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

Application of Pacific Gas and Electric Company for Approval of 2013-2014 Energy Efficiency Programs and Budget (U39M).	Application 12-07-001 (Filed July 2, 2012)
Application of San Diego Gas & Electric Company (U902M) for Approval of Electric and Natural Gas Energy Efficiency Programs and Budgets for Years 2013 through 2014.	Application 12-07-002 (Filed July 2, 2012)
Application of Southern California Gas Company (U904G) for Approval of Natural Gas Energy Efficiency Programs and Budgets for Years 2013 through 2014.	Application 12-07-003 (Filed July 2, 2012)
Application of Southern California Edison Company (U338E) for Approval of Energy Efficiency and Demand Response Integrated Demand Side Management Programs and Budgets for 2013-2014.	Application 12-07-004 (Filed July 2, 2012)

COMMENTS OF THE COUNTY OF LOS ANGELES ON SUPPLEMENTAL INFORMATION FOR 2013-2014 ENERGY EFFICIENCY PORTFOLIOS

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FOR the County of Los Angeles and the Southern California Regional Energy Network

September 14, 2012

I. INTRODUCTION

Los Angeles County ("LA County"), on behalf of the proposed Southern California Regional Energy Network ("SoCalREN") submits these Comments in response to Supplemental Information submitted to the California Public Utilities Commission ("Commission") in A.12-07-001 et al. LA County will primarily respond to the supplemental information provided by Southern California Edison ("SCE") and Southern California Gas Company ("SCG") in response to specific questions in Attachment A to the August 27, 2012, Scoping Memo.

These comments focus on the following:

- The value of the Southern California Regional Energy Center ("SoCalREC"), a subprogram of the SoCalREN. The SoCalREC is an existing entity, established in the 2010-2012 program cycle. The SoCalREC is an attractive, effective vehicle for implementing the Commission's policy objectives for whole building retrofits, integrated demand side management activities, and reaching municipalities and schools.
- The SoCalREN will build on existing financing programs established in the 2010-2012 program cycle with funds from the American Recovery and Reinvestment Act ("ARRA"). SoCalREN financing in the 2013-2014 transition period will be available throughout the region covered by the SoCalREN. These financing programs must be offered as part of the SoCalREN, not under separate contract, so they can be seamlessly linked to the implementation activities of the SoCalREN. LA County disagrees with the preliminary assessment of the findings from the financing consultant regarding financing needs of the public sector.
- The SoCalREN welcomes the opportunity during the Transition Period to build on the workforce training initiatives initiated as part of Energy Upgrade California in the current program cycle. This includes working with unions and historically underserved communities to increase their ability to provide services in the energy services industry for the non-residential sector.
- Similarly, the SoCalREN will continue the work initiated in the current cycle with affordable housing organizations, notably the Community Development Commission of LA County, a sister agency and natural partner for the SoCalREN.

II. Comments

Question 15: SCE and SCG both provide responses pertaining to how they arrived at builder and home/unit participation targets for the California Advanced Home Program ("CAHP") program for 2013-14, and explaining how their programs advance the goals of the Strategic Plan and Zero Net Energy strategies.

LA County comment: The affordable housing industry does not fit into the builder projections for the general multifamily industry. This is because affordable multifamily housing is highly dependent on availability of housing funds by federal, state, and local governments. Earlier this year, community redevelopment agencies across the State were eliminated, drastically reducing the availability of funding for affordable housing. However, using historical data by the California Tax Credit Allocation Committee ("TCAC") for the number of projects it awarded in Los Angeles County we estimate a range of 31-55 affordable multifamily projects for 2013-2014 that can benefit from participation in CAHP, as indicated in the table below.

Awarded Tax Credit Projects in Los Angeles County			
Year	Total	4% tax credit	9% tax credit
2009	38	24	14
2010	31	16	15
2011	55	37	18
2012	(not yet available)		

Based on the experience of the Community Development Commission of Los Angeles County ("CDC"), the affordable housing industry has the motivation and capacity to meet increased energy efficiency goals given sufficient funding resources to cover the incremental cost of surpassing code requirements, and is enthusiastic about working with the proposed SoCalREN to accomplish these important tasks.

Question 18: In their responses to the question regarding IOU work to explore HERS II assessment or rating incentive pilots with local governments and the CEC, Southern California Edison ("SCE") states that it engaged with its local government partners but did not receive any interest from local governments looking to pilot HERS II assessment or rating incentives.

LA County comment: We point out that LA County has, in fact, set aside approximately $1 million in grant funds from the CEC to support integrating HERSII assessments and ratings into Energy Upgrade California ("EUC") package financing. We have had, to date, no discussions with SCE or SCG about leveraging this funding along with Los Angeles County's EUC financing program initiatives. We would welcome such discussions. We also understand that the California Homebuyers Fund ("CHF") ARRA-supported residential financing program endorsed (or required) HERS II ratings as a loan eligibility requirement. To the extent SCE and SCG will be funding CHF to operate the same or similar residential financing program in their service territories, it would be appropriate to also have a discussion on how to leverage the LA County grant funding from the CEC with any IOU-CHF program that might be approved.

Question 19: Both SCE and SCG indicate that they will meet the Commission's directive to raise incentive levels in residential new construction in such a way that eases the transition to the 2014 code and helps push builders toward the early adoption of code measures.

LA County comment: As part of the SoCalREN, the Community Development Commission of Los Angeles County will adjust the proposed energy efficiency incentive for affordable multifamily housing to take into account the new baseline established by the Title 24 building energy standards. The CDC's energy efficiency incentive has served to transition projects in Los Angeles County to deeper energy efficiency and can continue push the industry towards innovative design strategies to meet increased efficiency targets under the umbrella of the proposed SoCalREN program.

Question 20, 21 and 22: With respect to the structuring of commercial efficiency programs to achieve an emphasis on deep energy savings, emerging technologies and incorporation of whole building approaches. SCE's response indicates that statewide, third party and local government programs will be designed and delivered to encourage the customer to do a full assessment of their energy use and implement all cost effective energy savings measures, to help customers achieve deeper energy savings. SCE also states that its Energy Advisor and Continuous Energy Improvement ("CEI") sub-programs will highlight deep energy savings measures, bundled measures, and emerging technologies in their assessments. In SCG's response, it indicates that it believes one of the keys to achieving deeper energy savings is encouraging and motivating customers to first perform an appropriate and detailed energy assessment (audit). SCE also points to energy management and information systems and products as important elements in enabling or engendering those types of savings. Also, SCE believes that there are significant technical and evaluation challenges that must be addressed in order for whole building approach based programs to become viable for deployment on a large scale.

LA County Comment: The Southern California Regional Energy Center ("SoCalREC") initiative under the SoCalREN program proposal is the best approach that has been put forward to expand a comprehensive whole building approach to the public agency building sector in the Southern California region. SCE's and SCG's responses are focused generally on commercial buildings, which are different from most public agency buildings. The current model as implemented within the local government partnership programs of encouraging and motivating customers to complete basic audits and providing measure retrofit incentives has not achieved all of the savings potential that is available in local government partnership ("LGP") buildings and facilities. Under the current model, LGP program managers are reluctant to approve deeper level audits unless they have a high level of confidence that these audits will lead customers to actual project implementation. The SoCalREC model has shown that strategic provision of additional, complementary technical services, when accomplished in the context of more comprehensive energy project procurement and implementation services, can drive more public agency participation and project delivery. These additional, complementary services are described in Attachment A: "SoCalREC Implementation Strategy with IOU Program LGPs: Whole Building Approach".

We emphasize that the current SoCalREC pilot is already carrying out for the local government sector much of what both SCE and SCG identify as steps to incorporate deep energy savings in commercial buildings during the Transition Period. The IOUs discuss a Whole Building Demonstration and Whole Building Approach to drive deep energy savings through bundled measures. We are already piloting Whole Building projects and have targeted public agency buildings for bundling of measures, including Retro-commissioning ("RCx") and Continuous Energy Improvement.

Also, the coordination of deep energy savings through bundled measures between SCE and SCG has been challenging given that their ratepayer funding is restricted to independent gas and electric measures. SoCalREC provides a valuable service by breaking through this barrier to provide fuel neutral comprehensiveness from a single resource that is available to public agencies. SCG and SCE mention the value of RCx and CEI, sub-metering, and energy management information systems ("EMIS") as valuable tools for achieving bundled measure savings and ensuring persistence of savings. These tools are all being utilized and leveraged within SoCalREC. Currently SCG does not participate in SoCalREC because funding is only provided through SCE ratepayers and ARRA grants. Funding of SoCalREN, and by extension, SoCalREC, will ensure SCG participation on a going forward basis.

Question 24: Both SCE and SCG state that they currently have no plans to include incentives for submetering, but will include submetering as-needed to help assess and verify the validity of whole building measure identification and savings quantification techniques.

LA County comment: The SoCalREN proposal includes expanded access to LA County's Enterprise Energy Management Information System (EEMIS) program to public agencies within SCE/SCG service territories, to include meter and sub-meter data. Utilization of EEMIS was supported by the SCE Flight 5.6 program and ARRA funding in 2012-2012, and is proposed to continue within the SoCalREC sub-program. Based on the SCE and SCG responses, it is clear that the SoCalREC project will present a valuable opportunity for submetering to be cost-effectively integrated into the public agency whole building projects that will be completed by SoCalREC. The new round of proposed local government partnership strategic planning funds in the SCE application ($20 million) would be an appropriate source for the additional funding required to implement these submetering projects within local government buildings, including training building management personnel and technical assistance as appropriate.

Question 27: SCE proposes to provide a robust offering of energy efficiency services and products to the municipalities, universities, colleges, schools and hospitals ("MUSH") market sector through statewide third party and local government partnerships in 2013-14. SCG also indicates that it will enhance its current MUSH market offerings through additional financing options and additional third party and local and regional government partnership solicitations and contracts. SCG also states: "All 13 local government partnerships will focus on assisting cities and counties with identifying and implementing energy efficiency projects in municipal facilities through a combination of customized rebate and deemed rebate programs."

LA County comment: Continuing the SoCalREC initiative under the SoCalREN proposal is the best and most appropriate strategy for targeting the Public Agency building component of the MUSH market. The SoCalREC pilot, as currently operating and proposed to be continued, provides targeted strategies, resources, program designs and implementation steps that are producing greater participation by public agencies and leading to more projects being implemented. The IOU "strategies" for targeting the public agency/municipal subset of MUSH – continuing existing services, increasing incentives and rebates, focus on marketing and communication, and increasing local government partnerships – will be significantly augmented by approval of the SoCalREN.

Question 29: In response to the question to provide targets for the number of business improvement districts ("BIDs") and LGPs with which the IOUs plan to partner through the direct install program, SCE states that while its hast not yet determined the specific communities that will be targeted in 2013-2014, it will encourage and target BID and LGP participation in 100%

of the geographic areas that SCE's Direct Install Program serves. The program will coordinate with all LGPs and BIDs in cities where they exist, and which are scheduled to receive program services. SCG states that although it does not implement direct install programs, if the opportunity arises, SoCalGas will investigate working with BIDS, LGPs, and municipalities for possible Direct Install opportunities.

LA County comment: The proposed SoCalREN, which comprises an impressive and valuable consortium of local government leadership and resources, can play a lead role in the effort to engage and partner with Business Improvement Districts and LGPs to promote and facilitate the integration of Direct Install measures, as well as participation in other IOU core programs. This effort should be managed regionally to enhance cost-effectiveness rather than through individual LGPs, especially because SCG's LGPs are non-resource programs and do not encourage or reward LGPs to work with BIDs to implement incentive measures.

Question 38: SCE states that it will develop and promote integrated-measure offerings that include energy efficiency, demand response, or distributed generation technologies. In order to promote integrated projects, increased incentives or incentive adders for bundled DSM offerings will also be explored. SCE will then integrate relevant DSM solutions into its marketing and outreach activities for CEI. SCG indicates that the CEI statewide team is currently awaiting a final report of the CEI process evaluation, and plans to further incorporate the findings of the report to better address integrated program design.

LA County comments: The Southern California Regional Energy Center (SoCalREC) initiative within the proposed SoCalREN program is the best approach that has been put forward to expand a comprehensive whole building approach to the public agency building sector in the Southern California region. SoCalREC is already piloting integrated demand side management ("IDSM") approaches in public agency building upgrades. We have already enlisted jurisdictions interested in aggregated approaches towards bundled EE, IDSM audits, project evaluations, procurement, and implementation. The SoCalREN project provides a great opportunity to leverage CEI funds to test and implement the IOUs IDSM programs in public agency buildings. The SoCalREC model has already shown that strategic provision of additional, complementary technical services, when accomplished in the context of more comprehensive energy project procurement and implementation services, can drive more public agency participation and delivery of comprehensive and integrated energy upgrade projects.

Question 51: SCE and SCG provide a breakdown of their proposed financing program expenditures which indicates that the vast majority of the funding will be used for On-Bill Financing programs.

LA County comment: The Commission has ordered an IOU budget for Financing of at least \$200 million statewide. We note the IOU budgets include nearly \$123 million for On Bill Financing, nearly \$63 million for New Finance Offerings, and \$23.5 million for ARRA-Originated programs. The SoCalREN has requested funding to support credit enhancements for an existing residential private financing program that would operate throughout the SCE/SCG service territory, funding for an existing commercial private financing program (property assessed clean energy, or “PACE”) in LA County and other jurisdictions, and funding for two municipal financing programs that are eligible to public agencies throughout the SCE/SCE service territory.

The SoCalREN’s budget request differs from what SCE/SCG propose to support these SoCalREN programs by $5 million (the proposed SCE/SCG budget for SoCalREN financing programs is $5 million less than the SoCalREN requested budget amount because SCE/SCG do not support funding of debt service reserves for PACE or a pilot Revolving Loan Fund for public agencies). SoCalREN suggests that given the combined IOUs’ proposed budget of $123 million for OBF and $63 million for financing programs that are not yet designed, it would be unwise to deny $5 million in funding to augment two very significant financing programs that will have reach throughout such a large regional territory.

The SoCalREN proponents also request direction from the Commission that if the SoCalREN proposed financing programs show more success than is currently projected they should be considered for additional funding if, at that time, significant amounts of the on-bill financing (“OBF”) and New Finance Offerings budgets are still unencumbered.

Question 52: Both SCE and SCG provide breakdowns of their proposed allocations and rationale for continued funding of previously-ARRA-funded programs during 2013-14.

La County comment: The SoCalREN proponents appreciate the dialogue between existing ARRA financing program administrators and the IOUs to determine the best proposals for 2013-14. The ARRA financing program administrators and the IOUs should meet together to discuss individual program design and operating details before the IOUs determine where individual financing programs shall or shall not operate. For example, the IOUs propose that the LA County residential financing program should operate in Los Angeles and Orange counties only, the CHF residential financing program should operate in Riverside and San Bernardino counties, and the Santa Barbara County financing program should operate in Santa Barbara and Ventura counties.

It should be noted, however, that LA County's (and Santa Barbara County's) program currently only finance Energy Upgrade California packages. It is our understanding that the CHF Residential financing program finances any individual energy measure or set of energy measures. Without further discussion of the intent of these existing programs, it would not be prudent to immediately define and restrict the geographic operating span for the various programs because there is a danger that residents in different counties in the same IOU service territory may not have access to the same residential financing opportunities. SCE and SCG in their response put forward the financing budget they believe should be offered to LA County for a variety of financing programs that have been described elsewhere in this proceeding.

LA County is also the lead local government that would contract with the IOUs to implement the SoCalREN program, if approved. Accordingly, the SoCalREN proposal includes requested budget amounts from SCE/SCG to implement these same programs. Both SoCalREN and SCE/SCG have submitted documents outlining the differences in the budget request by the SoCalREN and the amounts proposed by the IOUs for LA County. To avoid duplication, the SoCalREN recommends financing programs should be approved by the Commission under the SoCalREN contract with the IOUs, and that the proposed IOU budget amounts for LA County that are in the IOU applications can then be eliminated. SoCalREN, if approved, would be administering Energy Upgrade CA programs (including EUC packages eligible for private financing) and the SoCalREC program (which promotes public agency building projects which may utilize financing). It would not make sense, therefore, to have SoCalREN financing programs managed under a separate contract between the IOUs and LA County.

Question 53: SCE believes that estimation of incremental energy savings should follow the same process as like-resource programs offered through SCE's energy efficiency portfolio. Estimated energy savings would be identified for individual projects and corresponding energy savings and demand reduction estimates would be reported at the time an energy efficiency project loan is funded. SCE is willing to work with Energy Division staff to revise the Commission's Reporting Requirements Manual to reflect the Commission directives on this issue.

LA County comment: ARRA financing program administrators and/or Regional Energy Networks must also participate in this process to determine the appropriate "resource" credit for financing programs. We completely support the need to determine incremental energy savings from financing programs especially if financing programs are to become and remain "resource" programs. The SoCalREN proponents believe that financing should be made available for all approved or eligible energy measures – not just currently incentivized IOU measures. The SoCalREN proponents also maintain that determination of savings from approved or eligible measures should not be a prerequisite step for approval of a project loan.

Additionally, inspection or verification of the financed project should not be overly prescriptive or burdensome. These are current IOU resource program aspects that, in our opinion, have hindered participation in EUC in the SCE/SCG service territories. Considerable discussion should be had on the necessary program QA/QC, administration, and participant eligibility requirements for programs that provide ratepayer support for credit enhancement to ensure that they do not become so onerous as to discourage participation. Where private financing is being used to fund the implementation of projects and ratepayer funding is used for credit enhancements and administration, underwriting criteria should primarily be left to lenders themselves. Similarly, lenders should leave program technical design, implementation, and eligibility issues to the program managers.

Question 58 and 59: In response to the questions regarding overlap and potential duplication between IOU financing programs and those of the RENs, both SCE and SCG present their proposed budget for SoCalREN financing programs. Neither SCE nor SCG supports funding for a PACE debt service reserve or a Public Agency Revolving Loan Fund.

LA County comment: The proposed IOU budgets include extension funds for LA County ARRA finance programs that duplicate the SoCalREN finance programs. Attachment B compares, in detail, the REN and IOU financing programs. To avoid duplication, the SoCalREN recommends financing programs should be approved under the SoCalREN budget which would allow the elimination of the duplicate IOU budget amounts. SoCalREN, if approved, would be administering Energy Upgrade CA programs (including EUC packages eligible for private financing) and the SoCalREC program (which includes public agency building projects which may utilize financing). The SoCalREN proponents believe that the piloting of a public agency revolving loan fund, in particular, has substantial merit for the 2013-14 transition period. It would also not make sense to have REN financing programs managed under a separate contract between the IOUs and LA County, and these programs should instead be included in a consolidated SoCalREN/IOU contract.

Question 62, 63 and 65: In their response to these questions, SCE and SCG explain how they will support IDSM activities and how other IOU program funds will be leveraged to support IDSM activities during 2013-14.

LA County comment: We believe the 2013-14 transition period presents a tremendous opportunity for the testing and implementation of public agency building IDSM projects through the SoCalREC initiative that is a part of the SoCalREN program. The SoCalREN pilot is already utilizing a central technical resource, knowledgeable in bundled EE measures that can be leveraged to add the additional project elements that constitute a complete IDSM project – renewables, DR, CEI , commissioning, water, behavioral and other green building improvements. The SoCalREC model has already shown that strategic provision of additional, complementary technical services when accomplished in the context of more comprehensive energy project procurement and implementation services can drive more public agency participation and delivery of comprehensive and integrated projects.

Question 70 and 71: Both SCE and SCG propose expanding their LGPs to include new partners, expanding scopes of work, adding new services and increasing funding.

LA County comment: Since the SoCalREN has been proposed, proponents have cited the need to leverage centralized resources across all local government partnerships to improve cost-effectiveness and to provide currently unavailable complementary resources which will increase the number of energy projects that are implemented by local governments. The SoCalREC initiative within the SoCalREN program augments these basic activities with other additional program services such as project financing, expansion of EEMIS, and inclusion of other public agencies (special districts) on a pilot basis. Another need that the SoCalREC addresses is the provision of services to all local governments – whether or not they are currently in an Institutional or Local Government Partnership.

The SoCalREC sub-program within SoCalREN was proposed (and is currently being piloted under the SCE Flight 5.6 program) because 1) many local government jurisdictions are not included in IOU partnerships; 2) the important energy project services that are provided by the SoCalREC were not available; and 3) most importantly, it seemed illogical for LGP programs to include individual cities and counties or small groups of cities that could be better served by a broader regional group of jurisdictions with similar opportunities and similar needs. However, we do not have a specific opinion as to why/how LGPs should be formed or expanded. We do believe, though, that a regional local government program structure such as the SoCalREN makes consummate sense as a technical, logistical and financial support model that transcends and complements the particular IOU eligibility criteria for LGPs, with the primary goal of increasing energy savings by public agencies. We do not believe that simply increasing the numbers of Partnerships under the current LGP model will, in and of itself, deliver sufficient cost-effective public agency energy savings. Nor do we believe the additional services that are proposed, but not yet specified, that will be offered to LGPs by the IOUs will be as comprehensive and effective as those proposed under the SoCalREN model, and as are described in the attached comparison chart.

Question 72: Both SCE and SCG in their responses explain and justify the role that they play in the arena of Codes and Standards at the local government level.

LA County comment: The LGSEC in its August 3, 2012 *Response* provided information on the role of the utilities in Codes and Standards work. At the local level, many local governments have adopted codes that exceed the State's Title 24 building standards. At minimum, any local government must adhere to Title 24, which becomes progressively more stringent on a regular basis. The challenge is not getting local governments to adopt aggressive building codes; it is ensuring that building inspectors are adequately ensuring compliance with the aggressive code in place. LGSEC suggests that if there are great concerns about codes and standards at the local level, the Commission should consider providing funds for local building inspectors to ensure compliance with code.

Another option might be to provide a fee waiver for projects that exceed Title 24 by some predetermined minimum percentage. This is similar to the current Savings By Design program offered by the utilities, except it provides the incentive to the developer upfront through lower fees, instead of after the project is complete. A fee waiver would create a shortfall for the local government, a disincentive, because permit funds often pay for local government building code staff. The Commission therefore would want to authorize the use of ratepayer funds to make up that difference for the local government. The Commission also could consider a mechanism for creating incentives for local governments to adopt and then enforce voluntary reach codes. All of these options could be provided using resources that otherwise would fund utilities to do "local code and standards work."

Whichever approaches the Commission chooses to pursue, it is our belief that the SoCalREN, if approved, will be very well-positioned to coordinate with SCE, SCG and current LGPs to implement these local government outreach and advocacy efforts related to Codes and Standards within the Southern California region. Such an approach, utilizing the resources and established local government network of the SoCalREN, holds the promise of being extremely cost-effective.

Question 81: Both SCE and SCG present their proposed strategies for pursuing, not only the training, but also employment opportunities after training is complete for minority, low-income and disadvantaged workers.

LA County comment: LA County agrees with the comments raised previously by the California Construction Industry Labor Management Cooperation Trust that training for workers in building sectors other than residential have not been adequately addressed in the SoCalREN proposal. The SoCalREN team has been working with organized labor training stakeholders and has developed a pilot training program that integrates the various stakeholders in this industry in order to do the following:

- Identify the need/demand for labor in non-residential sectors (primarily Municipal, University, Schools, Hospitals and Commercial);
- Create a program which connects and coordinates labor resources from local job training groups like Workforce Investment Boards, Community Colleges, and groups that assist those from disadvantaged backgrounds;
- Identify and connect existing training resources with potential labor pools;

• Help develop and encourage apprenticeship programs in energy efficiency;

• Assess and encourage local hiring practices.

LA County would be pleased to provide further details on this pilot program proposal and can easily include it under the current proposed SoCalREN workforce training scope without increasing that budget.

IV. Conclusion

LA County appreciates the opportunity to provide Comments. We believe the concept of RENs provides strong benefits to all energy efficiency stakeholders and appreciate deeply the Commission's support in the development of and proposals for implementing them.

September 14, 2012

Respectfully submitted,

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FOR the County of Los Angeles and the Southern California Regional Energy Network

ATTACHMENT A:

SOUTHERN CALIFORNIA REGIONAL ENERGY CENTER IMPLEMENTATION STRATEGY

ATTACHMENT B

SOUTHERN CALIFORNIA REGIONAL ENERGY NETWORK
COMPARISON TO INVESTOR-OWNED UTILITY PROGRAMS