BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF CALIFORNIA

Application of Southern California Edison Company (U 338-E) for Approval of its 2009-2011 Energy Efficiency Program Plans and Associated Pubic Goods Charge (PGC) and Procurement Funding Requests.	Application A.08-07-021 (Filed July 21, 2008)
And Related Matters.	Application 08-07-022 Application 08-07-023 Application 08-07-031 (Filed 21, 2008)

~~REVISED~~ SECOND AMENDED APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR APPROVAL OF ITS ~~2009-2011~~ 2010-2012 PROPOSED ENERGY EFFICIENCY PROGRAM PLANS AND PUBLIC GOODS CHARGE AND PROCUREMENT FUNDING REQUESTS

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Dated: ~~March 2, 2009~~ July 2, 2009

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Pursuant to Rules 1 and 2 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, prior Commission decisions regarding energy efficiency programs and funding, the Commission's Decision 07-10-032 dated October 18, 2007, and the subsequent rulings of the Assigned Commissioner and Administrative Law Judge issued on February 29, 2008, May 15, 2008 and June 2, 2008, Southern California Edison Company (SCE) respectfully submitted its 2009-2011 proposed energy efficiency program plan on July 21, 2008. The first prehearing conference was held on August 11, 2008 and the ALJ indicated the investor-owned utilities (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company and Southern California Gas Company, known as the Joint IOUs) would be required to update their Applications. A second prehearing conference was held on October 8, 2008 during which the ALJ indicated that a Ruling would be issued identifying

modifications that the IOUs would need to make to their Applications. That Ruling was issued on October 30, 2008 and required the IOUs to make a number of modifications and to refile their Applications. On November 25, 2008, the scoping memo was issued which set a scope and schedule for the proceeding including the need to refile the Application.

On December 12, 2008, an additional Ruling was issued that required considerably more modifications and additional information in the IOUs' supplemental filings. The Ruling also contained several Energy Division attachments which identified more information that was to be considered for inclusion into the IOUs' applications. The Ruling also directed the IOUs to refile their Applications on February 16, 2009. The IOUs requested an extension for filing their supplemental application from February 16, 2009 to April 2, 2009. The extension was necessary to consider all of the many, various modifications and requests for information contained in the numerous Rulings. On February 10, 2009, the ALJ revised the schedule and extended the filing date by two weeks to March 2, 2009. SCE's ~~Supplemental~~ Amended Application was ~~is~~ as complete as possible within the time constraints imposed. Additional ~~Missing~~ portions of this Application ~~will be~~ were supplemented ~~at a later date, when they become~~ on March 12 and March 25, 2009 ~~available~~. On May 26, 2009, the Commission subsequently issued D.09-05-037[1], which denied the majority of the proposed policy changes in the Utilities' Amended Applications. A subsequent Ruling[2] ordered the Utilities to again file amended applications by July 2, 2009, to reflect this new policy and counting issues Decision. ~~More importantly, this~~ This Second Amended Application adheres to the spirit of the Commission Decision, the Energy Action Plan, the Strategic Plan and other important state actions.

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1 D.09-05-037, Interim Decision Determining Policy and Counting Issues for 2009 to 2011 Energy Efficiency Programs, dated May 26, 2009.

2 ALJ Ruling Setting Schedule For Supplemental Filings Per Decision 09-05-037, dated May 29, 2009.

SCE ~~is hereby withdrawing~~ withdrew its July 21, 2008 filing in its entirety[3] and ~~replacing~~ replaced that filing ~~with this supplemental filing dated~~ March ~~2,~~ 2009, with the Amended filing which ~~consists~~ consisted of an Application, Exhibit SCE-1, Testimony, Exhibit SCE-2, updated Compliance Tables and charts, Exhibits SCE-3 (A&B), SCE-4 and SCE-5 ~~(to be provided at a later date)~~ Proposed Program Implementation Plans ~~(these are subject to change and modification as necessary until the final supplemental filing is completed)~~, Exhibit SCE-6, Revised Proposed Energy Efficiency Demand Side Management Integration, Exhibit SCE-7 AB 32 Impact, and Exhibit SCE-8 SCE Workpapers updated ~~(to be supplemented at a later date)~~. ~~Several portions of this filing are still being prepared; and today's March 2, 2009 refiled Application will be supplemented as necessary, Exhibit SCE-2 – updated Compliance Tables and Charts, Exhibit SCE-3 (A&B) PIPs (updated with metrics), Exhibit SCE-4 PIPs (updated with metrics), Exhibit SCE-5 PIPs (when finalized) and Exhibit SCE-8 – SCE Workpapers updated., when all of these portions are completed and finalized.~~

SCE's Second Amended Application for Approval of its 2010-2012 Proposed Energy Efficiency Program dated July 2, 2009 consists of:

(a) the Second Amended Application, dated July 2, 2009;

(b) the Second Amended Exhibit SCE-1, SCE's Testimony, dated July 2, 2009, which replaces the March 2009, Exhibit SCE-1;

(c) the Second Amended Exhibit SCE-2, SCE's 2010-2012 Compliance Tables, dated July 2, 2009, which replaces the March 2009, Exhibit SCE-2;

(d) Exhibit SCE-3A (amended), 3B (amended), 4 (amended), and 5 (amended), detailed Program Implementation Plans, dated March, 2009.

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[3] SCE is hereby withdrawing : (1) the Application dated July 21, 2008; (2) Exhibit SCE-1 Testimony dated July 21, 2008; (3) Exhibit SCE-2 Compliance Tables and Charts dated July 21, 2009; (4) Exhibits SCE-3 & SCE-4 Program Implementation Plans dated July 21, 2008; (5) Exhibit SCE-5 Demand Side Management dated July 21, 2008; (6) Exhibit SCE-6 Cross-Reference dated July 21, 2008; (7) Exhibit SCE-7 AB-32 Impact dated July 21, 2008; and (8) Exhibit SCE-8 Proposed Scenario Workpapers dated July 21, 2008.

(e) the Second Amended Exhibit SCE-6, SCE's 2010-2012 Energy Efficiency Demand-Side Management Integration and Coordination, dated July 2, 2009, which replaces the March 2009, Exhibit SCE-6;

(f) the Second Amended Exhibit SCE-7, dated July 2, 2009, which replaces the March 2, 2009, Exhibit SCE-7;

(g) the Second Amended Exhibit SCE-8, SCE's 2010-2012 Proposed Program Plan Workpapers, dated July 2, 2009, which replaces the March 2009 Exhibit SCE-8 (amended);

(h) the Second Amended Exhibit SCE-9, dated July 2, 2009, which replaces the March 2009, Exhibit SCE-9;

(i) SCE's new Exhibit SCE-10, Modifications to Exhibits SCE-3A (amended) ,3B (amended), 4 (amended) and 5 (amended), dated July 2, 2009 (this Exhibit shows all deletions and additions to SCE's proposed program implementation plans); and

(j) SCE's new Exhibit SCE-11, Explanation of Changes from March to July, 2009, dated July 2, 2009.

This Second Amended Application and Exhibits are all presented in strike through and underline format to assist review.

SCE respectfully requests the Commission approve its ~~2009-2011~~ 2010-2012 Energy Efficiency Program Plans as filed, its proposed energy efficiency policies and rule changes, and Request for Public Goods Charge (PGC) and Procurement Funding (Application).[4]

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[4] This Application is filed pursuant to and in compliance with all Commission Decisions related to energy efficiency, including Decision 04-09-060, "Interim Opinion: Energy Savings Goals for Program Year 2006 and Beyond"; Decision 05-01-055, "Interim Opinion on the Administrative Structure for Energy Efficiency: Threshold Issues," Decision 05-04-051, "Interim Opinion: Updated Policy Rules for Post-2005 Energy Efficiency and Threshold Issues related to Evaluation, Measurement, and Verification of Energy Efficiency Programs"; and Decision 07-10-032, "Interim Opinion on Issues Relating to Future Savings Goals and Program Planning for 2009-2011 Energy Efficiency and Beyond."

I.

INTRODUCTION AND EXECUTIVE SUMMARY

A. SCE Proposed Portfolio

In this Second Amended Application (Application) and supporting Testimony and Exhibits, Southern California Edison Company (SCE) requests approval of its proposed energy efficiency program plans, its proposal to establish a 2010-2012 program cycle, its proposed energy efficiency policy rule changes, and SCE's funding requests.[5] SCE hereby amends the testimony and exhibits submitted on March 2, 2009, in its Revised 2009-2011 Proposed Energy Efficiency Program Plans And Funding Requests[6] (First Amended Plan) and the subsequent additional amendments to this Application filed on March 12, 2009,[7] and March 25, 2009.[8] This amendment partially replaces the First Amended Plan as detailed in Exhibit SCE-11 of this Application, dated July 2, 2009. SCE requests authority to fund these proposed programs through: (1) its existing Energy Efficiency-related Public Goods Charge (PGC); (2) its existing Procurement Energy Efficiency-related Public Purpose Programs Charge (PPPC); and (3) an increase in its Procurement Energy Efficiency-related PPPC.

As discussed below, the 2009-2011 Utility Energy Efficiency Application process has been critically derailed by a series of delays and extensive modifications to Application requirements. It is no longer feasible to accomplish an ambitious 36-month plan in the

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5 All references in this Testimony to portfolio, program plan, plan, strategy scenario, refer to SCE's proposed 2010-2012 energy efficiency program plans.

6 Southern California Edison Company's Application For Approval of Its Revised 2009-2011 Proposed Energy Efficiency Program Plans and Public Goods Charge And Procurement Funding Requests, dated March 2, 2009.

7 Southern California Edison Company's First Amendment to its Amended Application for Approval of its 2009-2011 Proposed Energy Efficiency Program Plans and Public Goods Charge and Procurement Funding Request, dated March 12, 2009.

8 Southern California Edison Company's Second Amendment to its Amended Application for Approval of its 2009-2011 Proposed Energy Efficiency Program Plans and Public Goods Charge and Procurement Funding Request, dated March 25, 2009.

remaining 24-27 months and meet the 2006-2011 cumulative goals. SCE estimates the regulatory process, including program solicitations will have taken more than two years before a final decision is issued on what is now a two-year program cycle. Consequently, in order to provide SCE and its partners with a reasonable opportunity to achieve the cumulative energy savings goals and make progress toward the long-term strategies included in the California Long-Term Energy Efficiency Strategic Plan (Strategic Plan), SCE proposes a full three-year program cycle of 2010-2012, with a 2007-2012 cumulative goal. This adjustment will allow SCE to execute a full three-year program plan as originally designed and expected by the energy efficiency stakeholders in the marketplace.

SCE will diligently work to meet the annual cumulative energy savings and demand reduction goals ultimately set forth by the California Public Utilities Commission (Commission). However, even assuming the adoption of a 2010-2012 cycle, SCE recognizes there is still considerable risk of not being able to achieve the ambitious cumulative energy savings goals, due to the regulatory delays in the approval of SCE's Application and changes in the policies and counting resulting from Decision (D.) 09-05-037.

In Decision (D.)07-10-032 the Commission set forth the original schedule for the 2009-2011 Energy Efficiency Applications,[9] setting May 15, 2008 as the due date for the investor-

[9] D.07-10-032 specifically stated:

The schedule for the efforts we describe in this order, which may be modified by the assigned Commissioner, is as follows:

Continued on the next page

owned utilities' (Utilities or IOUs) Applications, with a final Decision slated for October 2008. This initial Application deadline was postponed several times due to delays in the release of 2008 DEER updates, and the substantial impact of these updates. After the original Application filing on July 21, 2008,[10] the Utilities were required to file amended Applications to align with the California Public Utilities Commission's (Commission) Long-Term Energy Efficiency Strategic Plan[11] issued in September 2008 and to comply with extensive modifications to the Application requirements – modifications issued through Rulings released in the fourth quarter of 2008.[12] The Rulings required a complete reorganization of the Utilities' proposed program structure and also entirely revised requirements for program plans and related tables and analysis

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Continued from the previous page

November 5	Initial strategic planning meeting to discuss work products, format, outreach and schedule at Commission Courtroom, State Office Building, 505 Van Ness Avenue, San Francisco, CA 94102
November - December 2007	Strategic planning meetings; IOU workshops on programmatic initiatives;
	Initial solicitations and program proposals for third-party contracts and local government partnerships
February 1, 2008	Publication of utilities' draft statewide strategic plan
January – February	Utility meetings on preliminary strategic plan
	Written comments from Commission staff and interested parties submitted to utilities (not filed)
May 15, 2008	Utility applications for 2009-2011 energy efficiency portfolios, including final proposed strategic plan
Summer 2008	Review of applications; hearings, workshops and written comments as required
October 2008	Commission decision

[10] Southern California Edison Company's Application For Approval Of Its 2009-2011 Energy Efficiency Program Plans And Public Goods Charge And Procurement Funding Requests, dated July 21, 2008.

[11] D.08-09-040 Decision Adopting the California Long-Term Energy Efficiency Strategic Plan, dated September 19, 2008.

[12] ALJ Ruling Requiring Supplemental Filings, dated October 30, 2008; Scoping Memo And ALJ Ruling Determining The Scope, Schedule, And Need For Hearing In This Proceeding, dated November 25, 2008; and ALJ Ruling Modifying Schedule And Requiring Additional Information For 2009-2011 Supplemental Filings, dated December 12, 2008.

that the Commission's Energy Division had initially directed prior to the original Application.[13] In order to comply with all required modifications, SCE and the other Utilities filed Amended Applications on March 2, 2009,[14] and additional supplements to these Amended Applications on March 12, 2009,[15] and March 25, 2009.[16]

On May 26, 2009, the Commission issued D.09-05-037,[17] which denied the majority of the proposed policy changes in the Utilities' Amended Applications. A subsequent Ruling[18] ordered the Utilities to again file amended Applications by July 2, 2009, to reflect this new Decision.

Recently, the Commission has expanded discussion of issues related to the 2009-2011 Applications through a series of public workshops held throughout June 2009. In addition to discussing issues directly related to the Utilities' Applications, discussion has expanded to include some very basic and fundamental questions that are not in direct response to program proposals. Most recently, the assigned Administrative Law Judge has again opened the record for comment on a wide range of 2009-2011 program issues that are well beyond the Amendments filed by the Utilities. The June 9, 2009 ALJ Ruling[19] allows parties to comment on the June workshops and discuss other issues raised in the June 9 Ruling.

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13 Assigned Commissioner's And Administrative Law Judge's Ruling Regarding 2009 To 2011 Energy Efficiency Program Applications, dated February 29, 2008.

14 Southern California Edison Company's Application For Approval of Its Revised 2009-2011 Proposed Energy Efficiency Program Plans and Public Goods Charge And Procurement Funding Requests, dated March 2, 2009

15 Southern California Edison Company's First Amendment to its Amended Application for Approval of its 2009-2011 Proposed Energy Efficiency Program Plans and Public Goods Charge and Procurement Funding Request, dated March 12, 2009.

16 Southern California Edison Company's Second Amendment to its Amended Application for Approval of its 2009-2011 Proposed Energy Efficiency Program Plans and Public Goods Charge and Procurement Funding Request, dated March 25, 2009.

17 D.09-05-037, Interim Decision Determining Policy And Counting Issues for 2009 to 2011 Energy Efficiency Programs, dated May 26, 2009.

18 ALJ Ruling Setting Schedule For Supplemental Filings Per Decision 09-05-037, dated May 29, 2009.

19 ALJ Ruling Seeking Additional Record And Comments On Workshop Issues, dated June 9, 2009.

At this juncture, SCE recognizes that a Decision on the 2009-2011 Applications is not likely until the third quarter of 2009, at the earliest, and that program implementation will not realistically begin until 2010. Although significant program achievements have been made during the 2009 bridge funding period, SCE has not been allowed to launch its proposed new, innovative, and comprehensive programs for the full three-year cycle.

Given the present realities, SCE believes it is not feasible to meet the proposed 2006-2011 cumulative energy savings goal by the end of 2011 due to the decreased time now allowed for the implementation of a 36-month plan. Alternatively, in order to provide SCE and its partners with a reasonable opportunity to achieve the cumulative energy savings goals, SCE is proposing a 2010-2012 program cycle, with a 2007-2012 cumulative goal. SCE's First Amended Plan, as filed on March 2, 2009, remains otherwise unchanged- including program design and structure and overall funding levels. However, this adjustment to the timing of the cycle will allow SCE to thoroughly and properly execute a full three-year program plan, as originally designed. This will also provide greater certainty to market participants than a limited 2-year portfolio period would provide. As part of this request, SCE proposes that the Commission extend bridge funding through December 31, 2009, as authorized by D.08-10-027.

SCE recognizes that in order to implement a 2010-2012 program cycle, the Commission must formally adopt a 2012 goal. SCE proposes that the Commission adopt the IOU programs component of SCE's Interim 2012 Total Market Gross (TMG) Goal established in D.08-07-047, as this Decision established interim TMG goals for each IOU service territory for the years 2012 through 2020.[20] This approach is detailed further in Chapter II of the Testimony, Second Amended SCE-1, dated July 2, 2009.

Additionally, SCE understands that a 2010-2012 cycle must take into account adjustments for the staged implementation of the Huffman Bill which will increasingly affect the savings attributable to CFLs. This adjustment is also discussed in Chapter II of the Testimony,

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[20] D.08-07-047, Table A-4, Appendix p. 3

Second Amended SCE-1, dated July 2, 2009, and reflected in the 2010-2012 Second Amended Energy Efficiency Proposed Program Plan (Proposed Program Plan) tables in Second Amended Exhibit SCE-2, dated July 2, 2009.

As stated above, however, even with the adoption of a 2010-2012 cycle, there is still considerable risk that despite SCE's best efforts, cumulative energy savings goals will not be met due to the aforementioned delays. There are also outstanding policy issues that must be clarified to provide a higher degree of certainty around the energy efficiency process for the Commission, the Utilities, and other stakeholders. These policy issues are detailed in Chapter II of this Testimony and include:

1. **Cumulative Savings**: To align with SCE's proposed 2010-2012 program cycle, SCE proposes to define cumulative energy savings goals to include program years 2007-2012.
2. **Attribution:** The Commission should not adopt a separate attribution factor to account for actions taken by customers with external motivations (e.g., federal stimulus funds). This issue may impact multiple programs. In the case of government partnerships, the current .70 net-to-gross ratio for government partnership program savings should be retained, on an overall program basis, for all projects.
3. **Assumptions:** Ex ante benefit and measure cost assumptions used for planning the 2010-2012 Energy Efficiency Portfolio should also be used for portfolio reporting and evaluation. These assumptions should include limited SCE-proposed revisions to the Energy Division's 2008 DEER update.

SCE's Proposed Program Plan complies with all previous Commission Decisions, Rulings, and directives, with the exception of the issues listed above. Specifically, the Proposed Program Plan assumes: a) a 2010-2012 cycle with a 2007-2012 cumulative goal; b) application of the current net-to-gross ratios, including a net-to-gross ratio of .70 for local government partnershipsto account for external influences (*e.g.*, federal stimulus funds); and c) limited

Utility-proposed revisions to the December 2008 DEER update, as discussed further in Chapter II of this Testimony and supported by Second Amended Exhibit SCE-8, dated July 2, 2009.

This Application and Testimony support SCE's Proposed Program Plan approach. SCE believes that approval of its Proposed Program Plan will greatly promote the State, Commission, and the Strategic Plan's aggressive and essential goals of market transformation and resource procurement for the deployment of energy efficiency products and services, and of big, bold and long-term strategies for energy efficiency. SCE's proposed portfolio, if approved with the proposed policy changes, represents an investment of $1.344 billion that will generate an unprecedented 5.457 billion kilowatt hours of cumulative gross annualized energy savings, 1,063 megawatts of gross peak demand reduction, and over $4.1 billion in gross resource benefits to ratepayers, resulting in nearly $1.7 billion in gross benefits to ratepayers, after program costs.[21] A full detailed showing of the anticipated outcomes of this proposal is shown in Second Amended Exhibit SCE-2, dated July 2, 2009. Additionally, the amended Program Implementation Plans included in Exhibit SCE-10, dated July 2, 2009, reflect this revised SCE Proposed Program Plan approach.

For information purposes, SCE also includes a compliance scenario, compliant with all Commission directives. This scenario also assumes the current net-to-gross ratio of .70 for local government partnerships. SCE does not endorse, support, or propose this scenario be adopted in any way by the Commission, and firmly believes that due to the repeated delays discussed above, this compliance scenario will not allow SCE to achieve the 2006-2011 cumulative goal by 2011. This compliance scenario would represent an investment of $1.344 billion that would generate 5,275 billion kilowatt hours of cumulative gross[22] annualized energy savings 1,098 megawatts of gross peak demand reduction, and over $2.8 billion in net electric resource benefits to ratepayers,

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[21] Gross savings and benefits are not reduced by an estimate of free-ridership.

[22] Gross goals were used in compliance with the Proposed Decision Adopting Interim Energy Efficiency Savings Goals For 2012 Through 2020, And Defining Energy Efficiency Savings Goals For 2009 Through 2011, dated July 1, 2008, p. 2.

which would result in nearly $525 million in net benefits to ratepayers, after program costs. A full detailed showing of the compliant scenario is also shown in Second Amended Exhibit SCE-2, dated July 2, 2009.

Exhibit SCE-11, dated July 2, 2009, summarizes the differences between the Application filed on March 2, 2009 (including the subsequent amendments to exhibits filed on March 15, 2009, and March 25, 2009), and this Second Amended Application.

SCE's Proposed Program Plan aspires to fully realize all cost-effective energy efficiency as a reliable, robust, and least-cost resource, fully aligned with the State's vision of energy efficiency and all activities as communicated in the *Energy Action Plan* (EAP).[23] SCE's proposed portfolio offers a unified program approach where all programs work together seamlessly to encourage customers to take actions towards energy efficiency. SCE relies on a combination of short- and long-term solutions to energy efficiency that will vigorously implement SCE's commitment to making energy efficiency part of its long-term resource solution.

SCE's proposed portfolio creates a framework for sustainable energy efficiency and other demand reduction programs and a process for achieving extensive energy savings through short-term programs and using long-term planning to sow the seeds of future programs and initiatives. SCE maximizes the benefits of diversity within the portfolio among approaches, measures, markets, delivery channels, and implementers. SCE maximizes the potential of its programs by engaging in collaborative efforts with others in planning and delivering energy efficiency savings. SCE also continues to develop and sustain partnerships as a key element of efforts to build a durable distributed infrastructure of local energy efficiency networks. SCE views

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[23] The Energy Action Plan, most recently updated jointly by the Commission and the California Energy Commission in March 2008, identifies specific goals and actions to ensure that adequate, reliable and reasonably-priced electrical power and natural gas supplies are achieved and provided through cost-effective and environmentally sound strategies. A copy of the Energy Action Plan is posted on the Commission's website at http://www.cpuc.ca.gov/static/energy/electric/energy+action+plan/index.htm. *See also*, D.05-06-043, (*mimeo),* p. 15; Energy Efficiency Policy Manual Version 3 (Policy Rules), Rule II.2 (Attachment 3 to D.05-04-051).

partnerships as an effective means to encourage customers, on a local level, to embrace energy efficiency. Furthermore, SCE looks to new and emerging technologies, promising program designs, and codes and standards to build the future for energy efficiency.

It is important to step back and note the magnitude and difficulty of the task at hand with regard to the state's energy, economic, and environmental future. All parties to this proceeding are disappointed and frustrated in the ongoing delays in getting the new, innovative and comprehensive efficiency programs underway. Nonetheless, at this time it is necessary to recognize the realities of successful program implementation and shift the program cycle to 2010-2012 for maximum energy savings. California's concerns in these regards – ongoing severe recession and credit crunch, State budget shortfalls, volatile oil and natural gas prices, and projections of climate change-driven heat waves – are serious and stubborn. Energy efficiency must play a central, if not leading, role in responding to these challenges, and SCE is committed to contributing most vigorously to energy efficiency success. SCE's Proposed Program Plan and the related strategies laid out in the Strategic Plan are critical in SCE, its partners, and its customers doing so.

~~In this Revised Application and supporting testimony and exhibits, SCE requests approval of its 2009-2011 proposed energy efficiency program plans, SCE's proposed energy efficiency policies and rules changes, and SCE's funding requests. SCE requests authority to fund these programs through; (1) its existing Energy Efficiency-related Public Goods Charge (PGC); (2) its existing Procurement Energy Efficiency-related Public Purpose Programs Charge (PPPC); and (3) an increase in its Procurement Energy Efficiency-related PPPC.~~

~~The new Strategic Plan is a call for long-term market transformative actions and several selective changes to current policies are necessary to enable SCE to more effectively rise to the challenge of meeting the Commission's aggressive and visionary goals. These essential proposed policy changes are mentioned in Chapter II hereof and described further in Exhibit SCE-1 Chapter 2.~~

Approval of SCE's proposed 2009-2011 program plan in this Application will greatly promote both the Commission's and the Strategic Plan's goals of resource procurement and market transformation from the provision of energy efficiency products and services, and of bold, long-term strategies for efficiency. SCE's proposed portfolio, with the proposed policy changes, represents an investment of $1.344 billion that will generate an unprecedented 5.553 billion kilowatt hours of cumulative gross annualized energy savings, 1,078 megawatts of gross peak demand reduction, and over $4.4 billion in gross resource benefits to ratepayers, resulting in nearly $2.0 billion in gross benefits to ratepayers, after program costs.[24] SCE's Application and Exhibit SCE-1 Testimony support this proposed approach. A full detailed showing of this proposal is shown in Exhibit SCE-2.

For information purposes, SCE also ran a mandated scenario with the 2009-2011 Assigned Commissioner and ALJ directives. SCE does not endorse, support, or propose in any way that this mandated scenario be adopted by the Commission. This mandated scenario would represent an investment of $1.344 billion that would generate 6.238 billion kilowatt hours of commutative gross[25] annualized energy savings 1.271 megawatts of gross peak demand reduction, and nearly $3.1 billion in gross resource benefits to ratepayers, which would result in $765 million in net benefits to ratepayers, after program costs. A full detailed showing of this mandated scenario is shown in Exhibit SCE-2.

In D.07-10-032, the Commission concluded the goals adopted for SCE in D.04-09-060 are reasonable and appropriate to use in the 2009-2011 program planning cycle[26] and suggested that the proposed energy efficiency program portfolio plans and funding levels meet the adopted goals. D.07-10-032 also directed that the goals must be aggressive and must stretch the

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[24] Gross savings and benefits are not reduced by an estimate of free ridership.

[25] Gross goals were used in compliance with the Proposed Decision Adopting Interim Energy Efficiency Savings Goals For 2012 Through 2020, And Defining energy Efficiency Savings Goals For 2009 Through 2011, dated July 1, 2008, p. 2.

[26] D.07-10-032 dated October 18, 2007, OP #24 p. 48.

capabilities and efforts of those involved. In D.08-07-047, the Commission clarified that the adopted energy efficiency savings goals for 2009-2011 be defined as a "gross" level that includes free riders.[27] Such a determination is reflective of the latest data on energy efficiency potential and is in line with the promotion of strategic, long-term energy efficiency programs, such as those embodied in SCE's proposed portfolio.[28] To facilitate achievement of the long-term goals of the State, the Commission authorized a three-year program implementation and funding cycle.[29]

D.07-10-032 affirmed D.05-01-055, which ordered the IOUs to assume responsibility for program choice and portfolio management functions for post-2005 energy efficiency programs.[30] D.07-10-032 required, among other items, that the IOUs file their Application no later than May 15, 2008, for development of and Commission approval of a proposed statewide strategic plan, energy efficiency program plans, and funding levels through both the public goods charge and procurement rates, for the three-year program implementation and funding cycle beginning January 1, 2009.[31] In D.08-10-027, the Commission authorized bridge funding for select 2008 programs pending resolution of the 2009-2011 Application.[32]

In response to the IOUs' February 3, 2009 request for a 45-day extension,[33] the ALJ issued a 14-day extension, establishing a filing date of March 2, 2009.[34] D.05-04-051 clarified the goals, policies, and administrative framework and D.07-10-032 directed that utility energy

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[27] Decision Adopting Interim Energy Efficiency Savings Goals For 2012 Through 2020, And Defining Energy Efficiency Savings Goals for 2009 Through 2011, OP #4, p. 39.

[28] *Id.* pp. 2-3 and 27.

[29] D.07-10-032, dated October 18, 2007, p. 11, *see also* D.04-09-060, dated September 23, 2004, p. 22.

[30] D.07-10-032, dated October 18, 2007, p. 4.

[31] D.07-10-032, dated October 18, 2007, OP #4, 10 and 12, pp. 141-144.

[32] D.08-10-027, dated October 17, 2007.

[33] "Request for Extension on Supplemental Filings of Energy Efficiency 2009-2011 Applications" to the Commission's Executive Director from Bruce Foster on behalf of the state's IOUs, requested until April 2, 2009 to refile this Application.

[34] Administrative Law Judge's Ruling Revising Proceeding Schedule, dated February 10, 2009.

~~efficiency performance should be evaluated on the basis of overall portfolio achievement rather than individual programs.[35] Consistent with these decisions, SCE's Proposed 2009-2011 Energy Efficiency Plan, with proposed policy changes, presents a portfolio which exceeds the established goals.~~

~~The IOUs prepared a Preliminary Energy Efficiency Strategic Plan (PEESP) over a three-month period, involving the guidance of the Commission and bringing together the input of over 1,100 participants in over 35 workshops. The PEESP evolved into the CEESP and based upon additional input from stakeholders including Commission staff, on September 18, 2008, the Commission unanimously adopted[36] the California Long-Term Energy Efficiency Strategic Plan (Strategic Plan).[37]~~

~~The primary objective of the Strategic Plan is to contribute to the state's goal of having reasonably priced, stable, reliable, and clean energy resources by brining energy efficiency efforts – not only those of the utilities, but of the many other essential energy actors – to a "next level," by identifying and implementing a path of aggressive resource acquisition, market transformation, and innovative, integrated solutions for an ultra-efficient and even zero net energy future.~~

~~SCE's 2009-2011 Energy Efficiency Proposed Program Plan aspires to fully realize all cost-effective energy efficiency as a reliable, robust, and least-cost resource, fully aligned with the state's vision of energy efficiency and all activities as communicated in the Energy Action Plan (EAP).[38] SCE's proposed portfolio offers a unified program approach where all programs~~

~~[35] D.05-04-051, dated April 21, 2005, p. 7, *see also* D.07-10-032, dated October 18, 2007, p. 12.~~

[36] D.08-09-040, dated September 18, 2008.

[37] "California Long-Term Energy Efficiency Strategic Plan," dated September 2008.

[38] The Energy Action Plan, most recently updated jointly by the Commission and the California Energy Commission in March 2008, identifies specific goals and actions to ensure that adequate, reliable and reasonably-priced electrical power and natural gas supplies are achieved and provided through cost-effective and environmentally sound strategies. A copy of the Energy Action plan is posted on the Commission's website at http://www.cpuc.ca.gov/static/energy/electric/energy+action+plan/index.htm. *See also*, Decision 05-06-043, *(mimeo)*, p. 15; Energy Efficiency Policy Manual Version 3 (Policy Rules), Rule II2 (Attachment 3 to D.05-04-051).

work together seamlessly to encourage customers to take actions towards energy efficiency. SCE relies on a combination of short- and long-term solutions to energy efficiency that will vigorously implement SCE's commitment to making energy efficiency part of its long-term resource solution.

SCE's proposed portfolio creates a framework for sustainable energy efficiency and other demand reduction programs and a process for achieving extensive energy savings through short-term programs and using long-term planning to sow the seeds of future programs and initiatives. SCE maximizes the benefits of diversity within the portfolio among approaches, measures, markets, delivery channels, and implementers. SCE maximizes the potential of its programs by engaging in collaborative efforts with others in planning and delivering energy efficiency savings. SCE continues to develop and sustain partnerships as a key element of efforts to build a durable distributed infrastructure of local energy efficiency networks; SCE views partnerships as an effective means to encourage customers, on a local level, to embrace energy efficiency. Furthermore, SCE looks to new and emerging technologies, promising program designs, and codes and standards to build the future for energy efficiency.

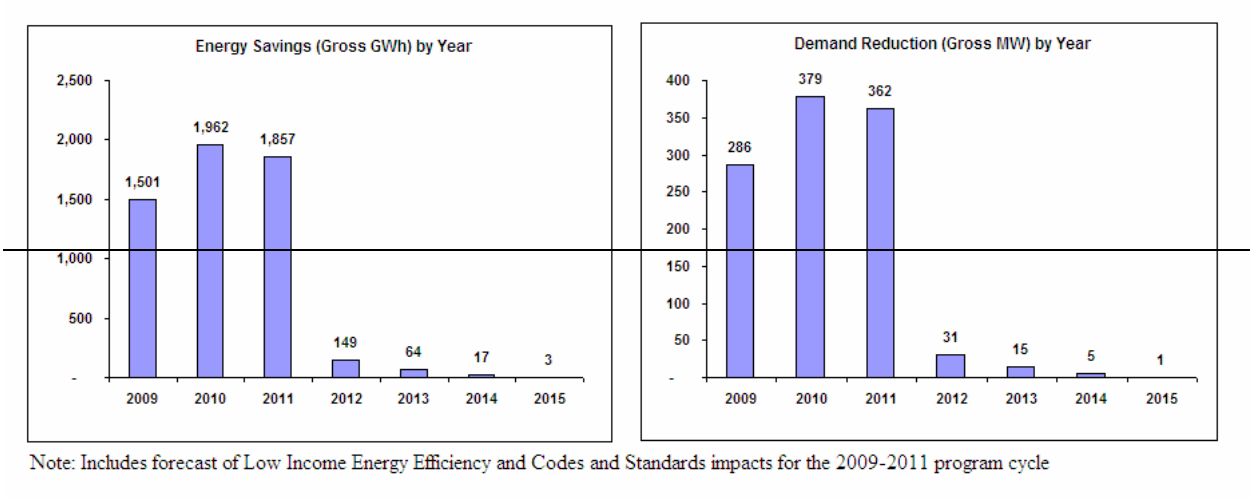
It is important to note the magnitude of the task at hand with regard to the state's energy, economic, and environmental future; California's concerns in these regards – volatile oil and natural gas prices, severe recession and ongoing credit crunch, and projections of climate change-driven heat waves – are serious and stubborn. Energy efficiency and other DSM must play a central, if not leading, role in responding to these challenges, and SCE is committed to contribute vigorously and successfully. SCE's Proposed Program Plan in this Application and the related strategies laid out in the Strategic Plan are critical in SCE doing so.

B. Summary Tables And Pie Charts Of Portfolios And Energy Efficiency Measure Groupings

1. Energy Savings And Demand Reduction

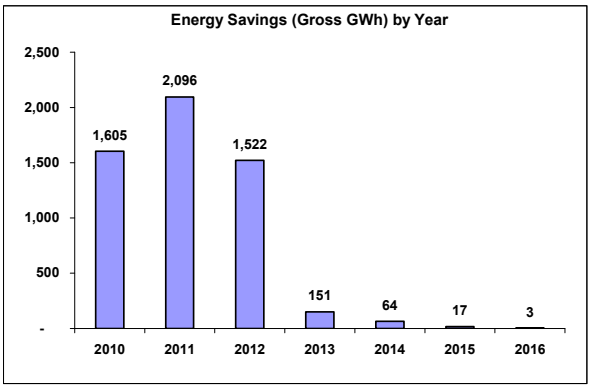
SCE's ~~2009-2011~~ Second Amended 2010-2012 Proposed Program Plan represents ~~5.553~~ 5.457 billion kilowatt hours of cumulative annualized energy savings and ~~1,078~~ 1,063 megawatts of gross peak demand reduction. *See* Second Amended Table **I-1** below for energy savings and demand reduction by year.

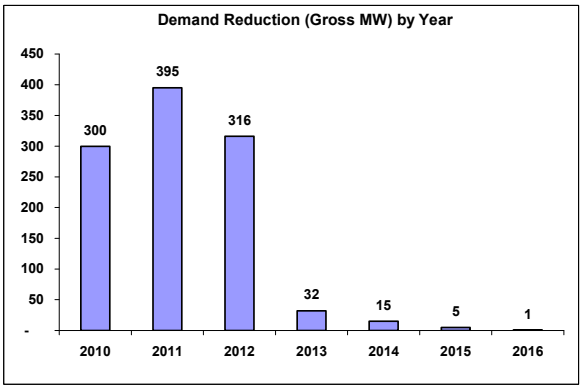
~~Table I-1~~
~~Annual Energy Savings and Demand Reduction~~



Note: Includes forecast of Low Income Energy Efficiency and Codes and Standards impacts for the 2009-2011 program cycle

Second Amended Table I-1
Annual Energy Savings and Demand Reduction



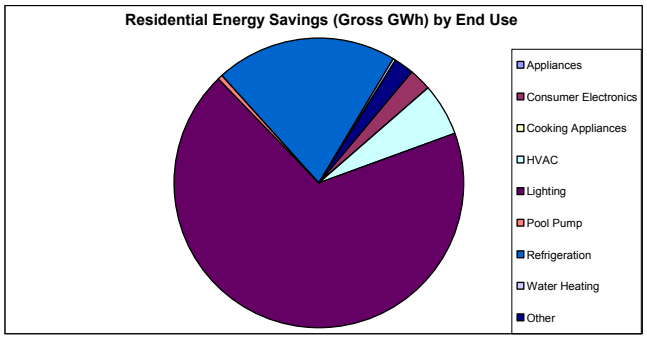


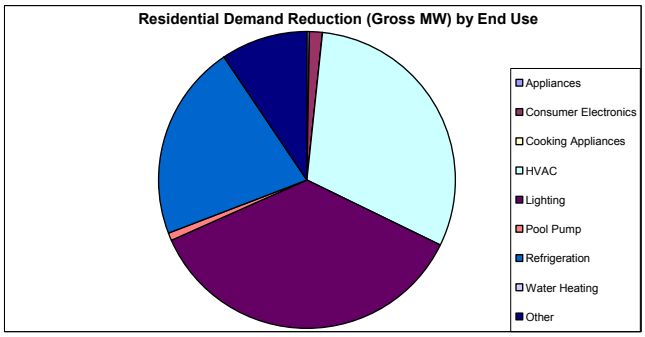
Note: Includes forecast of Low Income Energy Efficiency and Codes and Standards impacts for the 2010-2012 program cycle

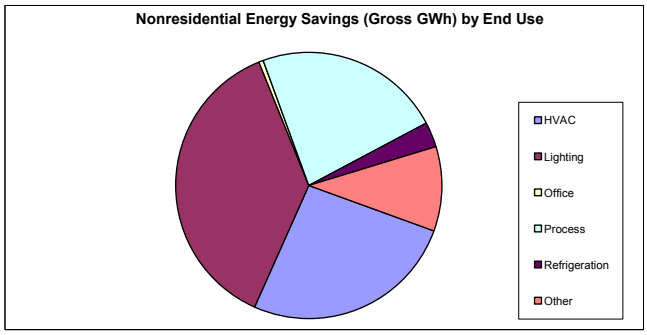
2. End Use Savings

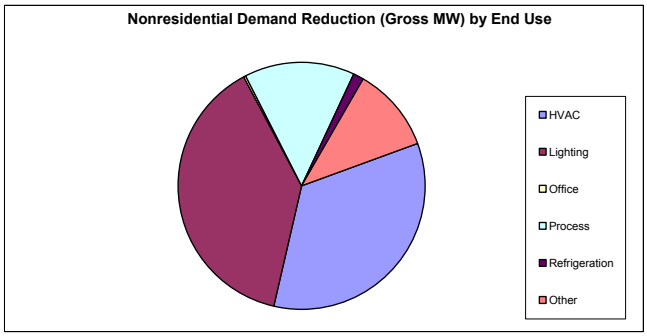
SCE's ~~2009-2011~~ Second Amended 2010-2012 Proposed Program Plan savings is comprised of HVAC, lighting, refrigeration and other miscellaneous end uses. The break out of energy savings and demand reduction among end uses is shown below in Second Amended Table I-2.

~~*Table I-2*~~
~~*Energy Saving and Demand Reduction by End Use*~~

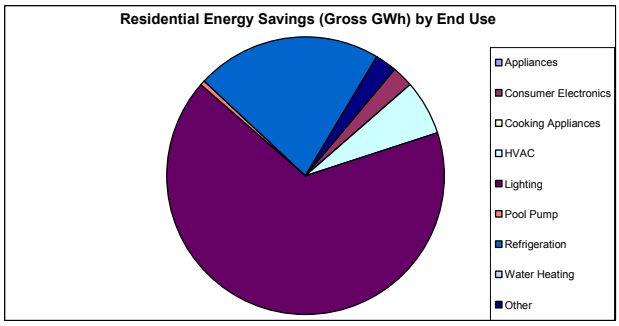


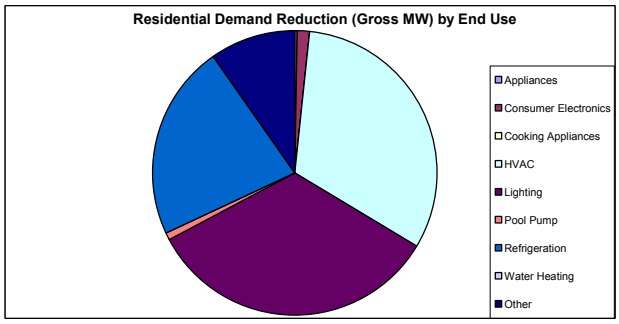


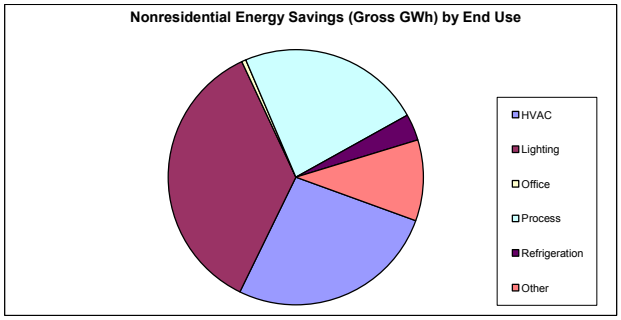


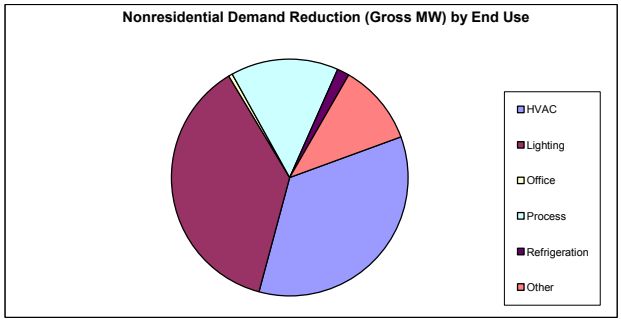


Second Amended Table I-2
Energy Savings and Demand Reduction by End Use









3. Budget

SCE's ~~2009-2011~~ Second Amended 2010-2012 Proposed Program Plan represents $1.344 billion. Second Amended Table I-3 below represents SCE's proposed annual budget.

~~Table I-3~~
~~Annual Budgets~~

	2009 Budget	2010 Budget	2011 Budget	Total 2009-2011 Program Cycle Budget
Total SCE Program Budget	$ 366,666,000	$ 428,377,000	$ 460,257,520	$ 1,255,300,520
Total SCE/CPUC EM&V Budget	$ 22,118,000	$ 33,177,000	$ 33,083,480	$ 88,378,480
Total SCE Portfolio Budget	$ 388,784,000	$ 461,554,000	$ 493,341,000	$ 1,343,679,000

Second Amended Table I-3
Annual Budgets

	2010 Budget	2011 Budget	2012 Budget	Total 2010-2012 Program Cycle Budget
Total SCE Program Budget	$ 368,611,720	$ 432,488,706	$ 452,918,574	$ 1,254,019,000
Total SCE/CPUC EM&V Budget	$ 20,172,280	$ 29,065,294	$ 40,422,426	$ 89,660,000
Total SCE Portfolio Budget	$ 388,784,000	$ 461,554,000	$ 493,341,000	$ 1,343,679,000

C. Elements Of SCE's ~~2009-2011~~ 2010-2012 Proposed Program Plan Are Designed To Reflect The Strategic Plan

In D.07-10-032, the Commission approved a ground-breaking new requirement for the State's IOUs to prepare a single strategic plan for energy efficiency through 2020 and beyond, as "a directed, statewide strategic planning effort [that] will deliver more savings from existing measures, create new savings opportunities for the future, and afford efficiencies in the development and delivery of programs."[39]

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[39] D.07-10-032 dated October 18, 2007, p. 20.

SCE strongly supports the development of a single statewide strategic plan for energy efficiency, as outlined by the Commission in the Decision. Since that Decision, over 1,100 participants, including the Commission and IOU staffs and other key stakeholders, have invested significant time, resources, and effort in this process. SCE and the other IOUs submitted a supplemented draft California Energy Efficiency Strategic Plan on March 8, 2008 and the final version by the IOUs, on June 2, 2008. Subsequently the Commission issued the California Long-Term Energy Efficiency Strategic Plan (Strategic Plan).

As a foundation for continued strategic planning and implementation during ~~2009-2011~~ 2010-2012 and beyond, SCE has established a dedicated and substantial energy efficiency Strategic Planning team. This team helps lead SCE's strategic planning, including collaboration with the Commission and other key actors towards the goals, strategies, actions, and results put forward in the Strategic Plan.

There are numerous initiatives throughout SCE's Proposed Program Plan that are designed to better integrate the energy efficiency activities and goals with those of the other demand side resources, including demand response, advanced metering, low income energy efficiency, California Solar Initiative (CSI), *etc.* See Second Amended Exhibit SCE-6, dated July 2, 2009, Demand Side Management Integration and Coordination and the Statewide Integrated Demand Side Management Program Implementation Plan for more detail.

D. Summary Of Initiatives And Activities Proposed To Accomplish The Sector Objectives And Why SCE's Proposed Program Strategies Will Meet The Stated Goals

One of the most important aspects of the regulatory and business environment guiding the design of SCE's proposed ~~2009-2011~~ 2010-2012 energy efficiency portfolio is the need to be strategic, comprehensive, and "big and bold." This Proposed Program Plan makes essential steps in that direction. Below are examples of the proposed initiatives and activities that will help accomplish the goals.

BBEES 1: All new residential construction in California will be zero net energy (ZNE) by 2020.

The proposed program plan includes both residential new construction and crosscutting initiatives, programs, and activities to accomplish the goals of the residential new construction ZNE BBEES, as they are laid out in D.07-10-032 and the Strategic Plan.[40] Residential new construction activities are included.

BBEES 2: All new commercial construction in California will be zero net energy by 2030.

SCE's Proposed Program Plan includes both commercial new construction, and crosscutting initiatives, programs, and activities to accomplish the goals of the commercial new construction ZNE BBEES, as laid out in D.07-10-032 and the Strategic Plan.[41] Several commercial new construction activities are included.

BBEES 3: Heating, Ventilation, and Air Conditioning (HVAC) will be reshaped to ensure optimal equipment performance.

The Proposed Program Plan includes both specifically targeted and crosscutting initiatives, programs and activities to accomplish the goals of the HVAC BBEES, as laid out in D.07-10-032 and the Strategic Plan.[42]

Local Government

Recognizing the key role played by local governments to provide energy efficiency, conservation, distributed renewable generation and other DSM resources, SCE embraces the vision of the Strategic Plan to strengthen and capitalize on the capacity of local governments. Local governments' role includes improving codes and standards compliance, providing energy

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[40] D.07-10-032, dated October 18, 2007, pp. 42-44, *see also* California Long-Term Energy Efficiency Strategic Plan, pp. 12-13.

[41] D. 07-10-032, dated October 18, 2007, pp. 46-48, *see also* California Long-Term Energy Efficiency Strategic Plan, dated September 2008.

[42] D.07-10-032, dated October 18, 2007, pp. 50-52, see also California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 57-66.

efficiency and other DSM incentives and regulations, reaching out to their communities, and leading by example in their own facilities.

The Local Government Partnerships (LGPs) in this Proposed Program Plan work with the Sustainable Communities Program and Codes and Standards Program to provide support to local governments to adopt and support relevant policies, ordinances, and building codes. Peer-to-peer support is considered a key part of this strategy; the partnerships provide forums for local governments to come together and share best practices and to learn from and support each other. In addition, SCE includes local government organizations such as Councils of Government (COG) and other Joint Powers Associations in the partnership portfolio.

Marketing, Education & Outreach (ME&O)

SCE's Proposed Program Plan includes an integrated portfolio of Marketing, Education, and Outreach (ME&O) actions designed to educate consumers about energy efficiency and other DSM offerings, a need discussed in both D.07-10-032 and the Strategic Plan.[43] SCE continues to develop integrated marketing campaigns, using customer segmentation research and techniques, to efficiently and successfully move consumers through a continuum from awareness to attitude change to action. ME&O materials leverage statewide branding to maximize participation, market transformation, and adoption of long-term energy efficiency behaviors. Emphasis will be placed on program bundling, to coordinate and pull together relevant energy efficiency, demand response, low income, California Solar Initiative, and SmartConnect™ (advanced metering) enabled offerings.

Workforce Education & Training

SCE's Proposed Program Plan strongly supports the Workforce Education & Training (WE&T) activities and goals laid out in the Strategic Plan that focus on educating and training Californians to perform the jobs needed to achieve the State's clean energy and climate

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[43] D.07-10-032, dated October 18, 2007, pp. 55-64, *see also* California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 71-73 & 79-83.

mitigation goals. SCE is proposing a collaborative and comprehensive approach to education and training. This program will develop new types of energy efficiency- related jobs, and increase awareness and demand for these careers. The program coordinates with other utilities and key players on a statewide basis and addresses energy efficiency WE&T needs with those of other DSM resources, to achieve streamlined and accessible programs with cost-effective economies of scale.

Industrial Sector

The industrial sector strategy targets industrial processes and systems (plus appropriate building-related measures) and is structured to reflect industrial consumers' reluctance to alter elements of a working production system for reasons other than production output or quality. SCE's industrial sector activities are designed to increase industrial consumers' awareness of and their participation in energy efficiency, demand response, and/or renewable self-generation opportunities.

Agricultural Sector

The proposed agricultural strategy for ~~2009-2011~~ 2010-2012 is designed to enhance adoption of energy efficient equipment and practices among agriculture and water systems customers, by mitigating historical barriers to adoption. As memorialized in the Strategic Plan, the primary barriers are economics, lack of coordination among programs offered to the agricultural sector, and a general lack of information.

The statewide agricultural program brings together the disparate IOU programs of the past and augments them, as necessary, to implement the agricultural strategies in the Strategic Plan. The program improves customer economics, provides a central information warehouse and increases outreach to agricultural customers.

Integrated DSM

SCE's proposed program includes the formation of a statewide Integrated DSM (IDSM) Task Force in collaboration with the other IOUs and the Energy Division. The Task Force will meet regularly and will address key issues like cost-effectiveness, demonstration pilots and other

ways to drive greater levels of DSM integration. In addition, each Program Implementation Plan addresses IDSM where applicable.

The proposed budgets and savings for the program activities listed above in Section B are included in Second Amended Table I-4 below.

~~Table I-4~~
~~Estimated Budgets and Savings for New Approaches~~

	SCE EE Program	Total 2009-2011 Program Cycle Budget	Total Gross Energy Savings (kWh)	Total Gross Demand Reduction (kW)
	Residential & Commercial HVAC Program	$ 76,413,000	124,443,900	91,954
	Industrial Energy Efficiency Program	$ 101,066,000	584,491,601	97,459
	Agriculture Energy Efficiency Program	$ 29,578,000	172,975,916	41,731
	Sustainable Communities	$ 14,254,000	-	-
	SW Codes & Standards	$ 11,080,000	232,416,517	43,441
	SW Emerging Technologies	$ 22,901,000	-	-
	New Construction Program	$ 77,655,000	241,674,434	62,128
	Automatic Energy Review for Schools	$ 2,015,000	2,900,732	650
	SW Marketing, Education & Outreach	$ 20,213,514	-	-
	Energy Leader Partnership Program (Core)	$ 5,609,000	14,395,899	2,884
1	Energy Leader Partnership Strategic Support	$ 994,000	-	-
1	City of Redlands Energy Leader Partnership	$ 798,000	1,875,000	376
1	Community Energy Leader Partnership	$ 3,891,000	10,000,000	1,986
1	City of Beaumont Energy Leader Partnership	$ 573,000	1,250,000	251
1	Desert Cities Energy Leader Partnership	$ 1,486,000	3,750,000	728
1	Eastern Sierra Energy Leader Partnership	$ 956,000	2,250,000	487
1	Kern County Energy Leader Partnership	$ 2,645,000	6,743,750	1,354
1	City of Long Beach Energy Leader Partnership	$ 1,851,000	4,619,795	907
1	Orange County Cities Energy Leader Partnership	$ 2,218,000	5,625,000	1,104
1	City of Ridgecrest Energy Leader Partnership	$ 786,000	1,856,250	376
1	City of Santa Ana Energy Leader Partnership	$ 1,858,000	4,750,000	943
1	City of Simi Valley Energy Leader Partnership	$ 391,000	625,000	126
1	Ventura County Energy Leader Partnership	$ 4,765,000	12,500,000	2,454
1	South Santa Barbara County Energy Leader Partnership	$ 2,958,000	7,500,000	1,472
1	South Bay Energy Leader Partnership	$ 2,969,000	7,500,000	1,490
1	City of South Gate Energy Leader Partnership	$ 798,000	1,875,000	372
1	San Gabriel Valley Energy Leader Partnership	$ 1,996,000	5,000,000	1,011
1	San Joaquin Valley Energy Leader Partnership	$ 2,225,000	5,625,000	1,129
1	Palm Desert Demonstration Partnership	$ 20,815,000	62,130,677	18,214
	Institutional and Government Core Energy Efficiency Partnership Program (Core)	$ 4,294,000	9,384,376	1,392
1	California Community Colleges Energy Efficiency Partnership	$ 12,041,000	38,926,292	5,774
1	California Department of Corrections and Rehabilitation Energy Efficiency Partnership	$ 3,241,000	7,188,089	1,066
1	County of Los Angeles Energy Efficiency Partnership	$ 2,737,000	7,188,096	1,140
1	County of Riverside Energy Efficiency Partnership	$ 3,727,000	8,042,578	1,425
1	UC/CSU Energy Efficiency Partnership	$ 14,019,000	45,516,901	6,705
1	County of San Bernardino Energy Efficiency Partnership	$ 2,186,000	5,466,335	874
1	State of California Energy Efficiency Partnership	$ 3,669,000	7,982,776	1,184
1	Business and Consumer Electronics Program	$ 12,642,000	51,622,602	5,334
1	WE&T Connections	$ 9,056,000	4,504,564	790
1	WE&T Centergies	$ 26,334,000	-	-
	Total	**$ 509,703,514**	**1,704,597,080**	**400,713**

1 - Represents a element within a proposed SCE EE program.

Second Amended Table I-4
Estimated Budgets and Savings for New Approaches

	SCE EE Program	Total 2010-2012 Program Cycle Budget	Total Gross Energy Savings (kWh)	Total Gross Demand Reduction (kW)
	Residential & Commercial HVAC Program	$ 76,413,000	124,443,900	91,954
	Industrial Energy Efficiency Program	$ 101,066,000	584,491,601	97,459
	Agriculture Energy Efficiency Program	$ 29,578,000	172,975,916	41,731
	Sustainable Communities	$ 14,254,000	-	-
	SW Codes & Standards	$ 11,080,000	270,023,041	47,516
	SW Emerging Technologies	$ 22,901,000	-	-
	New Construction Program	$ 77,655,000	241,674,434	62,128
	Automatic Energy Review for Schools	$ 2,015,000	2,900,732	650
	SW Marketing, Education & Outreach	$ 20,213,514	-	-
	Energy Leader Partnership Program (Core)	$ 5,609,000	14,395,899	2,884
1	Energy Leader Partnership Strategic Support	$ 994,000	-	-
1	City of Redlands Energy Leader Partnership	$ 798,000	1,875,000	376
1	Community Energy Leader Partnership	$ 3,891,000	10,000,000	1,986
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1	County of Los Angeles Energy Efficiency Partnership	$ 2,737,000	7,188,096	1,140
1	County of Riverside Energy Efficiency Partnership	$ 3,727,000	8,042,578	1,425
1	UC/CSU Energy Efficiency Partnership	$ 14,019,000	45,516,901	6,705
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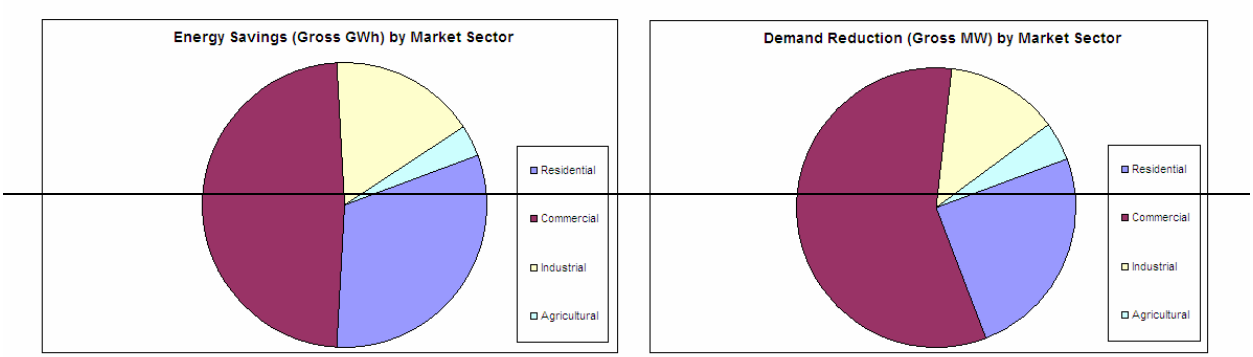
1	State of California Energy Efficiency Partnership	$ 3,669,000	7,982,776	1,184
1	Business and Consumer Electronics Program	$ 12,642,000	51,622,602	5,334
1	WE&T Connections	$ 9,056,000	3,247,809	576
1	WE&T Centergies	$ 26,334,000	-	-
	Total	**$ 509,703,514**	**1,740,946,849**	**404,575**

1 - Represents a element within a proposed SCE EE program.

E. Charts Summarizing Projected Energy Savings From Each Of The Four Major Sectors For The Program Cycle; And, Charts Of Expected Savings Against Estimated Baseload Consumption, Averaged Over Three Years

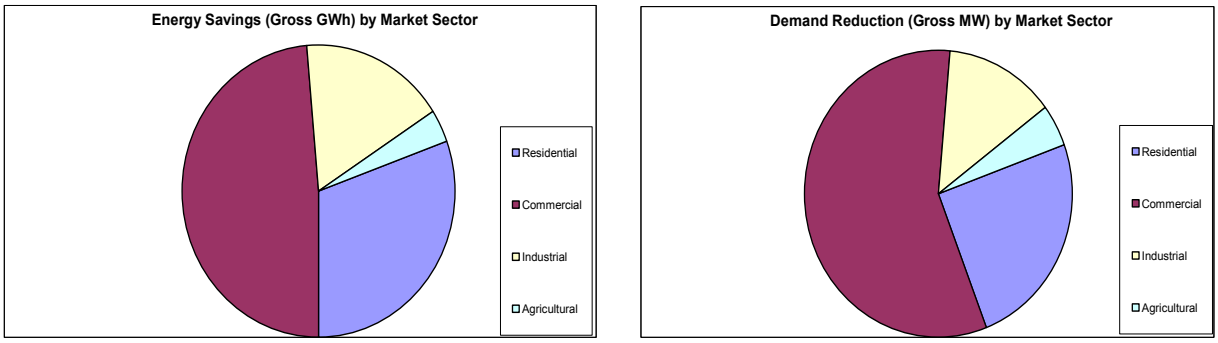
Second Amended **Table I-5** below shows projected energy savings and demand reduction from each of the four major sectors (Residential, Commercial, Agricultural, and Industrial). Second Amended Exhibit SCE-2, dated July 2, 2009 Table 1.3 includes a detailed breakdown by sector of SCE's proposed budget, energy saving, and demand reduction. Second Amended Exhibit SCE-2, dated July 2, 2009 Table 1.4 also includes a break down of energy efficiency measures.

~~Table I-5~~
~~Energy Savings And Demand Reduction By Market Sector~~



Note: Does not include forecast of Low Income Energy Efficiency and Codes and Standards impacts for the 2009-2011 program cycle.

Second Amended Table I-5
Energy Savings And Demand Reduction By Market Sector



Note: Does not include forecast of Low Income Energy Efficiency and Codes and Standards impacts for the 2010-2012 program cycle.

II.

PROPOSED ENERGY EFFICIENCY POLICIES AND RULES

A. Introduction

In this chapter, SCE proposes key policy modifications that are necessary to enable the success of California's energy efficiency programs in the 2010-2012 period and beyond. This Second Amended testimony on proposed policies supersedes the policy testimony submitted by the Joint IOUs on March 2, 2009.[44] This Testimony is being submitted to the Commission pursuant to D.07-10-032, the California Long-Term Energy Efficiency Strategic Plan (Strategic Plan) D.08-09-040 adopted on September 18, 2008, the Order Instituting Rulemaking 09-01-019 on the Energy Efficiency Risk Reward Incentive Mechanism issued February 4, 2009, and other rulings and orders.[45]

Although Decision (D.) 09-05-037, issued May 26, 2009, adopted changes in existing rules on the calculation of energy savings and portfolio cost-effectiveness for the Utilities' 2009-2011 Energy Efficiency Applications, SCE believes there are still outstanding policy issues that must be clarified to provide a higher degree of certainty around the energy efficiency process for the Commission, the Utilities, and other parties and stakeholders. These policy issues include:

1. **Cumulative Savings**: To align with SCE's proposed 2010-2012 program cycle, SCE proposes to define cumulative energy savings for the 2010-2012 cycle as including energy savings goals for years 2007-2012.

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[44] Southern California Edison Company's Application For Approval of Its Revised 2009-2011 Proposed Energy Efficiency Program Plans and Public Goods Charge And Procurement Funding Requests, Exhibit SCE-1, Chapter II, Proposed Energy Efficiency Policies And Rules, dated March 2, 2009.

[45] *See also* Administrative Law Judge (ALJ) Ruling dated October 31, 2008; Scoping Memo dated November 25 2008; Guidance Ruling dated December 12, 2008; ALJ Ruling Revising Proceeding Schedule dated February 10, 2009; ALJ Ruling Regarding Policy Issues, dated February 25, 2009; D.09-05-037 Interim Decision Determining Policy And Counting Issues For 2009 To 2011 Energy Efficiency Programs, dated May 26, 2009; and ALJ Ruling Setting Schedule for Supplemental Filings, dated May 29, 2009.

2. **Attribution**: The Commission should not adopt a separate attribution factor to account for actions taken by customers with external motivations (e.g., federal stimulus funds). This issue may impact multiple programs. In the case of government partnerships, the current .70 net-to-gross ratio for government partnership program savings should be retained, on an overall program basis, for all projects.
3. **Assumptions:** Ex ante benefit and measure cost assumptions used for planning the 2010-2012 Energy Efficiency Portfolio should also be used for portfolio reporting and evaluation. These assumptions should include limited Utility-proposed revisions to the 2008 DEER update proposed by the Energy Division.

It is essential that these policy matters are resolved in order for the Commission to adopt successful energy efficiency portfolios. SCE's proposal focuses on cost-effectively maximizing the total energy savings necessary to meet California's aggressive vision and need for energy efficiency. These requests allow SCE to focus on the forceful execution of an energy efficiency portfolio that supports the State's energy efficiency goals as articulated in the Strategic Plan, including the Big, Bold Energy Efficiency Strategies, AB 32 – the California Global Warming Solutions Act of 2006, and the State's Energy Action Plan (EAP). Additionally, adjustment of the program cycle from 2009-2011 to 2010-2012 creates a more reasonable timeframe for SCE to implement the strategies necessary to achieve these aggressive goals.

SCE's Proposed Program Plans for 2010-2012 are contingent upon Commission adoption of the above-described policy changes. The energy savings and cost-effectiveness of the Proposed Program Plans are summarized in the amended testimony and tables in Second Amended Exhibit SCE-2, dated July 2, 2009. SCE's testimony and tables also include results for a compliance scenario required by the Administrative Law Judge that assumes cumulative savings cover the period 2006-2011, full December 2008 DEER updates as proposed by the Energy Division, and other current policies mandated in Commission Decisions and Rulings.

This scenario also assumes the current net-to-gross ratio of .70 for local government partnerships.

At this point in the Application process, SCE believes that the compliance scenario is not feasible, as the remaining 24-27 months following a Commission decision on its Application do not provide SCE and its partners the time needed to achieve the 2006-2011 cumulative goals. Accordingly, to maximize the likelihood that SCE is able to implement a portfolio that maximizes energy efficiency and greenhouse gas reductions and supports the Commission's long-term vision for efficiency as presented in the Strategic Plan and elsewhere, SCE urges the Commission to adopt the proposed policy changes upon which the portfolio is built.

B. Changes Needed For A Cost-Effective Portfolio That Meets Commission Goals

1. Cumulative Savings Should Be Defined To Include Program Years 2007-2012

At this juncture, SCE recognizes that a Decision on the 2009-2011 Applications is not likely until the end of the third quarter of 2009 at the earliest, and that program implementation will not realistically begin until 2010. Although significant program achievements have been made during the 2009 bridge funding period, SCE has not been authorized to execute the 2009 plans that were originally developed and launch new, innovative and comprehensive programs for the full three-year cycle.

Given the present realities, SCE believes it is not feasible to accomplish an ambitious 36-month plan in the remaining 24-27 months, in order to meet the proposed 2006-2011 cumulative energy savings goal by the end of 2011. In order to provide SCE and its partners with a reasonable opportunity to achieve the cumulative energy savings goals, SCE is proposing a 2010-2012 program cycle, with a 2007-2012 cumulative goal. SCE's overall First Amended Plan, as filed on March 2, 2009, remains otherwise unchanged – including program design and structure and overall funding levels. However, this adjustment to the timing of the cycle will allow SCE to thoroughly and properly execute a full three-year program plan, as

originally designed. As part of this proposal, SCE proposes that the Commission extend bridge funding through December 31, 2009, as authorized by D.08-10-027.

SCE recognizes that in order to implement a 2010-2012 program cycle, several factors will need to be taken into consideration. These include:

a) CPUC Adoption of 2012 Energy Efficiency Goal

As of the date of this filing, the CPUC has not yet formally adopted IOU Energy Efficiency goals for 2012. SCE proposes that the Commission adopt the IOU programs component of SCE's Interim 2012 and beyond. SCE proposes that the Commission adopt the IOU programs' component of SCE's Interim 2012 Total Market Gross (TMG) Goal established in D.08-07-047, as this Decision established interim TMG goals for each IOU service territory for the years 2012 through 2020.

Unlike previous energy efficiency goals which were based on IOU programs only, the TMG goals incorporate energy efficiency from non-IOU savings mechanisms, including legislation (specifically AB 1109 California Lighting Efficiency and Toxics Reduction Act, also known as the "Huffman Bill"), state and federal standards, Big Bold Energy Efficiency Strategies (BBEES), and IOU programs. The Commission characterized the TMG goals as interim and identified the need to update the TMG goals and establish IOU program-specific expansive net goals.[46] However, the Commission's target date for completing the update is October 2010.[47]

In the absence of updated TMG and/or expansive net goals, SCE proposes to use the IOU Programs component of SCE's Total Market Gross goal adopted in D.08-07-047 as the goal for SCE's 2012 energy efficiency portfolio. SCE's Total Market Gross Energy Efficiency goal broken-down by savings mechanism is shown below.[48]

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[46] D.08-07-047, p. 33

[47] D.08-07-047, OP#5

[48] D.08-07-047, Table A-4, Appendix p. 3

Table A-4: SCE (cumulative)

GWH	2012	2013	2014	2015	2016	2017	2018	2019	2020
Huffman Bill	151	302	453	604	755	906	1,057	1,207	1,358
T24+Federal Standards	83	170	270	390	546	708	874	1,046	1,223
BBEES	66	127	183	245	299	353	413	471	528
IOU Programs	673	1,236	1,713	2,129	2,546	2,969	3,394	3,818	4,241
Total Market Gross	973	1,834	2,618	3,368	4,146	4,935	5,737	6,543	7,350
MW									
Huffman Bill	20	40	61	81	101	121	142	162	182
T24+Federal Standards	29	60	94	136	199	265	332	402	473
BBEES	37	71	104	143	178	214	253	292	329
IOU Programs	129	243	345	438	531	625	720	814	908
Total Market Gross	215	415	604	797	1,010	1,225	1,447	1,670	1,892

Even though the Itron analysis underlying the TMG goals has not been updated to reflect the most recent energy efficiency input data, (e.g., DEER 2008), it remains the best publicly-available analysis of IOU energy efficiency potential at this time. The Itron analysis is particularly valuable because it reflects the forecasted impacts of legislation, standards, and the California Long-Term Energy Efficiency Strategic Plan on the levels of energy efficiency achievable through IOU programs. Consequently SCE believes that the IOU Programs component of the TMG goals represents the best available proxy for an IOU program goal until the Commission completes its updated study of energy efficiency potential in 2010.

In D.08-07-047 the Commission adopted the interim TMG goals for use by the California Air Resources Board in its Assembly Bill 32 planning process and in the Commission's long-term procurement planning process.[49] Further, IOUs were directed to use one hundred percent of the interim Total Market Gross energy savings goals for 2012 through 2020 in future Long-Term Procurement Planning proceedings, until superseded by permanent goals.[50] Use of the TMG goals adopted in D.08-07-047 for GHG planning was reiterated by the Commission in D.08-10-037.[51]

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[49] D.08-07-047, OP#1

[50] D.08-07-047, OP#3

[51] D.08-10-037, OP#1

To maintain consistency with the Total Market Gross energy efficiency goals that the Commission has adopted for long-term procurement and GHG planning, it is appropriate to use the IOU Programs component of these goals as the goal for SCE's 2012 EE portfolio.

b) Assembly Bill 1109 ("Huffman Bill") Impacts

California Assembly Bill 1109 (California Lighting Efficiency and Toxic Reduction Act), also known as the "Huffman Bill," aims to reduce lighting energy usage in California. It does so by applying existing appliance energy standards to include lighting products, as well as require minimum lumen/watt standards for different categories of lighting products. In essence, the amount of energy efficiency savings attributed to compact fluorescent lighting will reduce. As a result, SCE's proposed program plans actively ramp down incentives on bare spiral CFLs in years 2010 and 2011 and increase its focus on more efficient lighting (including LEDs, dimmable CFLs, etc.) in 2012.

2. The Commission Should Not Adopt A Separate Attribution Factor To Account For Actions Taken by Customers with External Motivations

D.09-05-037 denies the Utilities' request to change attribution rules regarding savings credit for actions taken by customers supported by Utility programs, but who may also be motivated by external factors (such as federal stimulus funds, Green Building Initiative, and other initiatives, as applicable). What is now needed is simply a clear understanding of how utilities should claim savings from program activities where it is known that the customer is also receiving support from other sources.

In fact, we already have the tool for making the attribution determination, and we're already using it. It is the program net-to-gross ratio (NTGR). The basic function of net-to-gross analysis is to correctly attribute energy savings due to program activities to the program, and to remove energy savings due to other causes. Free ridership analysis looks at the customer environment and seeks to answer the question: what is the probability that each customer would have achieved these savings (or a fraction of these savings) in the absence of the program?

Therefore, SCE proposes that the Utilities continue to rely on the currently-proposed program NTGRs as the appropriate attribution factors for each program. Ex post studies will determine the level of free ridership from all causes, from non-energy benefits to very strong paybacks to grants and tax credits. The federal stimulus funds simply represent a particular new instance of the types of other motivating factors that the NTGR has always been intended to take into account.

Because of the particular economic circumstances during this time, it is unnecessary to change the ex ante NTGRs of programs where some customers will have the opportunity to receive federal stimulus grants or tax credits or to respond to initiatives. The extreme national recession is taking a disproportionate toll in California on government budgets, employment, asset values, and credit availability. Recovery is projected to take longer in California. This results in a situation where substantially higher incentives and support are likely to be necessary for most customers who still have some capability to undertake costly energy efficiency upgrades. The combined effect of utility incentives and substantial utility support for participation in the other initiatives will probably be necessary for most customers to participate. In addition, the stimulus funds are available for only a short time period. Thus, the NTGRs for the new program cycle are unlikely to decline from present values.

If the Commission chooses instead to establish a low NTGR for programs that provide support in areas where customers also have access to federal stimulus funds, the Commission runs the risk of substantially reducing California customer use of the stimulus funding. This will be the result if the utilities are unable to provide needed additional support to customers to take advantage of these funds, due to loss of calculated cost-effectiveness.

Consequently, as an example, SCE does not see any justification for prescribing new and different rules for crediting savings from existing program funds in the presence of federal stimulus funds. Given the short timeframes involved, SCE and local governments should maintain maximum flexibility to leverage available energy efficiency funding resources within existing program criteria in order to create jobs and energy savings in California. The

Commission should maintain consistent policies regardless of whether local governments elect to fund a portion of their investment with ARRA funds or other previously available sources of support, such as bond funds. The net-to-gross ratio already takes this into account at the program level. This means that the current 0.70 net-to-gross ratio for government partnership program savings should be retained, on an overall program basis, for all projects.

3. Ex Ante Per-Unit Benefit And Cost Assumptions Should Be Adopted For 2010-2012 Portfolio Planning And Also Used For Portfolio Evaluation

SCE's 2010-2012 Proposed Program Plans support the Commission's goals for both short-term and long-term resource benefits to the State, focusing on a mix of both existing and emerging technologies and programs. Energy efficiency is the premier resource in California's loading order, and as such deserves and demands a reliable and reasonable planning and implementation environment. Such an environment allows the Utilities, the energy efficiency industry, and local partners to focus on producing savings and not continually be concerned about responding to shifting assumptions. It allows the State, the Commission, and ratepayers to receive the benefits the Utilities are proposing.

The benefits and measure costs supporting SCE's Proposed Program Plans are based on the DEER data, with limited IOU modifications as discussed herein. Failure to adopt the per-unit benefit and cost assumptions (including but not limited to kWh, kW, EUL, and measure costs) for portfolio planning, reporting, and evaluation jeopardizes achievement of the Commission's and State's energy goals, as currently established. The Commission has acknowledged the inconsistency in the per-unit benefit and cost assumptions underlying goal development and new assumptions being released, such as the 2008 December DEER update proposed by the Energy Division. The following sequence describes the Commission's actions:

The goals for the period 2004-2013 set forth in the 2004 Decision D.04-09-060 were created using a set of facts regarding benefits and measure costs available at that time. The energy savings potential, from which the goals are derived, exists as previously stated only when the underlying inputs (*e.g.,* energy savings, costs, EULs, *etc.*) remain consistent. Variations in

the underlying inputs call into question whether the energy savings potential, upon which the goals are based, continues to exist at the previously estimated levels.

In 2008, the Commission confirmed that the 2009-2011 goals are gross goals, citing D.04-09-060 and new analysis showing "that the currently-adopted numeric goals for 2009-2011 are consistent with, and in most cases higher than, recent analysis of maximum achievable utility gross savings potential during these years."[52]

In D.08-07-047, the Commission found that 2009 and beyond goals were "now out of date. Key assumptions embedded in the current goals do not resemble trends visible in the overall energy efficiency market today. For example, the net-to-gross and expected useful life assumptions in the 2009-2011 goals are about ten years old."[53]

The Energy Division then updated key assumptions through the 2008 DEER update, most recently in December 2008. The Commission declined to reflect these assumption changes in the goals for 2009-2011 adopted in D.08-07-047, even though the Commission intends to correct the misalignment for future program cycles.[54]

Accordingly, the Commission must either freeze the goals with the per-unit benefit and measure cost assumptions needed to achieve those goals (as presented herein) or allow the goals to proportionately "float" to address the constantly changing assumptions proposed through DEER and other updates. Continual changes to the rules of the game make it exceedingly difficult and expensive for Utilities and third parties to effectively plan and implement energy efficiency programs to meet the energy savings goals. Furthermore, changes to per-unit measure and cost assumptions between program adoption and evaluation compromise SCE's ability to focus on the Strategic Plan since proven, cost-effective portfolio measures cannot be used to balance new, non-cost-effective efforts for both the cost-effectiveness and

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[52] D.08-07-047, dated August 1, 2008, p. 29.

[53] *Id.*, p. 28.

[54] D.08-07-047, dated August 1, 2008, p. 33.

energy saving achievement calculations. Thus, SCE requests that the Commission adopt and maintain the per-unit benefit and cost assumptions, as proposed herein, throughout the program cycle to meet the Commission's energy savings goals as established in D.04-09-060.

4. New Process Needed for Measures in Proposed Framework

In light of the proposed framework, SCE requests that the existing process for adding new measures, as adopted in D.05-09-043, be altered to allow for proper, formal, on-the-record review of benefit and measure costs proposed by the Energy Division. The new measure information would be provided to SCE's local peer review group (PRG) for informal review as required by the Energy Efficiency Policy Manual, Version 4.0, Table 8. Upon receipt of such information, the Energy Division would then be given 15 calendar days to resolve any issue. The Executive Director of the Energy Division would then send a letter to the local PRG and SCE on their recommended benefit and measure cost values. If the Energy Division does not resolve the values that should be used and inform SCE of such resolution by the 15th calendar day, then the SCE-proposed benefit and measure cost data will be used for portfolio reporting and evaluation. If SCE does not support the Energy Division's recommendation, SCE would have the opportunity to file an Advice Letter for full Commission review and resolution. SCE believes this proposed process provides the local PRGs ongoing information and the Energy Division ample opportunity to review proposed benefit and measure cost values while facilitating the inclusion of new measures through a timely and transparent process.

Savings assumptions should include limited SCE-proposed revisions to the DEER update issued by the Energy Division in December 2008 and should be adopted by the Commission for portfolio planning and evaluation. SCE's Proposed Program Plans include limited modifications to the proposed values from the DEER database, as supported by the workpapers in Second Amended Exhibit SCE-8, dated July 2, 2009. The Proposed Program Plans are based upon updated cost-effectiveness metrics that SCE maintains are more appropriate for the portfolio than those currently included in the Energy Division's proposed 2008 DEER

Update (December 2008). The values utilized in the Proposed Program Plans represent values which are based upon supportable assumptions and studies of the resource benefits and measure costs of the portfolio. These values are also consistent with the goals of the Commission and the State.

The updated DEER numbers proposed by the Energy Division significantly reduce the amount of energy efficiency savings available from utility programs, but without commensurately reducing the energy efficiency savings goals. SCE firmly supports the use of estimates based on Commission studies that adhere to the Commission's evaluation, measurement, and verification (EM&V) protocols and that have gone through the proper vetting process. SCE rejects unsupported savings estimates proposed by Energy Division (or any party) that are developed outside of the Commission's protocols and that lack transparency. SCE maintains, and has submitted evidence[55] to support the conclusion that certain revised DEER estimates (December 2008) are flawed and thus inappropriate for use in this proceeding, as demonstrated in Second Amended Exhibit SCE-8, dated July 2, 2009.

~~A. Introduction~~

~~The Joint IOUs propose key policy modifications that are absolutely necessary to enable the success of California's energy efficiency programs in the 2009-2011 period and beyond. SCE's amended proposed policy testimony supersedes the policy testimony submitted by the Joint IOUs in support of Application 08-07-021 *et al* on July 21, 2008. The testimony in SCE-1 is being submitted to the Commission pursuant to Decision 07-10-032, the California Long-Term Energy Efficiency Strategic Plan (Strategic Plan) Decision 08-09-040 adopted on September 18, 2008, the Order Instituting Rulemaking 09-01-019 on the Energy Efficiency Risk Reward~~

55 Southern California Edison Company's (U338-E) Comments On the Review Draft Of The Energy Efficiency 2006-2007 Verification Report, dated December 15, 2008.

~~Incentive Mechanism issued February 4, 2009, and other rulings and orders.[56] The Joint IOUs propose policies that are essential to be decided within the context of the 2009-2011 proceeding and fit into two general policy categories.~~

~~The first category of policy requests is needed in order for the IOUs to each build well-balanced portfolios that meet the sum of the Commission's annual 2009-2011 energy efficiency goals cost-effectively. Changes required for cost-effective energy efficiency portfolios that meet these goals are:~~

1. ~~Benefit and measure cost assumptions that are used for planning the adopted 2009-2011 Energy Efficiency Portfolio (ex ante) should also be used for portfolio reporting and evaluation. These assumptions should include limited IOU-proposed revisions to the Database for Energy Efficiency Resources (DEER) update proposed by the Energy Division in December 2008;~~
2. ~~Cumulative savings should be defined as the sum of the annual savings goals for the three-year portfolio period upon which the proposed budgets are based; and~~
3. ~~Residential interactive effects and commercial heating interactive effects should be removed from energy efficiency calculations.~~

~~The second category of policy requests is essential to achieve both near and long-term goals of the State of California and the Commission. These include:~~

1. ~~Certain costs in direct support of the Strategic Plan should be exempt from the shareholder risk reward incentive mechanism;~~
2. ~~IOUs should receive credit for energy efficiency actions taken by customers who may be motivated in part by other influences; and~~
3. ~~To encourage long-term measure installations, the maximum effective useful life (EUL) should be extended to 30 years.~~

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[56] *See also* Administrative Law Judge (ALJ) Ruling dated October 31, 2008, Scoping Memo dated November 25 2008; Guidance Ruling dated December 12, 2008 and Ruling Revising Proceeding Schedule dated February 10, 2009.

~~The IOUs also discuss a third set of policy requests that are important to successful energy efficiency programs. The IOUs acknowledge that these will be addressed in a subsequent R.09-01-019 by the CPUC. The Joint IOUs constructed their respective Proposed Program Plans anticipating that this third set of policy requests will be adopted by the Commission. In the event these policy requests are not granted in a subsequent rulemaking, the IOUs may need to revise their 2009-2011 Proposed Program Plans.~~

1. ~~Gross metrics should be used for the calculation of performance toward the minimum performance standard (MPS) and performance earnings basis (PEB) under the RRIM; and~~
2. ~~Mid-cycle funding augmentation rules should be revised.~~

~~The Commission has indicated a desire to consider policy revisions to the energy efficiency process.[57] The Joint IOUs recognize that the Commission intends to address energy efficiency policy issues and the risk/reward incentive mechanism in upcoming rulemakings and their instant applications. The Joint IOUs assert it is essential that these policy matters are resolved in order for the Commission to adopt successful utility 2009-2011 energy efficiency portfolios. The Joint IOUs' proposal focuses on cost-effectively maximizing the total energy savings necessary to meet California's aggressive vision for energy efficiency. These requests allow the IOUs to focus on execution of energy efficiency portfolios that support all of the State's energy efficiency goals articulated in the Strategic Plan, including the Big, Bold Energy Efficiency Strategies; AB 32 – The California Global Warming Solutions Act of 2006; and the State's Energy Action Plan (EAP).~~

~~The IOUs' Proposed Program Plans for 2009-2011 are contingent upon Commission adoption of the above-described policy changes. The energy savings and cost effectiveness of the Proposed Program Plans are summarized in each of the IOUs' individual amended testimony and tables. The individual IOU testimony and tables also includes results for a mandated~~

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[57] R.09-01-019. *See also* D.08-12-059.

scenario required by the ALJ that employs the full December 2008 DEER updates proposed by the Energy Division and other current policies mandated in Commission Decisions and Rulings. The IOUs are not able to develop and implement reasonable and well-balanced portfolios that meet all the Commission-adopted energy savings goals cost-effectively based on the mandated scenarios (*i.e.*, if the IOU-recommended policies are not adopted). Accordingly, to ensure that IOUs are able to implement portfolios that maximize energy efficiency and greenhouse gas reductions and support the Commission's long-term vision for efficiency as presented in the Strategic Plan and elsewhere, the Joint IOUs urge the Commission to quickly adopt the proposed policy changes upon which such portfolios are built.

C. Changes Needed For Cost-effective Portfolio That Meets Commission Goals

1. Per-Unit Benefit And Cost Assumptions Should Be Adopted For 2009-2011 Portfolio Planning (*Ex Ante*) And Also Used For Portfolio Evaluation

The IOUs' 2009-2011 Proposed Program Plans support the Commission's goals for both short-term and long-term resource benefits to the State, focusing on a mix of both existing and emerging technologies and programs. Energy efficiency is the premier resource in California's loading order, and as such deserves and demands a reliable and reasonable planning and implementation environment. Such an environment allows the IOUs, and the energy efficiency industry, to focus on producing savings and not continually be concerned about responding to shifting assumptions. It allows the State, the Commission, and ratepayers to receive the benefits the utilities are proposing.

Failure to adopt the per-unit benefit and cost assumptions (including but not limited to kWh, kW, EUL, and measure costs) for portfolio planning, reporting, and evaluation jeopardizes achievement of the CPUC's and State's energy goals, as currently established. The Commission has acknowledged the inconsistency in the per-unit benefit and cost assumptions underlying goal development and new assumptions being released, such as the 2008 December DEER update proposed by the Energy Division. Thus, the Joint IOUs request that the

~~Commission adopt and maintain the per-unit benefit and cost assumptions, as proposed in SCE-1 Chapter II, throughout the program cycle to meet the Commission's energy savings goals as established in D.04-09-060.~~

~~In light of the proposed framework, the Joint IOUs request that the existing process for adding new measures, as adopted in D.05-09-043, be altered to allow for proper, formal, on-the-record review of benefit and measure costs proposed by the Energy Division. The new measure information will also be provided to the Joint IOUs' various local peer review groups (PRGs) for informal review as required by the Energy Efficiency Policy Manual, Version 4.0, Table 8.~~

~~Savings Assumptions Should Include Limited IOU-Proposed Revisions To The Database For Energy Efficient Resources (DEER) Update Issued By The Energy Division in December 2008 And Should Be Adopted By The Commission For Portfolio Planning And Evaluation. The IOUs' Proposed Program Plans include limited modifications to the proposed values from the DEER database, as supported by the work papers in Exhibit SCE-8/PG&E Appendix E/ SDG&E/SoCalGas Exhibits. The Proposed Program Plans are based upon updated cost-effectiveness metrics that the IOUs maintain are more appropriate for the portfolio than those currently included in the Energy Division's proposed 2008 DEER Update (December 2008). The values utilized in the Proposed Program Plans represent values which are based upon supportable assumptions and studies of the resource benefits and measure costs of the portfolio. These values are also consistent with the goals of the Commission and the State.~~

~~The updated DEER numbers proposed by the Energy Division significantly reduce the amount of energy efficiency savings available from utility programs, but without reducing the energy efficiency savings goals. The IOUs support the use of estimates based on Commission studies that adhere to the Commission's evaluation, measurement, and verification (EM&V) protocols and that have gone through the proper vetting process. The IOUs reject unsupported savings estimates proposed by Energy Division that are developed outside of the protocols and lack transparency.~~

2. Cumulative Savings Should Be Defined As The Sum Of The Annual Savings Goals For The Three-Year Portfolio Period

Cumulative savings goals for the IOUs should be defined as the sum of the annual goals for the three-year portfolio cycle. Defining cumulative savings to include a longer-term period, such as back to 2004, cannot be implemented by the IOUs, as it is inconsistent with Commission goal development and is not technically feasible from a timing perspective. 2006-2008 evaluation results would not be available until December 2010 well after the 2009-2011 portfolio has been budgeted and adopted. Further, there are no reliable studies that can quantify the amount, if any, of savings that do not still persist from installations back to 2004. Accordingly, the Joint IOUs recommend reconsideration of the current definition of cumulative savings such that cumulative be defined as the sum of the annual savings goals for the three-year portfolio period (2009-2011).

- Defining Cumulative Savings To Be Beyond The Three-year Period Is Not Consistent With Commission Goal Development And Policy

The Commission created goals for the 2004-2013 period in 2004 based on then available potential and energy savings data. To create cumulative goals, the Commission merely added the individual annual goals. No party did an assessment or adjustment for decay, an assessment of the change in energy savings due to ex post measurement, or an assessment of whether the cumulative goals were defined as net or gross. Such an assessment would have resulted in a reduction of the cumulative goals or an increase in the annual goals to replace such savings that would "fall away."

In addition to the changes in policy as to whether to count some or all of C&S savings, there have also been other changes to policy for counting savings, including the variation from commitments to actual installations and from net goals to gross goals. The change to gross from net in 2009-2011 creates an additional layer of uncertainty and arbitrariness in assessing cumulative savings. In its Decision on 2009-2011 goals and 2012-2020 goals, the Commission states that "2009-2011 savings will be measured as ex-post gross and layered on top

of 2004-2008 savings to measure cumulative savings…."[58] This means that the Commission will mix ex post net achievements for 2004-2008 (including commitments) with ex post gross achievements for 2009-2011. Any cumulative savings goals beyond the three-year period need to reflect whether those energy savings are, in fact, available for IOU programs or have been adequately addressed through other developments in the marketplace (*e.g.*, rising baselines, Codes and Standards, *etc.*). As discussed in SCE-1 Chapter II, defining cumulative savings back to 2004 is inconsistent with Commission goal development and policies on counting savings. Accordingly, the Joint IOUs request cumulative savings for which the IOUs are responsible be defined as the sum of the annual goals for the 2009-2011 period.

3. Residential Interactive Effects And Commercial Heating-Related Interactive Effects Should Be Removed From Energy Efficiency Calculations

The Commission goals were adopted under 2002 assumptions of market potential and savings assumptions. Subsequent DEER updates proposed by the Energy Division were not used to modify the potential estimates nor the goals derived from those estimates. Furthermore, the CPUC's potential study never considered interactive effects from electric measures on gas usage in its assessment.

However, current DEER updates proposed by the Energy Division include assumptions for "interactive effects" which produce substantial increases in gas usage resulting from electric savings. Any interactive electric savings effects would undermine gas savings accomplishments making it impossible for gas and gas/electric utilities to achieve both gas and electric goals under existing rules.

The Joint IOUs have strong concerns about the validity of DEER on residential interactive effects and commercial heating-related interactive effects due to conclusions from a CFL Energy Impact Study dated January 2009 done by San Diego State University (the study is

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[58] D.08-07-047, dated August 1, 2008, p. 29.

presented in SDG&E's Attachment D-1). The Joint IOUs agree with the analysis performed and the conclusion that negative heating interactive effects in residences are overstated in DEER. Therefore, the 2008 DEER update for this situation cannot be supported and, residential interactive effects and commercial heating-related interactive effects should be removed.

D. Other Policy Requests Essential In Supporting The Commission's Guidance (Support For Strategic Plan, Collaboration, Long-Life Measures)

1. Activity Costs In Direct Support Of The California Long-Term Energy Efficiency Strategic Plan Should Be Exempt From The Shareholder Risk/Reward Incentive Mechanism

In D.07-10-032, the Commission stated that "all parties will agree that California (and likely other regions as well) will achieve far greater savings if the IOUs and Commission actively engage in coordinated, long-term planning."[59] On June 2, 2008, the Joint IOUs jointly filed a Strategic Plan.[60] On September 18, 2008 the Commission adopted and issued the California Long-Term Energy Efficiency Strategic Plan (Strategic Plan).[61] The Strategic Plan contains various goals for California, both near and long-term.

However, many of the Strategic Plan oriented items may not produce identifiable or measurable energy savings, and/or may produce only minimally or even non-cost-effective energy savings in the near-term. The Strategic Plan oriented items include market characterization reports, research, convening of stakeholders to discuss visionary energy

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59 D.07-10-032, dated October 18, 2007, p. 20.

60 California Energy Efficiency Strategic Plan And Appendices And Joint Application Of Pacific Gas And Electric Company (U 39 M), Southern California Edison Company, San Diego Gas & Electric Company And Southern California Gas Company Submitting The California Energy Efficiency Strategic Plan, June 2, 2008, Docket No. R.06-04-010.

61 California Long-Term Energy Efficiency Strategic Plan, dated September 2008.

~~efficiency, support of the California Energy Commission or local government activities, pilots, and workforce development, among other things.~~

~~Given this policy challenge, the Joint IOUs support specialized treatment of these costs for these discrete Strategic Plan activities. The Joint IOUs believe that activities should be exempt from the risk/reward incentive mechanism[62] if:~~

~~a) The activity explicitly supports a Strategic Plan Strategy; and~~

~~b) The activity will produce minimal or no cost-effective, measurable savings in 2009-2011.~~

~~The Commission's concurrence with this exemption will ensure there is a policy framework that would support the long-term, innovative activities necessary to achieve the vision in the Strategic Plan. Strategic Plan activities should be treated similarly to Emerging Technologies costs, which were exempted from risk/reward mechanism calculations, pursuant to D.07-09-043.~~

~~To ensure that costs for the Strategic Plan do not remove the more wide-scale energy efficiency benefit from utility customers, each of the IOUs will include all the savings and costs, including those from exempted programs, in its cost-effectiveness calculation for their 2009-2011 portfolios. Each of the IOUs will ensure that their respective portfolios, including exempted programs, also remain cost effective to ensure that utility customers continue to receive a positive benefit from energy efficiency programs.~~

~~The IOUs look forward to furthering the Strategic Plan and working with stakeholders to achieve the long-term vision, but want to ensure that the Strategic Plan receives the appropriate, discrete resources and funding on a going-forward basis to ensure the success that the Commission envisions. Table II-6 below showcases the programs and corresponding~~

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62 This reference is to the existing RRIM. IOUs recognize that the Commission has instituted R.09-01-019 to evaluate and modify the existing RRIM. Although the design of any new or modified RRIM is not known at this time, the IOUs underlying premise would also apply to any modification of the RRIM (*i.e.*, any RRIM should facilitate and not hamper IOUs support for the long-term goals in the Strategic Plan.)

~~costs that SCE requests be outside of the shareholder earnings mechanism (*i.e.*, performance earnings basis). Accordingly, the Joint IOUs recommend that that evaluation and modification of the RRIM consider the above issue so that it facilitates, and not hampers, IOU activities that advance the long-term goals of the Strategic Plan.~~

~~Table II-6~~
~~Program and Costs Outside the RRIM~~

SCE Program/Activity	Budget ($ in millions)
Workforce Education and Training – EARTH Education & Training Program [1]	$12.535
Statewide Marketing, Education and Outreach	$20.214
Emerging Technologies [1]	$22.901
Sustainable Communities Program	$14.254
California New Homes Program	$24.894
Manufactured Housing New Construction Program	$3.516
Codes and Standards Program	$11.080
Financial Solutions	$23.978
Total Budget	$133.372
Total Portfolio Budget	$1,344.000
% of Total Portfolio Budget	10%

[1] Includes WE&T Centergies and Planning

~~2. IOUs Should Receive Energy Efficiency Savings Credit For Energy Efficiency Actions Taken By Customers Who May Be Motivated In Part By Federal And State Policies Or Legislation, Local Codes And Ordinances, Or Multiple Sources Of "Green" Messaging Supported By IOUs~~

~~In D.07-10-032, the Commission made visionary statements about the future direction of energy efficiency. The Commission acknowledged that programs need to be leveraged and integrated to ensure maximum energy savings for the State. D.07-10-032 states:~~

> ~~"In the past, we have emphasized utility programs, utility funding and utility customers. This is logical given the limits of our legal jurisdiction, but this approach has resulted in fractured energy efficiency program development and delivery. Cost-effective use of resources for maximum reductions in energy demand will require the commitment of the most influential decision-makers who can affect comprehensive change. In order to reach a goal of making energy efficiency an integral part of "business as usual," we~~

~~need a pronounced commitment from business and government leaders and a more collaborative approach that involves all key stakeholders. We emphasize the need for enhanced cooperation and collaboration and commit to a leadership role in reaching out to key leaders to engage participation in this effort and direct the IOUs to do likewise."[63]~~

~~Unfortunately, the traditional regulatory framework, in which savings can only be applied to the Commission's goals if they are both attributable to the IOU's energy efficiency program and specifically identified by the customer as the reason for engaging in the activity, does not motivate increased cooperation and collaboration. To maximize energy savings in support of the State's aggressive GHG goals, the Commission should explicitly recognize energy efficiency savings credit for energy efficiency actions taken by customers who are supported by IOU programs and who may be motivated by federal and state policies or legislation (including that from the recent federal Economic Stimulus package), federal funding or loans, local codes and ordinances, or multiple sources of "green" messaging.~~

~~Incorporation of energy savings from customers who may be motivated in part by federal and state policies or legislation, local codes and ordinances, *etc*. is consistent with the Commission's goals for 2009-2011, as adopted in D.04-09-060. Removing the IOUs' ability to count savings from these customers hampers the IOUs' ability to design and implement a portfolio that meets Commission's adopted 2009-2011 goals, and does not promote the Commission's important vision of increased collaboration in the State. The Joint IOUs request the same treatment the Commission provided for the Governor's Green Building Initiative in D.05-09-043 in which the Commission found that utility support for this state initiative would not be reduced by free ridership reductions.[64] An extension of such treatment for other state initiatives, including GHG reduction, allows for increased and essential collaboration in making energy efficiency a way of life in California.~~

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[63] D.07-10-032, dated October 18, 2007, p. 7.

[64] D.05-09-043, dated September 22, 2005, p. 9.

3. To Encourage Long-Term Measure Installations, The Maximum Effective Useful Life (EUL) Should Be Extended To 30 Years

Maximum Effective Useful Lives (EUL) should be extended to 30 years to better reflect the true lifetime of certain measures. Currently the EULs of all energy efficiency measures are subject to an arbitrary 20-year ceiling, regardless of the true lifetime of measures. This practice biases the portfolio toward shorter-term measures whose savings are accumulated within that 20-year term span of time. Eliminating years of savings for these measures reduces their ostensible cost-effectiveness and thus limits the IOUs' ability to pursue them.

E. Policies That Need To Be Adopted In The CPUC's Subsequent Proceeding To Ensure The Success Of Energy Efficiency

1. Gross Metrics Should Be Used For The Calculation Of Performance Toward The Performance Earnings Basis (PEB) Under The RRIM

The Joint IOUs support the consistent use of gross metrics to calculate the achievement of goals, the Minimum Performance Standard (MPS), and the Performance Earnings Basis (PEB). In addition, Joint IOUs support the development of goals which are based upon the best available information on the potential for energy efficiency and which align with the Commission's key policies – including the use of energy efficiency as a reliable energy resource, as an important factor in reducing greenhouse gases from electricity generation, and in support of the Commission's long-term, "big, bold" strategies for energy efficiency.

The use of gross goals for 2009-2011, as ordered by the Commission in its July 31, 2008 Decision,[65] appropriately promotes three key Commission objectives: (1) maximizing energy efficiency in California, (2) underscoring Commission-set targets for the IOUs to aim for in the development of portfolios in this proceeding and in the implementation of these portfolios

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65 D.08-07-047, dated July 31, 2008, OP#4, p. 39.

~~in 2009-2011, and (3) enhancing collaboration among all stakeholders, including the IOUs, to meet these and other important goals. The Commission should continue to align the objectives of the programs – delivery of energy savings to customers – with the performance incentive mechanism. In fact, neither procurement planners nor greenhouse gas reduction calculations need consider net-to-gross ratios. This concept should be extended to the performance metrics for energy efficiency.~~

~~Utilizing both gross goals and a gross performance earnings basis calculation for the 2009-2011 period can open up the opportunity for more program options that support the long-term goals for energy efficiency than the use of net goals. This focus on customer savings will encourage collaboration among all stakeholders to develop and deliver the most effective and efficient energy savings to California customers.~~

~~The continued use of a net performance basis does not embody the "big, bold" concepts being promoted in this proceeding. This penalizes the utilities for success in increasing customer awareness of energy efficiency and energy efficient measures, which should not be the object of goal-setting and performance basis calculations. It is appropriate to remove this inherent penalty included in the use of net-to-gross ratios. The utilities support the adoption of a gross performance basis calculation for 2009-2011 which supports the development and delivery of expanded program options and support the long-term policy goals for energy efficiency in California. To do otherwise could adversely affect the Commission's effort to promote and implement maximum levels of energy efficiency in the state.~~

~~Ultimately, it is gross savings impacts delivered to customers that affect future resource needs and GHG emissions levels. The use of gross savings and benefits as a metric will align the utility program results with the system impacts and reduced GHG emissions. The Joint IOUs acknowledge that the adoption of gross goals may warrant changes to the RRIM, including the shared-savings rates, and look forward to addressing this issue in the new incentive mechanism Rulemaking R.09-01-019.~~

2. Mid-Cycle Funding Augmentation Rules Should Be Revised

The Joint IOUs propose to modify the 2006-2008 mid-cycle funding policy rule for 2009-2011 to allow each of the IOUs to count all installed energy efficiency results towards the Commission's aggressive energy savings and demand reduction goals. As a result of the current rule, the IOUs are now discouraged from pursuing all cost-effective energy efficiency even though there may be energy efficiency funds available from prior years. The Joint IOUs propose the elimination of the 2006-2008 mid-cycle funding augmentation rule for 2009-2011. It creates a disincentive to propose new programs, discourage mid-cycle changes to incent customers in order to achieve the Commission energy efficiency goals and works against the California's Energy Action Plan[66] and Commission policy to pursue all cost-effective energy efficiency.

An IOU's inability to record results from mid-cycle funding may stifle program innovation and ignore the creation of promising programs. This is contrary to the Commission's desire to promote innovation and test new program designs. The marketplace is dynamic with many actors and unforeseen influences which can foreclose expected opportunities as well as create new opportunities.

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[66] 2008 Updated Energy Action Plan, dated February 2008.

III.

SCE'S PORTFOLIO REFLECTS STATE ENERGY POLICIES AND THE STRATEGIC PLAN

A. State Energy Policy And Initiatives

1. Portfolio Meets The Objectives Of The Energy Action Plan

The joint Energy Action Plan 2008 Update builds upon the previous Energy Action Plans, as well as recent statutes and gubernatorial directives, while maintaining energy efficiency and demand-side management as its foundation. The Energy Action Plan Update notes that:

> "…it will not be enough to replicate current strategies for delivery of energy efficiency options to consumers. To meet the AB 32 goals, we will need to employ new and innovative approaches not yet tried. Toward this end, the Public Utilities Commission launched a strategic planning process to develop comprehensive, long-term strategies for sustainable energy efficiency savings to achieve the ultimate goal of making energy efficiency a way of life for Californians."[67]

SCE's Application is focused on meeting the objectives of the Energy Action Plan. As noted elsewhere in SCE's Testimony, SCE's portfolio is intended to go well beyond existing efficiency efforts and begin a new phase of more strategic, coordinated, and effective activities. These activities are designed to face California's enormous energy and environmental challenges and over time, change the nature of the utility efficiency activities as envisioned in the Energy Action Plan.

SCE's portfolio of programs is designed to maximize cost-effective energy savings and demand reduction through a combination of market transformational and resource acquisition initiatives that address each consuming sector. This portfolio is designed to improve upon the

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[67] Energy Action Plan: 2008 Update, State of California, February 2008, p. 2.

course of previous programs by increasingly influencing the actions of key non-utility actors, such as the federal and local governments, the California Energy Commission (CEC) and manufacturers, builders, and retailers of energy-consuming applications.

The Energy Action Plan Update, like D.07-10-032, the CEC's 2007 Integrated Energy Policy Report (IEPR),[68] and the Strategic Plan notes the essential role of municipality-owned utilities in meeting California's energy and environmental goals. SCE is committed to working with the California municipality-owned utilities to mutually improve our efforts and results.

2. AB 32 Goals And Efforts

a) Environmental Benefits Projected

The passage of AB 32 is arguably the most significant recent change in SCE's regulatory and business environment. The Energy Action Plan Update states:

> "The most important development in California energy policy in the past two years, if not the past several decades, is the arrival at consensus that California must act to decrease its greenhouse gas emissions to reduce the impact of climate change."[69]

Additionally, as required by D.07-10-032, this Application includes Exhibit SCE-7, AB 32 Status Report, which includes a report on "the status of AB 32's implementation and proposed program changes that would complement rules and policies, if adopted, including and in particular programs targeting energy efficiency measures in the industrial sector."[70]

While AB 32's implementation has not yet been finalized, SCE is aware of the nexus between energy efficiency programs and carbon emitters' obligations, and is taking

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[68] "2007 Integrated Energy Policy Report," California Energy Commission, 2007, CEC-100-2007-008-CMF.

[69] Energy Action Plan: 2008 Update, State of California, February 2008, p. 2.

[70] D.07-10-032, dated October 18, 2007, OP# 13, pp. 144-145.

steps to integrate the two. SCE's portfolio is replete with initiatives that leverage the energy efficiency portfolio to achieve GHG reductions.

b) AB 32 Status Report

SCE's report on the status of AB 32's implementation and proposed program changes that would complement rules and policies is attached as Exhibit SCE-7 to this Testimony. As the California Air Resources Board (CARB), the California Energy Commission (CEC), the Commission, and other AB 32 decision makers are in the midst of key decisions regarding AB 32 (final rules are due January 1, 2011 and scheduled to take effect January 1, 2012); implementation by SCE and other utilities is only in its earliest stages.

3. Governor's Green Building Initiative

a) Energy Savings Projected Towards GBI Goals

SCE's Application provides numerous programs and opportunities for State agencies, departments, and other entities under the direct executive authority of the Governor to take measures to help meet their obligations under the Green Building Initiative (GBI) to reduce grid-based energy purchases for state-owned buildings through the installation of cost-effective efficiency measures.

SCE's estimates of the annualized energy savings and peak demand reduction that these programs and sub-programs will help yield are set forth in Second Amended Exhibit SCE-2, dated July 2, 2009, Tables 2.4 and 2.4(a).

B. Coordination With Statewide Energy Efficiency Strategic Plan

1. Portfolios Reflect Regional And Local Variations Complementing The Strategic Plan

The proposed portfolio strongly reflects the Strategic Plan which, among other goals, robustly integrates the energy efficiency activities of the Joint IOUs as well as non-IOU statewide actors. Nonetheless, as D.07-10-032[71] recognizes, there are – and should be – regional and local variations in program activities. Even within a single IOU's service territory, there are regional and local factors that may warrant targeted program activities. These include climate, building stock, building ownership and rental patterns, grid performance issues, local leadership and interest, and commercial and industrial consumer types.

Examples of proposed activities that retain regional and/or local variations, even while remaining a component of a statewide, integrated energy efficiency strategy include:

- Sustainable Communities Program – this program coordinates with localized non-energy offerings such as water agencies and AQMD incentives, if any.
- Local Government Partnerships – the partnerships vary based upon local conditions including climate, building stock, community leadership, *etc.* The new Energy Leader model[72] is designed to create energy partnerships with local governments that will vary based upon local effectiveness. Partnerships also include a tiered incentive structure that offers higher levels of support as the city and its community achieves higher levels of installed energy savings.

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[71] D.07-10-032, dated October 18, 2007, OP# 12, p. 144.

[72] The Energy Leader Partnership model was previously referred to as the "Affinity" model during the planning phase.

- SCE's SmartConnect™ (AMI) deployment – the deployment of SCE's advanced metering infrastructure will produce data to more specifically target energy efficiency and DSM measures based on local factors.

2. Portfolios Contain Appropriate Strategies And Program Designs For The Three Statewide Initiatives

The proposed ~~2009-2011~~ 2010-2012 portfolio contains numerous appropriate strategies and program designs designed to help achieve three BBEES Statewide Initiatives (residential ZNE, commercial ZNE, and transformed HVAC).

a) Residential New Construction

The ~~2009-2011~~ 2010-2012 program cycle begins the first three year increment of the 12-year time period covered by the Strategic Plan. To support the market-transforming goals of the Strategic Plan and its implementation, and to begin to advance residential new construction toward the BBEES, SCE plans robust, multifaceted, residential new construction offerings as part of the California Advanced Homes (CAHP),[73] Zero Net Energy Homes, and Sustainable Communities (SCP ZNEH) programs/sub-programs.

CAHP encourages single and multi-family builders of all production volumes to construct homes that exceed California's Title 24 standards by a minimum of 15 percent, reducing energy usage through a combination of incentives, technical education, design assistance, and verification.

The pay-for-performance incentive structure for the ~~2009-2011~~ 2010-2012 CAHP is modified from the previous three-tiered structure to a graduated incentive model closely modeled on Savings By Design's whole building approach. Starting from 15 percent better than Title 24 and ramping up through 45 percent, projects are paid on an ascending scale

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[73] Referred to as the California New Home Program (CANHP) in the July filing.

per annualized kilowatt hour, kilowatt, and therm; this structure incentivizes a wide range of technology development and deployment, thereby accelerating penetration while letting the market find the most cost-effective route to success. SCE will also explore rewarding peak kilowatt reductions.

Similarly, CAHP is working to integrate DSM offerings to builders. CAHP will explore coordinating with DR offerings to reward builders for installing programmable communicating thermostats, and is proposing that air conditioning cycling controllers be installed at construction of the new home. CAHP will also look to leverage SmartConnect™ meters as they are deployed.

In addition to the direct energy savings incentives, builders will also be eligible for additional "kickers" including:

- ENERGY STAR homes
- Homes that meet green building standards
- Homes that install solar thermal hot water systems
- Homes whose PV systems reduce peak load
- Smaller homes (where the total square footage is 10% less than the median home by climate zone and building type)
- Homes with solar thermal systems

Each increase is discrete and independent of the others.

For ~~2009-2011~~ 2010-2012, SCE will explore offering a "carpool lane" to builders who participate in CAHP to expedite their project through SCE's planning process. However, due to the slowdown in building in our territory, the housing market, the total number of projects that have decreased, and the marginal benefit to participating buildings *de minimis*.

SCE is also working with the Metropolitan Water District to promote water conservation in our shared service territory. If the water-energy pilot[74] is successful, SCE intends to facilitate the offers of additional incentives in this area.

The Zero Net Energy Homes Program (ZNEH)[75] is an offering for projects that seek to go beyond 35% reduction in T24 usage to explore zero net performance. The program will work with Emerging Technology (ET) to demonstrate technologies and to provide technical assistance to project teams looking to achieve ZNE performance. ZNEH offers educational opportunities to builders, architects, and other residential construction stakeholders seeking knowledge about emerging technologies and new home design.

In addition to CAHP and ZNEH, SCE continues to offer the Sustainable Communities Program (SCP) which seeks to expand the traditional focus of utility programs from energy efficiency in "vertical construction," to "horizontal construction:" the planning of communities, layout of streets, infrastructure design, and civil engineering. In addition, when working with "vertical construction," SCP will promote sustainable development, addressing commercial and residential construction practices that affect occupant health and environmental well-being.

D.07-10-032[76] orders the development of the Strategic Plan and calls out a BBEES goal specifically relevant to the residential new construction industry. These goals are:

- 100 percent of the residential new construction market will be zero net energy by 2020.
- 50 percent of the residential new construction market will be 35 percent better than the 2005 Title 24 by 2011.

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[74] D.07-12-050, dated December 20, 2007, OP#2, p. 100.

[75] Referred to as the Advanced Home Program or (AHP) in the July filing.

[76] D.07-10-032, dated October 18, 2007, pp. 42-43 as finalized in the Strategic Plan, dated September 2008, pp. 11-17.

- 10 percent of the residential new construction market will be 55 percent better than 2005 Title 24 by 2011.

The concerted and coordinated efforts of many stakeholders, including the IOUs, will be necessary to make measurable progress towards the realization of the BBEES and advanced market penetration of ZNE-related technologies and practices. SCE recognizes that the integration of DSM approaches and integrated design is important to achieving ZNE new construction. This can better be accomplished when the entire suite of DSM offerings is at the table (including demand response, energy efficiency, SmartConnect™/AMI, and distributed generation). Further, these offerings can only be maximally effective when they are part of an integrated design that ideally includes the Sustainable Communities intervention in the layout of streets and optimizing for solar orientation.

b) Commercial New Construction

To implement the Strategic Plan strategies and begin to advance commercial new construction toward the BBEES for the commercial sector, SCE plans a robust, multifaceted commercial new construction program.

SCE will continue to offer the statewide Savings By Design (SBD) program, which reduces the electric energy needs of new and expanding commercial, industrial, governmental, and institutional facilities throughout SCE's service territory. SBD will help building owners, architects, engineers, sub-consultants, and other key actors throughout SCE's service territory achieve optimum energy and resource efficiency in their design projects through offerings such as multi-level design and technical and financial assistance.

The program's rationale is to intervene early and aggressively to minimize lost opportunities that may result when a building's energy performance is not a primary design consideration. SBD promotes energy efficiency in new construction or major remodel/renovation projects through three complementary and coordinated components – Whole Building Approach, Systems Approach, and the Simplified Approach for Small Projects.

For the ~~2009-2011~~ 2010-2012 program cycle, SBD offers new financial incentives (beyond direct kilowatt hour and kilowatt) to WBA and SA projects that achieve green building certification, perform building commissioning during design and construction, and/or establish and follow a building measurement and verification plan after occupancy. These sustainability incentives are designed to encourage buildings to be well designed, well built, and well operated.

As in the residential sector, utility programs have traditionally had an energy focus, but the explosion of "green" into the nonresidential sector and the increased awareness of green benefits has created significant market opportunities to pursue energy efficiency. D.07-10-032[77] also orders the development of the Strategic Plan and calls out the following BBEES goal specifically relevant to the nonresidential new construction industry.

- 100 percent of the nonresidential new construction market will be zero net energy by 2030.
- 50 percent of the nonresidential existing stock will be zero net energy by 2030.

The concerted efforts of many stakeholders, including the IOUs, will be necessary to make significant progress towards the realization of the BBEES. This can better be accomplished when the entire suite of DSM offerings is at the table (including demand response, energy efficiency, SmartConnect™, and distributed generation). Further, these offerings can only be maximally effective when they are part of an integrated design.

SCE also intends to leverage other existing offerings, internal and external to SCE, to assist projects that desire a cohesive sense of sustainability beyond the traditional aspects of electric energy efficiency. SCE will leverage SBD and SCP among other programs to make progress towards the milestones of the Strategic Plan.

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[77] D.07-10-032, dated October 18, 2007, p. 46.

c) Heating, Ventilation And Air Conditioning (HVAC) Industry

The HVAC market is an extremely diverse, complex, and fragmented market, which presents many challenges to energy efficiency adoption and impedes market transformation. These challenges include a low level of knowledge among market actors (*i.e.*, contractors and end users) about the energy performance benefits of quality installation and maintenance, inconsistent compliance with energy regulations by building departments and contractors, and market distortions that force contractors to sell their services based on first price, which often encourages a sub-optimal installation in order complete the job with a reasonable profit margin. In addition, federal standards that preempt California's ability to impose requirements to install equipment that better reflects the performance characteristics of California's hotter inland locations further impact the energy performance of HVAC systems.[78] Due to the number of market barriers facing this industry, reshaping this market requires a variety of creative strategies, a broad and engaged stakeholder community, statewide coordination, and a high level of program entrepreneurship.

Increases in QI/QM will be achieved through a concerted training effort using existing industry channels and by requiring documented compliance with appropriate HVAC industry standards as those published by the Air Conditioning Contractors of America (ACCA), Sheet Metal and Air Conditioning Contractors' National Association (SMACNA), American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) and Title 24. Effective code compliance activities will require and receive increased coordination with the IOUs' Statewide Codes & Standards efforts.

The majority of equipment sold today is standard efficiency unitary equipment that performs inefficiently in California's hot/dry climate. The Strategic Plan's HVAC strategy[79] is to develop new California-oriented HVAC technologies and system

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[78] Recent federal legislation does, however, authorize the U.S. DOE to set regional HVAC standards.

[79] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 60-65.

diagnostics and accelerate their penetration in the marketplace recognizes that opportunities exist for accelerating the deployment of better equipment choices.

HVAC systems are a major contributor to peak load, but are typically unconnected to comprehensive load reduction strategies. SCE plans to more closely align load efficiency and demand reduction activities. The proposed ~~2009-2011~~ 2010-2012 HVAC program approach tackles several long-standing market barriers:

- Organizational and market practices impede HVAC contractors,
- Increased transaction costs for Title 24 compliance,
- High cost of purchasing energy efficient equipment.
- Performance is not well disseminated and uncertainties exist.

Full partnership with the HVAC and building industries and the wider stakeholder community is essential. SCE, in concert with the Commission, the CEC and the other California IOUs, is facilitating the formation of an HVAC Industry Leadership Task Force consisting of industry stakeholders, as laid out in the Strategic Plan.[80] Membership is focused on industry, utility, and other stakeholders that represent a variety of points of view and are in a position to effect change within their community.

In order to accomplish the Commission and Strategic Plan objective[81] of profoundly transforming the HVAC market in California, sufficient resources and activities *(e.g.,* labor, education, marketing, *etc.*) are required. Program management and coordination with measurement and evaluation efforts must be aligned with the program's market transformation approach to ensure the desired market outcomes are achieved.

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[80] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 58-65.

[81] D.07-10-032, dated October 18, 2007, p. 2, *see also* California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 58-65.

C. Strategic Plan Vision For All Sectors

1. Existing Residential

The Strategic Plan sets forth the following vision for the Residential sector (both new construction and existing homes):

> Residential energy use will be transformed to ultra-high levels of energy efficiency resulting in Zero Net Energy new buildings by 2020. All cost-effective potential for energy efficiency, demand response, and clean energy production will be routinely realized on a fully integrated, site-specific basis.[82]

SCE's residential portfolio includes many programs and sub-programs that directly support the Strategic Plan – including the Comprehensive Home Performance Program (CHPP), the Business and Consumer Electronics Program, and the On-line Buyer's Guide – and its goals of coordinated, aggressive, and permanent market transformation.

The CHPP delivers comprehensive improvement packages tailored to the needs of each existing home and its owner. The sub-program solicits, screens, trains, and mentors qualified residential repair, renovation, and HVAC contractors. This program supports the Strategic Plan's residential sector strategy to transform home improvement markets to apply whole-house solutions to existing homes.[83]

As a sub-program of the Statewide Residential Energy Efficiency Program, the Business and Consumer Electronics Program's rationale is to bring about midstream market transformation by providing incentives to retailers to increase the stocking and promotion of highly efficient electronic products including computers, computer monitors, cable and satellite set-top boxes, televisions, smart power strips, and additional business and consumer electronics as they become available to the market. This sub-program supports the Strategic Plan's residential and commercial sector' transformation, including the strategic goal of revolutionizing

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[82] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, p. 9.

[83] *Id.*, pp. 10-24.

the energy efficiency and management of plug load devices by consumers.[84] This Program also takes an active leadership role by engaging stakeholders such as the Department of Energy (DOE), the Environmental Protection Agency (EPA), ENERGY STAR, manufacturers, and retailers to address the energy use issues associated with the increasing demand of plug load devices.

The On-line Buyer's Guide is a new service designed to provide residential consumers with instant on-line access (via sce.com) to information and tools designed to overcome barriers to purchasing energy efficient equipment and/or participating in utility programs. The guide consists of an interactive technology experience that has a substantial database that provides product recommendation, shopping guide, available rebate and incentives and a list of retailers. The On-Line Buyer's Guide supports several Strategic Plan residential sector strategies,[85] as well as those in the commercial and HVAC sectors, by expanding the penetration of more efficient products.

2. Existing Commercial

SCE's analysis of the commercial market segment indicates that commercial buildings are one of SCE's largest consumers of electricity, offering a substantial potential market for energy efficiency. This portfolio includes programs and sub-programs that target existing commercial buildings and proposes how to best address this high potential during the ~~2009-2011~~ 2010-2012 program cycle, while still achieving a cost-effective balance of measures.

The Strategic Plan's vision for the Commercial Sector (both new construction and existing buildings) is that:

> Commercial buildings will be put on a path to zero net energy by 2030 for all new and a substantial proportion of existing buildings. Innovative technologies and enhanced building design and operation practices will dramatically grow in use in the coming

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[84] *Id.*

[85] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 10-25.

> years through a combination of technology development, market pull, professional education, targeted financing and incentives, and codes and standards.[86]

The following new programmatic concepts and methods are designed to motivate commercial customers to meet energy efficiency and climate mitigation reduction goals, while directly implementing the Strategic Plan:

- Continuous Energy Improvement Practices
- Retrocommissioning of Commercial Building Space
- Office of the Future Program
- Financial Solutions Program
- Comprehensive approach including the Commercial Energy Efficiency Program and related solicitations.
- Sub-segment Solutions Program
- Savings Calculation Tool Development

Numerous Strategic Plan crosscutting activities are also key to transforming this sector in an integrated and long-lasting way, including HVAC, local government initiatives, workforce education and training, emerging technologies, and codes and standards.

Implementation of these actions requires the identification of key technologies through the CEC's PIER Program, universities, and the national labs, in coordination with the statewide Emerging Technologies Program. New technologies are also supported by the new Technology Resource Incubator Outreach (TRIO) program and the Innovative Designs for Energy Efficiency Activities (IDEEA) program, designed to incubate, pilot, and quickly mainstream successful technologies into the California marketplace.

Coordination within this sector includes statewide planning and program coordination to ensure consistency in incentives, offerings, and services across all IOUs, a key Strategic Plan approach. Accordingly, Commercial Energy Efficiency has been designated by

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[86] *Id.*, pp. 30-41.

the IOUs as a Statewide Core Program. In addition, common marketing and outreach for statewide and other related programs is coordinated to improve cost-effectiveness and to deliver a common message. Coordination also includes additional outreach that aligns with major sub-segment elements with specific needs and/or barriers. Sub-segments are addressed through a comprehensive team approach which may include stakeholders such as building owners, PIER, Building Owners and Managers Association, CEC, CARB, POUs and others, as identified in the Strategic Plan.

3. Industrial

SCE's industrial sector strategy will build upon the 2006-2008 Industrial Energy Efficiency Program and advances comprehensive energy efficiency including integrating approaches to minimize lost opportunities, planning and recruiting sites for a pilot energy efficiency certification program in industrial facilities, analyzing and identifying resulting process improvements, investigating financing options, benchmarking, and promoting advances in equipment efficiency and operations through process improvements. SCE's industrial sector strategy is designed to overcome well-understood barriers (or limits) to the adoption of energy efficiency.

The program targets energy efficiency opportunities in industrial processes and systems (although cost-effective building measures will be bundled along with process improvements to prevent lost opportunities), which have historically had low energy efficiency adoption rates. The program is structured to reflect the industrial customer's reluctance to alter elements of a working production process for reasons other than product output or quality. As industrial customers think in terms of processes, so should utilities, in order to maximize the industry's awareness and uptake of energy efficiency, demand response, and renewable self-generation opportunities.

SCE's industrial sector strategy builds on and incorporates other energy efficiency programs and sub-programs that focus on systems and processes and on key end-use applications such as motors and variable speed drives.

This program is designed to mitigate those barriers through a systems approach to identifying energy efficiency potential and by presenting existing opportunities within a comprehensive business context. Recent evaluations of the 2004-2005 Standard Performance Contract (SPC) Program[87] provide significant insight into the issues that affect decisions about installing energy efficiency measures within industrial process facilities. The issues tend to vary by firm size and by industry type.[88]

Most energy efficiency programs are designed around direct (investment) costs and are aimed at reducing simple payback, or increasing return on investment for projects that may be just short of a company's threshold for investment. Given that time has economic value, and that undue delay is a key market barrier, energy efficiency programs for industrial customers need to incorporate elements to reduce the cost and time commitment associated with energy efficiency decisions.

The industrial energy efficiency program is one of the IOUs' Statewide core programs, ensuring full coordination among the other IOUs to drive towards consistent incentive levels and information. In addition, the IOUs are coordinating to offer a joint audit and recommendation package to facilities that share service territories. The program is built on the same principles that form the Strategic Plan vision and strategy for the industrial sector and aligns with multiple Strategic Plan strategies,[89] including leveraging the marketing and comprehensive benefits of energy efficiency branding, certification, and continuous improvement methods

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[87] 2004-2005 Statewide Nonresidential Standard Performance Contract Program Measurement and Evaluation Study: Impact, Process and Market Evaluation-Final Report, March 19, 2008.

[88] 2004-2005 Statewide Nonresidential Standard Performance Contract Program Measurement and Evaluation Study: Impact, Process and Market Evaluation-Final Report, March 19, 2008.

[89] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 42-49.

4. Agricultural

SCE's targeted approach to the agricultural and water systems sector includes food production enterprises, crop production enterprises, and public and private water system enterprises.

The Strategic Plan sets forth the following vision for the Agricultural Sector:

> "Energy efficiency will support the long-term economic and environmental success of California agriculture."[90]

SCE's ~~2009-2011~~ 2010-2012 agricultural strategy supports the Strategic Plan vision through various strategies, as outlined in the segment's implementation plan. Specifically, SCE's portfolio supports the Strategic Plan's strategy of market characterization and goal setting,[91] which focuses on establishing and maintaining a sufficient knowledge base for the sector to support the development of energy efficiency and demand reduction resources.

SCE's portfolio supports the Strategic Plan's strategy of fostering advances in best management practices and equipment efficiency.[92] This is accomplished through the Statewide Agricultural Energy Efficiency Program, which follows up on pump testing audit findings (in the industrial and commercial sectors, as well as agricultural) to implement tailored, customized solutions for enhancing operating efficiencies of water treatment and distribution systems. Furthermore, this sector is a good opportunity to focus on integrated DSM efforts. In particular, the agricultural strategy plans for continued work and program development around reduced water usage which has reduced electricity use as a secondary benefit; lessons learned from the water-energy Pilot[93] may also be used in designing new customized programs or sub-programs.

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[90] *Id.*, pp. 50-56.

[91] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 50-56.

[92] *Id.* p. 50-56.

[93] D.07-12-050, dated December 20, 2007.

5. Emerging Technologies

The development, enhancement, deployment, and operation of energy efficiency related technology is fundamental to achieve California's energy efficiency vision – "Technology advancement related to energy use and demand will match – or even eclipse – the consumer electronics industry in innovation, time to market, and consumer acceptance"[94] – and goals and to successfully implement the Strategic Plan. The Strategic Plan looks to technology advancement in general and the statewide Emerging Technology Program (ETP) in particular to support these overall efforts. The ETP delivers information, insights, analytical tools, and resources to help enable expedited adoption of innovative technologies and support the promotion of new applications of existing technologies.

Strategically focused activities in the ETP include working with integrated demand side activities, enhancing market intelligence efforts, engaging and leveraging other stakeholders in the ET process, and accelerating technology transfer and adoption activities. Integrated Demand Side Management activities are included in the ETP and encompass the integration of appropriate energy efficiency renewables, demand response, permanent load shifting strategies, carbon mitigation measures, and other sustainability activities.

Several new concepts are introduced in the ~~2009-2011~~ 2010-2012 filing, including limited ETP efforts in the following areas:

- Scaled Field Placements;
- Demonstration Showcases;
- Market and Behavioral Studies;
- Technology Development Support; and
- Business Incubation Support.

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[94] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, p. 83.

The TRIO and Technology Development Support program will be aimed at contributing to increased technology supply through influencing the ease and attractiveness of energy efficiency technology investment and development in California. Assessments, Scaled Field Placements, Demonstration Showcases, and Market and Behavioral Studies are aimed at supporting increased market demand for energy efficiency measures.

A strong focus of the ETP will be contributing to zero net energy technology advancement. The ETP filing includes a new ZNE Technology Test Center aimed both at evaluating ZNE technologies (including capacity for detailed testing and instrumentation) and increasing public and professional awareness of these technologies through showcasing and demonstration.

The ETP will also work closely with the CEC's PIER Program and the RD&D communities through the Emerging Technology Coordinating Council (ETCC) to assure these research portfolios are aligned with the IOU's demand side activities and the Strategic Plan[95] so that ET resources can be leveraged, potential energy savings can be maximized, and technology transformation can be broad-based and long-lasting.

6. Codes & Standards

The Codes & Standards (C&S) program directs initiatives to enhance state and federal building and appliance standards to codify cost-effective, reliable, verifiable, and persistent demand side measures. The program's goal is to maximize portfolio energy savings, demand reduction, and demand response, consistent with the Strategic Plan's overall philosophy and C&S vision:

"A broad range of aggressive and continually improving minimum and higher voluntary sets of energy codes and standards will be adopted to greatly accelerate the widespread deployment of zero-net and highly efficient buildings and equipment. The effectiveness of codes

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[95] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 83-88.

and standards will be enhanced by improved code compliance as well as coordinated voluntary efficiency activities."[96]

Comprehensive Codes and Standards Enhancement (CASE) studies for energy efficiency improvements are performed for promising design practices and technologies and are presented to standards and code-setting bodies. The goal is to reduce energy use (*e.g.*, better building envelopes, regulation of plug loads, higher efficiency air conditioning systems, *etc.*) and increase on-site renewable energy generation by developing more comprehensive whole building approaches, concentrating on new areas of appliance regulation, developing "reach" codes, and better integrating demand response, water use, and renewable energy.

The C&S statewide core program closely coordinates among the IOUs, local government partnerships, energy efficiency programs, the CEC, other state agencies, and other stakeholders to develop and implement codes that appropriately address government, customer, and industry needs, and legislative initiatives and mandates. In alignment with the Strategic Plan,[97] C&S coordinates with the local government partnerships to train staff and support code development efforts with the U.S. Department of Energy.

7. Local And State Governments

SCE's energy efficiency partnership program portfolio consists of partnerships with local and state government organizations as well as with institutional customers. SCE acknowledges that these governments and institutions provide a number of key functions relating to demand side management and efficiency. Additionally, SCE embraces the vision of the Strategic Plan to strengthen and capitalize upon the capacity of governments and institutions to encourage community outreach, leadership by example, and enforcement of state and local codes

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[96] *Id.*, p. 67.

[97] California Long-Term Energy Efficiency Strategic Plan, dated September 2008. pp. 67-71.

and standards in support of California's aggressive energy savings goals. The Strategic Plan's vision for local governments[98] is that:

> By 2020, California's local governments will be leaders of in using energy efficiency to reduce energy use and global warming emissions both in their own facilities and throughout their communities.[99]

SCE's ~~2009-2011~~ 2010-2012 partnership programs provide opportunities for institutional and local government partners to lead by example, enhancing efficiency-related market transformation while delivering cost-effective energy savings. Following the guidance of the Strategic Plan,[100] these programs provide assistance for partners to identify energy efficiency retrofit projects, enhanced incentives, audits, and other technical assistance to help overcome barriers to implementation of energy efficiency projects.

Many governments and institutions are working to develop local ordinances or programs to build a sustainable environment. SCE's partnership programs will work with these partners, with support from other demand side management programs such as the Sustainable Communities, Codes and Standards, and new construction programs. These resources support the governments and institutions segment to simplify and standardize relevant policies and codes as well as create model ordinances or programs to facilitate adoption locally and statewide. The role of local governments in this key area is discussed extensively in the Strategic Plan.[101]

Peer-to-peer support is considered a key part of SCE's partnership strategy, and is outlined in the Strategic Plan.[102] Forums will be created for partners to share best practices and to support each other. In addition, SCE's partnership portfolio includes partnerships with local

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98 *Id.,*, pp, 89-91.

99 *Id.*

100 *Id.*, pp. 89-97.

101 California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 89-97.

102 *Id.*

government organizations such as Councils of Government and other joint powers authorities representing groups of cities/counties in the partnership portfolio.

SCE's ~~2009-2011~~ 2010-2012 partnership programs include a greater focus on coordination with demand response and other DSM activities. Different levels of demand response offerings have been defined and partners are encouraged to establish progressively higher goals for participation in demand response activities.

SCE's partnership program approach stipulates that the type of support available to partners can be a combination of enhanced energy efficiency incentives, technical support, strategic plan support, and marketing, education and outreach, depending on the specific needs of the partner and its community.

8. DSM Integration

In alignment with the Strategic Plan and in collaboration with the Energy Division, as well as the other IOUs, SCE proposes an Integrated Demand-Side Management strategy. SCE's strategy shares the vision and addresses the strategies of the California Long Term Energy Efficiency Strategic Plan. The strategy has several elements, each of which addresses the Strategic Plan.

SCE, with the other IOUs, proposes a new Statewide IDSM Task Force (see Statewide DSM Coordination and Integration Program Implementation Plan for detail). The Task Force will meet regularly to identify and promote best practices, track and assess IDSM pilots, address foundational issues such as cost-effectiveness, develop further measurement and evaluation protocols, etc. Membership in the Task Force will include the CPUC Energy Division, dedicated IDSM staff from the IOUs, and stakeholders from marketing, emerging technologies and other areas. This Task Force will take full advantage of the opportunity for statewide coordination and should lead to pilot and regular program offerings in the future, in addition to those proposed in SCE's Proposed Program Plan.

In alignment with Commission guidance, and to further the IDSM knowledge base, SCE will conduct a series of pilots during ~~2009-2011~~ 2010-2012. The pilots are discussed in detail both in Second Amended Exhibit SCE-6 as well as in the individual PIPs for each pilot. Conducting pilots directly aligns with Strategic Plan Strategy 8.4.1 "Pilot Programs."[103] These pilots will advance the market by providing valuable insights at a manageable scale into customer reaction to integrated offers. Additionally, the pilots integrate a number of different areas including application of emerging technologies, and involve newer stakeholders such as institutional partners to provide insight into better promoting integrated DSM.

For further discussion of Integrated DSM, see Second Amended Exhibit SCE-6, dated July 2, 2009, and note that in addition most Program Implementation Plan have a section addressing integrating DSM.

9. Marketing, Education, And Outreach

The Strategic Plan sets forth a clear vision for Marketing, Education, and Outreach (ME&O): "Californians will be engaged as partners in the state's energy efficiency, demand-side management and clean energy efforts by becoming fully informed of the importance of energy efficiency and their opportunities to act."[104]

Consistent with the Strategic Plan, and coordinated with the other IOUs as a Statewide core program, SCE's marketing, education, and outreach efforts seek to maximize energy savings and move customers towards permanent adoption of an energy-efficient lifestyle. Integrated DSM marketing and outreach – a cornerstone of SCE's marketing approach – will continue to leverage both the statewide brand and other market actors to drive program participation, market transformation, and behavior change. SCE's integrated DSM marketing and outreach campaigns will continue to utilize segmentation research to better understand

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[103] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 71-73.

[104] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, p. 79.

customers and provide them with a wide range of action-oriented solutions to maximize energy savings. Segmentation also enables SCE to customize the characteristics of its offerings, providing customers with solutions that are relevant to their needs.

SCE plans to conduct up to three integrated marketing campaigns each year that feature integrated DSM solutions to common consumer issues, like managing cooling costs. SCE will promote participation in energy efficiency programs and sub-programs such as Residential/Light Commercial HVAC, Home Energy Efficiency Surveys, and Low Income Energy Efficiency, as well as other demand-side management programs, such as the Air Conditioning Cycling demand response program. Providing integrated product bundles encourages customers to change behavior and motivates them toward salient and long-lasting solutions.

As SCE continues to conduct marketing efforts for its key DSM programs an integrated mix of traditional and non-traditional marketing channels will be utilized. Specifically, SCE's marketing efforts could include grass-roots outreach, Events Outreach, the Mobile Energy Units (MEUs), in-language communications, behavior-based marketing, point-of-sale, direct response, outbound calling, trade journals, sce.com, on-line and electronic advertising, social networking bill messaging, inserts, outreach through the MEU and partnerships with community-based and faith-based organizations, as well as with other market actors.

Additionally, in alignment with the Strategic Plan,[105] the Statewide Marketing and Outreach Program includes exploration of a statewide EE/DSM brand for California, utilization of statewide segmentation and social marketing techniques to develop marketing campaigns and messaging that facilitates awareness and long-term behavior change, and development of a statewide EE/DSM web portal.

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[105] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 79-82.

10. Workforce Education And Training

Workforce Education & Training (WE&T) is an increasingly important crosscutting activity that educates and trains current and future workers to successfully perform the jobs needed to reach California's clean energy goals. The economic conditions facing southern California (and well beyond) demand vigorous new approaches to successful and tangible green collar job creation. SCE will, among other actions, expand needed training curricula and educational and training facilities, and leverage other resources, including our existing facilities (such as CTAC and AgTAC) and various parties' funds, such as new federal economic stimulus funds, low income energy efficiency funds, other demand-side management funds, and union and other training budgets. The Strategic Plan's vision[106] for WE&T is that:

> [b]y 2020, California's workforce is trained and fully engaged to provide the human capital necessary to achieve California's economic energy efficiency and demand-side management potential.

SCE's ~~2009-2011~~ 2010-2012 WE&T Program is a statewide program and includes three important core delivery sub-programs: 1) WE&T Planning; 2) WE&T Centergies; and 3) WE&T Connections. Each sub-program is designed to target specific market segments, and contribute significantly to the Strategic Plan's larger education and training goals and objectives.

The WE&T Program promotes energy efficiency to a variety of customer segments and supports market penetration through disseminating information about efficient technologies and practices to electric, natural gas, and water utility customers. It also provides services to a variety of midstream and upstream market actors (*e.g.*, architects, engineers, distributors, technicians, and contractors) who use information and tools to design more efficient buildings or processes, and to conduct efficient energy and water system retrofits and renovations.

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[106] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 74-78.

WE&T also supports the Commission's BBEES by educating the residential and nonresidential new construction industries on ways to achieve the zero net energy new commercial buildings and residential new construction targets. In addition to statewide coordination, the WE&T Program plays a significant role in coordinating DSM offerings by providing education and training that provides meaningful and effective education and training to communicate DSM messages to a broad spectrum of customers.

11. Low Income Energy Efficiency

The low income residential segment section of the Strategic Plan identifies several strategies to ensure maximum realization of the Commission's programmatic initiative, "[t]o provide all eligible customers the opportunity to participate in the LIEE programs and to offer those who wish to participate in all cost-effective energy efficiency measures in their residences by 2020."[107]

SCE's Low Income Energy Efficiency (LIEE) program for 2009-2011 will include cost-effective measures for all eligible customers. The portfolio of cost-effective measures is augmented by measures that produce long term and enduring savings, such as cooling measures, which help promote the comfort, health and safety of eligible low-income customers. SCE's LIEE program and budget, as adopted by the Commission in D.08-11-031, are designed to achieve one-fourth of the Programmatic Initiative by December 2011, and provide enduring savings. To achieve the Programmatic Initiative, SCE's authorized three-year program budget is $185.2 million. The increased program budget over 2007-2008 funding levels, together with leveraging the resources of other entities, and improving integration with SCE's energy efficiency and demand-side programs, enables SCE to provide the measures and reach the number of homes required to achieve one fourth of the Programmatic Initiative by year-end 2011.

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[107] D.07-12-051, dated December, 20, 2007, p. 4.

D. Strategic Plan Outlook For Ten Years And Beyond

1. Application Includes A Program Line Item And Budget For Strategic Planning Personnel

Due to the importance and magnitude of California's "next generation" strategic planning and the Strategic Plan, SCE has established a dedicated Strategic Planning Team. The primary purpose of the team is to ensure that SCE's ~~2009-2011~~ 2010-2012 Application and the short and medium-term activities that flow from the proposed portfolio work toward the achievement of the long-term goals of the Strategic Plan. The team represents an increase in current staffing, as this additional capacity is needed to collaborate and coordinate with the Commission, other IOUs, and third parties to reach the Commission's long-term vision for energy efficiency and DSM. SCE proposes a budget of $10.213 million for the ~~2009-2011~~ 2010-2012 cycle to support this new organization which includes both current and planned staffing.

SCE's Strategic Planning Team will serve several key roles that range from analysis to coordinating implementation and helping design new offerings. Following the outline provided by the Commission in its April 29, 2008 ACR, the team focuses on the following:

- Information gathering on existing state, regional, and private/public sector demand side initiatives.
- Ongoing work to review and update implementation of the Strategic Plan and ~~2009-2011~~ 2010-2012 programs.
- Working closely with SCE management and staff with relevant responsibilities.
- Collaboration with the other key actors and stakeholders described in the Strategic Plan.

In summary, SCE proposes a substantial dedication of personnel, budget, and other resources-beyond current levels and staff capacity – so that we can strongly maintain

ongoing strategic planning efforts, and do so without being unduly distracted by "day to day" events. Our new energy efficiency Strategic Planning Team will have leadership and staff that is simultaneously analytic and action-oriented undertaking the multiple goals of rigorous planning, innovative program development, spirited problem solving, robust implementation of market transformative activities, and strategic thinking.

2. New ~~2009-2011~~ 2010-2012 Pilot Project Programs, Based On The Strategic Plan

SCE's ~~2009-2011~~ 2010-2012 portfolio includes numerous pilot programs in support of the Strategic Plan's specific goals and strategies for both residential and nonresidential consumers, including the commercial, industrial, and agricultural sectors, as well as to advance the Strategic Plan's broader market transformation goals. These include:

- Continuous Energy Improvement;
- Agricultural IDSM;
- Commercial Offices;
- Emerging Technologies
- Comprehensive Industrial Energy Efficiency
- LED Street Lighting for Local Government

3. Methodologies To Address Programs With Long-Term Savings

The proposed portfolio is intended to provide both short-term and long-term energy efficiency solutions, including the ability to work with market participants to affect changes ten years or more into the future. SCE's portfolio – strongly coordinated on a statewide basis with the other IOUs – is designed to support various long-term ventures, such as the Big, Bold Energy Efficiency Strategies discussed above: Residential New Construction, Commercial New Construction, and driving the transformation of California's HVAC market. The portfolio also continues to support the development of codes and standards, as well as identifying and testing the viability of emerging technologies. There is no distinct regulatory treatment required

beyond the adoption of the recommended budget levels, the fund-shifting proposal set forth by SCE in this Proposed Program Plan and the ability to encumber funds in the ~~2009-2011~~ 2010-2012 cycle which can be funded from the subsequent program cycles. SCE's recommended funding in this Application, concurrent with its proposed fund-shifting rules and the ability to use funding from future cycles, will allow SCE to fund the commitments for installation forecast in this Proposed Program Plan.

IV.

SCE'S PROPOSED ENERGY EFFICIENCY PORTFOLIO

This chapter of the Application provides narrative data to support SCE's proposed energy efficiency portfolio for ~~2009-2011~~ 2010-2012.

A. The Proposed Portfolio Meets Or Exceeds The Energy Efficiency Goals

1. Portfolios Meet Or Exceed ~~2011~~ 2012 Cumulative Energy Savings Goals

SCE's Proposed Program Plan meets the cumulative savings goals for the three-year cycle. As discussed in the Policy section of this Application, SCE recommends a cumulative goal be adopted which reflects cumulative savings beginning in ~~2009~~ 2007 and ending in ~~2011~~ 2012. SCE calculates these savings based on the following:

(1) 2007, and 2008 net energy savings and demand reduction results as estimated using DEER 2008 version 2008.2.04 and the 2006-2007 Energy Efficiency Verification Report; ~~and~~

(2) 2009 gross energy savings and demand reduction results as estimated using DEER 2008 version 2008.2.04; and

(3) ~~2009-2011~~ 2010-2012 gross energy savings and demand reduction results as forecast in this proceeding.

SCE also provides a calculation scenario which follows the direction of ~~D.07-10-032~~ D.09-05-037, calculating the expected cumulative savings of the portfolio plans using ~~2004~~ 2006 as the base year (see Second Amended Exhibit SCE-2, dated July 2, 2009).

- ~~2004 and 2005 net savings results as reported in draft or final program impact studies, where available;~~
- ~~2004 and 2005 net savings results from forecasts, where impact studies are not available;~~

These scenarios do not include the cumulative impacts for savings occurring during this period for programs implemented prior to ~~2004~~ 2006, or other items which were not explicitly included in the studies or forecasts of savings. ~~It is unclear as to whether impact evaluations for the 2004-2005 programs included all of the programs that SCE implemented or the full commitments made during the program cycle. Such inclusions may alter the analysis performed for this Application. SCE would expect to see the cumulative effect of these savings continue over time as participants continue to install the measures which were installed previously, particularly as codes and standards improve over time. SCE looks forward to further addressing this analysis in order to ensure that the appropriate calculation is performed which allows the IOUs to meet the Commission's policy and resource goals while providing cost-effective portfolios to customers.~~

2. Portfolios and Funding Levels Appropriately Balance Short-Term and Long-Term Savings

The Proposed Program Plan is intended to provide both short-term and long-term energy efficiency solutions, including implementation of the California Long-Term Energy Efficiency Strategic Plan, which is intended to affect changes ten years or more into the future. Short-term savings are supported by the implementation of the full set of resource programs, designed to focus on immediate savings for customers, the immediate replacement of supply-side resources, and the immediate reduction of greenhouse gases. SCE's portfolio is also designed to

support various long-term ventures, such as those discussed above: Residential New Construction, Commercial New Construction, and driving the transformation process of California's HVAC market. In addition, the portfolio includes substantial contributions to programs such as Marketing Education and Outreach, and Workforce Education and Training, each with a significant focus on long-term benefits to the state. The portfolio also continues to support the development of codes and standards, as well as identifying and testing the viability of emerging technologies.

The average useful life of SCE's portfolio proposed in this Application is approximately 11 years, increased from approximately 9.8 years in SCE's 2006-2008 Application. SCE proposes a diverse portfolio of approaches and measures to address the short-term and long-term needs of all customers through a multitude of delivery channels and program implementers. SCE will focus on the identified potential of savings and look to new and emerging technologies, promising program designs, and codes and standards to build the future for energy efficiency.

3. Portfolios Reasonably Allocate Funding Among Market Sectors & Applications With Respect to Potential Studies

In planning SCE's ~~2009-2011~~ 2010-2012 program portfolio, SCE made judicious use of studies of energy efficiency potential to inform their planning process. SCE used the results of both the 2006 California Energy Efficiency Potential Study[108] and the California Energy Efficiency Potential Study 2008[109] to guide their decision-making regarding SCE's program offerings.

SCE broadly attempts to align portfolio planning with estimates of energy efficiency potential by sector for the four customer sectors identified in the Strategic Plan:

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[108] California Energy Efficiency Potential Study 2006, Itron, Inc., KEMA, Inc., RLW Analytics, Inc., and Architectural Energy Corp., May 2006.

[109] California Energy Efficiency Potential Study 2008 (Draft), Itron, Inc., February 2008

residential, commercial, industrial, and agricultural. The 2006 and 2008 Itron studies of energy efficiency potential provide a significant amount of useful information for program planning for the residential, commercial, and industrial sectors. For the agricultural sector, SCE used the data available, which is summarized into the industrial sector results.

SCE used the energy efficiency potential studies to align programs with the available potential by sectors. In addition, SCE considered other factors such as cost-efficiency in determining the allocation across sectors. Second Amended Table IV-7 below compares SCE's ~~2009-2011~~ 2010-2012 Energy Efficiency Portfolio with the results of the California Energy Efficiency Potential Study 2008 for SCE's service territory.

~~Table IV-7~~
~~Energy Efficiency Potential by Sector 2009-2011~~

	SCE Portfolio		SCE Potential - 2009-2011*	
Sector	kWh	kW	kWh	kW
Residential	31.0%	26.9%	43.3%	29.8%
Commercial	48.6%	57.6%	37.7%	56.6%
Industrial	17.6%	11.8%	19.0%	13.7%
Agriculture	2.8%	3.7%	-	-
Total	100.0%	100.0%	100.0%	100.0%

Second Amended Table IV-7
Energy Efficiency Potential by Sector 2010-2012

	SCE Portfolio		SCE Potential - 2010-2012*	
Sector	kWh	kW	kWh	kW
Residential	31%	25%	37%	25%
Commercial	49%	57%	44%	62%
Industrial	17%	13%	19%	13%
Agriculture	4%	5%	0%	0%
Total	100%	100%	100%	100%

* Results based on California Energy Efficiency Potential Study 2008, Itron (Full Restricted Scenario)

SCE also used data regarding potential by end use to guide the type and mix of measures included in the portfolio. Second Amended Table IV-8 compares SCE's proposed

portfolio with the results of the 2008 Itron energy efficiency potential study for SCE's service territory.

~~***Table IV-8***~~
~~***Comparison of SCE's Portfolio***~~

	SCE Portfolio		SCE Potential - 2009-2011*	
End Use	**kWh**	**kW**	**kWh**	**kW**
HVAC	19.1%	32.5%	17.1%	43.0%
Lighting	47.6%	37.7%	55.1%	38.9%
Refrigeration	9.1%	8.8%	15.3%	9.6%
Misc/Other	17.5%	16.2%	2.0%	1.8%
Compressed Air	1.0%	0.6%	2.8%	1.8%
Drives	1.8%	0.9%	1.6%	1.0%
Pumps	3.8%	3.4%	6.1%	3.9%
Total	100.0%	100.0%	100.0%	100.0%
*Results based on California Energy Efficiency Potential Study 2008, Itron Inc. (Full Restricted Scenario)				

Second Amended Table IV-8
Comparison of SCE's Portfolio

	SCE Portfolio		SCE Potential - 2010-2012*	
End Use	kWh	kW	kWh	kW
HVAC	19%	33%	16%	40%
Lighting	45%	36%	44%	28%
Refrigeration	9%	7%	15%	8%
Misc/Other	19%	18%	14%	17%
Compressed Air	1%	0%	3%	2%
Drives	3%	2%	1%	1%
Fan	0%	0%	2%	1%
Pumps	4%	4%	6%	3%
Total	100%	100%	100%	100%

* Results based on California Energy Efficiency Potential Study 2008, Itron (Full Restricted Scenario)

A precise comparison of SCE's portfolio to the Itron energy efficiency potential study is difficult because of somewhat different mapping of measures into end uses. In general, Itron used fewer end use categories and, as a result, their end use definitions were more highly aggregated. To achieve a "lowest common denominator," SCE mapped its measures into Itron's

end use categories. These mapping differences are particularly apparent in the Miscellaneous/Other category which represents a "catch all" for a variety of relatively small end uses, or measures that do not fall neatly into other end use categories. Overall, SCE's portfolio aligns well with identified potential by end use when these factors are considered, especially in the major end uses, lighting, HVAC, and refrigeration.

4. Portfolio's Proposed Cost-effectiveness Takes into Account Uncertainty

SCE's energy efficiency portfolio is consistent with the Commission's goal of procuring all available cost-effective energy efficiency.[110] Through a diverse set of program offerings, SCE's energy efficiency portfolio is focused on strategies articulated in the Strategic Plan that harvest cost-effective energy efficiency savings and demand reductions while looking beyond the ~~2009-2011~~ 2010-2012 planning cycle to ensure energy efficiency remains a reliable and robust resource.

The Energy Efficiency Standard Practice Manual outlines the methodologies and indicators used to perform a dual-test cost-effectiveness evaluation, which consist of the Total Resource Cost (TRC) test and the Program Administrator Cost (PAC) test. The E3 Calculator, which is the Commission-approved tool to run cost-effectiveness calculations, contains the aforementioned methodologies and indicators. SCE used the E3 Calculator to develop the portfolio and calculate cost-effectiveness. The portfolio is in compliance with the April 21, 2008 Assigned Commissioner's Ruling requiring the IOUs to use the updated 2007 generation cost values adopted in Resolution E-4118, dated October 4, 2007. SCE presents its prospective showing of cost-effectiveness of its ~~2009-2011~~ 2010-2012 energy efficiency portfolio in the tables below.

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[110] Public Utility Code § 701.1(b).

~~***Table IV-9***~~
~~***Total Resource Cost (TRC)***~~

Total Costs	$2,423,160,961
Total Savings	$4,420,971,830
Total Benefits	$1,997,810,869
Benefit/Cost Ratio	1.782
Levelized Cost per kWh Saved (cents/kWh)	$0.072
Levelized Cost per therm Saved ($/therm)	--

Second Amended Table IV-9
Total Resource Cost (TRC)

Total Costs	$2,092,703,736
Total Savings	$3,011,739,816
Total Benefits	$919,036,080
Benefit/Cost Ratio	1.44
Levelized Cost per kWh Saved (cents/kWh)	$0.091
Levelized Cost per therm Saved ($/therm)	--

~~***Table IV-10***~~
~~***Program Administrator Cost (PAC)***~~

Total Costs	$1,259,193,820
Total Savings	$4,420,971,830
Total Net Benefits	$3,161,778,010
Benefit/Cost Ratio	3.51
Levelized Cost per kWh Saved (cents/kWh)	$0.037
Levelized Cost per therm Saved ($/therm)	--

***Second Amended* Table IV-10**
Program Administrator Cost (PAC)

Total Costs	$1,249,555,589
Total Savings	$3,011,739,816
Total Net Benefits	$1,762,184,226
Benefit/Cost Ratio	2.41
Levelized Cost per kWh Saved (cents/kWh)	$0.055
Levelized Cost per therm Saved ($/therm)	--

The cost-effectiveness tests are derived to calculate the benefits and costs associated with the implementation of energy efficiency programs. The benefit and cost calculations are driven by specific key parameters, including Expected Useful Lives (EUL), Net-to-Gross Ratios (NTG), Measure Costs, and measure energy use impacts. SCE, in compliance with Commission direction in the Assigned Commissioner's and Administrative Law Judge's Ruling dated May 5, 2008, has used the May 30, 2008 release of DEER, with specific changes discussed in Chapter II. This includes estimates of the key parameters to calculate the ex-ante energy savings, demand reduction, and cost-effectiveness forecasts. Current measurement and evaluation protocols establish a process over the course of the program cycle to evaluate the ex-ante impacts in order to determine the proper ex-post evaluation of the portfolio. This process creates an inherent uncertainty in program planning because it subjects the impacts of the portfolio to change four years removed from the beginning of the program cycle.

In response to the Assigned Commissioner's and Assigned Law Judge's Ruling dated April 21, 2008, SCE presents its prospective showing of cost-effectiveness using a higher $30/ton carbon adder value in the tables below.

~~***Table IV-11***~~
~~***Total Resource Cost (TRC)***~~
~~***With Higher Carbon Adder***~~

Total Costs	$2,423,160,961
Total Savings	$4,742,064,878
Total Benefits	$2,318,903,917
Benefit/Cost Ratio	1.96
Levelized Cost per kWh Saved (cents/kWh)	$0.072
Levelized Cost per therm Saved ($/therm)	--

Second Amended Table IV-11
Total Resource Cost (TRC)
With Higher Carbon Adder

Total Costs	$2,092,703,736
Total Savings	$3,221,231,104
Total Benefits	$1,128,527,368
Benefit/Cost Ratio	1.54
Levelized Cost per kWh Saved (cents/kWh)	$0.091
Levelized Cost per therm Saved ($/therm)	--

~~***Table IV-12***~~
~~***Program Administrator Cost (PAC)***~~
~~***With Higher Carbon Adder***~~

Total Costs	$1,259,193,820
Total Savings	$4,742,064,878
Total Benefits	$3,482,871,058
Benefit/Cost Ratio	3.77
Levelized Cost per kWh Saved (cents/kWh)	$0.037
Levelized Cost per therm Saved ($/therm)	--

***Second Amended* Table IV-12**
Program Administrator Cost (PAC)
With Higher Carbon Adder

Total Costs	$1,249,555,589
Total Savings	$3,221,231,104
Total Benefits	$1,971,675,514
Benefit/Cost Ratio	2.58
Levelized Cost per kWh Saved (cents/kWh)	$0.055
Levelized Cost per therm Saved ($/therm)	--

SCE has planned its ~~2009-2011~~ 2010-2012 energy efficiency portfolio to account for the uncertainty around evaluating its portfolio using two sets of different assumptions: Effective Useful Life and Measure Costs. SCE has conducted the following scenarios, based upon the key parameters influencing cost-effectiveness, which illustrate the effects on its portfolio's energy savings, demand reduction, and cost-effectiveness.

~~***Table IV-13***~~

~~***Scenarios Based on Key Parameters Influencing Cost-effectiveness***~~

Scenario	Adjustment Factor	Energy Savings (kWh)	Demand Reduction (MW)	Cost-Effectiveness
SCE 2009-11 Proposal	None	5,553,400,515	1,077,907	1.82
Gross Measure Costs Adjustment	Increase by 10%	-	-	1.70
Gross Measure Costs Adjustment	Increase by 20%	-	-	1.60
Effective Useful Life	Decrease by 10%	-	-	1.70
Effective Useful Life	Decrease by 20%	-	-	1.56
Gross Measure Costs Adjustment / Effective Useful Life	Increase by 10% / Decrease by 10%	-	-	1.58
Gross Measure Costs Adjustment / Effective Useful Life	Increase by 20% / Decrease by 20%	-	-	1.36

Second Amended Table IV-13

Scenarios Based on Key Parameters Influencing Cost-effectiveness

Scenario	Adjustment Factor	Energy Savings (GWh)	Demand Reduction (MW)	Cost-Effectiveness
SCE's 2010-12 Proposal	None	5,457	1,063	1.44
Gross Measure Costs Adjustment	Increase by 10%	-	-	1.36
Gross Measure Costs Adjustment	Increase by 20%	-	-	1.29
Effective Useful Life	Decrease by 10%	-	-	1.34
Effective Useful Life	Decrease by 20%	-	-	1.24
Gross Measure Costs Adjustment / Effective Useful Life	Increase by 10% / Decrease by 10%	-	-	1.27
Gross Measure Costs Adjustment / Effective Useful Life	Increase by 20% / Decrease by 20%	-	-	1.10

5. Portfolios Are Designed to Overcome Barriers to Market Transformation And To Advance Integration

In D.07-10-032, the Commission made several key changes to the previous regulatory framework for efficiency programs, including embracing market transformation initiatives and placing an imperative on integration – across utility service areas, utility ownership types, state agencies, and demand side programs. SCE is supportive of these changes and has worked jointly with the other IOUs to ensure they permeate the Strategic Plan.

This Proposed Program Plan advances that agenda. With respect to market transformation, SCE's portfolio includes proposed activities that address each major component of the market transformation continuum and their respective barriers. These include:

- Emerging Technology Program – the important and ambitious goals of the State cannot be met without the development and commercialization of new energy efficiency and demand-side management technologies.
- Education and outreach – overcoming informational and motivational barriers by educating customers about the merits of choosing energy efficiency and the options available to help them implement it is at the heart of voluntary market transformation.
- Financial incentives – voluntary market transformation often relies heavily on providing financial incentives to overcome the barriers of high first costs and/or discomfort with new products.
- Workforce Education & Training – although not typically part of the market transformation continuum, vigorously responding to the shortage of trained energy efficiency workers is now widely recognized as essential if markets are to be transformed thoroughly and quickly, especially in light of the economic conditions we face. This Proposed Program Plan supports the Strategic Plan's strategies in this area.

- Codes & Standards – D.07-10-032 and the Strategic Plan appropriately place great emphasis on the powerful market transformation tool: the adoption of and improved compliance with aggressive energy codes & standards. Codes & Standards are an essential element to reach the zero net energy building targets, HVAC transformation, peak management, and other goals of the Commission and SCE.

Additionally, SCE proposes activities that support market transformation in an over-arching way, including proposing of policy changes that SCE believes will better enable market transformation and the long term goals of the Strategic Plan.

This Application also advances the integration agenda. Integration is primarily used in the Decision and Strategic Plan to indicate coordination among DSM options, but it also refers to coordination across utilities (preferably statewide) and coordination between utilities and government agencies. Proposed integration and coordination actions in this Application include:

- Those that coordinate across utility companies, such as ME&O, Emerging Technologies, California Advanced Homes, and others;
- Utility-agency coordination, such as working more closely with the CEC, the Commission, and local governments on codes & standards development and compliance, and jointly developing, promoting, and improving the ENERGY STAR labels and benchmarks; and
- Integration and coordination among demand-side resources, there are a wide array of activities planned as described in Second Amended Exhibit SCE-6, dated July 2, 2009, Demand Side Management Integration and Coordination.

B. Program Design Achieves Savings Objectives

1. Strategies To Reduce Critical Peak Loads And Improve System Load Factors

SCE's ~~2009-2011~~ 2010-2012 energy efficiency portfolio produces energy savings across all hours of the year, and de facto reduces critical peak loads. SCE's ~~2009-2011~~ 2010-2012 energy efficiency portfolio places appropriate emphasis on measures and strategies that serve to reduce costly peak demand and provide system stabilizing relief. Strategies include the specific targeting of measures that have substantial peak impact and new incentive levels for ~~2009-2011~~ 2010-2012 that will reflect higher values based on the measure's ability to deliver peak demand reduction.

As shown in section IV.A.3, SCE's ~~2009-2011~~ 2010-2012 energy efficiency portfolio includes measures that encompass all major end uses. The portfolio is structured across end uses to provide both energy and demand savings, creating a complete energy efficiency resource, as directed by D.07-10-032 and the Strategic Plan.[111] SCE's proposed ~~2009-2011~~ 2010-2012 energy efficiency portfolio has a peak-to-energy ratio of ~~0.192~~ 0.193.[112] By comparison, the peak-to-energy ratio for SCE's 2006-200~~7~~8 proposed energy efficiency programs was approximately ~~0.165~~ 0.181. Overall, SCE has increased the on-peak reductions of its proposed ~~2009-2011~~ 2010-2012 energy efficiency portfolio from historic levels. These results demonstrate that SCE has focused on improving system load factor in designing its ~~2009-2011~~ 2010-2012 EE portfolio.

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[111] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 58-65, 66-70, 89-97.

[112] California Energy Efficiency Potential Study, Itron, Inc., September 2008, p. 4-38 (GWh) and 4-58 (MW). Peak-to-energy ratio based on Itron's Full Restricted Scenario.

For SCE, the Itron California Energy Efficiency Potential Study shows a peak-to-energy ratio of 0.1896 for the analysis period examined in the study, 2007-2026.[113] The study results imply a peak-to-energy ratio for ~~2009-2011~~ 2010-2012 of ~~0.2005~~ .1900. Thus, SCE's ~~2009-2011~~ 2010-2012 EE portfolio exceeds the long-term peak-to-energy ratio estimated in the Itron EE potential study, and it is consistent with the peak-to-energy ratio during the ~~2009-2011~~ 2010-2012 period.

About ~~19~~ 20 percent of the energy savings and ~~32~~ 34 percent of the demand reductions in SCE's EE portfolio come from HVAC measures with a peak-to-energy ratio of ~~0.3378~~ 0.3225. Approximately 41 percent of the energy savings and ~~53~~ 70 percent of the demand reduction in SCE's EE portfolio come from measures with peak energy ratios of 0.1800 of greater. This result shows that a significant percentage of SCE's portfolio is focused on measures with higher than average peak-to-energy savings. Measures with high peak-to-energy ratios reduce critical peak loads and improve system load factors.

2. Strategies To Minimize Lost Opportunities

SCE's portfolio planning and development process included careful consideration of minimizing and/or avoiding potential lost opportunities across all program areas, one of the Strategic Plan's goals.[114]

SCE's ~~2009-2011~~ 2010-2012 portfolio of residential programs is generally designed to avoid lost opportunities through a "comprehensiveness" strategy. Programs are promoted and designed to encourage comprehensive projects that are not limited to only the most cost-effective measures. In the residential sector, lost opportunities are most likely to arise when a consumer elects to upgrade equipment in isolation.

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[113] California Long-Term Energy Efficiency Strategic Plan, dated September 2008. Peak-to-energy ratio based on Itron's Full Restricted Scenario.

[114] California Long-Term Energy Efficiency Strategic Plan, dated September 2008.

SCE's comprehensive approach encourages consumers to look at the complete picture of managing energy and demand. Where programs are targeted to specific end-uses or equipment, care is taken to select equipment that does not create lost opportunities in most circumstances (*e.g.,* refrigerator replacement, light bulb exchanges). In addition, SCE's programs are supported by general advertising and educational campaigns. The campaigns encourage residential consumers to pursue all cost-effective opportunities energy efficiency improvements.

SCE's implementation strategy for the nonresidential portfolio also emphasizes comprehensiveness along multiple parameters, including a comprehensive approach to addressing all vertical market segments, and a comprehensive approach to individual customers, by emphasizing energy efficiency project opportunities which yield comprehensive savings.

In addition to residential and business programs, both Local Government partnerships and Institutional partnerships promote a comprehensive approach to minimize lost opportunities in local government and intuitional facilities, respectively. In general, this market segment has high potential for lost opportunities. In most instances, the operations and maintenance (O&M) department and the capital improvement department have different management with different budgets. The capital improvements department designs and constructs a project to minimize cost; the O&M department inherits the higher cost of operating and maintaining the inefficient equipment or building. Energy efficiency opportunities are lost due to the lack of collaboration.

The partnerships effectively minimize these lost opportunities by providing a team of experts on the front lines with the customer to communicate and facilitate the potential results of energy efficiency to decision makers within these organizations. Partnerships also provide project identification and collaboration with partners to review potential projects and work towards bringing all customer facility personnel to the table.

3. Successful And Cost-Effective Programs Have Been Continued

SCE proposes to continue successful 2006-2008 programs in the ~~2009-2011~~ 2010-2012 cycle. SCE has taken the opportunity to further enhance these successful programs to increase comprehensiveness, increase integration, and to align with the Strategic Plan.

SCE's overarching goal for energy efficiency programs is to procure cost-effective energy savings. SCE's portfolio continues to rely on proven programs and sub-programs such as the Calculated and Deemed Incentives Programs and the Residential Lighting Incentive Program for Basic CFLs, which have successfully demonstrated the ability to achieve cost-effective energy and demand savings over the near term. SCE also continues to place emphasis on those programs that have a proven ability to set the framework for longer term energy savings such as California Advanced Homes, Savings By Design, and Sustainable Communities.

4. Program Design Reflects Cumulative Savings

As discussed in more detail above, SCE's proposed plan meets the cumulative savings goals for the three-year cycle. This is performed through a focus on both long-term and short-term measures, combined with the full support of the Strategic Plan.[115] The quantification of the long-term impacts of the Strategic Plan is difficult, but the efforts in support of the Strategic Plan are throughout this Application and are focused on cumulative savings from both short-term strategies being implemented today and the impact of the Strategic Plan in the long term.

SCE proposes a diverse portfolio of approaches and measures to address the short-term and long-term needs of all customers through a multitude of delivery channels and programs. This portfolio is designed to focus on continuing to pursue long-term savings and allow SCE to address the need for long-term, cumulative savings to meet the resource needs of

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[115] California Long-Term Energy Efficiency Strategic Plan, dated September 2008.

California. A full discussion of the programs and their short-term and long-term strategies can be found throughout this Proposed Program Plan and throughout the Strategic Plan.

5. How The Potential Inclusion Of Energy Savings From "Spillover" Activities Has Been Reflected In Program Design

Current policy rules[116] still do not allow energy savings from either participant or non-participant spillover activities to be counted towards energy savings goals. Consequently, SCE's portfolio is designed to be cost-effective without counting spillover effects.

SCE's portfolio includes opportunities to create both participant and non-participant spillover effects that can be generated on top of clearly countable savings. For example, SCE's Savings By Design program offers a stipend to building design teams to participate in an integrated design process. In this as in many other SCE ~~2009-2011~~ 2010-2012 programs, the free ridership rates that will be measured by *ex post* impact evaluations of future-year programs will in fact be reflecting spillover effects of the ~~2009-2011~~ 2010-2012 programs, because initial rounds of program participation enable customers to gain experience with the value of particular new technologies and practices promoted by the programs.

However, given the Strategic Plan, the social value and the Commission's interest in generating savings beyond direct program participation, SCE is also including in its portfolio some nominally non-cost-effective programs focused on spillover effects.

The adoption of a focused, multi-channel marketing approach to nonresidential market segments is a second example. It was developed based on both a need to drive program penetration deeper into specific customer groups and a desire to get to the point of word-of-mouth promotion of efficient technologies among customers within some key segments. SCE hopes that this will lead not only to greater program participation, but also to participant and non-participant spillover and, ultimately, to market transformation for particular technologies.

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[116] Energy Efficiency Policy Manual, v.3.1, dated January 8, 2008, p. 6.

6. How Utilities Propose That Potential Energy Savings From Market Transformation Programs Should Be Measured, And How This Will Lead To The Phase Out From Utility Programs Of The Transformed Measures

For market transformation measurement methods, SCE highly recommends the following two nationally-praised works developed with California Public Goods Charge funds and overseen by statewide advisory groups including regulatory and utility evaluation personnel:

- A Framework for Planning and Assessing Publicly Funded Energy Efficiency (2001, http://www.calmac.org/events/20010301PGE0023ME.pdf) and
- The California Evaluation Framework, (http://www.calmac.org/events/California_Evaluation_Framework_June_2004.pdf).

The CFL direct installation and rebate programs represent one of the most impressive energy efficiency market transformation examples to date. It provides a prime example of monitoring energy savings potential and achieved energy savings, to work towards the goal of transforming a market and enabling the phasing out of support for a technology.

The CFL programs took an obscure technology, demonstrated its efficacy, and have gradually built increasing demand for it year after year. Problems with the technology were identified and program efforts sought to overcome these. The result has been a continuing reduction in cost and an increase in the number of manufacturers, available lamp varieties, and the number and types of retail outlets. At each phase of the growth, new customers have been drawn into the market to install more CFLs for a wider variety of uses.

As long as a program is able to cost-effectively broaden the penetration of the measure by these means, promotion of the measure will continue. In general, borderline cost-effectiveness among certain uses or groups because of rising free ridership is a signal that the program needs to be either refocused to more narrowly targeted uses or groups, or ended.

7. Emerging Technologies That Are Anticipated To Increase Savings Potential

The statewide Emerging Technology Program (ETP) seeks to influence savings potential through contributing to the acceleration and improvement of technology adoption, as articulated in the Strategic Plan.[117] This is accomplished by delivering information, insights, analytical tools, and resources to help enable expedited adoption of innovative technologies and support the promotion of new applications of existing technologies.

One new concept in the ~~2009-2011~~ 2010-2012 filing is that limited ETP efforts will be aimed at contributing to technology adoption through influencing the ease/attractiveness of energy efficiency technology investment and development in California. The Technology Research Incubation Outreach (TRIO) initiative addresses these issues. A second new concept is conducting scaled field placements on selected technologies in the market in larger volumes. These placements will target market awareness and/or advanced technology assessments.

8. Portfolios Contribute to the Green Building Initiative

In December 2004, Governor Schwarzenegger signed Executive Order S-20-04, which was accompanied by the Green Building Action Plan. Together they became known as the state's Green Building Initiative (GBI). Also important is Assembly Bill 2160,[118] which requires a Green Building Report, which was submitted in January 2008 by the CEC to the Governor's Green Action Team.[119] GBI places great attention on buildings owned by the State, but also addresses furthering green buildings that are owned and managed by other public, institutional, and for-profit commercial entities.

SCE's proposed portfolio provides numerous programs and opportunities for State agencies, departments, and other entities under the direct executive authority of the

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[117] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 83-88.

[118] Lieu, Chapter 742, Statutes of 2006.

[119] CEC January 2008, CEC-400-2008-005-CMF.

Governor to implement measures to reduce grid-based energy purchases for state-owned buildings through the installation of cost-effective efficiency measures. In fact, the CEC cites in its Green Building Report the "formal partnership between the state and investor-owned utilities to provide energy audits and coordinate incentive program funds to help pay for energy efficiency retrofit projects."[120]

Furthermore, as embodied in the Strategic Plan and throughout this Proposed Program Plan, SCE proposes several important activities that facilitate the GBI and address many of the major obstacles to furthering green building projects as identified by the CEC in the Green Building Report. These include developing consistent benchmarking of facilities, supporting RCx, expansion and ongoing tightening of Titles 24 and 20 codes & standards, developing voluntary tiers for green buildings beyond Title 24, coordinating with the PIER program to deploy emerging technologies in state buildings, promoting integrated building design and training, developing California-oriented HVAC technologies, and supporting various related activities by local governments.

C. Proposed Portfolio Design Reflects Market Strategies, Integration, And Delivery Channels To Enhance Customer Participation In Demand-Side Resources

1. Summary of Proposed Programs

This section provides an overview of SCE's proposed program offerings for program years ~~2009-2011~~ 2010-2012. Each of the programs in SCE's portfolio is described in detail in the Program Implementation Plans in Amended Exhibits SCE-3 (A&B), SCE-4, ~~and~~ SCE-5 and SCE-10, dated July 2, 2009. SCE's portfolio incorporates the successful elements of previous program designs while making innovative changes to maximize the resource benefits derived from the programs and to align with the long-term Strategic Plan.

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[120] AB 2160 Green Building Report: For Submission to the Governor's Green Action Team", California Energy Commission, January 2008, CEC-400-2008-005-CMF, p. 1.

a) Residential Programs

SCE's residential customer base constitutes one of the largest and most challenging groups of electricity consumers in the nation, due to its diversity, complexity, and size. SCE's residential energy efficiency portfolio delivers a wide array of programs and services to increase awareness of energy efficiency and to provide relevant energy management solutions. SCE's residential portfolio greatly advances the implementation of the BBEES, the Strategic Plan, and California's EAP for the benefit of all customers.

(1) Statewide Residential Energy Efficiency Program

The Residential Energy Efficiency Program is designed to promote comprehensive energy solutions to residential electricity consumers.

- Home Energy Efficiency Surveys
- Residential Lighting Incentive Program for Basic CFLs
- Advanced Consumer Lighting Program
- Home Energy Efficiency Rebate Program
- Appliance Recycling Program
- Business and Consumer Electronics Program
- Multifamily Energy Efficiency Rebate Program

(2) Comprehensive Mobile Home Program

SCE's Comprehensive Manufactured/Mobile Home Program (CMHP) is a continuation of the existing program. CMHP is a direct install program designed to provide a comprehensive suite of energy management solutions to mobile home customers in collaboration with local communities. The program provides for the installation of energy efficient products in the dwellings and common areas of mobile home parks, starting with the warmer climate zones.

(3) Comprehensive Home Performance Program

The CHPP provides incentives and other support to promote comprehensive improvement packages tailored to the unique needs of homes and home owners. The CHPP solicits, screens, and trains qualified residential repair, renovation and HVAC contractors so it can assemble a capable contracting team to perform whole-house diagnostics, develop a comprehensive improvement package, complete the recommended improvements, and verify and report overall results. The program also includes marketing activities to help educate customers on other DSM programs and services to motivate homeowners towards deeper energy savings.

(4) Efficient Affordable Housing

The program will use a performance-based approach to encourage the owners of affordable housing properties to employ energy efficiency measures to achieve a 20 percent energy improvement over existing building conditions. The program is designed to transform the affordable housing retrofit market away from a prescriptive, one-size-fits-all approach, towards a comprehensive building analysis approach. In addition, energy education workshops will provide information regarding the retrofit and knowledge about energy efficiency for tenants and owners.

(5) On-line Buyer's Guide

The On-Line Buyer's Guide is a new service to provide residential customers with one web-based source of information and tools to support energy efficiency practices and program participation. The guide will include technical information, a product database, a savings calculation tool, a shopping guide, rebate program information, and retailer information for products.

(6) Community Language Efficiency Outreach

The Community Language Efficiency Outreach Program (CLEO) is a highly targeted residential energy efficiency marketing, outreach, education and training program specifically targeted to the low and middle income Vietnamese, Indian, Chinese and Korean speaking customers of SCE and SCG. The program strategy is unique in that it is an in-language strategy, which serves a key role in overcoming language barriers.

b) Nonresidential Programs

SCE's ~~2009-2011~~ 2010-2012 nonresidential portfolio is designed to reach a broad spectrum of customers in each of the major sectors- commercial, industrial, and agriculture and water systems, and to align with the strategies and goals of the Strategic Plan.

To achieve delivery of targeted energy efficiency and other integrated DSM solutions to specific market segments and customers, as laid out in the Strategic Plan, SCE proposes a nonresidential program portfolio that better tailors offerings to the markets while leveraging a common infrastructure. This approach recognizes the need to assemble individual offerings and services into segment- and customer- specific solutions.

This approach allows integrated customer solutions to be developed and targeted to specific market segments and sub-segments, while leveraging a standardized menu of offerings and services and a common program infrastructure. Such an approach enables SCE to integrate the full range of DSM offerings into solution bundles that are customized and targeted to both the level of the market segment and individual customer.

Under this hybrid approach, traditional statewide and local energy efficiency programs, such as Standard Performance Contract, Express Efficiency, and Savings By Design, will continue ~~(see Business Incentives Element PIP~~). However, they will be managed as menus of offerings and services. These programs are described in depth in the PIPs, as shown in Amended Exhibits SCE-3 (A&B), SCE-4, ~~and~~ SCE-5, and SCE-10, dated July 2,

2009. Program budgets and savings impacts will continue to be tied to these programs ~~(*e.g.*, BIE)~~.

The Market Segment Plans describe how the key market segments are targeted with customized solutions chosen from the menu of offerings, but the PIPs include detailed descriptions of the individual offerings and services and how each is designed to overcome a barrier to adoption. Program budgets and savings impacts are not tied to the Market Segment Plans.

Nonresidential Programs

- Residential and Commercial HVAC Program
- Statewide Industrial Energy Efficiency Program
- Agriculture Energy Efficiency Program
- Commercial Energy Efficiency Program
- Financial Solutions
- Private College Campus Housing Energy Efficiency Program
- Management Affiliates Program
- Healthcare Energy Efficiency Program
- Local Integrated DSM Pilot for Food Processing
- Automated Energy Review for Schools
- Sustainable Portfolios
- Monitoring-Based Commissioning
- ~~Leased Office Space Retrofit Program~~
- Data Center Energy Efficiency Program
- Monitoring-Based Persistence Commissioning Program
- Data Center Optimization Program
- Cool Planet Program
- Livestock Industry Resource Advantage
- Comprehensive Beverage Manufacturing and Resource Efficiency

- Solid Waste Energy Efficiency Program
- Lodging Energy Efficiency Program
- Food & Kindred Products Program
- Primary and Fabricated Metals Energy Efficiency Program
- Industrial Gases Energy Efficiency Program
- Non-Metallic Minerals and Products Program
- Comprehensive Chemical Products Program
- Chemical Products Efficiency Program
- Comprehensive Petroleum Refining Program
- Oil Production Program
- Refinery Energy Efficiency Program
- High Performance Hospitals Program
- Cool Schools Program
- Public Pre-Schools, Elementary Schools and High Schools Program
- Retail Energy Action Program
- Commercial Utility Building Efficiency (CUBE)

c) Partnerships

SCE continues to support collaborative energy efficiency partnerships with institutions and government customers. These partnerships leverage the skills and knowledge of each organization to overcome operational, technical, financial, political and cultural barriers to energy efficiency. The partnerships will implement cost effective energy efficiency programs that will result in both immediate and long-term energy savings and demand reduction.

(1) Energy Leader Partnership Program

SCE's Energy Leader Partnership (ELPP) Program is designed to leverage the considerable power and influence of California's local governments (LG) by first helping them to adopt as much energy efficiency, demand response, and renewable onsite generation as possible. Next, the program is designed to support LG efforts to encourage their constituents (residents, businesses and other key stakeholders such as local developers) to do the same. The program provides financial incentives; technical assistance; and education and outreach. As well, the level of support is keyed to the level of LG commitment and performance; that is, the higher the performance, the higher the incentive.

~~2009-2011~~ 2010-2012 Local Government Partnerships currently include:

- Community Energy Partnerships
- Beaumont Energy Leader
- Desert Cities Energy Leader
- Eastern Sierra Energy Leader
- Kern County Energy Leader
- Long Beach Energy Leader
- Orange County Cities Energy Leader
- Redlands Energy Leader
- Ridgecrest Energy Leader
- Santa Ana Energy Leader
- Simi Valley Energy Leader
- Ventura County Energy Leader
- South Santa Barbara County Energy Leader
- South Bay Energy Leader
- South Gate Energy Leader
- San Gabriel Valley Energy Leader

- San Joaquin Valley Energy Leader
- Palm Desert Partnership

(2) Institutional And Government Partnership

SCE is proposing seven partnerships during the program cycle. These partnerships consist of: three educational institutions (UC, CSU and CCC), one state agency (CDCR), one with the State of California and three county governments (Los Angeles, Riverside and San Bernardino). Most of these partnerships were existing partners that participated in the last program cycle. The only new partnership being proposed is the County of San Bernardino.

~~2009-2011~~ 2010-2012 Institutional Partnerships include:

- California Community Colleges
- California Department of Corrections and Rehabilitation
- SCE-SCG County of Los Angeles Partnership
- Riverside County Partnership
- UC/CSU/IOU Partnership
- County of San Bernardino Partnership
- State of California/IOU Partnership

d) Crosscutting Programs

SCE's crosscutting programs were designed and structured based on the guidance in the Strategic Plan and on CPUC Energy Division staff input.

(1) New Construction

The Statewide New Construction program is a suite of activities designed to promote integrated energy management design and systems into new buildings. The program comprises three sub-programs:

- California Advanced Homes (CAHP)

- Energy Star Manufactured Homes
- Savings By Design

(2) Residential And Commercial HVAC Program

The Residential and Commercial HVAC Program is a statewide program that will continue the transformation process of California's HVAC market to ensure that:

- HVAC technology, equipment, installation, and maintenance are of the highest quality;
- Quality installation and maintenance practices are easily recognized and requested by customers;
- The HVAC value chain is educated and understands their involvement with energy efficiency and peak load reduction; and
- The above changes lead to sustained profitability for HVAC trade allies as the business model for installing and maintaining heating and cooling systems changes from a commodity-based to a value-added service business.

Market transformation, direct energy savings and demand reductions will be achieved through a series of sub-programs:

- ENERGY STAR Residential Quality Installation
- Commercial Quality Installation
- Upstream HVAC Equipment Incentive
- Residential Quality Maintenance and Commercial Quality Maintenance
- HVAC Technologies and System Diagnostics Advocacy
- HVAC Workforce Education and Training

(3) Emerging Technologies Program (ET)

The mission of the Emerging Technologies Program (ETP) is to support increased energy efficiency market demand and technology supply (the term supply encompassing breadth, depth, and efficacy of product offerings) by contributing to development and deployment of new and underutilized energy efficiency (EE) measures (that is, technologies, practices, and tools), and by facilitating their adoption as measures supporting California's aggressive energy and demand savings goals.

(4) Codes & Standards Program (C&S)

The Codes and Standards (C&S) Program saves energy on behalf of ratepayers by directly working with standards and code-setting bodies to strengthen energy efficiency regulations, by improving compliance with existing codes and standards, and by working with local governments to develop ordinances that exceed statewide minimum requirements.

(5) Sustainable Communities Program

The Sustainable Communities Program (SCP) is a pilot to encourage the inclusion of sustainable elements and energy efficient features in campus projects, mixed-use complexes, residential new construction, multi-family and transit-oriented developments, and other projects whose scope exceeds traditional SCE programs. The SCP provides financial incentives and customized technical assistance.

(6) Workforce Education And Training

The Statewide IOU Workforce Education and Training (WE&T) Program is a portfolio of IOU programs that provide education, training and workforce development planning and implementation.

The program comprises three sub-programs:

- WE&T Centergies
- WE&T Connections
- WE&T Planning

(7) Marketing Education And Outreach

The purpose of Marketing, Education and Outreach (ME&O) is to increase consumer awareness of and participation in demand side management activities and to encourage behavior changes that save energy, reduce greenhouse gas emissions, and support clean energy solutions.

- Statewide Marketing & Outreach
- Strategic Planning

(8) Integrated Marketing & Outreach

SCE's Demand Side Management (DSM) marketing efforts will be expanded and formalized within the Integrated Marketing and Outreach program. This local program will provide funding to collect and maintain market intelligence, enhance SCE's website to ensure customers receive integrated solutions, adapt behavior-based marketing methods, and allow the utility to generate awareness of its integrated demand side management solutions through the use of ongoing seasonal marketing campaigns.

(9) Integrated Demand-Side Management

In addition to their individual IDSM activities and pilots, the IOUs are proposing a statewide IDSM effort that will establish a Statewide Integration Task Force (Task Force). The work of the Task Force will encompass activities that promote, in a statewide-coordinated fashion, two specific IDSM strategies identified in the strategic Plan.

(10) Statewide Lighting Transformation

The Statewide Lighting Market Transformation Program (LMT) establishes processes through which the IOUs can develop and test market transformation strategies for emerging lighting technologies (products, systems and design strategies) as well as for technologies already incorporated into their energy-efficiency programs.

This program includes three sub-programs:

- Lighting Technology Advancement
- Lighting Education and Information
- Lighting Market Transformation

(11) Third Party Solicitations

SCE's third party solicitation process is designed to enable successful solicitation, selection, and implementation of third party programs. SCE's third party solicitation process utilizes a multi-faceted solicitation approach which includes the following elements:

- Local Targeted Program Solicitation Support
- Statewide General Program Solicitation Support
- Local Solicitation – Innovative Design for Energy Efficiency Activities (IDEEA)
- Technology Resource Incubator Outreach (TRIO)
- Local Solicitation – Demand Side Management (DSM)

SCE's third-party solicitation process targets and promotes new and innovative energy efficiency technologies and program designs in preparation for and throughout the ~~2009-2011~~ 2010-2012 program years. The results of SCE's ~~2009-2011~~ 2010-2012 third party program solicitations, including SCE's selected programs are shown in Second Amended Exhibit SCE-2, Table 3.4, dated July 2, 2009. For ~~2009-2011~~ 2010-2012, SCE also proposes to seek, as part of its third party solicitations process, creative program ideas centered

around technologies applications that can serve energy efficiency and demand response needs. This coordination attempts to further leverage potential technologies to integrate energy efficiency with other DSM offerings.

e) General And Administrative Costs

The General and Administrative (G&A) elements for ~~2009-2011~~ 2010-2012 consists of various types of indirect administrative costs that are general in nature; these costs are allocated over the entire program portfolio or subgroup of programs. G&A support costs include: regulatory and reporting, finance and accounting, engineering, marketing, procurement, information and tracking systems, memberships, internal communication, job skills training, operations management, audit, internal review, quality assurance, planning, and legal support. The G&A allocation is based on programs' budget, which represents the scope of work for the program receiving the G&A support.

2. Third Party Contracts

a) Process, Criteria, And Statewide Consistency

(1) Overview

While SCE's energy efficiency program portfolio includes a variety of programs addressing a broad range of market segments, SCE recognized that there may be new opportunities that have not yet been identified, new markets that can be more effectively targeted, and market players who can leverage their relationships or expertise within an industry very effectively. Consistent with Commission direction to conduct a competitive bid "for the purpose of soliciting new ideas and proposals for improved portfolio performance,"[121] SCE's third party competitive solicitation process is a comprehensive and multi-faceted

[121] D.05-01-055, Section 5.2.1, p. 94.

approach that draws from the skill, experience, and creativity of the energy efficiency community with the goal of enhancing current program design and uncovering new approaches to capturing cost-effective energy efficiency. Additionally, the program solicitations promote comprehensive energy efficiency approaches, and focus on new ways to integrate demand side management offerings.

SCE offers two unique categories of solicitations for ~~2009-2011~~ 2010-2012: general and targeted. General solicitations allow bidders to design and submit their own program proposals to help SCE fill gaps within its energy efficiency program portfolio and develop newer methods or program designs. Targeted solicitations support identified markets and program needs. SCE offered local targeted solicitations for identified market sector needs, and also participated in a statewide targeted solicitation.

(2) Statewide General Solicitation

The Statewide General Solicitation offered bidders the opportunity to propose their own program ideas and strategies to enhance SCE's existing programs, and also offered bidders the option to propose a statewide program within some or all four IOU's service territories depending on the bidder's proposal.

(3) Local General Solicitation

SCE offered a Local General Solicitation named IDEEA. The purpose of the IDEEA solicitation is to find, fund, and field test the best new and innovative program delivery ideas from the marketplace and to provide the opportunity to "mainstream" them into the overall SCE-managed portfolio of proven, successful, and reliable programs. While the Statewide General Solicitation emphasized reliable and proven components, SCE's local IDEEA two-staged solicitation focused on innovative program ideas to capture energy savings and demand reduction.

(4) Targeted - Statewide and Local Solicitations

Three of SCE's Targeted Requests for Proposals (RFPs) were coordinated with the other IOUs. The coordinated RFPs gave bidders the opportunity to submit proposals to offer their program in one, multiple, or all IOU service territories. These Statewide Targeted Solicitations were single stage because the RFP defined the broad program scope, eliminating the need for screening the proof of concept. Statewide Targeted RFPs[122] were issued for the following three program areas on a statewide basis:

- Manufactured Housing New Construction
- Energy Efficiency for Entertainment Centers
- Private Schools and Colleges Program

(5) Local Targeted Solicitations

SCE also identified various program areas within its portfolio that would benefit from the focused efforts of a third party implementer. Thus SCE issued an RFP for each targeted area that included broad program expectations, target market sector, technologies but looked to the bidder to propose a program design and implementation plan. The Local Targeted Solicitations were single stage because the RFPs defined the broad program scope, eliminating the need for screening the proof of concept. SCE issued Local Targeted RFPs[123] for the following fourteen energy efficiency program areas:

- Efficient Affordable Housing
- CA New Homes Multi-Family
- Campus Housing Energy Efficiency Program
- Industrial Energy Efficiency Program

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[122] The results of these programs solicitations are shown in Second Amended Exhibit SCE-2, Table 3.4, dated July 2, 2009..

[123] The results of these programs solicitations are shown in Second Amended Exhibit SCE-2, Table 3.4, dated July 2, 2009..

- Agricultural Energy Efficiency Program
- Commercial Energy Efficiency Program
- Residential and Commercial HVAC Program- Technology Commercialization
- Residential/Light Commercial HVAC Program- Quality Maintenance
- Public Schools, Governments and Institutions Program
- Comprehensive Manufactured Homes Program
- Community Language Efficiency Outreach Program
- Commercial Direct Install Program
- Newly Developing and Specialty Use Program
- Sustainable Communities

(6) Solicitation Process

SCE grouped several individual RFPs into a single "flight." SCE had several groupings or "flights" as part of its program solicitation process. These "flights" were released over time during November 2007 through April 2008. This is a new approach adopted by all IOUs for the ~~2009-2011~~ 2010-2012 cycle, allowing bidders greater opportunity and more time to respond to multiple RFPs instead of releasing all RFPs at one time. The flight schedules were coordinated and adopted by all IOUs, with the longest two-stage RFPs released in earlier flights, and the shorter solicitations positioned in the later flights. Flight #1 included the Statewide General and SCE's local IDEEA Solicitations, Flights #2-4 included Statewide and Local Targeted RFPs, SCE did not participate in Flight #3, as these solicitations were moved to Flight #5 in order to provide more time to develop SCE's RFPs for this flight. SCE launched Flight #5 in late April 2008, which was primarily designed to support SCE's new approach (*i.e.*, vertical market segmentation) to the nonresidential sectors, through a local targeted solicitation.

(7) Proposal Evaluation

The proposal review process involved an extensive evaluation of each proposal based on scoring criteria jointly developed by the IOUs and reviewed by the Peer Review Groups ("PRG"). To ensure a thorough, fair and consistent evaluation of all aspects of the proposals, SCE established the following evaluation process:

- Overall Program Scoring
- Technical Review
- Supplier Responsibility
- Portfolio Review
- Peer Review Group Review

(8) Criteria

The IOUs developed joint evaluation criteria for the Targeted[124] and General Solicitations. The two sets of criteria slightly differed as follows:

- The Targeted Solicitations were single-stage and did not need abstract evaluation criteria because the program description area of the Targeted Solicitations was defined in each RFP. As the program scope was outlined in the RFP, it was not necessary to include portfolio fit as a scoring criteria.
- For the two-stage General Solicitation, the abstract evaluation criteria were similar to the scoring criteria for the full proposal except that the abstract stage did not require the submission of an E3 Calculator, so a full cost-effectiveness showing could not be evaluated. From past experience, requirement of a full E3 Calculator showing, in the abstract stage, is too costly and

[124] SCE applied the Statewide Targeted Solicitation criteria to its Local Targeted Solicitations.

burdensome for bidders and typically reduces the number of potential bidders. Instead, the IOUs developed a more streamlined cost efficiency worksheet which approximated cost-effectiveness for the purposes of the abstract evaluation.

The following scoring criteria and corresponding weights were used for all SCE General and Targeted Solicitations:

2009-2011 Scoring Criteria- General

Stage 1

Part 1: Abstract Responsiveness (Pass/Fail)

Part 2: Abstract Evaluation

A. Program Implementation and Feasibility	50%
B. Cost Efficiency	30%
C. Skill and Experience	20%
Total	100%

Stage 2

Part 1: Proposal Responsiveness (Pass/Fail)

Part 2: Proposal Evaluation

A. Program Implementation and Feasibility	50%
B. Cost-effectiveness	30%
C. Skill and Experience	10%
D. Supplier Diversity & Miscellaneous	10%
Total	100%

2009-2011 Scoring Criteria- Targeted[125]

Part 1: Proposal Responsiveness (Pass/Fail)

Part 2: Proposal Evaluation

A. Program Implementation and Feasibility	35%
B. Cost-effectiveness	30%
C. Skill and Experience	25%
D. Supplier Diversity & Miscellaneous	10%
Total	100%

(a) Statewide Consistency

For ~~2009-2011~~ 2010-2012, SCE, in coordination with the IOUs, streamlined the solicitation process to solicit and accept bids on a statewide level. This process was designed to provide bidders with an opportunity to respond to one statewide RFP for each statewide program, thereby improving the quality of the proposals, streamlining the utilities' process, and simplifying the bidders' process. The IOUs developed common outreach, solicitation process, flight schedule, scoring process and criteria, and developed a statewide on-line portal (PEPMA – Proposal Evaluation and Proposal Management Application) that included all IOU solicitation information for bidders, IOUs, and the PRGs.

To ensure selected programs offer a consistent statewide program, the IOUs will form statewide teams assigned to each statewide program to ensure consistent implementation across IOU service territories. (See Second Amended SCE-1, Chapter IV, dated July 2, 2009.)

Each statewide solicitation was coordinated by a lead IOU that was responsible to coordinate the development and release of the RFP in close coordination with the other IOUs. Bidders had the option to bid into any number of service territories, and were not required to respond with a bid proposing a program that covers all four IOU territories.

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[125] SCE applied the Statewide Targeted Solicitation criteria to its Local Targeted Solicitations.

The IOUs implemented other mechanisms that facilitated common statewide solicitation, including:

- Statewide Call for Abstracts and RFP
- Statewide Targeted RFPs
- Local Targeted RFP Templates
- Statewide Portal
- Statewide Bidder's Training
- Statewide Scoring Criteria

b) Third-Party Programs Continued From 2006-2008

Consistent with D.07-010-032, SCE proposes to extend its successful third party programs which were selected as part of competitive solicitation for the 2006-2008 program cycle into ~~2009-2011~~ 2010-2012.[126] In an effort to further expand successful third party programs, SCE and the other IOUs shared their lists of 2006-2008 successful programs. In order to facilitate the identification of successful programs, the IOUs agreed upon a success criteria to be used to determine whether a program and/or implementer was successful and should be continued into ~~2009-2011~~ 2010-2012.

- Program Goals and Achievements
- Program Cost
- Cost-Effectiveness
- Actual Installed Measure Mix
- Customer Satisfaction/Program Quality
- Coordination/Vendor Relationship
- Regulatory and Reporting Compliance/Audits
- Energy Savings Claims

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[126] D.07-10-032, dated October 18, 2007, pp. 74-75.

Additionally, per D.07-10-032,[127] only programs that were competitively bid in 2006-2008 could be considered for renewal to be included in the 20 percent requirement.

c) Efforts To Expand Third-party Programs And Results Of Competitive Bid Selection Process

The IOUs shared outreach techniques including mailing lists with other IOUs, trade associates, and service lists, to inform a greater number of potential bidders about upcoming program solicitations. As a result, SCE sent various Calls for Abstracts to over 2,700 potential bidders. SCE's efforts to expand third party programs included: (1) expanding targeted RFPs to incorporate program designs from other IOU's 2006-2008 energy efficiency portfolio; (2) expanding SCE's 2006-2008 IDEEA program to statewide programs in ~~2009-2011~~ 2010-2012, and (3) developing IDEEA 365 as a non-traditional method to expand SCE's open solicitation offering and to provide additional outreach during ~~2009-2011~~ 2010-2012. SCE's successful 2009-2011 program solicitation process included several new and promising program offerings, as shown in Second Amended Exhibit SCE-2, dated July 2, 2009.

d) Review With Peer Review Group (PRG)

In D.07-10-032,[128] the Commission continued the role of the local PRGs for 2009-2011. Specifically, for SCE, the Commission continued the role of the combined SCE and SCG PRG. To support the Commission's vision for the PRG, SCE engaged its local PRG during the portfolio planning process. Throughout the planning process, the PRG has provided recommendations and insights to refine and improve the development of the third party program solicitation process. SCE appreciates the insights and contributions of its PRG during this very involved and lengthy process and looks forward to their continuing support during the 2009-2011 program solicitations.

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[127] D.07-10-032, dated October 18, 2007, pp. 74-75.

[128] D.07-10-032, dated October 18, 2007, OP# 30, p.149.

e) Implementer Contracts

SCE has gained valuable experience over the past several years in developing and administering third party contracts. Based on this experience, SCE proposes to create third party contracts that: (1) promote a "pay for performance" approach while minimizing reliance on "time and material" contracting; (2) allow for immediate execution of third party contracts upon Commission approval of 2009-2011 program portfolio; (3) emphasize greater comprehensive approaches (*e.g.*, multiple end uses); (4) promote greater DSM integration and coordination, and (5) allow for increased funding for successful installation of energy efficiency projects while providing for program closure for non-performing programs. Reliance on these sound contracting approaches will allow successful programs to continue to play an integral role in achieving SCE's ~~2009-2011~~ 2010-2012 energy efficiency goals.

3. Partnerships

a) Proposed Local Government Partnership Structure And Statewide Consistency

SCE's partnership portfolio addresses energy efficiency with many of our public sector customers to more effectively respond to the specific barriers that this sector must address in implementing energy efficiency. This sector faces particularly difficult issues with respect to limited budgets, complex and hierarchical energy decision making processes, insufficient energy efficiency training, and limited staff resources that warrant the added attention and support afforded through the partnership approach.

SCE's partnership portfolio includes both local government partnerships as well as institutional partnerships. In both cases, SCE works in closely with the partner organization to identify the unique issues that the partner faces, determine how the partnership can help to resolve those issues to drive a long term energy efficiency strategy and

implementation plan, and provide the necessary support to assist the partner in reaching their energy efficiency goals.

b) Proposed Institutional Partnership Structure

SCE and the other IOUs have developed collaborative energy efficiency partnerships with institutions and government customers. These partnerships will leverage the skills and knowledge of each organization to overcome unique operational, technical, financial and cultural barriers and other external influences (including the Strategic Plan, AB 32, salient Executive Orders and other mandates). The partnerships will address the hurdles to implement cost effective energy efficiency programs that will result in both immediate and long-term peak energy savings and demand reduction.

Some local county government partners are included in the Institutional Partnership portfolio because the program has a strong emphasis on the implementation of energy efficiency in county municipal facilities. SCE is cognizant of the CPUC objectives to direct local government partnerships to work with communities in developing strategies that align with the Strategic Plan.

Each partnership has a management team comprised of representatives from each partner organization. For instance, for the UC/CSU/IOU partnership, the management team consists of representative from each of the investor owned utilities (SCE, SCG, SDG&E and PG&E), the UC Office of the President, CSU chancellor's office and other representatives from selected campuses statewide. This management team will provide oversight for the partnerships to coordinate and deliver an integrated program that will align to the Strategic Plan where applicable.

c) Proposed Local Government Partnership Structure

SCE has refined and strengthened SCE's ~~2009-2011~~ 2010-2012 partnership portfolio to enhance partner benefits, increase cost-effectiveness, and improve the consistency and transparency of the selection of local government partnerships (LGPs). The

major change in SCE's partnering strategy has been the selection and development of LGP programs.

SCE's new Energy Leader (EL) model for local governments improves the current local government partnering strategy – and supports the Strategic Plan directions – by establishing a disciplined approach for local agencies to lead by example and realize energy savings. Partners demonstrate leadership and environmental stewardship by taking action in their own facilities as well as engaging local business and residential customers to participate in DSM programs. The model provides clarity to local governments regarding their levels of energy use (both in their own facilities and in their communities).

The new Energy Leader model's goal is to stimulate greater engagement by local governments in energy efficiency activities while maintaining compliance with all CPUC criteria, including cost effectiveness. All interested SCE cities pursuing a long-tem sustainability strategy qualify as Energy Leader Partners. Joint Powers Authorities and non-profits representing groups of cities can also qualify for partnerships.

The model is established to accommodate local governments at all levels of readiness, from the valued partner level, which begins to educate and guide local governments in understanding and implementing energy efficiency to the most experienced and progressive partners at the platinum level.

Partnership levels are:

- Valued Partner Level
- Silver Level
- Gold Level
- Platinum Level

d) Statewide Consistency

The Commission hosted workshops to jointly solicit existing local government partner input on partnerships moving forward into the new cycle. The IOUs drafted

2009-2011 partnership selection criteria to reflect this input and improve statewide consistency. Additionally, the IOUs worked together to develop a similar evaluation process and document to capture the evaluators' scores.

The Commission encouraged a statewide approach to the local government partnerships and hosted a workshop on December 17, 2008 with IOU Partnership staff and local governments' representatives to discuss the Strategic Plan.

e) Government And Institutional Partnership Opportunities

As the awareness and success of the government and Institutional Partnerships grow, more government agencies and institutional customers may wish to form partnerships. SCE proposes to reserve a budget for these partnerships should they materialize during the course of the three-year program cycle.

f) Partnership Selection Criteria And Process

D.07-10-032 gave the PRG oversight over the selection of local government partnerships.[129] The development of selection criteria for the 2009-2011 Local Government Partnerships was a collaborative process that included the local governments themselves, the IOUs, and PRG members. These criteria were used in the selection of both local and statewide partnerships at SCE.

- Cost Efficiency
- Skill and Experience
- Demonstrated Commitment
- Municipal Facility Buildings
- Feasibility
- Integrated Approach

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[129] D.07-10-032, dated October 18, 2007, p. 103

- Comprehensiveness
- Innovation and Reflects Strategic Plan

A pre-announcement was sent to all cities, counties, and local government organizations, and appropriate non-profit organizations on February 11, 2008, alerting them that the Call for Abstract (CFA) would be released on February 21, 2008. SCE and existing partners supported the distribution of the abstract in SCE's service territory. Eligibility requirements to become a partner were also developed among the IOUs, with input from PRG members. For ~~2009-2011~~ 2010-2012, new partnerships will be with government or non-profits that work directly with government entities, government associations, and joint powers authorities.

Table IV-14
Abstract Evaluation Criteria

Item	Criteria	Weights
Part 1: Threshold Requirement		
A.	Abstract Responsiveness	Pass/Fail
Part 2: Proposal Scoring		
A.	Cost Efficiency	20%
B.	Skill and Experience	10%
C.	Demonstrated Commitment	10%
D.	Municipal Facilities	15%
E.	Feasibility	10%
F.	Integrated Approach	10%
G.	Comprehensiveness	10%
H.	Innovation and Reflects Strategic Planning Process	15%

g) Review With Peer Review Group

Scores for each partnership were recorded in the summary sheet submitted to PRG members on March 19, 2008 along with the actual abstract. SCE and the PRG members reviewed and discussed evaluation scores together on March 27, 2008.

PRG members provided formal feedback by way of a memorandum to government agency staff proposing local government partnership programs and to IOU staff regarding PRG member input on LGP programs.

h) PGR Recommendations And Responses

The PRG members provided suggestions on the development of the selection criteria. Several key suggestions from PRG members were incorporated into the CFA document and process (see Second Amended Exhibit SCE-1, Chapter IV, dated July 2, 2009).

i) Partnerships Comply With Energy Efficiency Policy Manual

The Energy Efficiency Policy Manual states that the partnership arrangements "should in no way diminish or dilute the responsibility and accountability of Program Administrators to meet the Commission-adopted savings goals."[130] Therefore, potential partners were asked to identify those innovative and strategic plan elements separately, along with the applicable budgets. Although integration of other energy programs including demand response and solar were a criterion, incremental funding to support these activities would need to come directly from the appropriate program.

j) Palm Desert Partnership

Although integration of other energy programs including demand response and solar were a criterion, incremental funding to support these activities would need to come directly from the appropriate program.

Results from operations in year one of this five-year project show that participation in energy efficiency increased by more than a factor of four since the partnership launched its program.

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[130] Energy Efficiency Policy Manual v.3.1, dated January 8, 2008, Rule 5, p. A-13.

The project seeks to develop an energy management system for residential and small commercial customers and pioneer methods to both affect and measure energy savings associated with behavioral changes. A new method of financing energy efficiency projects is under development for launch in ~~2009~~ 2010. A full program implementation plan for the Palm Desert Demonstration Project is in Exhibit SCE-4 and SCE-10, dated July 2, 2009.

4. Summary Of Market Transformation Strategies

Key market transformation strategies are summarized in Section IV.A.5, "Portfolios are designed to overcome barriers to market transformation and to advance integration". Additional details are also discussed in the Program Implementation Plans in Exhibits SCE-3 (A&B), SCE-4, ~~and~~ SCE-5 and SCE-10, dated July 2, 2009.

5. Proposals For On-Bill Financing

a) Nonresidential And Institutional Customers

As guided by the Strategic Plan, SCE proposes to build on the experience of the On-Bill Financing (OBF) Pilot conducted during the 2006-2008 program cycle as part of a coordinated Financial Solutions program effort. In this cycle, OBF was offered to qualified convenience store and small grocery store customers electing to participate in a direct install energy efficiency program. The pilot program required a minimum loan amount of $5,000 and a maximum loan term of five years.

The Strategic Plan[131] identified OBF as an option in many customer segments, provided that adequate eligibility standards and enforcement mechanisms are in place to limit risk to ratepayers. SCE proposes to extend OBF as a financing option to qualified small commercial and institutional customers (including governmental) undertaking approved efficiency improvements.

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[131] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 30-41, 51-56 and 89-97.

The proposed ~~2009-2011~~ 2010-2012 OBF program, an element of the Financial Solutions program, is a significant expansion of the 2006-2008 pilot. In order to facilitate appropriate controls and tracking, SCE plans to set up a separate balancing account for the purpose of tracking the loans. However, all loans will be funded through energy efficiency funding, as set out in this proposed portfolio. The operation of this account is described more fully in Second Amended Exhibit SCE-1, Chapter VII, dated July 2, 2009.

b) Proposal For On-Bill Financing For Residential Customers

In response to D.07-10-032 and the Assigned Commissioner's and Administrative Law Judge's Ruling[132] to further analyze residential on-bill financing to residential customers,[133] SCE supports renewed evaluation of all residential financing options, including residential on-bill financing. SCE proposes to expand its evaluation in collaboration with the other IOUs through direct participation and support of a Statewide Task Force (as recommended by the Strategic Plan[134]).

SCE is also presently seeking qualified consultants and advisors to provide an up-to-date evaluation of best practices in the financing of residential DSM projects, the current market for traditional third party financing of residential DSM projects, and alternative, creative financing vehicles for residential DSM projects.

In general, SCE's experience, analysis, and available research have identified several challenges to implementing fiscally responsible residential on-bill financing. A recent study conducted by CIEE[135] identified several limitations for residential on-bill financing programs for DSM projects.

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[132] Assigned Commissioner's and Administrative Law Judge's Ruling Requiring Supplemental Filings of 10-30-2008 in response to SCE's Application 08-07-021 Section 2. Required Revisions, subsection H Program Specific Gaps, p. 17.

[133] D.07-10-032, dated October 18, 2007, OP# 13, p. 144.

[134] CLTEESP, September 2008, p. 20.

[135] Enabling Investments in "Energy Efficiency- A Study of energy efficiency programs that reduce first cost barriers in the residential sector, prepared for CIEE Financing Team, September 2008.

Historical data on various incentive mechanisms to finance residential retrofits suggest that the perceived value of OBF to residential customers has been very low compared to other incentive offers and that the credit risk to the lending utility has been very high. This behavior also is in direct contrast with the behavior of sizeable commercial establishments that can plan their physical plant maintenance and improvements in a rationalized, incremental way and can make use of OBF options offered by utility.

It is not SCE's intent nor is it consistent with our fiduciary responsibility or relevant regulatory requirements to absorb greater or less credit risk than would be absorbed using prudent credit analysis and lending standards. This guiding principle also pertains to residential OBF. SCE's ongoing evaluation of residential OBF as a value-added service is further impacted by the current credit crisis which has resulted in higher electricity bill payment delinquency rates – thereby leading SCE to conclude that residential OBF may be even more challenging today than ever.

SCE is optimistic that AB 811, integrated with utility financing and innovative third-party financing efforts can help provide energy efficiency financing for many of SCE residential customers and serve them in a way that IOU – loans (*e.g.*, OBF) cannot.

6. Proposed Program Delivery And Market Outreach

a) Proposed Marketing And Outreach Program

Accomplishing the long-term goal of integrating demand side management programs, maximizing energy savings, and changing customer behavior requires a multi-layered marketing effort across all stakeholders with responsibility for energy efficiency in all sectors. Both institutional targeted marketing campaigns will move consumers through a continuum from awareness, to attitude change, to action, as is articulated in the Strategic Plan.

Second Amended Table IV-15 is a summary of SCE's approved, proposed, or anticipated ~~2009-2011~~ 2010-2012 marketing budgets (budgets exclude labor):

~~***Table IV-15***~~
~~***Summary of Marketing Budget***~~

~~**PROGRAM**~~	~~**2009 to 2011 MARKETING BUDGET (non-labor)**~~
~~AMI (SmartConnect™)~~	~~$37,058,929~~
~~California Solar Initiative (CSI)~~[136]	~~$1,500,000~~
~~Demand Response~~	~~$25,503,950~~
~~Energy Efficiency~~	~~$40,043,842~~

Second Amended Table IV-15
Summary of Marketing Budget

PROGRAM	**2010 to 2012 MARKETING BUDGET (non-labor)**
AMI (SmartConnect™)	$37,058,929
California Solar Initiative (CSI) [1]	$1,500,000
Demand Response	$25,503,950
Energy Efficiency [2]	$40,043,842

[1] 2009-2011 CSI marketing budget is estimated, based on actual 2008 CSI budget allocation.
[2] Marketing budget for Energy Efficiency represents the 2010 to 2012 budget cycle.

By coordinating and integrating demand side management programs, as appropriate, SCE expects to increase energy efficiency participation, avoid lost opportunities that may result from siloed communications, and provide simple and intuitive solutions for customers. Integrated bundled efforts are used to maximize delivery and gain more widespread awareness of our offerings, while targeted marketing efforts will continue in order to persuade high-potential customers to participate in key program activities, enabling the utility to meet program goals.

136 2009-2011 CSI marketing budget is estimated, based on actual 2008 CSI budget allocation.

b) Discussion Of Context And Funding Integration

(1) Demand Response And Advanced Metering Infrastructure (AMI)

As articulated extensively in the Strategic Plan,[137] SCE plans to actively pursue integrated DSM goals, and will evolve our goals even further in ~~2009~~ 2010 and beyond as a result of SCE's SmartConnect™ (AMI) technologies, equipment, and offerings. With the implementation of SmartConnect™, SCE will be able to provide real time information to customers that can help them make more informed decisions about their energy usage. Programs will be developed that give customers both an incentive to save energy and help them reduce energy costs with varying levels of participation.

(2) California Solar Initiative, Including Commission And CEC Programs

SCE will continue to promote the California Solar Initiative (CSI) program to residential and business customers to increase awareness, participation, and application submissions. For cost efficiency and maximum reach, CSI messaging will be included in 'bundled' marketing communications that present customers with the broad array of SCE's energy efficiency and DR solutions. Bill inserts, fact sheets, and training and educational materials will be developed to promote the program. Vertical marketing efforts will be implemented to drive participation from customers with the highest propensity to respond to the 'go solar' call to action.

SCE will work in partnership with the Commission to provide input leading to the development of a long-term strategic plan (including budget requirements) for marketing the CSI in ~~2009~~ 2010 and beyond. SCE will also identify opportunities to educate

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[137] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 71-73.

builders, new home buyers, trade organizations, and other stakeholders about the New Solar Homes Partnership program (NSHP) which provides incentives to homebuilders that incorporate high levels of energy efficiency and high performing solar systems into new construction.

(3) Low Income Energy Efficiency

As extensively discussed in the Strategic Plan's section on the Low Income Residential segment,[138] SCE will continue to reach out to low-income customers using direct mail, bill inserts, outreach events, fact sheets, savings guides, seasonal campaigns, brochures, and sce.com to increase program enrollment, and will expand energy efficiency and LIEE in-home education to leverage information on green house gas and SmartConnect™. SCE will work to identify program design gaps between energy efficiency and LIEE and evaluate solutions to ensure that all customers have the opportunity to accelerate adoption of energy efficiency. SCE's activities ~~will be coordinated in 2009 to ensure consistency with the developing single statewide ME&O program, and~~ will be integrated with the statewide program in 2010 and 2011, as directed by the Commission in D.08-11-031.

(4) Distributed Generation

SCE continues to administer the Self Generation Incentive Program (SGIP) that provides economic incentives to customers using clean, renewable, and efficient distributed generation technologies such as fuel cells and wind turbines. SCE will continue to facilitate and promote the use of cost and energy efficient distributed generation applications by it customers. SCE will also participate with the Commission, CEC, and other research organizations to simplify and streamline interconnection processes for Distributed Generation and to develop rates and tariffs that fairly allocate costs while reducing perceived barriers to the use of customer owned and operated distributed generation facilities.

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[138] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 24-29.

7. Proposed Training Programs

a) Overview

The Workforce Education and Training (WE&T) Program promotes energy efficiency through a variety of training and educational programs across residential and nonresidential customer segments.

b) Proposed Strategies And Training Programs

As identified in the Strategic Plan,[139] the WE&T Program Portfolio achieves its goals by contributing to the success of the following Strategic Plan initiatives:

- Initiate and drive long-term WE&T development and strategic planning.
- Develop K-12 curriculum to include energy efficiency fundamentals.
- Support the community college and adult education efforts to support students to develop career paths in energy efficiency.
- Incorporate energy efficiency and demand side energy management into traditional contractor and technician training.
- Create or expand college and university programs with energy efficiency and demand side energy management focus.

SCE also plans to initiate a needs assessment study, which will act as the foundation for the ~~2009-2011~~ 2010-2012 program moving forward. After the needs assessment has been completed, the WE&T stakeholders will prioritize the strategies and determine which WE&T sub-program would be most effective in addressing each. As laid out in the Strategic

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[139] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, pp. 9-2 and 9-6 to 9-10.

Plan,[140] under the guidance of the needs assessment report, SCE anticipates WE&T will provide training and workforce development opportunities.

c) Outreach To Moderate Income, Minorities And Disadvantaged Communities

SCE's EARTH Education and Training Program, CLEO, and MEUs bring their services to schools, school districts, and communities in areas where moderate income, minorities, and disadvantaged community constituents can be reached. In alignment with the Strategic Plan, these activities will be coordinated with LIEE workforce training. The programs' activities and services teach students and residents to keep energy efficiency practices in mind throughout their day whether at school, work, or at home.

V.

PROPOSED FUNDING REQUESTS AND FUND-SHIFTING PROPOSALS ARE REASONABLE

A. Funding Request Is Reasonable

1. Proposed Overall Funding Levels And Administrative Budgets Are Reasonable And Should Be Adopted

SCE's proposed ~~2009-2011~~ 2010-2012 energy efficiency program portfolio budget supports both the achievement of the Commission's aggressive ~~2009-2011~~ energy efficiency goals as well as supports progress towards the realization of the long-term goals and specific strategies and actions identified in the Strategic Plan. The proposed increase in funding over previous program cycles is attributable to several factors including: (1) increased energy

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[140] California Long-Term Energy Efficiency Strategic Plan, dated September 2008, p. 9-6.

efficiency goals[141] set forth by the Commission; (2) reduced estimates for energy savings and demand reduction resulting from measurement and evaluation work; (3) increased codes and standards; (4) increased incentives levels to encourage customers to adopt the latest energy efficiency technologies; and (5) increased resources needed to support the Commission's big, bold energy efficiency strategies and the other elements of the Strategic Plan. SCE's proposed ~~2009-2011~~ 2010-2012 energy efficiency budget summary, by program, is presented in Second Amended Exhibit SCE-2, dated July 2, 2009..

In response to the Assigned Commissioner and ALJ Rulings,[142] SCE provides additional information on the proposed budget, including administrative levels, that complies with the required budget templates, as shown in Second Amended Exhibit SCE-2, dated July 2, 2009. The Rulings indicate that SCE's original filing included a proposal for high administrative cost. This statement is inaccurate. SCE Application, filed July 21, 2008, and this Application include reasonable administrative cost proposals. Our proposed ~~2009-2011~~ 2010-2012 energy efficiency administrative budget (SCE administrative budget only) is approximately ~~11.9~~ 10.9 percent of the total program budget.

After review of SCE's July 21, 2008 energy efficiency Application and discussion with the Energy Division staff during the September 2008 workshops, it is apparent that the administrative cost referred to in the Ruling were not administrative costs but rather costs inputted into the Commission's E3 calculator, labeled administrative budget. The E3 administrative budget represents all program (IOU and third party) budget including all direct implementation, marketing/outreach, EM&V and incentives with the exception of rebates. This is a far different figure than the SCE-only administrative budget based on the Commission's

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[141] D.04-09-060, Table 1B.

[142] Assigned Commissioner's And Administrative Law Judge's Ruling Requiring Supplemental Filings, dated October 12, 2008 and Assigned Commissioner And Administrative Law Judge's ruling Modifying Schedule And requiring Additional Information For 2009-2011 Supplemental Filings, dated December 12, 2008.

reporting requirements. SCE proposed administrative budget is reasonable and consistent with levels approved by the Commission in the prior funding cycle.

2. Certain Costs Not Included In Cost-Effectiveness Calculations Per The Strategic Plan And Commission Direction

SCE proposes to include all forecasted costs associated with supporting the long-term Strategic Plan activities into the cost-effectiveness showing in SCE's Application to ensure ratepayers are funding a cost-effective energy efficiency portfolio. The Strategic Plan includes both near and long term goals for California. To realize the achievement of the Strategic Plan goals, California will need support from a vast number of market actors. To a certain extent, the IOUs' energy efficiency activities will play a part in supporting California's energy efficiency goal achievement. Many of these long-term IOU investments will not realize near-term (*i.e.*, ~~2009-2011~~ 2010-2012) benefits to ratepayers but will be vital in providing energy efficiency solutions in the long-term to these ratepayers. SCE recognizes the Assigned Commissioner and Administrative Law Judge's intent for the Commission to address this issue as part of Rulemaking R.09-01-019;[143] however, SCE offers this recommended policy change in this proceeding in order to highlight how integral this issue is to SCE's proposed ~~2009-2011~~ 2010-2012 energy efficiency program plan.

B. Proposed Fund-Shifting And Program Flexibility Proposals Are Reasonable

The fund shifting guidelines proposed in this Application for the ~~2009-2011~~ 2010-2012 program cycle (Proposed Guidelines) are in response to the fund-shifting guidelines issued as part of the post-2005 Energy Efficiency Policy Manual issued on August 6, 2008.[144] The Proposed Guidelines are consistent with the current post-2006 Energy Efficiency Policy Manual

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[143] Scoping Memo And Ruling Of Assigned Commissioner And Administrative Law Judge Determining The Scope, Schedule And Need For Hearing In This Proceeding, dated November 25, 2008, p. 13.

[144] Assigned Commissioner's And Administrative Law Judge's Ruling On Revision 4.0 Of The energy Efficiency Policy Manual, dated August 6, 2008.

(EE Policy Manual) with the exception of key modifications, as shown in Second Amended Exhibit SCE-1, Chapter V, Table V-17 Proposed ~~2009-2011~~ 2010-2012 Energy Efficiency Fund-shifting Guidelines, dated July 2, 2009 attached hereto.[145] For the 2006-2008 program cycle, the Commission recognized and approved the need for IOU program administrators to have flexibility "to make decisions, without undue restrictions or delays, so they can effectively manage their portfolios to meet or exceed the Commission's savings goals cost-effectively."[146] SCE's Proposed Guidelines extend this flexibility into ~~2009-2011~~ 2010-2012 funding cycle.

SCE proposes selective modifications to the current EE Policy Manual to: (1) change to the current treatment of mid-cycle portfolio funding augmentation; and (2) clarify language to make it applicable to ~~2009-2011~~ 2010-2012.

1. Provide Additional Clarity To Prior Year's Fund Shifting Guidelines To Reduce Confusion

SCE's Proposed Guidelines include clarifying language to the current fund-shifting guidelines that we believe will reduce confusion. For example, in proposing to add a new program (outside the competitive bidding process)[147] the IOUs are required to file an advice letter. We recommend that the current fund-shifting guidelines be modified to clarify that a full Commission resolution may not be required if the Commission deems the proposal acceptable, as filed.

Also, the post-2005 Energy Efficiency (EE) Policy Manual provides the IOUs ability to carry funds from a future funding cycle to a current cycle.[148] However, we recommend the following clarifying language be incorporated into the current fund-shifting guidelines in order to make it applicable to the ~~2009-2011~~ 2010-2012 cycle:

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[145] Dated ~~January 8, 2008~~ July 2, 2009, Attachment A, Table 8: Adopted Fund Shifting Rules, p. A-2.

[146] D.05-09-043, dated September 22, 2005, Section 8.9 Fund Shifting Guidelines, p. 144.

[147] D.05-09-043, dated September 22, 2005, p. 149, allows for new programs to be introduced during the implementation if the new program was selected through a competitive bid process overseen by the local PRG.

[148] Energy Efficiency Policy Manual v.4.0, dated August 6, 2008, p. 6.

"12. Bridge Funding. Programs continuing from the ~~2006-2008 2009-2011~~ 2010-2012 program cycle into the ~~2009-2011~~ ~~**2012-2014**~~ 2013-2015 cycle may use ~~2009-2011~~ ~~**2012-2014**~~ 2013-2015 funding **to keep programs from shutting down prior to the end of the implementation cycle**, once the ~~2009-2011~~ ~~**2012-2014**~~ 2013-2015 portfolio has been approved**. Additionally,** ~~and~~ start-up costs for ~~2009-2011~~ ~~**2012-2014**~~ 2013-2015 programs may use ~~2009-2011~~ **2012-2014** funding once the ~~2009-2011~~ ~~**2012-2014**~~ 2013-2015 portfolio has been approved **although the previous implementation cycle has not concluded**~~. (D.07-10-032)~~. Unspent or uncommitted funds from previous program years, or ~~2006-2008 2009-2011~~ 2010-2012 funds that will not be needed should be used prior to using ~~2009-2011~~ ~~**2012-2014**~~ 2013-2015 funds. Both continuing program funding and start-up cost funding, from ~~2009-2011~~ 2010-2012 or from previous program years, are limited to 15% of the current budget cycle without Commission approval. An Advice Letter is required for funding in excess of this percentage."

2. Modify Treatment Of Mid-Cycle Funding Augmentation

~~In D.07-10-032, the Commission set a policy rule (EE Policy Manual, rule 12, Section IV) prohibiting IOUs from claiming energy savings and demand reductions results towards the achievement of the Commission energy efficiency goals. Mid-cycle funding augmentation was perceived to provide a "bonus" to utilities without any undue risk bestowed upon them.[149] D.07-10-032 also indicates that "in effect, mid-cycle funding augmentations provide the utilities with additional funding to accomplish a goal that was set with a lower budget."[150] As a result of this rule, IOUs are now discouraged from pursuing all cost-effective energy efficiency even though there may be energy efficiency funds available from prior years. SCE proposes the elimination of the 2006-2008 mid-cycle funding augmentation rule for 2009-2011 2010-2012 as it: (1) creates a disincentive to propose new programs with augmented funding; (2) punishes, unnecessarily, IOUs when market conditions change which may require additional funds to incent customers in order to achieve the Commission energy efficiency goals,~~

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149 D.07-10-032, dated October 18, 2007, OP# 7, p. 143.

150 D.07-10-032, dated October 18, 2007, p. 98.

~~and (3) creates a tension with the California's Energy Action Policy[151] and Commission policy[152] to pursue all cost-effective energy efficiency. SCE recognizes the Assigned Commissioner and Administrative Law Judge's intent for the Commission to address this issue as part of Rulemaking R.09-01-019;[153] however, SCE offers this recommended policy change in this proceeding in order to highlight how integral this issue is to SCE's proposed 2009-2011 2010-2012 energy efficiency program plan.~~

~~The inability to record results from mid-cycle funding sends the wrong signal to IOUs to stifle program innovation and creation of promising programs. This is contrary to the Commission's desire to promote innovation and test new program designs. Another key fault of the 2006-2008 mid-cycle funding augmentation rule is it assumes that during the program implementation cycle the marketplace remains static and acts just as assumed during the planning process. This is unrealistic. The marketplace is dynamic with many actors and unforeseen influences which can foreclose expected opportunities as well as create new opportunities. Additionally, the mid-cycle rule works against California's Energy Action Plan[154] which calls for the pursuit of all cost-effective energy efficiency. Specifically, the mid-cycle rule discourages IOUs to supplement their program portfolios with promising new/enhanced programs. Thus, for 2009-2011, SCE proposes to modify the mid-cycle funding policy rule to~~

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151 Energy Action Plan identifies specific goals and actions to ensure that adequate, reliable, and reasonably-priced electrical power and natural gas supplies are achieved and provided through cost-effective and environmentally sound strategies. A copy of the Energy Action Plan, including the 2008 Update, is posted on the Commission's website at http://www.cpuc.ca.gov/static/energy/electric/energy+action+plan/index.htm. *See also*, D.05-09-043, *mimeo*, p. 15 and Energy Efficiency Policy Manual Version 3.1, dated January 8, 2008, Rule II.2, p. A-2.

152 D.07-10-032, dated October 18, 2007, p. 2.

153 Scoping Memo And Ruling Of Assigned Commissioner And Administrative Law Judge Determining The Scope, Schedule And Need For Hearing In This Proceeding, dated November 25, 2008, p. 14.

154 The Energy Action Plan identifies specific goals and actions to ensure that adequate, reliable, and reasonably-priced electrical power and natural gas supplies are achieved and provided through cost-effective and environmentally sound strategies. A copy of the Energy Action Plan, including the 2008 Update, is posted on the Commission's website at www.cpuc.ca.gov/static/energy/electric/energy+action+plan/index.htm. *See also,* D.05-09-043, *mimeo*, p. 15 and Energy Efficiency Policy Manual Version 3.1, dated January 8, 2008, Rule II.2, p. A-2.

~~allow all utilities to count all installed energy efficiency results towards the Commission's aggressive energy savings and demand reduction goals.~~

VI.

PROPOSED EVALUATION, MEASUREMENT & VERIFICATION PLANS AND BUDGETS

A. Funding Principles And Overall Funding Request

Consistent with D.07-10-032,[155] SCE's budget proposal includes a set aside of eight percent of its total non-strategic planning portfolio funding for both utility and Commission-managed EM&V studies, policy support, and strategic planning projects.

The budget amounts and allocations for EM&V need to be regarded as placeholders at this time. As the utilities and the Energy Division found in the 2006-2008 cycle, it is not feasible to develop meaningful study plans until the program portfolio has been developed and can be analyzed to determine the key researchable issues. In addition, due to the substantially larger program budgets for ~~2009-2011~~ 2010-2012, eight percent of total program budgets may be an unnecessarily large fraction to fund EM&V activities.

In the 2006-2008 cycle, development of detailed budget allocations occurred after program plans had been submitted; a similar deferred process should occur for ~~2009-2011~~ 2010-2012. SCE has contacted the Energy Division to discuss this issue for ~~2009-2011~~ 2010-2012. We look forward to working with the Energy Division to develop appropriate EM&V plans and budget levels. The final EM&V budget can then be approved in the final decision or through a later advice letter or compliance filing.

This request is for a three-year budget. As in 2006-2008, unspent funds will be carried forward from year to year within the period as necessary, and may be carried over into years

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[155] D. 07-10-032, dated October 18, 2007, p, 107.

after ~~2011~~ 2012 in order to conduct and complete evaluations of ~~2009-2011~~ 2010-2012 programs and other ~~2009-2011~~ 2010-2012 studies as necessary.

In 2006-2008, 72.5 percent of the funding was reserved for Commission-managed studies, policy support, and strategic planning projects, and 27.5 percent of the funding was allocated for utility-managed studies.[156] SCE proposes that this allocation be tentatively continued for ~~2009-2011~~ 2010-2012, until study budget estimates of the utilities and the Energy Division suggest that a different allocation is needed.

The proposed SCE study and activity budgets that comprise this funding request are described in the following sections. The specific studies, activities, and budget levels provided here are currently SCE's best estimates for the evaluation and analysis needs over the next three years. Past experience demonstrates that over such periods of time, study needs often change. Scope of work and related costs of specified studies may change, studies may need to be combined or separated, new studies may be identified, and work may be re-prioritized with changing and varied information needs. Budget flexibility is critical to allow for changing study and analysis priorities and needs. Consequently, SCE requests that the long-time practice of permitting full flexibility in the specific allocation of EM&V funding be continued for ~~2009-2011~~ 2010-2012 studies.

Quarterly and annual reporting on study status and budgets will allow for tracking of SCE's EM&V activity. Energy Division staff will also be informed by the utilities' submission of draft process evaluation plans, to allow for input by Energy Division and its consultants, as well as continuing coordination with the staff and their evaluation contractors.

B. Proposed SCE Studies And Activities

SCE's initial budget estimate for utility-managed EM&V activities is provided in overall budget allocation tables in Second Amended Exhibit SCE-2, dated July 2, 2009. Descriptions of

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[156] D.05-11-011, dated November 18, 2005, p. 7.

various areas that would be included in the budget estimates are provided in the sections below. EM&V activities are divided into two major categories: program-specific and cross-cutting.

1. Program-Specific Analyses

a) Process Evaluations And Evaluability Assessments

Process evaluations review the design and operation of programs to determine their effectiveness and their efficiency and to provide recommendations for program improvements.

Many of the programs in SCE's ~~2009-2011~~ 2010-2012 portfolio are either new programs or programs that have significant modifications from their previous design. Consequently, SCE will conduct process evaluations for most of the programs in the portfolio, submitting annual evaluation plans to the Energy Division as mandated in the California Energy Efficiency Evaluation Protocols.[157] Process evaluations will be particularly important for deciding whether to continue new programs and for providing some of the information needed to improve the design and operations of these programs.

Evaluability assessments are a related category of study, with a specific focus on assuring that programs are collecting the information that will be necessary to conduct effective impact, market effects, or process evaluations of the program. These are particularly important for new programs and programs implemented by organizations new to the Commission's evaluation requirements for Commission-regulated programs.

b) Program-Linked Market Analysis Studies

The budgets for market analyses related to SCE programs allow for analyses of particular markets central to the operation of specific SCE program and program

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[157] California Public Utilities Commission, California Energy Efficiency Evaluation Protocols, April 2006, p. 134, first paragraph.

components, such as emerging technologies, financing, building and industrial process maintenance services and practices, and structure and practices in the building construction, sale, and rental markets. With the increased focus on emerging technologies and codes & standards, analyses of the market potential of program candidate technologies will become more important.

c) Early Measurement & Verification/Baseline Activities

A particular focus of not only SCE's evaluation, measurement and verification contracts, but also internal work in ~~2009-2011~~ 2010-2012 will be quality control and process improvement. Given the demanding goals and preeminent role that the state has established for energy efficiency programs, it is vital that programs efficiently deliver the full savings of which they are capable. Early, small-sample measurement and verification (M&V) efforts including collection of baseline data are needed to assure that ex ante energy savings estimates are being achieved, and if they are not, whether and how achieved savings can be increased. Funding in this area will cover internal staffing plus engineering contracts to conduct early measurement and verification and baseline analyses to provide early feedback to program managers on whether their program energy savings assumptions are being met.

2. SCE's Crosscutting EM&V Activities

a) Energy Efficiency Potential And Forecasting Analyses

Forecasting energy and peak demand savings from energy efficiency programs and the portfolio, modeling annual energy savings streams, and cost-effectiveness analysis will be part of SCE's market analysis activities. This work builds on the energy efficiency potential studies that will be managed by Commission staff. It provides SCE staffing for development of Commission- and CEC-required energy efficiency forecasts and for detailed, SCE-specific analysis that will help the portfolio and program designers to determine cost-effective levels of energy efficiency program activity, to identify the most promising program areas, and to decide on program budget levels.

b) Market Segment Studies

These studies will gather data about market segments that will be targeted by the various programs. Surveys will gather data about customers' decision-making approach to energy efficiency investments. They will also collect information on these customers' level of knowledge of energy efficiency, sources of information, demographic characteristics, and program participation. The results will be provided to the utility, partnership, and third party personnel involved in refining program design, marketing and outreach activities, to assist them in increasing the effectiveness of their program offerings, messages and delivery methods.

c) Basic Data Collection And Analysis: Demographic, Business, And Weather Data

Market analysis work includes the ongoing collection and maintenance of basic types of data needed for effective program design, targeting, analysis, and evaluation: demographic, business classification, and weather data. SCE will contract for enhanced demographic data as well as use packaged demographic data available from SCE's market research organization. Business classification data and software will continue to be provided by EM&V funding, since its primary uses are for energy efficiency and demand forecasting, energy efficiency potential analysis, and program design, targeting, and marketing. Additional customer-specific data available from external sources will be purchased as justified by cost and the value of the data for effective program targeting.

SCE maintains a system of 24 weather stations that provide data used to estimate energy usage and energy savings of individual customers in multiple programs. It provides input to building energy simulation models used in multiple nonresidential energy efficiency programs, in particular Savings By Design and technology assessments. These data have also been used in impact evaluations of SCE programs.

d) Portfolio Analysis

This funding allows both consultant and internal evaluation staff work to analyze coverage of markets, strategies, end uses, and technologies in SCE's program portfolio. It also funds exploration of optimal coordination among programs in delivery, marketing, and outreach. Its goal is to make recommendations for refining current program coverage and to provide input for the ~~2012-2014~~ 2013-2015 program cycle. The work builds on process evaluations and other SCE and utility market analyses, especially including those of SCE's IDEEA and Emerging Technologies programs. It will also gather information from other states and utilities and coordinate with the energy efficiency forecasting/potential work that informs program design.

e) Program Best Practices Updates

SCE will support selective updating of the statewide Best Practices Database using its Portfolio Analysis work as a primary source of information about new program reports and practices to be included.

f) Multi-Client Studies

Each year, several opportunities arise for SCE to participate in multi-client studies dealing with energy efficiency program issues. Costs range from $10,000 to $50,000. These studies provide a relatively low-cost option for gathering data. Usually they provide data on a national level that can be used as at least a rough representation for SCE's service territory or that allow for comparison with SCE's service territory. Often regional breakdowns are available, providing something closer to data representative of California. In some cases, over-sampling within a specific area can be provided for an extra fee, so that the client can compare results in their own territory with national results.

These studies cover topics as diverse as ENERGY STAR brand recognition, customer attitudes and preferences, energy efficiency issues in particular market

segments, technology assessments, and program characteristics and funding. The American Council for an Energy-Efficient Economy, the Consortium for Energy Efficiency, and E-Source are examples of organizations that offer high-value joint research opportunities.

g) Conference And Organization Support

Support of conferences and conference attendance for national and regional conferences focused on energy efficiency programs and measurement and evaluation issues will be part of SCE's EM&V budget. Utility program management and evaluation staff members as well as Commission energy efficiency oversight staff need the information and professional development offered by these conferences to maintain their work at the premier level that California programs and evaluation work currently attain. Such conferences also provide access to studies completed by others that provide valuable information for California program planning.

h) CALMAC Support And Website

The California Measurement Advisory Council (CALMAC) website makes publicly available electronic copies of all energy efficiency studies completed with Commission-authorized energy efficiency funding. The website also provides notification and access to the activities of CALMAC. CALMAC serves as a forum for soliciting input on and presenting results of EM&V studies. It also hosts meetings of Commission and utility EM&V staff to communicate and work together on EM&V issues. Funding and staffing support will be provided to enable CALMAC meetings, workshops, and forums and to maintain and enhance the website.

i) Statewide Saturation Surveys

The utilities are required by Title 20 of the California Code of Regulations to conduct periodic surveys of their residential, commercial, and industrial customers and to provide the survey results to the California Energy Commission for demand forecasting

purposes. Funding is need for each of the sectoral saturation surveys during the ~~2009-2011~~ 2010-2012 period. The budgets of these studies tend to be quite large, since they generally require detailed onsite surveys to gather data for representative samples needed to meet Title 20 requirements. The surveys provide greater value for use in energy efficiency portfolio planning if the data gathered are quite detailed and if the samples are large enough to allow for reliable tabulations by service territory, customer segment, and climate zone.

j) Web Portal Development

The Commission has authorized the use of 2009 EM&V bridge funds for the development of a statewide energy efficiency web portal. The utilities, with the concurrence of the Energy Division, are also using EM&V bridge funds to begin the Energy Efficiency Workforce Education and Training (WE&T) needs assessment study and the development of a related WE&T website that will serve as a central information source for energy efficiency WE&T.

There may be similar projects that do not fit clearly into any of the categories of EM&V work described in previous sections. The utilities propose that if the Energy Division and the utilities concur, similar information development and dissemination projects may also be undertaken with EM&V funds.

3. Quantitative Baseline and Market Transformation Information

Market Transformation has not been a major focus of the California energy efficiency programs since the energy crisis. Consequently, relatively little attention has been given in recent years to identifying and gathering data on indicators of change towards market transformation. For some programs or sub-programs that promote a single end use or measure, there may be some data available for this purpose, probably from industry sources, that we have not yet identified. For many of the programs, however, this kind of long-term, consistent, and expensive data collection has not been done in California.

4. SCE EM&V Staffing

Specialized and experienced utility staffing is necessary for utility-administered EM&V activities and for support of the Commission's staff-administered activities. The appropriate activity budgets include funding for needed contract work and for many EM&V staff functions.

VII.

REVENUE REQUIREMENTS AND COST RECOVERY

A. Overview

SCE is requesting an increase in its ~~2009-2011~~ 2010-2012 energy efficiency funding levels in this Application. Currently, SCE is authorized to recover costs associated with: (1) legislatively mandated energy efficiency programs PGC; and (2) Commission authorized procurement-related energy efficiency programs. As discussed in more detail later in this application, these two categories of energy efficiency funding (*i.e.*, PGC and procurement-related) have separate ratemaking treatment. Second Amended Table VII-**16**, dated July 2, 2009, shows the requested increase in energy efficiency program costs during the ~~2009-2011~~ 2010-2012 period from the currently authorized funding amounts for the 2006-2008 period.

~~*Table VII-16*~~
~~*Requested Energy Efficiency Authorized Program Costs Increase*~~
~~*($000)*~~

	2009-2011	2006-2008	Increase	Current Authority
PGC Energy Efficiency 1/	294,943	294,943	TBD	
Procurement Energy Efficiency	1,048,736	433,688	615,048	
Unspent/Uncommitted Funds 2/	(62,200)	-	(62,200)	
Total	1,281,479	728,631	552,848	D.05-09-043, D.05-11-011
Franchise Fees and Uncollectibles			6,251	D.06-05-016
Total Increase Reflected In Rate Levels over 3-year period			559,099	

1/ Will increase pursuant to PU Code Section 399.8. To the extent the PGC EE funding increases the Procurement EE funding will decrease equal and opposite so that the total EE funding is $1.344 billion over the 2009 - 2011 period.

2/ See Table 6.2 in Exhibit SCE-2.

Second Amended *Table VII-16*
Requested Energy Efficiency Authorized Program Costs Increase
($000)

	2010-2012	2006-2008	Increase	Current Authority
PGC Energy Efficiency 1/	294,943	294,943	TBD	
Procurement Energy Efficiency	1,048,736	433,688	615,048	
Est. Unspent/Uncommitted Funds 2/	(62,200)	-	(62,200)	
Total	1,281,479	728,631	552,848	D.05-09-043, D.05-11-011
Franchise Fees and Uncollectibles			6,407	D.09-03-025
Total Increase Reflected In Rate Levels over 3-year period			559,255	

1/ Will increase pursuant to PU Code Section 399.8. To the extent the PGC EE funding increases the Procurement EE funding will decrease equal and opposite so that the total EE funding is $1.344 billion over the 2009 - 2011 period.

2/ See Table 6.2 in Exhibit 2. This amount will be updated at the end of 2009 with actual unspent/uncommitted funds.

As set forth in Second Amended Exhibit SCE-2, dated July 2, 2009, SCE has included as a source of funding for the ~~2009~~ 2010 through ~~2011~~ 2012 energy efficiency programs the estimated unencumbered funds from pre-2009 energy efficiency cycles at the end of 2008. SCE is currently estimating the unencumbered funds recorded in the energy efficiency balancing

accounts on December 31, 2008 to be $62.2 million. SCE will update this amount ~~at the end of the year~~ once the actual unencumbered amount is known. In addition, SCE is not requesting to change the level of its PGC energy efficiency funding. Consistent with the provisions of Public Utilities (PU) Code § 399.8 and Resolution E-3792,[158] SCE will continue to submit an annual advice letter to the Commission to escalate this funding level.

Finally, as discussed in more detail below, SCE is requesting to establish the On-Bill Financing Loan Balancing Account (OBFLBA) to record differences between the On-Bill Financing loan funding included as part of the procurement energy efficiency program funding requested in this proceeding, the amount of actual loans provided to participating customers, and their loan repayments.

B. PGC Energy Efficiency Ratemaking

SCE proposes no change to the currently-approved PGC energy efficiency ratemaking. SCE's current ratemaking associated with PGC energy efficiency includes: (1) the recovery of the authorized PGC energy efficiency revenue requirement as set forth in PU Code § 399.8 through the operation of the Public Purpose Programs Adjustment Mechanism (PPPAM); and (2) tracking the difference between the authorized PGC energy efficiency revenue requirement with actually incurred PGC Energy Efficiency expenses in the Energy Efficiency Programs Adjustment Mechanism (EEPAM) established in D.97-12-103. Unspent funds recorded in the EEPAM are refunded to customers upon approval by the Commission.

On a monthly basis, SCE records its actual PGC energy efficiency program expenses in the EEPAM. From this amount, SCE deducts one twelfth of the authorized PGC energy efficiency revenues to determine the monthly over- or under-collection recorded in the EEPAM.[159] Effective January 1, 2002, PU Code § 399.8 extended funding for the PGC energy

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[158] Resolution E-3792, OP# 7.

[159] Due to the one-way nature of the EEPAM, any under-collections (*i.e.,* excess expenditures) existing at the end of the authorized program cycle will not be eligible for recovery from customers.

efficiency program through January 1, 2012,[160] and set SCE's 2002 PGC energy efficiency funding level at $90 million. PU Code § 399.8 also required utilities to annually adjust the PGC target funding amounts at a rate equal to the lesser of the annual growth in electric commodity sales or the gross domestic product deflator (GDP).

The Commission further directed the utilities in Resolution E-3792 to file an annual Advice Letter by March 31st of each year beginning in 2003 to determine the annual adjusted funding amounts set forth in PU Code § 399.8. Advice Letter ~~2229-E~~ 2335-E[161] established the Public Goods funding for ~~2008~~ 2009 to be ~~$99.293~~ $100.415 million, by applying SCE's annual sales increase of ~~0.9%~~ 1.13% to the ~~2007~~ 2008 Public Goods funding level.

SCE will file an advice letter by March 31, 2010 to establish the ~~2009~~ 2010 authorized energy efficiency revenue by escalating the ~~2008~~ 2009 authorized level of ~~$99.293~~ $100.415 million by the lower of either the GDP or SCE's annual sales increase. Interest accrues monthly to the EEPAM by applying the three-month commercial paper rate to the average balance in the account.

C. Procurement Energy Efficiency Ratemaking

SCE's current ratemaking associated with procurement energy efficiency includes: (1) the recovery of the residually determined[162] procurement energy efficiency revenue requirement authorized in D.05-09-043 and D.05-11-011 through the operation of the PPPAM; and (2) tracking the difference between the authorized procurement energy efficiency revenue

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[160] PU Code § 381, effective September 24, 1996 required the major electric utilities to establish a nonbypassable PGC rate component in order to fund certain public interest programs including SCE's energy efficiency programs through the year 2011.

[161] Advice Letter 2229-E, is pending approval. ~~approved June 11, 2008, effective May 1, 2008.~~

[162] As described in Preliminary Statement FF, PPPAM, the annual procurement energy efficiency revenue requirement is determined residually by subtracting the authorized PGC Energy Efficiency revenue requirement from the total annual authorized energy efficiency funding levels. *See also* Second Amended Table VII-18, dated July 2, 2009.

requirement with actually incurred procurement energy efficiency expenses in the Procurement Energy Efficiency Balancing Account (PEEBA) established in D.03-12-062.

On a monthly basis, SCE records its actual procurement-related energy efficiency program expenses in the PEEBA. From this amount, SCE deducts one twelfth of the authorized procurement-related energy efficiency revenues to determine the monthly over- or under-collection recorded in the PEEBA.[163] Interest accrues monthly to the PEEBA by applying the three-month commercial paper rate to the average balance in the account. Unspent funds are refunded to customers upon approval by the Commission.

Second Amended Table VII-**17** below illustrates how SCE will determine the authorized procurement-related energy efficiency program funding each year.

~~Table VII-17~~
~~Procurement Energy Efficiency Authorized Program Funding~~
~~(Illustrative (000))~~

		2009	2010	2011	Total
1.	Total Authorized Energy Efficiency Funding 1/	326,584	461,554	493,341	1,281,479
2.	Less: PGC EE 2/	98,314	98,314	98,314	294,943
3.	Total Procurement EE Funding (Line 1 - Line 2)	228,270	363,240	395,027	986,536

1/ As adopted in this proceeding
2/ To be determined annually pursuant to PU Code 399.8 and Resolution E-3792. Therefore the authorized procurement EE funding will be determined residually.

[163] Due to the one-way nature of the PEEBA, any under-collections (*i.e.*, excess expenditures) existing at the end of the authorized program cycle will not be eligible for recovery from customers.

***Second Amended* Table VII-17**
Procurement Energy Efficiency Authorized Program Funding (Illustrative (000)

		2010	2011	2012	Total
1.	Total Authorized Energy Efficiency Funding 1/	326,584	461,554	493,341	1,281,479
2.	Less: PGC EE 2/	98,314	98,314	98,314	294,943
3.	Total Procurement EE Funding (Line 1 - Line 2)	228,270	363,240	395,027	986,536

1/ As adopted in this proceeding
2/ To be determined annually pursuant to PU Code 399.8 and Resolution E-3792. Therefore the authorized procurement EE funding will be determined residually.

D. On-Bill Financing (OBF) Balancing Account

In compliance with D.07-10-032, SCE will continue the 2006-2008 OBF program as a part of the ~~2009-2011~~ 2010-2012 procurement energy efficiency program. Advice Letter 2066-E, established the 2006-2008 pilot program, effective December 30, 2006. SCE established the OBF loan program initially by funding the OBF loans from SCE's working cash. SCE currently records the OBF Pilot Program expenses in the PEEBA.

As discussed in Chapter IV, the Commission in D.07-10-032[164] requires SCE to continue to expand the OBF pilot program, increasing the customer base to include institutional customers. In order to continue the expansion of this program, SCE proposes to create a new interest bearing balancing account to "upfront" fund the OBF loans, tracking the OBF authorized funding revenue (*i.e.*, requested in this proceeding) for the loans, actual loan disbursements and actual OBF loan repayments. SCE has included $16 million in energy efficiency funding requested in this proceeding over the ~~2009~~ 2010 through ~~2011~~ 2012 period to fund the loan portion of the program. SCE is requesting to begin to recover program funds through the Public Purpose Program Charge for use as the principal to fund loans to participating customers. The

[164] D.07-10-032, Ordering Paragraph #13.

OBF Balancing Account will track only OBF loans and the repayments on all OBF loans. All other program expenses such as incentives, administrative expenses, and loan defaults will continue to be recorded in the Procurement Energy Efficiency Balancing Account. Upon approval to establish the OBF Balancing Account, SCE proposes to transfer the remaining loan balances from the 2006-2008 OBF pilot program from the PEEBA to the OBF Balancing Account.

E. Rate Recovery Of Energy Efficiency Program Costs

SCE recovers its currently authorized PGC energy efficiency and procurement energy efficiency costs through its existing non-bypassable Public Purpose Programs Charge (PPPC), which applies to all of SCE's retail customers. Upon receiving a final decision on this Application's funding request, SCE will increase its annual authorized energy efficiency revenue requirement by the amount approved by the Commission. As discussed above, assuming the Commission adopts SCE's energy efficiency funding request as filed, SCE's energy efficiency revenue requirement will increase by $552.8 million over the three year period (*i.e.*, ~~2009-2011~~ 2010-2012 to reflect energy efficiency revenue requirement of $1.281 billion.[165]

In order to reduce the number of rate changes, the Commission has established the annual Energy Resource Recovery Account (ERRA) Forecast proceeding as the proper place to consolidate all Commission-authorized revenue requirement changes into one rate level change. Therefore, SCE proposes to include the ~~2010~~ 2009 PGC energy efficiency funding level submitted by advice filing in March ~~2010~~ 2009 and procurement-related energy efficiency revenue requirement approved in this proceeding in PPPC rate levels on or after January 1, 2010 as part of its ~~2009~~ 2010 ERRA Forecast proceeding revenue requirement and rate consolidation. This rate consolidation will include the true-up of any undercollection that may accrue in the PPPAM due to the time lag between implementing a revised procurement-related energy

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[165] Subject to a year-end adjustment for any remaining unspent/uncommitted funds from pre-2009 funding cycle.

efficiency revenue requirement and actually reflecting the revised revenue requirement in rate levels.

F. Rate And Bill Impact Analysis

In the Assigned Commissioner's and Administrative Law Judge's Ruling Regarding ~~2009-2011~~ 2010-2012 Energy Efficiency Program Applications,[166] the Commission directed SCE to provide estimates of the net rate impacts and bill impacts associated with the proposed portfolio of programs designed to meet the Commission-adopted energy savings goals. The methodology should be consistent across utilities. The Commission also directed SCE to provide, separately, any available unspent, uncommitted funds from previous cycles that will be included in the budget. The aggregate increase resulting from the proposed increase to the Procurement Energy Efficiency revenue requirement is 1.6% over rates in effect today.

~~***Table VII-18***~~
~~***SCE Estimated Annual Revenue Impacts***~~
~~***From 2009-2011 Energy Efficiency Program Requests***~~
~~***(In Millions)***~~

Line No	Electric Customer Class	June 2008 Revenue	Revenue Change	Total 2009 Revenue	Total % Change
1	Domestic (Residential)	4,394.0	71.3	4,465.3	1.6%
2	Small & Medium Commercial	4,257.4	69.1	4,326.5	1.6%
3	Industrial	2,385.4	38.7	2,424.1	1.6%
4	Agricultural & Pumping	311.8	5.1	316.9	1.6%
5	Streetlights	134.7	2.2	136.9	1.6%
6	System	11,483.3	186.4	11,669.7	1.6%

[166] Assigned Commissioner's and Administrative Law Judge's Ruling R.06-04-010 Regarding 2009 to 2011 Energy Efficiency Program Applications dated February 29, 2008, Attachment A, p. 6.

Second Amended Table VII-18
SCE Estimated Annual Revenue Impacts
From ~~2009-2011~~ 2010-2012 Energy Efficiency Program Requests
(In Millions)

Line No	Electric Customer Class	June 2009 Revenue	Revenue Change	Total 2010 Revenue	Total % Change
1	Domestic (Residential)	4,503.1	72.6	4,575.7	1.6%
2	Small & Medium Commercial	4,212.7	68.0	4,280.7	1.6%
3	Industrial	2,349.9	37.9	2,387.8	1.6%
4	Agricultural & Pumping	353.0	5.7	358.7	1.6%
5	Streetlights	135.2	2.2	137.4	1.6%
6	System	11,553.9	186.4	11,740.3	1.6%

SCE is requesting Energy Efficiency Program annualized funding of $186.4 million above the existing 2008 funding amounts, which compared to revenues at June 2008 rates, is an increase of approximately 1.6%.

If the Commission approves SCE's electric request, the bill for the average bundled residential customer using 600 kilowatt hours (kWh) per month in ~~2009~~ 2010 would change from ~~$82.70~~ $84.70 at June ~~2008~~ 2009 rates to ~~$83.45~~ $85.49, an increase of 0.9%.

~~*Table VII-19*~~
~~*SCE Estimated Annual Rate Impacts*~~
~~*From 2009-2011 Energy Efficiency Program Requests*~~
~~*(¢/kWh)*~~

Line No	Electric Customer Class	Average June 2008 Rate	Average Rate Change	Average 2009 Rate	Total % Change
1	Domestic (Residential)	14.88	0.24	15.13	1.6%
2	Small & Medium Commercial	13.95	0.23	14.18	1.6%
3	Industrial	9.22	0.15	9.37	1.6%
4	Agricultural & Pumping	10.87	0.18	11.04	1.6%
5	Streetlights	19.01	0.31	19.32	1.6%
6	System	12.83	0.21	13.04	1.6%

***Second Amended* Table VII-19**
SCE Estimated Annual Rate Impacts
From ~~2009-2011~~ 2010-2012 Energy Efficiency Program Requests
(¢/kWh)

Line No	Electric Customer Class	Average June 2009 Rate	Average Rate Change	Average 2010 Rate	Total % Change
1	Domestic (Residential)	15.48	0.25	15.73	1.6%
2	Small & Medium Commercial	14.26	0.23	14.49	1.6%
3	Industrial	9.29	0.15	9.44	1.6%
4	Agricultural & Pumping	10.92	0.18	11.10	1.6%
5	Streetlights	18.77	0.30	19.07	1.6%
6	System	13.15	0.21	13.36	1.6%

SCE is requesting Energy Efficiency Program annualized funding of $186.4 million above the existing 2008 funding amounts, which compared to revenues at June 2008 rates, is an increase of approximately 1.6%.

If the Commission approves SCE's electric request, the bill for the average bundled residential customer using 600 kilowatt hours (kWh) per month in ~~2009~~ 2010 would change from ~~$82.70~~ $84.70 at June ~~2008~~ 2009 rates to ~~$83.45~~ $85.49, an increase of 0.9%.

G. Revenue Requirements And Cost Recovery

On August 11, 2008, a prehearing conference was held to discuss the applications of SCE, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Gas Company (Utilities). Administrative Law Judge (ALJ) Gamson indicated that the Commission's final decision on the Utilities' applications would not be made before the end of 2008 and consequently, the ALJ directed the Utilities to submit a proposal, recommending approaches to funding for 2009, until a final decision could be issued on the ~~2009-2011~~ 2010-2012 energy efficiency portfolios. On August 18, 2008, the Utilities filed a joint proposal for a bridge funding approach.[167]

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[167] Joint Utility Request for Funding and Authorization to Continue to Operate 2006-2008 Energy Efficiency Programs in 2009 Pending a Final Decision on Applications for Approval of 2009-2011 Energy Efficiency Programs.

On October 16, 2008, the Commission approved D.08-10-027, formally authorizing a bridge funding period for the Utilities beginning January 1, 2009, and ending no later than three months after the effective date of a final decision on the Utilities' ~~2009-2011~~ 2010-2012 energy efficiency programs, or December 31, 2009, whichever comes first.[168] D.08-10-027 also requires each utility to file an Advice Letter within 10 days of the effective date of this Decision; this Advice Letter serves as SCE's compliance filing required by D.08-10-027.

D.08-10-027 authorized SCE to: 1) use $27.0 million in pre-2006 unspent, uncommitted energy efficiency funds to prevent the closure of four energy efficiency programs; 2) include $23.1 million of monthly bridge funding in Public Purpose Program rate levels on January 1, 2009 and; 3) establish the Energy Efficiency ~~2009-2011~~ 2010-2012 Memorandum Account to track the difference between the revenue requirement adopted for the bridge period and the revenue requirement requested in SCE's 2009-2011 Energy Efficiency Portfolio Application 08-07-021.

Table VII-20 below shows the monthly bridge funding amount as set forth in D.08-10-027 and the amount including Franchise Fees and Uncollectibles that will be included in SCE's Public Purpose Programs Charge (PPPC) levels.[169] Consistent with D.08-10-027 the bridge period shall end no later than three months after the effective date of a final decision in A.08-07-021, or December 31, 2009, whichever comes first.[170]

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[168] D.08-10-027, Section 4.2, p.10 and OP No. 5, p. 29.

[169] Because SCE uses annual revenue requirements to determine rate levels, Table 1 also shows an annualized amount (i.e., the monthly amount multiplied by 12) that will be used to determine PPPC rates.

[170] D.08-10-027, Section 4.2, p.10 and OP No. 5, p. 29.

Table VII-20
D.08-07-027 2009 Bridge Period Funding

D.08-10-027 2009 Bridge Period Funding

	Monthly	Annualized
Energy Efficiency[1/]	$8,274,417	$99,293,000
Procurement Energy Efficiency[2/]	14,816,202	177,794,428
Total	23,090,619	277,087,428
FF&U	261,072	3,132,863
Amount in Rates January 1, 2009	$23,351,691	$280,220,291

[1/]No change from 2008
[2/]Determined residually ($23,090,619 - $8,274,417)

Consistent with SCE's proposal in its 2009 Energy Resource Recovery Account Forecast proceeding (A.08-09-011), the energy efficiency authorized amounts will be consolidated along with other Commission authorized revenue requirement changes into rate levels on January 1, 2009, or soon after, once the Commission issues a final decision in A.08-09-011.

VIII.

ORGANIZATION OF SCE'S TESTIMONY

The original testimony dated July 21, 2008 has been withdrawn and new testimony in support of this Application ~~is being~~ was refiled in March 2009. SCE's Second Amended Testimony is filed herewith replaces the Testimony filed March 2009 and discusses SCE's proposed Energy Efficiency portfolio for ~~2009-2011~~ 2010-2012. The testimony also includes SCE's proposed cost recovery mechanism for the costs estimated for the proposed program implementation for the same period.

The testimony is comprised of what has been marked as Second Amended Exhibit SCE-1, dated July 2, 2009, which is described below, Second Amended Exhibit SCE-2 , dated July 2,

2009, which contains the compliance tables and charts, Amended Exhibits SCE-3A, SCE-3B, SCE-4, ~~and~~ SCE-5, which describe~~s~~ the specific individual Program Implementation Plans (PIP), Second Amended Exhibit SCE-6 , dated July 2, 2009, the DSM Integration and Coordination, Second Amended Exhibit SCE-7 , dated July 2, 2009, the ~~2009-2011~~ 2010-2012 Energy Efficiency AB 32 Impact, ~~and~~ Second Amended Exhibit SCE-8, dated July 2, 2009, Workpapers for SCE's proposed portfolio, Second Amended Exhibit SCE-9, dated July 2, 2009, Exhibit SCE-10, dated July 2, 2009, which shows the deletions and additions to SCE-3A, SCE-3B, SCE-4, and SCE-5, and Exhibit SCE-11, dated July 2, 2009, which maps the changes from the March 2009 filing to the July 2, 2009 filing.

Testimony in Support of Southern California Edison Company's Application for Approval of its ~~2009-2011~~ 2010-2012 Energy Efficiency Program Plans and Public Goods Charge and Procurement Funding Requests.

Chapter I: Introduction and Executive Summary

Chapter II: Proposed Energy Efficiency Policies and Rules Changes for ~~2009-2011~~ 2010-2012 Programs

Chapter III: SCE's Portfolio Reflects State Energy Policies and The Strategic Plan

Chapter IV: SCE's Proposed Energy Efficiency Portfolio

Chapter V: Proposed Funding Requests and Fund-Shifting Proposals are Reasonable

Chapter VI: Proposed Evaluation Management and Verification Plans and Budgets

Chapter VII: Revenue Requirements and Cost Recovery

Appendix A: Witness Qualifications

Appendix B: Abbreviations and Acronyms

IX.

STATUTORY AND PROCEDURAL REQUIREMENTS

A. Statutory And Procedural Authority

This Application is made pursuant to the Commission's Rules of Practice and Procedures, and the California Public Utilities Code.

Rule 2.1 requires that all applications: (1) clearly and concisely state authority or relief sought; (2) cite the statutory or other authority under which that relief is sought; and (3) be verified by the applicant. Rule 2.1 sets forth further requirements that are addressed separately below. The relief being sought is summarized in Sections I (Introduction and Executive Summary) and X (Conclusion), and is further described in the testimony accompanying this Application. The statutory and other authority under which this relief is being sought include California Public Utilities Code Sections 451, 454, 454.3, 491, 701, 728, 729, Article 2 and Rule 3.2 of the Commission's Rules of Practice and Procedure, and prior decisions, orders, and resolutions of this Commission. SCE's Application has been verified by an SCE officer as provided in Rules 1.11 and 2.1.

B. Rule 2.1

Rule 2.1 requires that applications shall state "the proposed category for the proceeding, the need for hearings, the issues to be considered, and a proposed schedule." These requirements are discussed below.

1. Proposed Categorization

SCE proposes to characterize this proceeding as "ratesetting" as defined in the Commission's Rules of Practice and Procedure, Rule 1.3(e) and Public Utilities Code §1701.1 (c)(3).

2. Need For Hearings And Proposed Schedule For Resolution Of Issues

SCE's proposed schedule assumes that there may be evidentiary hearings regarding SCE's program portfolio. SCE proposes the following schedule, if hearings are scheduled:

~~SCE files Supplemental Application~~	~~March 2, 2009~~
~~Comments Due~~	~~April 13, 2009~~
~~Reply to Comments~~	~~April 27, 2009~~
~~Prehearing Conference~~	~~April 2009~~
~~DRA and Intervenors File Opening Testimony~~	~~May 8, 2009~~
~~Rebuttal Testimony Due~~	~~May 15, 2009~~
~~Hearings and Workshops~~	~~May through July 2009~~
~~Concurrent Opening Briefs Due~~	~~August 15, 2009~~
~~Concurrent Reply Briefs Due~~	~~August 30, 2009~~
~~Commission Issues Proposed Decision~~	~~September 17, 2009~~
~~Commission Issues Final Decision~~	~~October 2009~~

SCE files Supplemental Application	July 2, 2009
Comments Due	July 16, 2009
Reply to Comments	July 27, 2009
DRA and Intervenors File Opening Testimony	July 16, 2009
Rebuttal Testimony Due	July 27, 2009
Prehearing Conference	July 29, 2009
Hearings and Workshops	August 1-15, 2009
Concurrent Opening Briefs Due	September 1, 2009
Concurrent Reply Briefs Due	September 15, 2009
Commission Issues Proposed Decision	October 1, 2009
Commission Issues Final Decision	November 1, 2009

3. Issues To Be Considered

The issues to be considered in this Application concern Commission approval of SCE's ~~2009-2011~~ 2010-2012 energy efficiency program portfolio, policy changes and funding requests for the program years for the portfolio.

4. Legal Name and Correspondence

Southern California Edison Company is an electric public utility organized and existing under the laws of the State of California. The location of SCE's principal place of business is 2244 Walnut Grove Avenue, Post Office Box 800, Rosemead, California 91770. SCE's attorneys in this matter are Jennifer Shigekawa and Larry R. Cope. Correspondence or communications regarding this application should be addressed to:

Larry R. Cope
Senior Attorney
Southern California Edison Company
P.O. Box 800
2244 Walnut Grove Avenue
Rosemead, California 91770
Telephone: (626) 302-2570
Facsimile: (626) 302-7740
e-mail: larry.cope@sce.com

To request a copy of this application, please contact:

Jennifer Alderete
Project Analyst
Southern California Edison Company
P.O. Box 800
2244 Walnut Grove Avenue
Rosemead, California 91770
Telephone: (626) 302-6697
Facsimile: (626) 302-3119
E-mail: jennifer.alderete@sce.com

C. Articles Of Incorporation – Rule 2.2

A copy of SCE's Certificate of Restated Articles of Incorporation, effective on March 2, 2006, and presently in effect, certified by the California Secretary of State, was filed with the Commission on March ~~14~~ 7, 2006, in connection with Application No. 06-03-020, and is by reference made a part hereof.

Certain classes and series of SCE's capital stock are listed on a "national securities exchange" as defined in the Securities Exchange Act of 1934 and copies of SCE's latest Annual

Report to Shareholders and its latest proxy statement sent to its stockholders has been filed with the Commission.

D. Authority To Increase Rates – Rule 3.2

Rule 3.2 requires that applications for authority to increase rates, or to implement changes that would result in increased rates, contain the following data.

1. Balance Sheet And Income Statement – Rule 3.2(a)(1)

Appendix A to this application contains copies of SCE's balance sheet as of ~~September 30, 2008~~ March 31, 2009, and income statement for the ~~nine~~ three months ended ~~September 30, 2008~~ March 31, 2009, the most recent period available.

2. Present And Proposed Rates – Rule 3.2(a)(2) and (a)(3)

The cost recovery mechanism proposal is summarized in Section VII above as well as Revenue Impact, Rate Impact and Average Bill Impact. The cost recovery mechanism proposal and the projected impact on rates are discussed in Second Amended Exhibit SCE-1, Section VII, dated July 2, 2009.

3. Description Of SCE's Service Territory And Utility System – Rule 3.2(a)(4)

Because this submittal is not a general rate application, this requirement is not applicable.

4. Summary Of Earnings – Rule 3.2(a)(5)

Rule 3.2(a)(5) requires:

> A summary of earnings (rate of return summary) on a depreciated rate base for the test period or periods upon which applicant bases its justification for an increase.

SCE's ~~2008~~ 2009 Summary of Earnings is attached hereto as Appendix B.

5. Depreciation – Rule 3.2(a)(7)

Because this submittal is not a general rate application, this requirement is not applicable.

6. Capital Stock and Proxy Statement – Rule 3.2(a)(8)

Because this submittal is not a general rate application, this requirement is not applicable.

7. Statement Pursuant to Rule 3.2(a)(10)

Rule 3.5(a)(10) requires the applicant to state whether its request is limited to passing through to customers "only increased costs to the corporation for the services or commodities furnished by it." This application seeks only to pass through to SCE's customers the costs incurred by SCE in its Energy Efficiency Program.

8. Service of Notice – Rule 3.2(b), (c) and (d)

A list of the cities and counties affected by the rate changes resulting from this application is attached as Appendix C. The State of California is also an SCE customer whose rates would be affected by the proposed revisions.

As provided in Rule 3.2(b) – (d), notice of filing of this application was: (1) mailed to the appropriate officials of the state and the counties and cities listed in Appendix C; (2) published in a newspaper of general circulation in each county in SCE's service territory within which the rate changes would be effective; and (3) mailed to all customers affected by the proposed changes. (*See* Proof of Rule 3.2(c) Notice dated July 31, 2008 and Proof of Rule 3.2(d) Notice, dated September 4, 2008.)

E. Service List

SCE is serving this filed application and its exhibits on all parties on the Commission's service lists for proceedings R.06-04-010 and A.08-07-021 *et al*.

F. Index Of Exhibits And Appendices To This Application – Rule 23(g)

SCE's submission in support of this Application includes the following, all of which are incorporated by reference herein:

Appendices

Appendix A – SCE's Balance Sheet and Income Statement

Appendix B – SCE's ~~2008~~ 2009 Summary of Earnings

Appendix C – List of Counties and Municipalities Served

Appendix D –Abbreviations and Acronyms

Exhibits Filed in Support of SCE's Application

Second Amended SCE-1: Testimony of Southern California Edison Company in Support of Its Application For Approval Of Its ~~2009-2011~~ 2010-2012 Energy Efficiency Program Plans And Public Goods Charge And Procurement Funding Requests. (Appendix A – Witness Qualifications and Appendix B – Abbreviations and Acronyms.)

Second Amended SCE-2: Compliance Tables and Charts

SCE-3 (A&B) (amended): SCE's ~~2009-2011~~ 2010-2012 Energy Efficiency Program Plans (Statewide)

SCE-4 (amended): SCE's ~~2009-2011~~ 2010-2012 Energy Efficiency Program Plans (Local)

SCE-5 (amended): SCE's ~~2009-2011~~ 2010-2012 Energy Efficiency Program Plans (3rd Party)

Second Amended SCE-6: SCE's DSM, Integration and Co-ordination

Second Amended SCE-7: SCE's ~~2009-2011~~ 2010-2012 Energy Efficiency AB32 Impact

Second Amended SCE-8: SCE's Workpapers For SCE's Proposed Plan

Second Amended SCE-9: SCE's ~~2009-2011~~ 2010-2012 Energy Efficiency Program Plan Implementation Plans – Revision Guides and Energy Division Compliance Tables

SCE-10: SCE's 2010-2012 Energy Efficiency Program Implementation Plan Amendments

SCE-11: SCE's 2010-2012 Energy Efficiency Amendments and Modifications Explained.

X.

CONCLUSION

SCE is now ready to proceed with its showing in support of this Application.

WHEREFORE, Southern California Edison Company respectfully requests that the Commission review this Application and expeditiously issue an order.

(1) Approving its ~~2009-2011~~ 2010-2012 Energy Efficiency Program Portfolio as filed;

(2) Approving SCE's Proposed Energy Efficiency Policies and Rules Changes; and

(3) Authorizing SCE to fund the programs as requested herein and in the manner and amounts requested through (i) its existing Energy Efficiency-related Public Goods Charge, (ii) its existing Procurement Energy Efficiency-related Public Purpose Programs Charge (PPPC), and (iii) an increase in its Procurement Energy Efficiency-related PPPC.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

/s/ Lynda L. Ziegler

By: Lynda L. Ziegler
Senior Vice President, Customer Service

JENNIFER TSAO SHIGEKAWA
LARRY R. COPE

/s/ Larry R. Cope

By: Larry R. Cope

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

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E-mail: larry.cope@sce.com

~~March~~ July, 2, 2009

VERIFICATION

I am an officer of Southern California Edison Company, a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the document described above are true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 26, 2009, at Rosemead, California.

/s/ Lynda L. Ziegler

By: Lynda L. Ziegler
Senior Vice President, Customer Service

Appendix A

SCE's Balance Sheet and Income Statement

SOUTHERN CALIFORNIA EDISON COMPANY

BALANCE SHEET

MARCH 31, 2009

A S S E T S

(Unaudited)

(Millions of Dollars)

UTILITY PLANT:	
Utility plant, at original cost	$22,021
Less - Accumulated depreciation and decommissioning	(5,606)
	16,415
Construction work in progress	2,649
Nuclear fuel, at amortized cost	257
	19,321
OTHER PROPERTY AND INVESTMENTS:	
Nonutility property - less accumulated provision for depreciation of $782	937
Nuclear decommissioning trusts	2,399
Other Investments	74
	3,410
CURRENT ASSETS:	
Cash and equivalents	1,177
Short-term investments	4
Margin and collateral deposits	37
Receivables, including unbilled revenues, less reserves of $37 for uncollectible accounts	686
Accrued unbilled revenue	335
Inventory	322
Accumulated deferred income taxes - net	76
Derivative assets	129
Regulatory assets	571
Other current assets	240
	3,577
DEFERRED CHARGES:	
Regulatory assets	5,273
Derivative assets	439
Other long-term assets	375
	6,087
	$32,395

SOUTHERN CALIFORNIA EDISON COMPANY

BALANCE SHEET

MARCH 31, 2009

CAPITALIZATION AND LIABILITIES

(Unaudited)

(Millions of Dollars)

CAPITALIZATION:	
Common stock	$2,168
Additional paid-in capital	536
Accumulated other comprehensive loss	(14)
Retained Earnings	4,032
Common shareholder's equity	6,722
Preferred and preference stock not subject to redemption requirements	920
Long-term debt	6,489
	14,131
CURRENT LIABILITIES:	
Short-term debt	1,558
Long-term debt due within one year	250
Accounts payable	659
Accrued taxes	366
Accrued interest	120
Counterparty collateral	7
Customer deposits	233
Book overdrafts	185
Derivative liabilities	141
Regulatory liabilities	972
Other current liabilities	418
	4,909
DEFERRED CREDITS:	
Accumulated deferred income taxes - net	3,036
Accumulated deferred investment tax credits	99
Customer advances	130
Derivative liabilities	742
Accumulated provision for pensions and benefits	2,527
Asset retirement obligations	3,049
Regulatory liabilities	2,542
Other deferred credits and other long-term liabilities	863
	12,988
Noncontrolling Interest	367
	$32,395

SOUTHERN CALIFORNIA EDISON COMPANY

STATEMENT OF INCOME

THREE MONTHS ENDED MARCH 31, 2009

(Unaudited)

(Millions of Dollars)

OPERATING REVENUE	$2,189
OPERATING EXPENSES:	
Fuel	199
Purchased power	540
Other operation and maintenance expenses	658
Depreciation, decommissioning and amortization	285
Property and other taxes	66
Total operating expenses	1,748
OPERATING INCOME	441
Interest income	4
Other nonoperating income	26
Interest expense - net of amounts capitalized	(109)
Other nonoperating deductions	(8)
INCOME BEFORE INCOME TAX	354
INCOME TAX EXPENSE	121
NET INCOME	233
Less: Net income attributable to noncontrolling interest	12
Dividends on preferred and preference stock not subject to mandatory redemption	13
NET INCOME AVAILABLE FOR COMMON STOCK	$208

Appendix B

SCE's ~~2008~~ 2009 Summary of Earnings

Southern California Edison
Summary of Earnings
2009 GRC-Related Adopted Revenue Requirement [1/]
Thousands of Dollars

Line No.	Item		Total
1.	**Base Revenues**		4,829,742
2.	**Expenses:**		
3.	Operation & Maintenance		2,130,052
4.	Depreciation		1,037,452
5.	Taxes		723,783
6.	Revenue Credits		(178,615)
7.		Total Expenses	3,712,672
8.	**Net Operating Revenue**		1,117,070
9.	**Rate Base**		12,766,518
10.	**Rate of Return**		8.75%

1/ D.09-03-025
Includes one SONGS 2&3 refueling and maintenance outage

Appendix C

List of Counties and Municipalities Served

Citizens or some of the citizens of the following counties and municipal corporations will or may be affected by the changes in rates proposed herein.

COUNTIES

Fresno	Kings	Orange	Tuolumne*
Imperial	Los Angeles	Riverside	Tulare
Inyo	Madera	San Bernardino	Ventura
Kern	Mono	Santa Barbara	

MUNICIPAL CORPORATIONS

Adelanto	Cudahy	La Habra	Ojai	Santa Monica
Agoura Hills	Culver City	La Habra Heights	Ontario	Santa Paula
Alhambra	Cypress	La Mirada	Orange	Seal Beach
Aliso Viejo	Delano	La Palma	Oxnard	Sierra Madre
Apple Valley	Desert Hot Springs	La Puente	Palm Desert	Signal Hill
Arcadia	Diamond Bar	La Verne	Palm Springs	Simi Valley
Artesia	Downey	Laguna Beach	Palmdale	South El Monte
Avalon	Duarte	Laguna Hills	Palos Verdes Estates	South Gate
Baldwin Park	El Monte	Laguna Niguel	Paramount	South Pasadena
Barstow	El Segundo	Laguna Woods	Perris	Stanton
Beaumont	Exeter	Lake Elsinore	Pico Rivera	Tehachapi
Bell	Farmersville	Lake Forest	Placentia	Temecula
Bell Gardens	Fillmore	Lakewood	Pomona	Temple City
Bellflower	Fontana	Lancaster	Port Hueneme	Thousand Oaks
Beverly Hills	Fountain Valley	Lawndale	Porterville	Torrance
Bishop	Fullerton	Lindsay	Rancho Cucamonga	Tulare
Blythe	Garden Grove	Loma Linda	Rancho Mirage	Tustin
Bradbury	Gardena	Lomita	Rancho Palos Verdes	Twentynine Palms
Brea	Glendora	Long Beach	Rancho Santa Margarita	Upland
Buena Park	Goleta	Los Alamitos	Redlands	Victorville
Calabasas	Grand Terrace	Lynwood	Redondo Beach	Villa Park
California City	Hanford	Malibu	Rialto	Visalia
Calimesa	Hawaiian Gardens	Mammoth Lakes	Ridgecrest	Walnut
Camarillo	Hawthorne	Manhattan Beach	Rolling Hills	West Covina
Canyon Lake	Hemet	Maywood	Rolling Hills Estates	West Hollywood
Carpinteria	Hermosa Beach	McFarland	Rosemead	Westlake Village
Carson	Hesperia	Mission Viejo	San Bernardino	Westminster
Cathedral City	Hidden Hills	Monrovia	San Buenaventura	Whittier
Cerritos	Highland	Montclair	San Dimas	Woodlake
Chino	Huntington Beach	Montebello	San Fernando	Yorba Linda
Chino Hills	Huntington Park	Monterey Park	San Gabriel	Yucaipa
Claremont	Indian Wells	Moorpark	San Jacinto	Yucca Valley
Commerce	Industry	Moreno Valley	San Marino	
Compton	Inglewood	Murrieta	Santa Ana	
Corona	Irvine	Newport Beach	Santa Barbara	
Costa Mesa	Irwindale	Norco	Santa Clarita	
Covina	La Canada Flintridge	Norwalk	Santa Fe Springs	

*SCE provides electric service to a small number of customer accounts in Tuolumne County and is not subject to franchise requirements.

Appendix D

SCE ~~2009-2011~~ 2010-2012 Energy Efficiency Program Plan

Abbreviations & Acronyms

SCE ~~2009-2011~~ 2010-2012 ENERGY EFFICIENCY PROGRAM PLAN ABBREVIATIONS & ACRONYMS	
Abbreviation/Acronym	**Definition**
AB 32	Assembly Bill 32 (Nunez, 2006)
AB 811	Assembly Bill 811 (Levine, 2008)
AC	Alternating Current
ACCA	Air Conditioning Contractors of America
ACEEE	American Council for an Energy Efficient Economy
ACR	Assigned Commissioner Ruling
AERS	Automatic Energy Review for Schools
AESC	Alternative Energy Systems Consulting
Ag MSP	Agricultural and Water Systems Market Segment Plan
AgEE	Agricultural Energy Efficiency Program
AGTAC	Agriculture Technology Application Center
AHP	Advanced Home Program
AHRI	Air Conditioning, Heating & Refrigeration Institute
AHU	Air Handling Unit
AIA	American Institute for Architects
ALJ	Administrative Law Judge
AMI	Advanced Metering Infrastructure
ANSI	American National Standards Institute
AQMD	Air Quality Management District
ARCA	Appliance Recycling Centers of America, Inc.
ARP	Appliance Recycling Program
ARRA	American Recovery and Reinvestment Act

SCE ~~2009-2011~~ 2010-2012 ENERGY EFFICIENCY PROGRAM PLAN ABBREVIATIONS & ACRONYMS	
Abbreviation/Acronym	**Definition**
ASHRAE	American Society of Heating, Refrigeration, & Air Conditioning Engineers
ATP	Authorization To Proceed
BAS	Building Automation System
BBEES	Big Bold Energy Efficiency Strategies
BCEP	Business and Consumer Electronics Program
BCS	Building Control System
BELP	Beaumont Energy Leader Partnership
BIE	Business Incentive Element
BIG	Build It Green
BIS	Business Incentives Services
BMS	Building Controls Management Systems
BOC	Building Operator Certification
BOMA	Building Owners Management Association
BOMI	Building Owners and Management Institution
BPI	Building Performance Institute
BSC	Building Standards Commission
BSE	Business Services Element
BTU™	Building Tune Up
BTU/H	British Thermal Units Per Hour
C&S	Codes & Standards
CAC	Central Air Conditioning
CADMAC	California DSM Measurement Advisory Committee

SCE ~~2009-2011~~ 2010-2012 ENERGY EFFICIENCY PROGRAM PLAN ABBREVIATIONS & ACRONYMS	
Abbreviation/Acronym	**Definition**
CAHP	California Advanced Homes Program (formerly California New Homes Program)
CALBO	California Building Code Officials
CALMAC	California Measurement Advisory Council
CARB	California Air Resources Board
CARE	California Alternate Rates for Energy
CASE	Codes And Standards Enhancement
CASH	Coalition for Adequate School Housing
CBIA	California Building Industry Association
CBO	Community Based Organization
CBPCA	California Building Performance Contractors' Association
CCC	California Community College
CDCR	California Department of Corrections & Rehabilitation
CDE	California Department of Education
CEC	California Energy Commission
CEE	Consortium for Energy Efficiency
CEEP	Commercial Energy Efficiency Plan
CEI	Continuous Energy Improvement
CEESP	(IOUs') California Energy Efficiency Strategic Plan
CEP	Community Energy Partnership
CFA	Call for Abstracts
CFL	Compact Fluorescent Lamps
CHA	California Hospital Association

SCE ~~2009-2011~~ 2010-2012 ENERGY EFFICIENCY PROGRAM PLAN ABBREVIATIONS & ACRONYMS	
Abbreviation/Acronym	**Definition**
CHEERS	California Home Energy Efficiency Rating System
C-HERS	California Home Energy Rating System
CHP	California Highway Patrol
CHPD	Comprehensive Home Performance Delivery
CHPP	Comprehensive Home Performance Program
CHPS™	Collaborative for High Performance Schools
CHSA	California Head Start Association
CIEE	California Institute for Energy Efficiency
CIRB	California Industry Research Board
CLEO	Community Language Efficiency Outreach
CMHP	Comprehensive Mobile Home Program
CNCQA	Commercial New Construction Quality Assurance
CO	Carbon Monoxide
CO_2	Carbon Dioxide
COG	Councils of Government
CPEEP	California Preschool Energy Efficiency Program
CPEP	Chemical Product Efficiency Program
CPUC	California Public Utilities Commission
CRA	Community Reinvestment Act
CSHE	California Society of Healthcare Engineering
CSI	California Solar Initiative
CSLB	California State Licensing Board

SCE ~~2009-2011~~ 2010-2012 ENERGY EFFICIENCY PROGRAM PLAN ABBREVIATIONS & ACRONYMS	
Abbreviation/Acronym	**Definition**
CSR	Customer Service Representative
CSU	California State University
CTAC	Customer Technology Application Center
CTE	Governor's Career Technical Education Initiative
CVAG	Coachella Valley Council of Governments
Cx	Commission
DA	Design Assistance
DAA	Design Assistance Agreement
DCEEP	Data Centers Energy Efficiency Program
DCELP	Desert Cities Energy Leader Partnership
DCOP	Data Center Optimization Program
DCV	Demand Control Ventilation
DDC	Direct Digital Control
DEER	Database for Energy Efficiency Resources
DG	Distributed Generation
DGS	Department of General Services
DHW	Domestic Hot Water
DMA	Dominant Market Area
DMV	Department of Motor Vehicles
DOE	(U.S.) Department Of Energy
DOF	Department of Finance
DR	Demand Response

SCE ~~2009-2011~~ 2010-2012 ENERGY EFFICIENCY PROGRAM PLAN ABBREVIATIONS & ACRONYMS	
Abbreviation/Acronym	**Definition**
DRA	Division of Ratepayer Advocates
DSA	Department of State Architects
DSM	Demand Side Management
DTI	Design Team Incentive
DX	Direct Expansion
E3	Energy and Environmental Economics, Inc.
EAP	(California) Energy Action Plan
EARTH	Educate Action Responsibility Teamwork Home
ECAA	Energy Conservation Assistance Accounts
ED	Energy Division
EDR	Energy Design Resources
EE	Energy Efficiency
EEM	Energy Efficiency Measure
EEMIS	Enterprise Energy Management Information System
EEPAM	Energy Efficiency Programs Adjustment Mechanism
EL	Energy Leader
ELP	Energy Leader Partnership
EM&V	Evaluation, Measurement & Verification
EMS	Energy Management System
EP	Efficiency Partnership
EP&QA	Engineering, Planning And Quality Assurance
EPA	Environmental Protection Agency

SCE ~~2009-2011~~ 2010-2012 ENERGY EFFICIENCY PROGRAM PLAN ABBREVIATIONS & ACRONYMS	
Abbreviation/Acronym	**Definition**
ERP	Enterprise Resource Planning
ERRA	Energy Resource Recovery Account
ESCO	Energy Services Company
ESP	Electrical Service Planning
ESPC	Energy Savings Performance Contract
ET	Emerging Technologies
ETCC	Emerging Technology Coordinating Council
ETP	Emerging Technologies Program
EUL	Expected Useful Lives
FSE	Financial Solutions Element
FSTC	Food Service Technology Center
FYP	Flex Your Power™
G&A	General & Administrative
GBI	Green Building Initiative
GDP	Gross Domestic Product
GHG	Greenhouse Gas
GWh	Gigawatt Hour
HAN	Home Area Network
HCD	Housing and Community Development
HEEP	Healthcare Energy Efficiency Program
HEER	Home Energy Efficiency Rebates
HEERP	Home Energy Efficiency Rebate Program

SCE ~~2009-2011~~ 2010-2012 ENERGY EFFICIENCY PROGRAM PLAN ABBREVIATIONS & ACRONYMS	
Abbreviation/Acronym	**Definition**
HEES	Home Energy Efficiency Survey Program
HEI	High Efficiency Incandescents
HERS	Home Energy Rating Scale
HID	High-Intensity Discharge
HP	Heat Pump
HUD	Housing and Urban Development
HVAC	Heating, Ventilation and Air Conditioning
ICLEI	Local Governments for Sustainability (formerly the International Council for Local Environmental Initiatives)
ICLS	Integrated Classroom Lighting System
IDEEA	Innovative Design for Energy Efficiency Activities
IDSM	Integrated Demand Side Management
IEPR	Integrated Energy Policy Report
IFMA	International Facility Management Association
IGA	Investment Grade Audits
IGREEN	Institutional and Government Resource for Energy Efficiency Now
IHACI	Institute for Heating & Air Conditioning Industries
IID	Imperial Irrigation District
IndEE	Innovative Designs for Energy Efficiency
IOS	International Organization for Standardization
IOU	Investor-Owned Utility
ISO	Independent System Operator, or International Organization for Standardization

SCE ~~2009-2011~~ 2010-2012 ENERGY EFFICIENCY PROGRAM PLAN ABBREVIATIONS & ACRONYMS	
Abbreviation/Acronym	**Definition**
ITP	Industrial Technology Program
JACO	an appliance recycling company
JLC	Journey of Light Construction
KCELP	Kern County Energy Leader Partnership
KEEP	Kern Environmental Education Program
KEMA	Energy efficiency consultant KEMA, Inc.
kW	kilowatt
kWh	kilowatt hour
LACMTA	Los Angeles County Metropolitan Transportation Authority
LACOE	Los Angeles County Office of Education
LADWP	Los Angeles Department of Water and Power
LAUSD	Los Angeles Unified School District
LED	Light Emitting Diode
LEED™	Leadership in Energy and Environmental Design
LEEP	Lodging Energy Efficiency Program
LG	Local Government(s)
LGI	Local Government Initiative
LGP	Local Government Partnership
LIEE	Low Income Energy Efficiency
LMT	Lighting Market Transformation Program
M&V	Measurement & Verification
MAP	Management Affiliates Program
MBCx	Monitoring-Based Commissioning

SCE ~~2009-2011~~ 2010-2012 ENERGY EFFICIENCY PROGRAM PLAN ABBREVIATIONS & ACRONYMS	
Abbreviation/Acronym	**Definition**
MBPCx	Monitoring-Based Persistence Commissioning Program
MDx	Measure Database
ME&O	Marketing, Education & Outreach
MEU	Mobile Energy Unit
MFEER	Multi-Family Energy Efficiency Rebate Program
MOU	Memorandum of Understanding
MPS	Master Production Scheduling
MT	Market Transformation
MW	Megawatt
MWD	Metropolitan Water District
MWh	Megawatt Hour
NAHB	National Association of Homebuilders
NAICS	North American Industry Classification System
NARI	National Association of the Remodeling Industry
NATE	North American Technician Excellence
NCS	New Construction Services
NEEP	Northeast Energy Efficiency Partnerships
NGO	Non-Governmental Organization
NOx	Nitrogen Oxides (NO and NO_2)
NR	Non-Residential
NSHP	New Solar Homes Partnership
NTG	Net-to-Gross (Ratio)

SCE ~~2009-2011~~ 2010-2012 ENERGY EFFICIENCY PROGRAM PLAN ABBREVIATIONS & ACRONYMS	
Abbreviation/Acronym	**Definition**
O&M	Operations & Maintenance
OBF	On-Bill Financing
OBFLBA	On-Bill Financing Loan Balancing Account
OSHPD	Office of Statewide Health Planning & Development
PAC	Program Administrator Cost
PAG	Program Advisory Group
PCHEER	Private College Campus Housing Energy Efficiency Program
PEARL	Program for Evaluation and Analysis of Residential Lighting
PEB	Performance Earnings Basis
PEEBA	Procurement Energy Efficiency Balancing Account
PEPMA	Proposal Evaluation and Proposal Management Application
PG&E	Pacific Gas & Electric
PGC	Public Goods Charge
PIER	Public Interest Energy Research
PIP	Program Implementation Plans
PLEP	Plug Load Efficiency Program
PO	Purchase Order
POS	Point-of-Sale
POU	Publicly-Owned Utilities
PPPAM	Public Purpose Programs Adjustment Mechanism
PPPC	Public Purpose Programs Charge
PRG	Peer Review Group

SCE ~~2009-2011~~ 2010-2012 ENERGY EFFICIENCY PROGRAM PLAN ABBREVIATIONS & ACRONYMS	
Abbreviation/Acronym	**Definition**
PTAC	Packaged Terminal Air Conditioner
PU	Public Utilities
PV	Photovoltaic(s)
QA	Quality Assurance
QC	Quality Control
QI	Quality Installation
QM	Quality Maintenance
R&D	Research & Development
RCA	Refrigerant Charge Adjustment
RCC	Resource Conservation Commission
RCx	Retro-commissioning
RD&D	Research, Development and Demonstration (or Deployment)
RELP	Ridgecrest Energy Leader Partnership
REM	Resource Energy Manager
RFP	Request for Proposals
RFQ	Request for Qualifications
RLW	Roger L. Wright Analytics, a consulting firm
ROI	Return On Investment
RP&A	Regulatory Policy and Affairs
RRIM	Risk/Reward Incentive Mechanism
SA	Systems Approach
SAELP	Santa Ana Energy Leader Partnership

SCE ~~2009-2011~~ 2010-2012 ENERGY EFFICIENCY PROGRAM PLAN ABBREVIATIONS & ACRONYMS	
Abbreviation/Acronym	**Definition**
SAS	Statistical Analysis System
SBD	Savings By Design
SBELP	South Bay Energy Leader Partnership
SCE	Southern California Edison
SCELP	South County Energy Leader Partnership
SCG	Southern California Gas
SCP	Sustainable Communities Program
SDG&E	San Diego Gas and Electric
SEAT	Student Energy Audit Training
SEER	Seasonal Energy Efficiency Rating
SEP	Strategic Energy Plan
SGELP	South Gate Energy Leader Partnership
SGIP	Self Generation Incentive Program
SJVCEO	San Joaquin Valley Clean Energy Coalition
SJVELP	San Joaquin Valley Energy Leader Partnership
SM	Energy $mart
SMACNA	Sheet Metal and Air Conditioning Contractors' National Association
SMART	Subcontractor Management And Reporting Tool
SMUD	Sacramento Municipal Utilities District
SOW	Statement of Work
SPA	Simplified Approach for Small Projects
SPB	Simple Payback

SCE ~~2009-2011~~ 2010-2012 ENERGY EFFICIENCY PROGRAM PLAN ABBREVIATIONS & ACRONYMS	
Abbreviation/Acronym	**Definition**
SPC	Standard Performance Contract
SPEED	Statewide Partnership for Energy Efficiency Demonstrations
SVELP	Simi Valley Energy Leader Partnership
SW	Statewide
T24	Title 24
T&D	Transmission & Distribution
T&E	Training & Education
TA	Technical Assistance
TBD	To Be Determined
TDV	Time Dependent Valuation
TI	Technical Incentive
TMG	Total Market Gross
TOU DT	Time of Use Domestic Tier
TRC	Total Resource Cost
TRIO	Technology Resource Incubator Outreach
TTC	Technology Test Centers
UC	University of California
UCOP	University of California Office of the President
UESCO	Utility Energy Services Contracts
UPS	Uninterruptible Power Source
USA	United States of America
VAC	Volts-Alternating Current

SCE ~~2009-2011~~ 2010-2012 ENERGY EFFICIENCY PROGRAM PLAN ABBREVIATIONS & ACRONYMS	
Abbreviation/Acronym	**Definition**
VAV	Variable Air Volume
VEA	Voluntary Early Actions
VFD	Variable Frequency Drive
VSD	Variable Speed Drive
WACC	Weighted Average Cost of Capital
WBA	Whole Building Approach
WE&T	Workforce Education & Training
ZNE	Zero Net Energy
ZNEH	Zero Net Energy Homes

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 REVISED SECOND AMENDED APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR APPROVAL OF ITS 2009-2011 2010-2012 PROPOSED ENERGY EFFICIENCY PROGRAM PLANS AND PUBLIC GOODS CHARGE AND PROCUREMENT FUNDING REQUESTS on all parties identified on the attached service list(s). 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. First class mail will be used if electronic service cannot be effectuated.

Executed this **2nd day of July, 2009**, at Rosemead, California.

/s/ Jennifer Alderete
Jennifer Alderete
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2244 Walnut Grove Avenue
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California Public Utilities Commission

CPUC Home

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

PROCEEDING: A0807021 - EDISON - FOR APPROV
FILER: SOUTHERN CALIFORNIA EDISON COMPANY
LIST NAME: LIST
LAST CHANGED: JUNE 30, 2009

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