by a third-party who are under contract to an IOU.\textsuperscript{12} Programs (and costs related to programs) administered by third parties under contract with the PAs, but originally proposed and designed by a regulatory agency or other stakeholder that is not under contract to an PA, should clearly fall within the scope of a third-party program,\textsuperscript{38} but the current definition may inadvertently exclude some of those costs from the third-party category. PG&E’s suggested update to the third-party definition will appropriately capture and account for activities performed by third parties, and thus the Commission should adopt the recommended change.

2. **It is Premature for the Commission to Order the PAs to Bid Out Programs to Fill Portfolio Gaps**

   In its Final Comments, NAESCO states, “[t]he Commission should order the IOUs to bid out several programs that are needed to fill substantial gaps in their portfolios.”\textsuperscript{39} NAESCO identifies residential downstream programs and municipals, universities, schools and hospitals as examples of gaps in the IOU portfolios.\textsuperscript{40} This proposal is premature because the PAs must first conduct their third-party solicitations before any gaps in the portfolio can be identified. SCE notes that its Solicitation for Innovation would allow third parties to propose innovative programs that target any segment, including the segments identified by NAESCO. As such, NAESCO’s recommendation is not necessary, and in fact could conflict with the Solicitation for Innovation process; therefore, NASESCO’s recommendation should be rejected.

3. **The Commission Should Allow SCE to Use the Existing Procurement Independent Evaluator (IE) Process and Peer Review Group (PRG)**

   In their Final Comments, NAESCO and NRDC separately recommend that the Commission adopt an EE-specific Independent Evaluator (IE) and Peer Review Group (PRG) to

\textsuperscript{12} Id., pp. 9-11.
\textsuperscript{38} See, e.g., D.16-08-019, COL 57.
\textsuperscript{39} See NAESCO Final Comments, p. 6.
\textsuperscript{40} See NAESCO Final Comments, pp. 6-11.
review and monitor third party proposals for statewide programs.\textsuperscript{41} As SCE described in its Comprehensive Solicitation Proposal,\textsuperscript{42} and its Final Comments,\textsuperscript{43} the Commission should authorize SCE’s proposal to use its existing IE and PRG process that monitors SCE’s current supply-side procurements. This process includes an IE selection process with oversight and input from Energy Division and the PRG, which could be used to ensure appropriate IEs are selected in support of EE solicitations. In addition, PRG membership could be expanded as needed to accommodate EE. Establishing an EE-specific IE and PRG as NAESCO and NRDC suggests would be redundant for PAs who utilize a Procurement Review Group and IE.

Because the purpose of IE and PRGs is to evaluate solicitations for fairness and transparency, the existing IE and PRG process is well-equipped to handle this function. Therefore, it is not necessary to form a separate EE-specific IE and PRG process, and the Commission should adopt SCE’s proposal to leverage its existing IE and PRG process.

D. **Metrics**

1. **The Commission Should Adopt the Business Plan Metrics Proposed by SCE, and Require PAs toContinue to Refine Metrics After the Business Plan is Approved**

   In its Final Comments, ORA mislabeled its recommendations for SCE’s net lifecycle savings projects (both kWh and kW). ORA’s Tables 7 and 8 reflect SCE’s gross lifecycle savings projections (i.e., not net lifecycle savings projections).\textsuperscript{44} Also, ORA states that the PAs have largely failed to address the omission and errors identified by ORA in ORA’s July

\textsuperscript{41} See NAESCO Final Comments, p. 16, See also NRDC Comments, p. 4.


\textsuperscript{43} See SCE Opening Comments on Comprehensive Solicitation Process Proposal (August 18, 2017), pp. 3-5.

\textsuperscript{44} See ORA Final Comments, pp. 26-27.
14, 2017 metric reply comments.\textsuperscript{45} However, in SCE’s July 24, 2017 Opening Comments on Revised Sector-Level Metric Proposals, SCE corrected an error identified by ORA by updating the baseline and targets for the Disadvantage Communities and Hard-to-Reach Markets metrics and other items.\textsuperscript{46} Also, as described in SCE’s sector-level metrics proposal,\textsuperscript{47} the “omissions” that ORA identified are related to Commission Staff guidance that PAs received just four days before the revised metrics filing was due. The guidance included 18 new metrics that were not reviewed and vetted by SCE or other parties. Given the short timeframe, SCE was not able to update its proposal to provide an accurate baseline and target for metrics that resulted in a significant restatement of the metric or for any new metric introduced. However, since that time SCE has been developing the information for such proposed metrics, which should be vetted and discussed with other parties for further refinement prior to a Commission decision on finalizing the metrics. However, the new metrics should not delay implementation of the entire business plan.

2. **New Metric Proposals Should Be Vetted with Parties and Discussed at CAEECC Sub-Committee Meetings**

In the Scoping Memo and Ruling of Assigned Commission and Administrative Law Judges,\textsuperscript{48} the Assigned Commissioner and ALJs outlined a process for developing and refining sector level metrics.\textsuperscript{49} Such process included a staff proposal, consultation with PAs and other parties, and a Commission staff hosted workshop to discuss proposed metrics. The ruling


\textsuperscript{46} 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.

\textsuperscript{47} See Southern California Edison Company’s Revised Sector-Level Metrics Proposal, July 14, 2017, p. 3.


\textsuperscript{49} Id.
also provided additional steps that may be needed, including additional workshops and CAEECC subcommittee meetings.\textsuperscript{50}

ORA suggests that the Assigned Commissioner and ALJs should circumvent their own metric development process and order net lifecycle savings targets. However, ORA’s recommendation does not allow for adequate stakeholder input. For example, for ORA’s suggested metric requiring net lifecycle savings targets, SCE is concerned that, because lifecycle savings take into account factors outside of SCE’s control (e.g., expected useful life (EUL)), such targets do not appropriately measure SCE’s progress towards the Commission’s goals. In addition, as mentioned by PG&E,\textsuperscript{51} PAs could be faced with a trade-off between meeting first year and lifecycle savings targets (e.g., Home Energy Reports has a short EUL but may help more in achieving first year savings target). As such, the Commission should follow the process outlined by the Assigned Commissioner and ALJs, and require new metric proposals to be vetted at appropriate workshops and CAEECC meetings.

3. \textbf{ORA’s Proposal to Reduce SCE’s Levelized Costs of Energy (LCOE) is Arbitrary and Not Justified}

ORA proposes to reduce SCE’s LCOE target by an additional 5 percent in the medium-term and an additional 5 percent in the long-term.\textsuperscript{52} However, ORA fails to provide any justification for this proposed reduction. In fact, ORA calls for “aggressive but achievable targets,”\textsuperscript{53} but does not provide any evidence to support whether its proposal is achievable. As such, prior to adopting this substantial change to medium- and long-term targets, the Commission should require ORA to provide evidentiary support for its proposed reduction of SCE’s LCOE targets, and require such new targets to be vetted with parties and discussed at a CAEECC Sub-Committee meeting.

\textsuperscript{50} Id.
\textsuperscript{51} See PG&E Reply Comments on Metrics and EE-DR Integration, July 31, 2017, p. 4.
\textsuperscript{52} See ORA Final Comments, pp. 21-22.
\textsuperscript{53} See ORA Final Comments, pp. 19-20.
E. Other Issues

1. The Commission Should Not Require a Statewide EE Balancing Account for SCE and Should Continue to Allow SCE to Record Costs for Account Representatives in its EE Balancing Account

   a. SCE Clarifies that Its EE Balancing Account is Sufficient to Track and Manage SCE’s Programs, Including Statewide Programs

   On August 4, 2017, SDG&E filed a Motion for leave to amend its Business Plan by requesting to establish EE balancing account(s) to track and manage the cost sharing among the statewide program lead administrators and the contributing PAs.\footnote{San Diego Gas & Electric Company’s Motion to Establish Balancing Accounts for Statewide Energy Efficiency Programs, August 4, 2017.} SCE does not oppose SDG&E establishing EE balancing accounts for programs for which it is the statewide lead, but SCE clarifies that the grant of SDG&E’s Motion should not require SCE to establish any additional EE Balancing Accounts. As noted by SDG&E, its proposed balancing accounts “are strictly a tracking and management mechanism for the statewide programs” and the Motion “does not address the manner in which the PAs will fund their shares of the statewide programs nor compensate the lead PA for costs.”\footnote{SDG&E Final Comments, p. 25.} SCE’s EE Balancing Account already accomplishes SDG&E’s intended goal of managing and tracking all of SCE’s EE programs, including statewide programs for which it is the lead PA. Thus, the Commission should not order SCE to establish any additional balancing accounts in connection with SDG&E’s request.\footnote{SCE has also advocated in past comments for consolidating the Demand Side Management balancing accounts in related proceedings (ex. EE and DR) to optimize the resources.}
b. **The Commission Should Continue to Allow the PAs to Retain and Fund Account Representatives through the EE Balancing Accounts**

In its Final Comments, ORA argues that because the PAs will be shifting from primarily implementation of programs to managing an EE portfolio largely comprised of third-party programs, the IOU PAs will no longer require EE account representatives and should therefore be prohibited from recovering costs for account representatives in their EE Balancing Accounts. ORA also asserts that the IOUs must only permit third-parties to utilize EE account representatives through a non-tariff services arrangement, or the IOUs must pass through EE account representative costs through its General Rate Case.

ORA’s argument fails in three important ways. First, as the solicitation process begins and the market unfolds, SCE will require at least the same number of account executives during the transition period while it is continuing to implement a majority of the programs as well as completing the solicitation process to move to the new third-party paradigm. SCE anticipates that during this transition period, SCE customer account representatives are likely to play a key role in helping customers navigate the new model. As the transition process stabilizes, any reduction in the need for account representatives will be reflected in the Annual Budget Advice Letters.

Second, ORA does not offer sufficient rationale for removing the costs properly attributed to account representatives working on EE programs from the EE Balancing Accounts. Even after the transition period, the IOU, as portfolio manager, will likely still be required to have customer-facing representatives assist customer in navigating EE options, ensure alignment of incentives within and across programs, and to help customers with general EE-related issues that may not fall within one specific program being implemented by a third-

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57 See ORA Final Comments, pp. 1 and 29-33.
58 See ORA Final Comments p. 34.
party. Costs incurred for these account representatives would properly fall within utility EE expenditures and thus should not be recovered through the general rate case, but rather through the EE Balancing Accounts, along with other properly incurred EE costs.

Third, and related to the reasons set forth above, ORA’s request is premature. Several parties, including CLEAResult, Nexant, and MCE, believe that utility account representatives will have an important continuing role in EE programs, particularly in being a point of contact for customers that may not otherwise adopt EE measures and/or customers that need assistance in determining which program or programs to utilize. It is also unknown what third-party programs will be proposed and implemented and what continuing role the utility PAs will be required to assume. Thus, unless and until there is substantial evidence that EE account representatives are no longer necessary, the PAs should be permitted, if not required, to retain and fund a level of customer-facing support through the Energy Efficiency Balancing Account.

2. The Commission Should Approve SCE’s Proposed Funding for LED Street Light Incentives as Part of Its Business Plan

SCE agrees with CALSLA’s recommendation that the Commission should approve SCE’s proposed funding for street light incentives contained in SCE’s Business Plan to the extent that those measures continue to be active and approved through the Energy Division’s work paper review process. As SCE stated in its response to CALSLA’s August 3, 2017 Data Request, “SCE is proposing to offer LED rebates for street light customers through

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59 See, e.g., Comments of CLEAResult on Ruling of Assigned Commissioner and Administrative Law Judge Seeking Input on Approaches for Statewide and Third-Party Programs, June 17, 2016, pp. 5-6.
60 Id.
61 See Comments of Nexant on Assigned Commissioner Ruling Seeking Input on Approaches for Statewide and Third-Party Programs, June 20, 2016, p. 15.
63 See CALSLA Final Comments p. 4.
2025 for any measure that continues to be an active, approved measure. SCE believes that these incentives will continue to encourage more LED streetlight retrofits, thereby increasing energy savings potential in support of EE Portfolio and street light conversion goals, while reducing maintenance and ownership costs for both SCE and local jurisdictions who have participated in the acquisition program. Further, SCE acknowledges CALSLA’s concerns that without LED street light rebates made available over multiple years, many acquisition customers may not be able to convert to LEDs, thus forfeiting energy savings potential.

SCE clarifies that continued funding of street light incentives is subject to the Energy Division’s approval of the LED street light measures. SCE has been actively engaged with the Energy Division Ex Ante staff in order to obtain approval of SCE’s multi-year street light rebate proposal, and in fact, SCE just received a response from the Commission’s Staff on October 11, 2017 regarding its “Street Lighting Proposal,” which SCE attaches as Attachment B to these Reply Comments so the Commission and the parties are aware of this new fact. SCE is in the process of reviewing this recent guidance and will seek additional clarification from the Energy Division, as necessary.

3. **If Interim Workforce Standards are Required, An Independent Body Should Develop the Standards With Input From Stakeholders**

NRDC proposes an interim set of standards to ensure an appropriately trained energy efficiency workforce. SCE does not agree that this interim step is necessary, because SCE already requires that all contractors who participate in ratepayer-funded EE programs to comply with all applicable federal, state, regional and local laws, and to be licensed and legally authorized to perform the work. Further, SCE expects to include any additional requirements

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64 See SCE’s response to CALSLA-SCE-02, Question 1c, attached to CALSLA’s Final Comments at Appendix C-3.
65 See CALSLA Final Comments p. 4.
66 See Attachment B, Memorandum from Peter Lai, CPUC, to Anuj Desai, SCE and Alok Singh, SCE, entitled “SCE’s Street Lighting Proposal,” dated October 10, 2017. Although this Memorandum is dated October 10, 2017, it was not transmitted to SCE until October 11, 2017.
67 See NRDC Final Comments, p. 8
resulting from the issuance of the California Energy Commission’s Responsible Contractor Policy. However, if the Commission orders that interim workforce standards be included in the solicitation process prior to the issuance of the Responsible Contractor Policy, SCE agrees with NRDC that such standards should be developed by a non-financially interested independent body. In its Final Comments, NRDC recommends that “instead of picking specific certifications, a non-financially interested independent body that is knowledgeable on the matter (e.g., a state agency or joint-agencies)- with input from IOUs and other interested stakeholders- should identify specific Knowledge, Skills and Abilities (KSAs) for a set of end-uses or programs as appropriate for 2018 solicitations.”

It is important that this independent body does not favor one specific group over the other.

If the Commission does establish this independent and unbiased working group, it should be required to review all current legal requirements, including relevant legislation and code enforcement. Contractors participating in EE programs are already expected to be appropriately licensed, fulfill their legal obligations, and pass local jurisdiction inspections for code and safety compliance. SCE is concerned that imposing any requirements above and beyond what is currently required by law may hinder qualified workers from participating in EE programs and may negatively affect the success of certain programs.

4. **The Commission Should Not Require PAs to Adopt Specific Certifications Proposed by CEE as Workforce Standards**

CEE continues to repeat similar arguments it made throughout this proceeding that IOUs Business Plans “failed to adequately address workforce standards, workforce diversity and inclusion goals and workforce education and training (‘WE&T’) alignment needs.” SCE will not repeat prior arguments it made in response to CEE again in this Reply Comments. SCE is concerned that the CEE’s proposal recommends that the Commission to impose specific

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68 Id.
69 See CEE Final Comments, pp. 3-7.
70 See SCE’s Reply Comments to Parties’ Comments on Supplemental Information and Any Other Key Issues Identified by the Parties, filed on June 29, 2017.
workforce standards on PAs’ business plans based on CEE’s subjective criteria, and not based on specific codes and standards. For example, CEE urges the Commission to order that “[a]ll downstream and midstream advanced lighting control installation, modification or maintenance measures installed, subsidized or paid for under a Program Administrator’s energy efficiency program” be “installed by workers that have been certified by the California Advanced Lighting Controls Training Program (CALCTP).”\textsuperscript{21} However, this requirement is not justified by the evidence. First, while CEE argues that CALCTP Installer certification “fills important gaps,”\textsuperscript{22} it has not presented evidence to support that CALCTP is the “only” certification that should be considered when hiring qualified workers. Second, SCE is not aware of any specific proposal being set forth by CEE or the Commission to make CALTCP certification a requirement in all EE bid proposals.\textsuperscript{23} Third, current advanced lighting controls systems are now much easier to commission with plug-and-play options as compared to legacy systems developed just a few years ago when CALCTP’s curriculum was first introduced. SCE is unable to determine at this time if any specialized advanced lighting controls training is necessary given the technology advancements. Moreover, SCE is evaluating the Advanced Lighting & Controls Systems Pilot (ALCS Pilot) Program, which was designed to test the qualitative aspect of the installation of Advanced Lighting Control Systems from CALCTP Certified and Non-CALCTP Certified Contractors. The data will be instrumental in understanding the role Advanced Lighting Control Systems play in the delivery of energy savings. Therefore, CEE’s recommendation is not necessary and should be rejected. Contractors participating in EE programs are expected to be appropriately licensed, fulfill their legal obligations, and pass local jurisdiction inspections for code and safety compliance.

\textsuperscript{21} See CEE Final Comments, p. 4.
\textsuperscript{22} See CEE Final Comments, p. 23.
\textsuperscript{23} Thus, CEE’s argument that SCE’s business plan does not comply with the Commission directive is incorrect. IOUs fully complied with Commission orders, and filed a Tier 2 advice letter (PG&E Advice 3567-G/4952-E et.al.) describing their approach to evaluating and taking preliminary action to initiate EE Guidance Plan recommendations.
III.

CONCLUSION

SCE appreciates the opportunity to provide this response to Parties’ Final Comments to SCE’s Energy Efficiency Rolling Portfolio Business Plans. SCE has demonstrated that its Amended Business Plan meets the requirements established by the Commission and therefore should be approved expeditiously so that SCE can begin to implement the plan.

Respectfully submitted,

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/s/ Jane Lee Cole
By: Jane Lee Cole

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October 13, 2017
Attachment A
Reference List of SCE Prior Filings
Table A - SCE Summary of Recommendations

The below table provides a reference list detailing the location of SCE’s positions and recommendations set forth in other filings in this proceeding.

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<td>Southern California Edison Company’s Amended Energy Efficiency Rolling Portfolio Business Plan For 2018-2025; February 10, 2017</td>
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<td>SCE Opening Comments on Solicitation</td>
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<td>SCE 2018 AL Protest Reply</td>
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Attachment B
Memorandum from Peter Lai, CPUC re SCE’s Street Lighting Proposal
Dated October 10, 2017
State of California

Memorandum

Date: October 10, 2017
To: Anuj Desai, SCE
Alok Singh, SCE
Cc:: Peter Lai, CPUC

From: Bryan Pena, CPUC
Subject: SCE’s Street Lighting Proposal

In a meeting on August 4, 2017 and a follow-up telephone meeting on August 10, 2017, SCE discussed with CPUC staff its proposal for street lighting savings and requesting to “grandfather” a set of historical customers in the SCE acquisition pipeline who entered the purchase and asset transfer process prior to September 2015; and to establish CPUC support for an acceptable multi-year framework for savings claims in 2018 and beyond.

Specifically, SCE requests that a specific set of customers in its territory who entered the acquisition pipeline in 2015 remain eligible for LED street lighting incentives through 2020 using its submitted 2017 workpaper savings values. SCE’s request is based on the understanding of the following customer types for SCE-owned street lights:

**Acquisition Customers:** Customers in the process of purchasing SCE-owned (LS-1) street lighting. This asset transfer process takes approximately three or four years to complete before any retrofits can begin.¹

**LS-1 Option E (AB-719) Customers:** Customers of SCE-owned street lights and pay the capital cost to retrofit to LED over a period of 20 years.² Customers typically face a one-year turnaround time from application submission to retrofit completion.

¹ Customers submitted deposits prior to Sept 2015 to enter the acquisition queue.
² SCE has submitted a capital request of $30M per year in its 2018-2020 GRC filing to support retrofits for these customers.
Program Participation:

It has been identified that there is no currently approved workpaper under which savings resulting from this program activity can be claimed. In order to provide for any program participation in 2018 and beyond, SCE must first resolve the following issues in its workpaper SCE 17LG097 Revision 1, dated June 30, 2017, submitted for 2017 program year. The applicable workpaper defines all measures as Replace-on-Burnout (now referred to as Normal Replacement or “NR”), however, the baselines for all measures covered by that workpaper are comprised of older, HID technologies, which are representative of a pre-existing technology. Therefore, the measures defined in the workpaper are, in practice, Accelerated Replacement (AR) measures. This workpaper does not follow CPUC policy that has been in place long before 2015. AR measures are required to include a standard baseline. The DEER 2016 updated directed that all AR exterior lighting measures have a second baseline of LED technologies. The projects proposed appear to be all Accelerated Replacement (AR). As a way to address these inconsistencies between the proposed projects and the proposed applicable workpaper, SCE shall revise the applicable workpaper for the 2018 program year as such:

- The measure application type must be corrected from Normal Replacement to Accelerated Replacement.
- SCE shall establish Preponderance of Evidence criteria that demonstrate that the customers, absent the incentive support, would more likely than not undertake the retrofits. This analysis must take into account the acquisition decision as well as the retrofit. All supporting data must be submitted via the normal workpaper submission process prior to any incentives being paid as with all deemed incentive offerings.
- Since the directed second baselines are LED technologies, the second period gross savings for the proposed projects shall be zero. Gross savings above the workpaper defined baselines shall be claimed for the RUL period only. The 2nd baseline is LED. Therefore the 2nd baseline savings is zero for the Accelerated Replacement.
- SCE shall apply the default net-to-gross value of 0.6 to the gross savings of these grandfather street lighting retrofits.

Acquisition Customers:

CPUC staff understands that there are 53 cities that entered the acquisition queue prior to September 2015 who remain in the process of purchasing and upgrading their street lighting, and that SCE is no longer entertaining new customers looking to purchase street lights.

CPUC staff does not object to maintaining program eligibility requirements, rules, and incentive for these 53 cities that entered the acquisition queue in 2015. Therefore, customers in this cohort shall be exempt from POE requirements in lieu of the eligibility requirements and other program rules in effect prior to September 2015. Incentives should also be maintained at the same levels as they were prior to September 2015.

LS-1 Option E (AB-719) Customers:

CPUC staff understands that these customers entered into agreements with SCE at varying times after AB-719 legislation was adopted and that program eligibility requirements, rules, and incentive levels tend to evolve. Therefore, customers in this cohort shall be exempt from POE requirements in lieu of the eligibility requirements and other program rules in effect at the time of customer application submittal. Incentives should also be maintained as the same levels as they were at the time of customer application submittal.
For future LS-1 Option E (AB-719) Customers and other potential program participants during 2018 and beyond, Commission staff sees no reason to allow the use of past program eligibility requirements, rules, and incentive levels. These customers shall follow all requirements imposed in the revised workpaper for the 2018 program year.

2019 Program Year:

Notwithstanding the above treatments for specific classes of customers, SCE shall conduct a standard practice study to examine the most current purchasing practices for LED street lighting retrofits, present its data and analysis, as well as propose findings to CPUC staff for review. CPUC considers that there is wide range of efficacy and performance in available LED products and that an ISP study would serve as a basis to establish deemed savings above the 2nd baseline. The results of any standard practice study, along with proposed workpaper revisions, should be submitted in a revised workpaper for the next Phase 1 workpaper review period for an effective date of January 1, 2019.

Commission staff appreciates SCE staff bringing this to our attention, and the opportunity for an open discussion of the issues.
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

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<td>(Filed January 17, 2017)</td>
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And Related Matters

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 TO VARIOUS PARTIES’ FINAL COMMENTS ON ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN 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.

Executed on October 13, 2017, at Rosemead, California.

/s/ AnnMarie Lett
AnnMarie Lett
Legal Administrative Assistant
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California  91770
### Parties

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FOR: CALIFORNIA ENERGY EFFICIENCY INDUSTRY COUNCIL
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<td>LAUREN CASEY</td>
<td>CLIMATE PROTECTION PROGRAM MANAGER</td>
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<td>DELPHINE HOU</td>
<td>CALIF. INDEPENDENT SYSTEMS OPERATOR</td>
<td>250 OUTCROPPING WAY</td>
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<td>JORDAN PINJUV</td>
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<td>915 L STREET, STE. 1480</td>
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<td>CAMILLE STOUGH, ESQ.</td>
<td>BRAUN BLAISING MCLAUGHLIN &amp; SMITH PC</td>
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<td>1830 N. DINUBA BLVD.</td>
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<tr>
<td>JOSEPH OLDHAM</td>
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<tr>
<td>SARAH TAHERI</td>
<td>ATTORNEY</td>
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<tr>
<td>STEVE SANDERS</td>
<td>PROGRAM DIRECTOR</td>
<td>INSTITUTE FOR LOCAL GOVERNMENT</td>
<td>1400 K STREET, SUITE 205</td>
<td>SACRAMENTO, CA 95814</td>
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<tr>
<td>STEVEN KELLY</td>
<td>POLICY DIRECTOR</td>
<td>INDEPENDENT ENERGY PRODUCERS ASSOCIATION</td>
<td>1215 K STREET, STE. 900</td>
<td>SACRAMENTO, CA 95814</td>
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<tr>
<td>TONY BRUNELLO</td>
<td>GREEN TECHNOLOGY LEADERSHIP GROUP</td>
<td>980 9TH STREET, SUITE 2000</td>
<td>SACRAMENTO, CA 95814</td>
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<tr>
<td>DANIEL L. CARDOZO</td>
<td>FOR: MISSION: DATA</td>
<td>ADAMS BRODWEll JOSEPH &amp; CARDOZO</td>
<td>520 CAPITAL MALL, STE. 350</td>
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<tr>
<td>RONALD LIEBERT</td>
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<td>2600 CAPITOL AVENUE, STE. 400</td>
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<tr>
<td>ROB NEENAN</td>
<td>CALIFORNIA LEAGUE OF FOOD PROCESSORS</td>
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<tr>
<td>ANN L. TROWBRIDGE</td>
<td>ATTORNEY</td>
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<td>3620 AMERICAN RIVER DRIVE, SUITE 205</td>
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<tr>
<td>JASON GREGORY</td>
<td>ENERGYSAVY</td>
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</tbody>
</table>
DONALD BROOKHYSER  
DULANE MORAN  
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LOLA OUNLAMI
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MARIA AMPARO WORSTER
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MARYAM GHADESSI
CALIF PUBLIC UTILITIES COMMISSION
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AREA 4-A
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<td>SAN FRANCISCO, CA 94102-3214</td>
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<td>DEANA J. CARRILLO</td>
<td>EXE. DIR</td>
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<tr>
<td>ERIK JENSEN</td>
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<td>MIRIAM JOFFE-BLOCK</td>
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<td>TIFFANY MATEO</td>
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<td>WILLIAM DIETRICH</td>
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