

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

Application of Southern California Edison Company (U338E) for Approval of Energy Efficiency Rolling Portfolio Business Plan

Application 17-01-013
(Filed January 17, 2017)

Application of San Diego Gas & Electric Company (U902-M) to adopt Energy Efficiency Rolling Portfolio Business Plan Pursuant to Decision 16-08-019

Application 17-01-014
(Filed January 17, 2017)

Application of Pacific Gas and Electric Company (U39M) for Approval of 2018-2025 Energy Efficiency Rolling Portfolio Business Plan and Budget

Application 17-01-015
(Filed January 17, 2017)

Application of Southern California Gas Company (U904G) for adoption of its Energy Efficiency Rolling Portfolio Business Plan and Related Relief

Application 17-01-016
(Filed January 17, 2017)

(Not Consolidated)

MOTION OF THE COUNTY OF LOS ANGELES,

**ON BEHALF OF SOUTHERN CALIFORNIA REGIONAL ENERGY NETWORK
(CPUC #940) FOR APPROVAL OF ITS ENERGY EFFICIENCY ROLLING
PORTFOLIO BUSINESS PLAN AND LOCAL GOVERNMENT SUSTAINABLE
ENERGY COALITION STATEWIDE LOCAL GOVERNMENT PROGRAM
ENERGY EFFICIENCY BUSINESS PLAN PROPOSAL**

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For the Local Government Sustainable
Energy Coalition and the Southern California
Regional Energy Network

Dated: **January 23, 2017**

**MOTION OF THE COUNTY OF LOS ANGELES,
ON BEHALF OF SOUTHERN CALIFORNIA REGIONAL ENERGY
NETWORK (CPUC #940) FOR APPROVAL OF ITS ROLLING
PORTFOLIO ENERGY EFFICIENCY BUSINESS PLAN AND LOCAL
GOVERNMENT SUSTAINABLE ENERGY COALITION STATEWIDE
LOCAL GOVERNMENT PROGRAM ENERGY EFFICIENCY BUSINESS
PLAN PROPOSAL**

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**MOTION OF THE COUNTY OF LOS ANGELES,
ON BEHALF OF SOUTHERN CALIFORNIA REGIONAL
ENERGY NETWORK (CPUC # 940) FOR APPROVAL OF ITS
ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN
AND LGSEC STATEWIDE LOCAL GOVERNMENT
PARTNERSHIPS EE BUSINESS PLAN PROPOSAL**

**I.
INTRODUCTION**

Pursuant to Rule 11.1 of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure, and in accordance with the *Assigned Commissioners and Administrative Law Judge’s Ruling and Amended Scoping Memorandum Regarding Procedures for Regional Energy Network Submissions for the filing of Rolling Portfolio Energy Efficiency Business Plans 2018–2025*, issued November 2, 2016 (Joint Ruling),¹ the County of Los Angeles (LA County), for itself and on behalf of the Southern California Regional Energy Network (SoCalREN) and the Local Government Sustainable Energy Coalition (LGSEC), submits this Motion for approval of SoCalREN’s Energy Efficiency Rolling Portfolio Business Plan as a Local Government Regional Energy Network (REN) serving public agencies and their constituencies within Southern California Edison’s (SCE) service territory. This Motion is presented in two parts:

1) A funding request for the 2018–2025 Rolling Portfolio period in the amount of \$149.7 million for electric energy efficiency in SCE’s service territory and \$37.4 million for a commensurate level of gas efficiency efforts in Southern California Gas Company’s (SoCalGas) service territory

2) A request to approve and fund a statewide Local Government Program (LGP) Business Plan (LGP Business Plan) for 2017 in the amount of \$2.3 million and an additional \$15.25 million for the 2018–2025 Rolling Portfolio period

¹ *Assigned Commissioner’s and Administrative Law Judge Ruling and Amended Scoping Memorandum Regarding Phase III of 13-11-005 (EE Ruling)*, R.13-11-015, dated November 2, 2016.

SoCalREN respectfully requests that should the statewide LGP Business Plan require additional time beyond that required to review and approve SoCalREN's Business Plan, the two proposals should be severed for procedural purposes, and separate schedules should be established for Parts 1 and 2 as distinct and separate proposals.

SoCalREN's Energy Efficiency Rolling Portfolio Business Plan: The total combined SoCalREN request (Application) for the 8-year period is in the amount of \$187.1 million. As discussed in general terms herein and in greater detail in the attached Business Plan, SoCalREN considers the SCE proposal to be reasonable and consistent with the provisions set forth in the Commission Decision (D.)15-10-028.² This Application is designed to complement SCE's application without overlap and is therefore also reasonable and consistent with the Commission's directives on energy efficiency rolling portfolio business plans. Attachment A, attached to this Application, is the Energy Efficiency Rolling Portfolio Business Plan for SoCalREN. This Business Plan was developed as directed by the Commission, using the guidance in D.15-10-028 issued on October 22, 2015,³ and has been vetted through the stakeholder process at the California Energy Efficiency Coordinating Committee (CAEECC).⁴ Should the Commission find that it requires additional information, SoCalREN will work with Commission staff in a timely fashion to ensure that the Commission has everything required to approve this Application.

Statewide LGP Business Plan: This Motion requests approval of the statewide LGP Business Plan proposal, attached hereto as Attachment B.⁵ The statewide LGP Business Plan was developed through the activities of the LGSEC, of which Los Angeles

² D.15-10-028, p. 46-58.

³ Ibid.

⁴ D.16-08-019, p.11.

⁵ D.16-08-019, p. 60, Conclusions of Law (COL) 53.

County is a member.⁶ LGSEC initiated this process by proposing the creation of a statewide local government program area with the Local Government Commission (LGC) as its single program administrator. This proposal was submitted in LGSEC’s comments in response to the May 24, 2016, Administrative Law Judge Ruling Seeking Input on Approaches for Statewide and Third-Party Programs.⁷ In D.16-09-018, the Commission directed LGSEC to present a proposed LGP Business Plan with more detail than was provided in the single round of rulemaking comments.⁸ The proposal included herein fulfills that direction. In addition, it reflects vetting through the CAEECC process and through a separate stakeholder process conducted by LGSEC.⁹

This Motion includes a 2017 initial startup administrative funding request of \$2.3 million and an additional 8-year total request of \$15.25 million for the 2018–2026 period, as follows:

Table 1. Statewide Local Government Program Initial Budget Request

| Budget Element | Investor-Owned Utilities (IOU) LGP Budget Amounts ¹⁰ | 2017 | 2018–2019 Years 1–2 | 2020–2023 Years 2–4 | 2024–2027 Years 5–8 |
|---|---|------|---------------------|---------------------|---------------------|
| Pacific Gas and Electric Company LGP Budget | \$35,285,899 ¹¹ | | \$3.18M | \$2.5M | \$2.12M |
| San Diego Gas & Electric Company LGP Budget | \$8,807,702 | | \$0.8M | \$0.6M | \$0.5M |
| Southern | \$20,340,000 | | \$1.8M | \$1.4M | \$1.2M |

⁶ LGSEC is a statewide membership organization of cities, counties, associations and councils of government, special districts, and non-profit organizations that support government entities. Each of these organizations may have different views on elements of this Application, which were approved by LGSEC’s Board. A list of LGSEC’s members can be found at www.lgsec.org. LGSEC is a program of the LGC. LGC is a 35-year-old non-profit organization supporting local government leadership in land use, energy, and water sustainability.

⁷ Order Instituting Rulemaking Concerning Energy Efficiency Rolling Portfolios, Policies, Programs, Evaluation and Related Issues (R.13-11-005.)

⁸ D.16-08-019, p. 60, Conclusion of Law (COL) 53.

⁹ Ibid.

¹⁰ These budget numbers are drawn from published IOU program documents. In 2017, LGC will work with the Commission and the IOUs to confirm and clarify these budget numbers.

¹¹ There is an additional ~\$40,000 for Direct Install programs in the Pacific Gas and Electric Company budget, but that amount is not included in this proposal’s budget basis.

| | | | | | |
|--|---|----------------|----------------|----------------|----------------|
| California Edison LGP Budget | | | | | |
| Southern California Gas & Electric Company LGP Budget | \$4,846,000 | | \$.44M | \$.34M | \$.3M |
| IOU Total | \$69,279,601 | | | | |
| | Administrative Budget as a Percentage of IOU Total | | 9% | 7% | 6% |
| LGC Proposal Request | | \$2.3 M | \$6.24M | \$4.85M | \$4.16M |

This funding request seeks support for the initial steps and phase-in transition period from today's LGPs by individual utilities to a statewide LGP. The statewide LGP Business Plan contemplates that a transition will occur whereby a number of administration, programmatic elements, and support programs would move from individual utility administration and implementation to a consolidated statewide approach. If adopted, an implementation plan would provide greater detail describing additional budget elements and seek incremental funding associated with those elements. Should the Commission find that it requires additional information in this proceeding, LGSEC will work with Commission staff in a timely fashion to ensure that the Commission has everything required to approve this proposal.

II. BACKGROUND

On January 22, 2013, the Commission initiated Rulemaking (R.) 13-11-005 to establish policies and procedures that would move away from the triennial review process towards a rolling review of energy efficiency program portfolios. On October 22, 2015, the Commission issued D.15-10-028 (Energy Efficiency Rolling Portfolio Decision), which adopted the energy efficiency rolling portfolio framework and directed Energy Efficiency

Program Administrators (PA) to file Business Plan Applications for the adopted rolling portfolio period. On August 18, 2016, the Commission issued D.16-08-019 providing final guidance on initial energy efficiency rolling portfolio business plan filings (Final Guidance). In addition, the Final Guidance recognized the benefit and opportunity of LGSEC's proposal for statewide implementation of local government partnerships and suggested that LGSEC present its proposal in a business plan for Commission consideration.¹²

A Joint Ruling was issued on November 2, 2016, that provided procedural direction for non-IOU PAs, detailing how energy efficiency rolling portfolio business plans must be submitted and when non-IOU PA plans are to be filed.¹³ This Joint Ruling directed RENs to file no later than January 23, 2017, a motion for approval of their energy efficiency rolling portfolio business plans to applicable IOU applications within their service territories.

III.

SUMMARY OF SOCALREN'S ENERGY EFFICIENCY ROLLING PORTFOLIO BUSINESS PLAN

In compliance with the Joint Ruling and the Final Guidance, SoCalREN respectfully submits the attached Energy Efficiency Rolling Portfolio Business Plan for Commission approval. SoCalREN's Energy Efficiency Rolling Portfolio Business Plan addresses the requirements of the Energy Efficiency Rolling Portfolio Decision, the Joint Ruling, and the Final Guidance. SoCalREN's Energy Efficiency Rolling Portfolio Business Plan is intended to facilitate a path forward towards increased cost-effective energy efficiency programs. It will also provide a roadmap for the evolution of public agency leadership to drive the market to Zero Net Energy (ZNE) communities through key intervention strategies and cross-cutting support, while also supporting broader state goals such as reducing

¹² D. 16-08-019, p. 60

¹³ Joint Ruling, p. 12.

greenhouse gas, integrating distributed energy resources, and enhancing customer choices of new technologies and service.

SoCalREN's Energy Efficiency Rolling Portfolio Business Plan is organized as follows:

- 1) Chapter 1 provides a high-level summary of SoCalREN's portfolio and includes the portfolio budgets, intervention strategies, and portfolio goals. This chapter serves as an executive summary of SoCalREN's energy efficiency framework.
- 2) Chapter 2 outlines SoCalREN's residential sector metrics, budgets, barriers, and approach to meeting sector goals. In addition, this chapter describes SoCalREN's move to solicit new program ideas supporting its public agency approach through the residential sector.
- 3) Chapter 3 outlines SoCalREN's public sector strategy to increase the amount of resources provided to this sector and the new strategies that will further drive the transition to ZNE communities. In addition, this chapter details SoCalREN's public sector metrics, budgets, barriers, and approach to meeting the sector goals.
- 4) Chapter 4 provides an overview of SoCalREN's new approach to compliance enhancement in codes and standards. This chapter provides details on how SoCalREN will assist its IOU partners in supporting the implementation of new codes and standards, including developing reach codes for agencies it supports. In addition, this chapter details SoCalREN's cross-cutting segment metrics, budgets, barriers, and cross-cutting compliance enhancement intervention strategies.
- 5) Chapter 5 outlines SoCalREN's cross-cutting financing budgets, barriers, and its approach to meeting the cross-cutting segment goals. In addition, this chapter details SoCalREN's plan to seek opportunities in public sector financing options for the public agencies it serves.
- 6) Chapter 6 provides an overview of SoCalREN's workforce education and training cross-cutting approach and expansion of interventions to support its portfolio. In addition, this chapter details the cross-cutting segment metrics, budgets, barriers, and energy-efficient strategies that will be pursued.
- 7) Attachment A-1 provides a table of CAEECC Stakeholder input applicable to the SoCalREN portfolio and provides notes to each comment.

In addition, per Energy Division guidance, SoCalREN's Energy Efficiency Rolling Portfolio Business Plan contains in each chapter the sections listed below:

- Vision Statement
- 8-Year Budget
- Energy Savings Goals (as applicable to sectors)
- Sector Overview
- Trends and Challenges
- SoCalREN’s Approach for Achieving Goals
- Key Partners and Coordination Efforts
- Metrics and Evaluation, Measurement, and Verification Considerations
- Appendix A – Acronym List
- Appendix B – Energy Division Compliance Checklist (with reference locations to content)

The plan is drafted at the sector level and contain goals, intervention strategies, and metrics at a high level. SoCalREN’s Energy Efficiency Rolling Portfolio Business Plan includes discussion of the proposed budget, projected savings and performance metrics, and cost effectiveness for the 2018–2025 Rolling Portfolio period. In addition, narrative description of changes from the existing portfolio is included discussing budget changes, program/intervention strategy changes with justifications, and a description of how the proposal meets portfolio guidance, statewide coordination, cross-sector coordination, and program-specific marketing and outreach efforts. Furthermore, SoCalREN has reviewed and applied stakeholder input from the Business Plan CAEECC discussions where appropriate. Further details on stakeholder input can be found in Attachment A-1 of Attachment A.

IV.

SUMMARY OF THE STATEWIDE LOCAL GOVERNMENT PROGRAM ENERGY EFFICIENCY BUSINESS PLAN PROPOSAL

The statewide LGP Business Plan proposal was prepared by LGSEC and LGC. It includes a request that LGC be approved as a lead administrator for a statewide program.¹⁴

¹⁴ D.16-09-018, COL 40, p. 102.

The proposal is a strategy to fully support local government participation in the Energy Efficiency Portfolio, realize greater energy savings, and leverage funding for local governments to advance state and local government energy and climate goals. The proposal follows the Commission's direction and addresses performance barriers in the current IOU administration for local government programs through a transition to statewide administration. The end-state envisioned includes a common administrative and technical support framework for all local government programs, a single point of local government program engagement for the Commission, optimization of ratepayer funds, maintenance of IOU customer-facing and core programs, expansion of those programs to reach jurisdictions not currently participating, continued use and investment in IOU customer and energy data tools, and leveraging of local government community engagement resources to drive projects to IOU core programs.

A phased transition from existing contracts is described in detail in the LGP Business Plan proposal. It is designed to maintain current and ongoing local government partnerships and programs, provide a clear pathway for local government program contract transitions over time, reduce administrative costs through consolidation, and continue to scale statewide successful local government programs.

It should be noted that the funding request for 2017 would support developing a detailed inventory of the current disparate IOU programs, accounting and reporting methods, budgets, and contracts. This is discussed in more detail in the LGP Business Plan. Such an inventory does not now exist. In addition, incremental budget amendments are anticipated once the scope of the coordinated and consolidated activities is more precisely defined in the first year and Phase 1 of the transition plan.

For 2017, this Motion is a request for \$2.3 million to cover:

- 1) Developing an implementation plan
- 2) Establishing key relationships, scope, and performance needs of a statewide energy

atlas¹⁵ and complementary LGP program metrics and a reporting tool

3) Engaging in Commission regulatory processes and establishing core administrative infrastructure in anticipation of expansion in subsequent years

Approval for this funding will enable LGC to:

- Clarify Existing Budgets. A review of existing filings reveals that IOU costs associated with LGP administration are not fully reflected or consistently described in the IOU's LGP budgets. For example; in its 2017 Budget Advice Letter, one IOU lumped its allocation of funds across administration; implementation; and marketing, education, and outreach (ME&O) activities.
- Clarify LGP Roles, Responsibilities, and Budgets: Create clear enumeration of LGPs activities and IOU third-party vendors, which is fundamental to assessing performance levels and impacts.
- Analyze Budget Elements by Allocation: Analyze administration, ME&O, non-incentive direct implementation, and direct implementation incentives and how costs are defined and applied across these elements.

The proposed LGP Business Plan includes discussion of the proposed budget, projected savings and performance metrics, and cost effectiveness for the 2018–2026 Rolling Portfolio. In addition, narrative description of changes from the existing portfolio is included discussing budget changes, program/intervention strategy changes with justifications, and a description of how the proposal meets portfolio guidance, statewide coordination, cross-sector coordination, and program-specific marketing and outreach efforts.

¹⁵ Modeled after the University of California, Los Angeles, Energy Atlas for Los Angeles County (www.energyatlas.ucla.edu). State legislation and regulatory action provide an exception for receipt and management of disaggregated data by academic and research institutions. The Energy Atlas is envisioned to be a database and user-interface providing statewide energy data, maps, building information, and analytical and reporting tools that promote strategic design and implementation of energy efficiency programs.

V.

STATUTORY AND PROCEDURAL REQUIREMENTS

A. Statutory and Other Authority (Rule 2.1)

SoCalREN's Application complies with the Commission's Rules of Practice and Procedure, Rules 1.5 through 1.11 and 1.13, which specify the procedures for, among other things, filing documents. In addition, this request complies with Rule 2.1 of the Commission's Rules of Practice and Procedure.¹⁶

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. Rules 2.1(a), 2.1(b), and 2.1(c) set forth further requirements that are addressed separately below.

The relief being sought is Commission approval of SoCalREN's Energy Efficiency Rolling Portfolio Business Plan, and approval of the statewide LGP Business Plan proposal.

B. Verification (Rules 2.1 and 1.11)

As required by Rules 2.1 and 1.11 of the Commission's Rules of Practice and Procedure, this Application has been verified by Howard Choy, Chair of SoCalREN, and Chair, Board of Directors, of LGSEC.

¹⁶ Rule 2.1(a) requires the application to state the exact legal name of the applicant and location of its principal place of business, and, if a corporation, the state under the laws of which the applicant was organized. Rule 2.1(b) requires the application to state the name, title, address, telephone number, facsimile transmission number, and e-mail address of the person to whom correspondence or communications in regard to the application are to be addressed.

C. Legal Name and Correspondence (Rules 2.1(a) and 2.1(b))

Pursuant to Rule 2.1(a) and 2.1(b) of the Commission's Rules of Practice and Procedure, the full legal name of the applicant is the County of Los Angeles on behalf of Southern California Regional Energy Network. SoCalREN is an association of local governments in Southern California. It is not a corporation organized and existing under the laws of the State of California.

SoCalREN's principal place of business is 1100 North Eastern Avenue, Los Angeles, California, 90063 and its post office address and telephone number are:

County of Los Angeles Office of
Sustainability
1100 North Eastern Avenue
Los Angeles, California 90063
Telephone: (323) 267-2006

Communications in regard to this Application are to be addressed to:

Howard Choy
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To request a copy of this Application, please contact:

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SoCalREN understands that notices, orders, and other papers may be served upon the individual named above, and such service shall be deemed to be service upon SoCalREN.

D. Proposed Categorization, Need for Hearings, Issues to Be Considered, Proposed Schedule (Rule 2.1(c))

Rule 2.1(c) requires that applications shall state “[t]he proposed category for the proceeding, the need for hearing, the issues to be considered, and a proposed schedule.” These requirements are discussed below.

1) Proposed Categorization

SoCalREN proposes to characterize this proceeding as “rate setting” as defined in the Commission’s Rules of Practice and Procedure, Rule 1.3(e) and Public Utilities Code § 1701.1(c)(3).

2) Issues to Be Considered

The issues to be considered in this Application concern the approval of SoCalREN’s Energy Efficiency Rolling Portfolio Business Plan, and approval of the statewide LGP Business Plan proposal.

3) Proposed Schedule and Hearings for Resolution of Issues

SoCalREN respectfully requests that the Commission expedite processing of this Application to allow for SoCalREN to commence operation on January 1, 2018,

the beginning of the rolling portfolio business plan period. As categorized in the Joint Ruling, hearings will not be required.¹⁷ The issue to be considered by the Commission by this Application is the allocation of funding to SoCalREN and approval of the statewide LGP Business Plan proposal.

SoCalREN respectfully requests that should the statewide LGP Business Plan require additional time beyond that required to review and approve SoCalREN's Business Plan, the two proposals should be severed for procedural purposes and separate schedules should be established for Parts 1 and 2 as distinct and separate proposals.

SoCalREN proposes the following schedule:

| | |
|--------------------------------|-------------------|
| Application Filed: | January 23, 2017 |
| Responses/Protests Due: | February 7, 2017 |
| Reply to Responses/Protests: | February 17, 2017 |
| Proposed Decision: | March 10, 2017 |
| Comments on Proposed Decision: | March 30, 2017 |
| Replies to Comments: | April 5, 2017 |
| Final Commission Decision: | April 2017 |

E. Service

SoCalREN will serve this Application as required by the Public Utilities Code and the Commission's Rules of Practice and Procedure and shall be served on the service list for the application proceedings for Southern California Edison, Southern California Gas Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company, as well as served on the parties to this rulemaking, R13-11-005.¹⁸

¹⁷ Joint Ruling, issued November 2, 2016. p. 13.

¹⁸ Joint Ruling, issued November 2, 2016. p. 1

VI.

CONCLUSION

SoCalREN respectfully requests that the Commission approve its Energy Efficiency Rolling Portfolio Business Plan and the statewide LGP Business Plan proposal.

Respectfully submitted,

/s/ Howard Choy

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For the Local Government Sustainable
Energy Coalition and the Southern
California Regional Energy Network

Dated: **January 23, 2017**

VERIFICATION

(See Rule 1.11)

Southern California Regional Energy Network

I am chair of the applicant association herein and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the matters that are herein stated on information and belief, and, as to those matters, I believe them to be true.

/s/ Howard Choy

By: Howard Choy
General Manager, COUNTY OF LOS ANGELES OFFICE OF SUSTAINABILITY
Chair, SOUTHERN CALIFORNIA REGIONAL ENERGY NETWORK
Chair, Board of Directors, LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION

Date: January 23, 2017

At Los Angeles, California