BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (U338E) for Approval of its 2009-2011 Energy Efficiency Program Plans and Associated Public Goods Charge (PGC) and Procurement Funding Requests.	Application 08-07-021 (Filed July 21, 2008)
And Related Matters.	Application 08-07-022 Application 08-07-023 Application 08-07-031

RESPONSE OF THE LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION TO UTILITY ENERGY EFFICIENCY APPLICATIONS FOR 2009-2011

JODY S. LONDON
Jody London Consulting
P.O. Box 3629
Oakland, California 94609
Telephone: (510) 459-0667
E-mail: jody_london_consulting@earthlink.net

For THE LOCAL GOVERNMENT
SUSTAINABLE ENERGY COALITION

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I. INTRODUCTION

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission") and the August 1, 2008 *Administrative Law Judge's Ruling Setting Prehearing Conference and Consolidating Applications*, the Local Government Sustainable Energy Coalition ("LGSEC")[1] submits this response to the applications of the investor-owned utilities for 2009-2011 energy efficiency programs. Nearly all members of the LGSEC have been active participants in local government partnership programs for several program cycles. Our comments are focused on those aspects of the 2009-2011 applications that most address local government programs and opportunities.

The LGSEC recognizes that the utilities will be making a supplemental filing, upon resolution of a number of issues with the Energy Division. As requested by ALJ Gamson at the August 11, 2008 prehearing conference, this response addresses broader policy issues raised in the initial applications. The key issues addressed in these comments include:

- ♦ Multiple program administrators have different structures for local government programs, and different approaches. Some of these structures and approaches are particularly problematic, particularly proposed by Southern California Edison.

- ♦ Regional opportunities are being overlooked in favor of new partnerships with individual cities which may overlap with existing regional partnerships. This contradicts State policy direction for regional collaboration, and creates opportunities for additional utility administrative costs.

- ♦ Innovation is not being encouraged with local government partnerships. Local government proposals are not fully considered.

- ♦ The partnerships continue, after all these years, to not be true collaborations. While there may be individual exceptions, the rule is that the utilities crunch numbers in

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[1] The Local Government Sustainable Energy Coalition includes: the Association of Bay Area Governments, the Association of Monterey Bay Area Governments, the County of Los Angeles, the County of Marin, the County of Ventura, the City of Santa Monica. Each of these organizations may have different views on elements of these comments, which were approved by the LGSEC's Board.

back rooms and present final products to the CPUC without agreement or even review prior to submittal from the partners.

- ♦ Partnership budgets must be carefully examined and vetted, particularly for excessive administrative costs, and also to determine whether the budgets are realistic for the scope of work and savings goals.

- ♦ The utilities should not be able to claim 100 percent of savings from codes and standards. And savings from codes and standards must include (1) that a prescribed menu of activities jointly developed by the partners and the utilities be developed indicating what constitutes support from the utilities, (2) that the utility must clearly demonstrate its actions actually supported the adoption of the code or standard, and (3) that the local government entity be provided a right of first refusal to retain any savings that might accrue from the code or standard adoption.

As it determines how to act on these applications, the Commission should: obtain a better understanding of utility costs; ensure funding for the financial costs to develop, amend, adopt, and implement building and planning codes that promote energy efficiency and climate change objectives; and consider a different administrative structure for local government partnerships, particularly in light of AB 32 implementation. As an interim step, the CPUC should facilitate the development of regional sustainability offices that have, as part of their mission, the development and delivery of energy efficiency programs

II. RESPONSE TO THE UTILITY APPLICATIONS AS A WHOLE

The utilities have clearly put a great deal of time and resources into developing the 2009-2011 applications. Yet, there are many areas where the local government programs can be improved. An overarching concern, which local governments have raised for many years,[2] is that the process for developing local government programs is not a true partnership, and does not allow local governments to tailor programs to achieve both local priorities and utility energy

[2] See, for example, *Response of the Government Partners to Southern California Edison Company's Response to ALJ Ruling Seeking Further Information*, September 19, 2006, pp. 4-5, in A.05-06-015 et al; *Comments of the Local Government Sustainable Energy Coalition on Proposed Decision on 2009-2011 Energy Efficiency Programs,* October 9, 2007, pp. 1-2, in R.06-04-010;

efficiency goals. This, in turn, hampers the innovation goals that the Commission is expecting of all energy efficiency programs, particularly the local government programs.[3]

An additional process concern is that the utility filing process has resulted in documents far too cumbersome to satisfactorily review. As the Commission has recognized, the documents cannot be adequately compared or evaluated in the short time frame.[4] The problem is further compounded in Southern California; it is obvious upon reading the separate descriptions filed by the utilities that partnerships that involve both Southern California Edison ("Edison") and Southern California Gas ("SoCalGas") have not been consistently identified or planned.

Specific overarching concerns are described below.

A. Narrow Focus For Local Government Partnerships

There is a spectrum of local government familiarity with and ability to implement energy management programs, including energy efficiency programs. The members of the LGSEC all have long histories and track records of designing and delivering energy efficiency programs. We all have ideas on how to improve the reach of our programs, and achieve many of the goals the CPUC has established around innovation. The filings for the 2009-2011 cycle, however, do not accept any innovative proposals from local governments. Indeed, programs with patterns of success in the 2002-2003, 2004-2005, and 2006-2008 cycles within a region find their programs, which have been built over time, replaced by a standard menu of incentives.

Local governments were either discouraged from submitting proposals for innovative programs, or those proposals were overwhelmingly disregarded in an effort to bring uniformity to the final utility application to the Commission. Attachment A includes a list of some of the

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[3] See August 19, 2008 revised draft *Energy Efficiency Strategic Plan*, pp. 93-94, 98-100, in R.08-07-011/A.08-06-004.
[4] See discussion at August 11, 2008 Prehearing Conference in this proceeding.

innovative program ideas that local governments stand ready to undertake for the 2009-2011 program cycle.

B. Lack Of Utility-Partner Collaboration

A related problem for the partnerships is that the utilities do not provide opportunities for local government partners to review the detailed filings prior to submittal to the Commission. This is a problem that, as indicated above, has persisted for many years. There may be discussion and consultation between the utilities and the local government, but at some point the programs are handed off to a group within the utility that crunches numbers and is not involved in program design. After this group has tweaked the portfolio, presumably to meet cost-effectiveness criteria and likely produce maximum shareholder incentive potential, it is prepared for submittal to the Commission, without local government partners having an opportunity to review the final program details. Goals and budgets for the current applications were finalized without benefit of the local government partner's buy-in. Local governments were surprised to see elements of their proposals not included in the utility's application to the CPUC. This is not equal footing.

C. Utilities Are Not Heeding Call For Regional Collaboration

The Commission has stated clearly its interest in seeing more regional collaboration on energy efficiency issues.[5] The California Air Resources Board ("CARB"), in its implementation plans for Assembly Bill 32, the Global Warming Solutions Act, has indicated a similar reliance on regional groupings of local governments.[6] CARB recommends regional targets for greenhouse gas emission reductions. The CPUC can facilitate this State goal by supporting an infrastructure that builds on regional collaboration.

[5] August 19, 2008 *Energy Efficiency Strategic Plan*, p. 99.
[6] California Air Resources Board, *Climate Change Draft Scoping Plan*, June 2008, pp. 31- 33.

It appears that the utilities want to create more partnerships with cities and individually administer them instead of creating regional partnerships, which is what the LGSEC and its members have been suggesting the utilities do for years. Multiple partnerships can function if the partnerships do different things, but the utilities appear to be creating overlapping partnerships. The Commission must recognize that partnerships with overlapping programs increase administrative, EM&V, and other costs, disregard local governments' knowledge of their regional needs and resources, and ignore the abilities of successful partnerships to grow naturally within their region. The applications seem to ignore the regional patterns regarding delivery of projects that build on the existing programs and leverage staff and economies of scale.

The emphasis in these applications for local government programs is on marketing programs and channeling projects to existing utility programs to create uniformity in programs and returns to standard approaches. These proposed programs are using local governments as a marketing channel for the delivery of a full suite of energy efficiency programs. For example, the SCE filing (page 7 of SCE-4) notes examples of utility and third- party programs that participating partnerships (i.e., cities) may request, and explains that the savings will be funneled to individual utility programs, yet not be attributed to the partnership. The issue of attributing energy savings to utility programs rather than the local government partnerships is a conflicting goal. This begs the question: Do the utilities benefit financially or otherwise by establishing more individual partnerships within a region versus building upon larger, existing regional partnerships?

The utilities state that regional programs are a good idea, but issues specific to joint partnerships, or multi-jurisdictional programs, are not recognized or addressed. This makes the actual practice of implementing regional programs utilizing existing partnerships difficult if not impossible.

The utility filings reflect several examples of "partnership" that could be better served if true partnerships could be established. For example, a city that has a long history of participation in a regional collaboration was recently contacted by Southern California Edison about forming an individual partnership specifically for that mid-sized city. Edison also has proposed for 2009-2011 a new and separate partnership with the City of Simi Valley, which is located within Ventura County and is an obvious candidate to join the existing Ventura County Partnership Program. Similarly, colleges and universities and the County of Los Angeles are placed in statewide, institutional partnerships, an action which puts a damper on their ability to participate in regionally focused partnerships or develop a larger, regional partnership (in the case of the County of Los Angeles). In PG&E's territory, PG&E is proposing to create new partnerships with entities that formerly participated in the Association of Bay Area Governments ("ABAG") Energy Watch program. The ABAG Energy Watch has long been regarded as a capacity building program that helps government entities, especially smaller organizations, climb the energy management learning curve, while also serving more sophisticated public entities. This would appear to be a divide and conquer strategy by the utilities.

Why are local government partners that have a proven record of success, knowledgeable staff and resources, and valuable program experience not being leveraged to expand and work with nearby, less-experienced public agencies? This IOU strategy ignores the benefits that successful local government partners have garnered over the years. The utilities do not share with others the innovation and creativity of local governments, so it is hard under the current administrative structure to capitalize on lessons learned.

D. Budget Issues

The CPUC must closely examine the proposed administrative budgets for the local government partnerships; the budgets in the applications only provide a breakdown of overall program cost and EM&V costs. This level of detail was not provided in the utility filings, but should be made publicly available. Edison did not respond to informal requests for this information which, in the spirit of collaboration, it seemed reasonable to assume it would do. Certainly in the case of Edison, the proposed administrative budget seems high. For example, for the County of Los Angeles partnership, in the budget the County saw, Edison was going to request nearly $500,000 for administrative costs out of a total project budget of $2.75 million, or 18%. This only version of the budget the County received prior to the filing of the application is included in Attachment B, as is an analysis of budgets for the South Bay Cities Council of Governments partnership over time. The SCE administrative budget should be evaluated with the knowledge that the County proposes to take on more project administration duties in 2009-11 (including administering all vendor contracts using County staff). The County since its first public goods charge funded program in 2002 has managed all projects using County staff. Using internal County resources provides savings to ratepayers.

The administrative costs seem further inflated when one considers that many of the partnerships are proposed to function more as facilitators of standard measure incentive programs in which local governments simply provide leads or incentive opportunities to utility in-house or third-party programs. These issues are described in greater detail below in relation to the Edison application, in particular.

E. Comments on Requested Overarching Policy Objectives

The utilities have requested a number of policy changes that they believe will better allow the utilities to reach energy efficiency as well as climate change goals. The utilities' joint testimony states that making these policy changes will "allow for and encourage real collaboration, cooperation, and innovation among all the parties." This is a goal the LGSEC certainly supports, and for which we have advocated for many years. On most of the proposed policy changes the LGSEC has no comment at this time. We do, however, have concerns about two of the policies.

First, the utilities request that a mechanism be established to capture savings from customer actions that are motivated by state policy or legislation, local codes, or "green" messaging. The utilities further request that all savings from these actions accrue to the utilities, with a net-to-gross ratio of 1.0. While there should be savings attributed to the adoption of strong codes and standards, those savings should not automatically accrue 100 percent to the utilities.

The process for a local government to develop, amend, adopt, and implement new codes is lengthy, extending over several years, and involves significant staff resources. Local governments adopt codes for any number of reasons. Increasingly as the State implements AB 32, one of the reasons for new codes and standards may be to create savings that can be applied toward compliance with greenhouse gas emission reduction goals. The financial costs to develop, amend, adopt, and implement codes that promote energy efficiency and climate change objectives must be funded or they will not happen under the current budgetary conditions. The use of Public Good Charge funds for this effort should be considered as a direct disbursement to local government and considered a high priority measure if energy efficiency and climate change goals are to be achieved. Allowing the utilities to claim all credit for codes and standards is simply not right, particularly given local governments' extraordinary and independent efforts to implement codes and standards, whether they are self- initiated or a result of potential mandates to comply with State or federal laws.

For example, the South Bay Cities Council of Governments ("SBCCOG") Partnership is working with its member cities on ordinances – sharing model ordinances and codes and standards from different agencies. SBCCOG also sponsors a Green Task Force through which it is educating city staffs on best practices and what others are doing. SBCCOG is offering Title 24 and beyond workshops, as well as other programs that should lead to code upgrades over time.

The utilities' request to claim these savings raises additional questions. At least one member of the LGSEC, the County of Los Angeles, asked Southern California Edison explicitly how the utility Partnership might assist the County in developing a "green building" ordinance, promoting the energy benefits to the building industry and the public, and participating in public hearing processes to educate others. This question was asked three specific times to Edison managers (including two Directors) in three separate venues – including before a Chief Deputy to a member of the Board of Supervisors. These were the responses (paraphrased): "There are no quantifiable savings associated with green building ordinances – let's focus on energy efficiency projects;" "The California Public Utilities Commission **does not allow** Edison to assist in developing and implementing green building ordinances;" and "Edison does not want to get in the middle of disputes between local governments and the building industry." Clearly Edison wanted nothing to do with the County's green building ordinance. As a result, the County is currently presenting its green building ordinance before the public, before the County Planning Commission, and ultimately before the Board of Supervisors (in further public meetings) without any presence or input from Edison. And now Edison is asking for 100% of the savings with a net-to-gross ratio of 1.0? It is nonsensical that the utilities get the total credit when the local government entity is laying the groundwork and bringing the tools to the cities directly, and raises questions about the utility's motivations. While this anecdote could be interpreted to support the need for the requested policy change, it also could be interpreted as the utility only wanting to engage in activities that will guarantee shareholder incentives.

If the Commission grants the requested policy change on credit for codes and standards, it must require: (1) that a prescribed menu of activities jointly developed by the partners and the utilities be developed indicating what constitutes support from the utilities, (2) that the utility must clearly demonstrate its actions actually supported the adoption of the code or standard, and (3) that the local government entity be provided a right of first refusal to retain any savings that might accrue from the code or standard adoption.

Second, the utilities also request a collaborative process for evaluation, measurement, and verification ("EM&V") activities. There certainly is room to improve the EM&V process. Currently, in at least some partnerships, EM&V is performed once by the utility, then again by the Commission. Along the way, the local government partner often produces documentation that supports these EM&V efforts. All this duplication is a poor use of ratepayer funds. To the extent that a collaborative process will eliminate the same EM&V work being performed more than once, and the process is truly collaborative with meaningful inclusion and opportunities for participation for local government partners, the LGSEC supports such an effort.

III. COMMENTS ON INDIVIDUAL UTILITY APPLICATIONS

In addition to the comments above that address the utility applications overall, there are issues in each utility's specific filing that should be addressed. These issues are identified below.

A. Southern California Edison

1. Changes In Partnership Strategy And Design

SCE proposes modifying its partnership structure to something it is calling the "Energy Leader" model. This model has most local governments, regardless of track record and existing policies, come into the program at the basic level, with the opportunity to "earn" higher status.[7] The structure of the partnership programs, with the incentive levels and additional "opportunities," illustrates how little collaboration there is between SCE and its local government partners. It completely disregards the benefits of a partnership with a track record of success over multiple years and says that the partnership provides nothing of value compared to a brand new partnership. (SCE filing, SCE-4, page 8 states: "2009-11 Energy Leader Partnerships all enter the model at the Valued partner level.")

SCE is redesigning the partnerships to mirror SCE's internal incentive programs. That is, all program elements are to be funded through a prescribed list of dollars ($) paid per kWh saved, with limits on measures and funding caps per project. This basically renders the local government partner into a marketing agent for the utility. In which case, it is even more unclear why SCE is assigning such high administrative costs to the local government partnerships. The past model of success whereby local governments with greater energy management expertise utilized their resources to find cost effective and innovative projects in hard to reach facilities and successfully implement them has been abandoned. Under this new model, successful programs that were initiated in past cycles under different funding criteria (e.g., facility retro-commissioning in 2004-2005) could not be proposed, developed, or implemented today because of the prescribed limits on scope and funding. Innovation and "outside the box" thinking are

[7] Edison also proposes a category of "institutional" partners, into which several existing partnerships would be placed. Edison is the only utility that makes this distinction. This is discussed in greater detail below.

eliminated. What new programs (like facility retro-commissioning in 2004-2005) are not going to be developed during 2009-11 because of these new criteria?

SCE's proposed 2009 - 2011 program is based upon a $/kWh saved with a maximum payout of up to 50% for lighting and HVAC and up to 80% for retro commissioning. SoCalGas does not have these types of restrictions for its incentive programs, i.e., SoCalGas will pay out 100 percent of a project if it falls within the $/therm savings criteria. Simply put, for some local governments, if they are not able to obtain the additional 20% to 50% required for electricity savings projects, they will not get implemented. This situation is true for all public agencies.

Edison does not appear to appreciate, in particular, the opportunities that regional organizations that work in multiple communities can offer. This Energy Leader model is not well-suited to a regional program. The regional partnership municipal sponsors know that many smaller cities will only participate with the guidance and technical support of their local regional government association.

2. Budgets Are Not Adequate

There is a disconnect between the program descriptions in SCE's testimony and actual budgets for local government partnerships. The budgets simply are not adequate to accomplish the many tasks described in the Program Implementation Plan. For example, the County of Los Angeles partnership has a total budget from SCE of $2.7 million. This is more than 50% less than in prior program cycles (but it does have a higher administrative budget percentage for Edison). Yet with this smaller budget, the County is expected to continue its hallmark retro-commissioning program, which has become a model for SCE's other retro-commissioning projects, although with a greater requirement for savings realized per dollar spent. The County also will offer energy efficiency projects to the various departments served by the County's

Energy Management Division, which is part of the Internal Services Department. In addition, the County will coordinate with other, independent departments such as the Sheriff, Health, and affiliated agencies including public housing, sanitation districts, transit authority, and County Office of Education. The County also is encouraged to, on a $2.7 million budget, investigate solar energy solutions, conduct public outreach, continue LEED certification efforts, engage in peer-to-peer networking and education, and do codes and standards work. The County has requested for years of SCE that its partnership be expanded and budgeted to include this other work and agencies. Only now does the County's program finally include this scope language, but it is expected to achieve its retro-commissioning goals and conduct this additional scope with a budget reduced by greater than 50%.

Other local government partners have the same situation. If incentive amounts for specific projects are reduced to minimum utility standards, it is likely that fewer projects will be implemented. Local governments will push energy efficiency projects given sufficient and flexible incentives. However, if incentive levels reduce, these projects will not be considered cost-effective and the energy efficiency and climate change goals will not be met. There is already a drop-off in new project development in some public agencies due to the lack of certainty regarding bridge funding for the local partnership programs. This problem will only get worse if incentive monies are not readily available to local governments already pressed with other project priorities.

The lesson to be taken away from this discussion is not that the list of activities is too ambitious. Rather, this is an example of the disjointed process by which SCE is developing program budgets. The solution should not be to restrict the activities of the partnership, but to expand the budget so it can fully undertake the many activities of which the public agency is capable.

3. Prescriptive Measures Hamper Innovation

SCE's Exhibit SCE-2 provides a list of measures that each program will be eligible to undertake. This list alone is further evidence of the lack of innovation in SCE's portfolio, at least for local government partnerships. The local government's ability to be truly comprehensive is further hampered by this prescriptive list of measures. For nearly every partnership, the list of measures allowed consists of Chillers, HVAC, HVAC EMS, Indoor Lighting, Indoor Lighting Controls & EMS, Motors, Outdoor Lighting, Outdoor Lighting Controls, VFDs, and RCx/MBCx. By contrast, the allowable measures for the Palm Desert partnership are a much longer list.

All local government partners have submitted innovative program proposals to Edison in the past. This has been confirmed among current partners. Consistently, Edison has told these partners not only that the innovative program elements would not be funded; they have told each partner what their menu of incentives would be – regardless of what the partner has proposed.

4. Different Treatment For Same Type Of Partnerships

SCE further complicates its partnership program by creating categories of partnerships. Being assigned to a category apparently has significance within SCE for the type of activities the local government partner can undertake. Of particular concern is the SCE creation of "institutional" partnerships. These partnerships apparently are focused only on municipal building projects. Yet the County of Los Angeles, which has the ability to perform other outreach and coordination with other County entities, which is even lauded in the Program Implementation Plan, is put into the institutional category. SoCalGas, which partners with SCE, does not create a similar distinction. To the County, Institutional Partner seems to be defined as "a partner who can find projects within their large infrastructure that qualify for incentives from the menu of prescribed measures that Edison has developed. This partner is not to get involved in other innovative programs."

A further concern with this type of artificial distinction is it creates an opportunity for SCE to create partnerships with other County departments or affiliates, under the argument that the County partnership is only institutional. This then allows SCE to create additional administrative positions. As mentioned earlier, the County since it began participating in public goods charge programs in 2002 has offered its energy management staff as an in-kind contribution to the program. Other local government partners have had the same experience. One partner reports finding by accident energy saving programs SCE is providing in its area. It has been this partner's method of operation to meet with those programs and figure out how to work together, but that is not always possible because SCE has competing goals for each program instead of developing rewards for mutual benefit. Similarly, the County of Los Angeles discovered that SCE account representatives were contacting other County departments and encouraging their participation in SCE's standard rebate programs instead of participating in the SCE/County partnership. This lack of coordination leads to duplication and more cost.

5. On-Bill Financing Amount is Insufficient

SCE proposes $26 million for on-bill financing in the commercial sector, with no offering in the residential sector. Many local governments are going through the necessary steps to determine their ability to participate in the program. For others that can immediately participate, there is a great demand for on-bill financing. SCE should be required to provide more funding for this important tool.

B. Pacific Gas & Electric

The main area of concern with the PG&E filing in terms of local government programs is that it does not reflect proposals for innovative programs put forward by local government partners at PG&E's request. Furthermore, there was no opportunity for local government partners to review the PG&E filing before it was submitted, meaning the way in which partners learned that their innovative programs would not move forward was in reviewing the voluminous application for 2009-2011 program.

PG&E also, like Edison, appears to have created several new partnerships, many of them within the jurisdiction of prior partnerships. This can be a problem because some of the services that have been implemented in the current regional partnerships, for example the ABAG Energy Watch Partnership (e.g., Energy Assessment Reports and Energy Action Plans), will not be available for many local government agencies in the new paradigm of more partnerships. While agencies have viewed these as very valuable services that should be continued, they were not included in the recommended programs. In discussing this with PG&E, PG&E stated that it is up to the individual partnerships to decide if the partnership wants these services and if so, then it should include them in the requested list of services. However, individual partnerships do not feel they can include these because it will hurt their cost effectiveness. This may be a case where a broader regional agency (i.e., ABAG) could take on these "generic" services for the whole territory.

Immediately prior to submittal of its application, and certainly in the time since it was filed, PG&E has been asking/encouraging local government partnerships to use the third parties for their direct install programs, rather than the local governments themselves contracting out that activity, as has happened historically. PG&E is systematically picking at the government partners' proposed budgets and stating that the allocations will be for the third party activities, rather than the local government partnerships. Many local governments are resisting this, but it shows how PG&E is consistently changing the rules after it submitted the portfolio proposal.

PG&E did request proposals from local government partners for innovative programs. However, those proposals were almost unanimously not reflected in the application filed with the Commission. PG&E has told the local government partners that it does not intend to negotiate the inclusion of innovative programs until the Commission approves the 2009-2011 applications. This effectively leaves about half the program cycle to actually undertake any of these innovative ideas, given the expected Commission approval in April 2009, and the subsequent negotiations and contract approvals. A better course would be for PG&E to include innovative ideas in the budget included in the supplemental filing it will be required to make in the next month or two, so that those programs can be negotiated in advance.

C. Southern California Gas

The LGSEC has far fewer concerns with the Southern California Gas application. The primary issue specific to this application is why the budget amounts are not provided for each partnership. (See table below.) It is difficult for partnerships to plan if they do not have even an idea of their budget. Additionally, SoCalGas does not attribute savings goals to individual partnerships, but rather says the savings will come through the resource programs. This makes it difficult to determine the cost-effectiveness of individual programs, but may yield results if local governments can leverage pilot projects or benefit from peer to peer projects.

Table 1-6: 2009-2011 Proposed Budget

IOU Program	2009	2010	2011	Total 2009-2011 Program Cycle Budget
Core Programs	$ 46,029,536	$ 48,230,899	$ 50,250,167	$ 144,510,602
Partnership Programs	$ 2,137,529	$ 2,173,098	$ 2,137,529	$ 6,448,156
Third Party Programs	$ 12,971,977	$ 13,522,318	$ 14,027,135	$ 40,521,430
Strategic Plan Programs	$ 9,607,707	$ 9,530,437	$ 9,653,406	$ 28,791,549
Total IOU Program Budget	$ 70,746,749	$ 73,456,751	$ 76,068,237	$ 220,271,738
Total IOU/CPUC EM&V Budget	$ 5,217,523	$ 5,456,801	$ 5,676,287	$ 16,350,611
Total IOU Portfolio Budget	$ 75,964,272	$ 78,913,553	$ 81,744,524	$ 236,622,349

D. San Diego Gas & Electric

The LGSEC does not offer any comments on issues specific to the SDG&E application at this time.

IV. CONCLUSIONS AND RECOMMENDED CPUC ACTION

A. Conclusions

The LGSEC review of the utility applications for 2009-20011 energy efficiency programs yields several conclusions:

- ♦ Multiple program administrators have different structures for local government programs, and different approaches.
- ♦ Regional opportunities are being overlooked in favor of new partnerships with individual cities. This contradicts State policy direction for regional collaboration, and creates opportunities for additional utility administrative costs.
- ♦ Innovation is not being encouraged with local government partnerships. Local government proposals are not fully considered.
- ♦ The partnerships continue, after all these years, to not be true collaborations. While there may be individual exceptions, the rule is that the utilities crunch numbers in back rooms and present final products to the CPUC without agreement from the partners.
- ♦ Priority for funding has gone to the utilities themselves while they have kept existing successful partnerships at a status quo level – unable to effectively expand their services and possibly having to re-trench, at least for Edison partnerships.

The State's expectations for local government assistance in achieving energy efficiency goals, which are a subset of broader climate change goals, are great. While the proposed local government partnerships may appear at first reading to harness the resources of local governments, closer inspection reveals that they are not comprehensive, nor are they innovative. Particularly in the case of Edison, local governments are being squeezed into a one-size-fits-all mold, regardless of organizational capacity and history of developing and implementing energy efficiency and other sustainability programs. The regional and contract aspects of Southern California government structure create a web of public infrastructure that can benefit from energy efficiency improvements if a more innovative approach is taken.

B. Recommended Commission Actions

The Commission must obtain a better understanding of utility costs, particularly SCE administrative costs. The Commission should not approve any energy efficiency programs that are top-heavy with administrative costs, particularly when some local government partners are providing program administration and project management services as in-kind contributions.

The financial costs to develop, amend, adopt, and implement building and planning codes that promote energy efficiency and climate change objectives must be funded or they will not happen under the current budgetary conditions. The use of Public Good Charge funds for this effort should be considered as a direct disbursement to local government and considered a high priority measure if energy efficiency and climate change goals are to be achieved.

The Commission should consider a different administrative structure for local government partnerships, particularly in light of AB 32 implementation. The LGSEC has made extensive comments on this in the context of the draft Energy Efficiency Strategic Plan, R.08-07-

011.[8] To summarize those comments, a different administrative approach will be required moving forward that addresses the range of issues encompassed in AB 32 implementation, including energy efficiency. As an interim step, the CPUC should facilitate the development of regional sustainability offices that have, as part of their mission, the development and delivery of energy efficiency programs. The CPUC could use as a starting point interested, existing local government partnerships that have a regional focus, or the California Center for Sustainable Energy in the San Diego region. The process moving forward for implementing both energy efficiency and climate policies should be modified to accommodate smaller stakeholders. In particular, the CPUC should work with sister agencies to identify a central, neutral clearinghouse for coordinating these efforts.

Dated: August 28, 2008

Respectfully submitted,

By:

Jody S. London

Jody London Consulting
P.O. Box 3629
Oakland, California 94609
Telephone: (510) 459-0667
E-mail: jody_london_consulting@earthlink.net

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[8] See in R.08-07-011/A.08-06-004 *Comments of the Local Government Sustainable Energy Coalition on the Draft Strategic Energy Efficiency Plan*, July 31, 2008, and *Reply Comments of the Local Government Sustainable Energy Coalition on the Draft Strategic Energy Efficiency Plan*, August 7, 2008.

ATTACHMENT A

Sample of Innovative Proposals from Local Government Organizations[9]

	Proposing Entity	Program Description
Strategic Planning, Development, and Coordination		
1.	Green Cities California	Develop community-wide strategic plans for energy efficiency and greenhouse gas reduction. Plans will be specific to market sectors, and would include elements to: develop proposals for funding from non-IOU sources, such as BAAQMD, US EPA, US DOE and private foundations; facilitate programs like the Cambridge Energy Alliance which is characterized by community-based, predominantly privately financed energy efficiency and renewables effort that leverages PGC funds and seeks deep penetration in all customer classes; conduct ongoing community-wide performance tracking and evaluations including residential and commercial energy programs and community energy consumption; prepare a blue print for engagement of local governments in regional partnerships and energy programs; include affiliate agencies such as local school districts, water and wastewater departments, and transit authorities to access existing programs and resources.
2.	East Bay Energy Watch	Green Jobs. Match qualified employee applicants with green energy and technology businesses in the corridor, bridge educational and training systems, develop an interactive website for employers and potential employees, fund development for developing pilots and institutionalizing workforce development for green jobs.
3.	Multiple	Low Income strategies that will see that the various services already available are coordinated locally to ensure greatest impact.
4.	County of Los Angeles	"Energy Resource Manager" for Los Angeles County "affiliate organizations." Affiliate organizations are those that have some operating relation to the Los Angeles County Board of Supervisors, but have independent budgets, and have little or no dedicated energy management resources. The Energy Resource Manager would work with these affiliate organizations to identify energy efficiency projects in their facilities. Because there is little or no dedicated energy resource, it is likely that cost-effective projects are not being implemented. Puget Sound Energy manages a similar "Energy Resource Manager" program and has stated they see an approximate 2-3 year payback on this investment.

[9] This is a partial list of proposals for "innovative" energy efficiency programs from local government partners and local government organizations working on broader sustainability issues.

5.	County of Los Angeles, and Ventura County Regional Energy Alliance	Regional Energy Office – develop a regional entity to provide benefits and services to those public agencies that are not part of an existing Local Government Partnership. A single, regional energy (or sustainability) entity, working in conjunction with all local government entities and the local utilities, could more cost effectively bring myriad local agencies up to speed on energy efficiency best practices and project implementation.
6.	East Bay Energy Watch	On-Bill Financing Pilot Project – Provide direct installation of energy efficiency hardware for small commercial customers.
7.	Silicon Valley Energy Watch	Evaluation, Measurement, & Verification - SVEW proposes initiating EM&V at the outset of the program, in order to improve program performance by supplying timely 3rd-party feedback throughout the course of the program. It is anticipated this will entail some cost beyond EM&V costs separately budgeted by PG&E for this partnership.
8.	Ventura County Regional Energy Alliance	Coordination and technical support provided to County Planning Department to create Build it Green website to further integrate energy efficiency, green design and sustainable planning efforts throughout the region.
Codes and Standards		
9.	Multiple	Define a proposed set of regional energy and green building standards that would facilitate increased regional consistency in energy and green building policy, and continued adoption of leading best practices in same.
10.	East Bay Energy Watch	Regional and replicable approach to building upon Berkeley's expertise in time-of-sale and renovation ordinances (RECO and CECO) to improving the energy efficiency of existing buildings, while also "helping to make local codes more consistent community-to-community."
11.	East Bay Energy Watch	Pilot to offer a commissioning agent at large for all new construction or major renovations. Improve local enforcement of energy codes through its training program
12.	East Bay Energy Watch	RECOPlus -- significantly leverage funding with existing funds from fees paid by home buyers under the city ordinance. In addition to the ordinance- required home energy efficiency inspections, RECOPlus will directly install CFL porch lights and provide new home buyers with energy efficiency education, and link customers with appropriate rebates as they make upgrades to their properties.
13.	Association of Monterey Bay Area Governments	Provide increased levels of technical support to develop green building programs for the 18 jurisdictions that do not have one in place currently.
14.	City of San Diego	Develop codes and standards in the Permit Review Process to achieve ZeroNet residential construction and commercial construction.

15.	Ventura County Regional Energy Alliance	Provide technical support through design review of new plans by a certified energy manager. Meetings are held at the convenience of the building owner/project developer to discuss the options and opportunities of leverage new technology with codes and standards. Design review meeting is held prior to the plan check process to ensure that best technology/best practices can be applied.
16.	Ventura County Regional Energy Alliance	Regional energy office provides point of contact for local "green" mortgage brokers and insurance providers seeking coordination and introduction to new and remodeled construction projects. Regional energy office acts as a conduit of information and is helping to build capacity for complimentary financing opportunities
Integrative Approach for Zero Net Energy New and Existing Buildings		
17.	Silicon Valley Energy Watch	SVEW will implement a program in collaboration with Build It Green to harness local governments' land use permitting powers and interest in green building to pilot a regional local government residential green building incentive program. Carbon Free Future will offer two types of local government assistance: (1) Planning grants supporting development of incentive mechanisms, ICLEI-template Climate Action Plans, or Finance District planning. (2) Performance payments for homes built or improved to green standards will be offered both to builders and to participating agencies who utilize programs, policies, or non-monetary incentives.
18.	East Bay Energy Watch	Partnership offers a *commissioning agent at large*. Lets member cities require commissioning of any new projects without forcing the builder to absorb all of the commissioning costs.
Resource Integration		
19.	County of Los Angeles	Water Utility Retro-commissioning – retro-commission a segment of the County Waterworks and Wastewater Treatment Divisions. There are a number of measures not identified in SCE's "menu" of incentive measures that could be implemented in water systems. These include but are not limited to: systems monitoring, operating schedule changes, pumping system optimization, advanced controls, storage system improvements, monitoring-based commissioning and maintenance scheduling.
20.	Association of Monterey Bay Area Governments	Solar Hot Water Deployment -- Develop and manage an incentive program to install solar hot water heaters on homes in the AMBAG region.
21.	Association of Monterey Bay Area Governments	Solar Technical Assistance -- Provide technical support to AMBAG's 21 jurisdictions to develop solar energy systems to support the full jurisdictional demand. Also provide assistance to large member cities to develop financing for solar on homes following the Berkeley model.
22.	Association of Monterey Bay Area Governments	Demand Response Training -- Provide a series of trainings to the 21 AMBAG jurisdictions on the applications and benefits of Demand Response.

23.	Association of Monterey Bay Area Governments	Replace all antiquated irrigation controllers in local regional and neighborhood parks with weather-based controllers to conserve water and energy.
24.	Association of Monterey Bay Area Governments	Complete a regional emissions inventory for Santa Cruz, Monterey and San Benito Counties. Support greenhouse gas emission inventory development for the 21 AMBAG jurisdictions.
25.	Ventura County Regional Energy Alliance	Regional energy office working in collaboration with Resource Conservation District for mobile water/energy lab to be available to agricultural and large water customers. The "one stop shot" approach has potential opportunity to integrate water, electricity, natural gas, and green waste components.
26.	Ventura County Regional Energy Alliance	Advance a case study/best practice approach to gymnasium lighting and pool operations for school districts. Through economies of scale and bundling similar projects through a regional energy office, new technologies can be advanced and energy savings achieved.
HVAC and Refrigeration Early Retirement		
27.	East Bay Energy Watch	HVAC Retirement Program: is an upstream program that works with vendors to push HVAC replacement of equipment that is 10 years or older. Incentives will be based on the existing equipment with a goal of pushing paybacks to less than 4 years. Existing equipment will be used for the baseline, thereby generating sufficient incentives to replace the older units before they fail.
Community Development, Outreach, and Marketing		
28.	East Bay Energy Watch	Integrated Environmental Marketing and Outreach -- Smart Biz is an existing non-resource program that should be expanded. The program uses an integrated environmental services and climate protection model to green targeted sectors in a community, in which "one-stop - shopping" is taken directly to these targeted businesses.
29.	East Bay Energy Watch	Enhanced Realtor Outreach -- Marketing, outreach, energy education and staffing for Realtors to support energy efficiency measures and programs, including High Performance Homes and other efficiency programs. Target outreach to ALL homeowners, not just buyers and sellers. Leverage existing and new contacts, mailings and other marketing mechanisms typically used by local Realtor associations and associated professions.
30.	East Bay Energy Watch	Use public access stations to broadcast training content prepared by PG&E (from other funding sources) as a form of outreach and education.
31.	East Bay Energy Watch	Neighborhood Saturation Projects -- advocate for high percentages of participation for residential and small business neighborhoods to complete comprehensive retrofits, possibly leading to demand response programs.

32.	East Bay Energy Watch	Emerging Technology Research and Development – Pay organizations like the California Lighting Technology Center, the Department of Energy's National Laboratories and the Electric Power Research Institute to deliver timely and relevant expert assistance when local government staffs need to create solutions that stand up to testing and scrutiny.
33.	East Bay Energy Watch	District Energy Research Pilot -- Study the subject to help cities determine if distributed energy downtown warrants further consideration.
34.	East Bay Energy Watch	Solar map -- allow property owners obtain quick assessments for solar potential and provide referrals to renewable and energy efficiency service providers.
35.	City of San Diego	Provide technical support to City Planning Community Investment Department in implementing plan that requires investment in green building and green neighborhood practices. Assist in raising awareness through Community Planning Groups about sustainable building design.
36.	East Bay Energy Watch	On-line Rebates and City-Marketed Energy Efficiency – makes use of existing city interactions with their constituents to market energy efficiency in libraries, community centers, fire stations, etc.
37.	City of San Diego	"Green City San Diego" will highlight and replicate best in class energy and water reductions; "Green Schools" and the annual "Youth Forum" will bring information to high school students; and peer-to-peer exchanges at the regional, state and national levels will transfer case studies.

Low-income Energy Efficiency Marketing and Outreach Support		
38.	East Bay Energy Watch	On-line Rebates and City-Marketed Energy Efficiency -- use existing city interactions with constituents to market energy efficiency in libraries, community centers, fire stations, etc. Reach a new set of customers by posting program messages on participating cities' websites. These postings should direct people to the whole menu of offerings with guides and self-directed screens to steer people to the best program for their needs
39.	Association of Monterey Bay Area Governments	Provide power strips and information on standby consumption reduction to low-income households.
40.	Association of Monterey Bay Area Governments	Pilot a program of installation of Hot Water Demand Systems in 200 low-income households.

ATTACHMENT B
AVAILABLE DETAILED PARTNERSHIPS BUDGET INFORMATION

South Bay Energy Savings Center Analysis of Program Budget*

Comparison of current Partnership & Edison proposal	SBESC Program	SCE Core Incentives (direct to customer)	SCE Costs	Total Program SBESC + SCE + incentives	kWh	kW	Total Program Cost/ kWh	SCE cost /kWh	SBESC Cost /kWh
current partnership	$1,208,804		$180,167	$1,208,804	0	na			
Edison 4/30/2008	$1,203,892	$1,020,000	$561,744	$2,785,636	6,000,000	1266	$ 0.46	$ 0.26	0.20
Percentage change between current Partnership and Edison proposal	**-0.41%**	**new**	**+212%**	**+130%**	**new**	**new**	**new**	**new**	**new**

* This analysis was prepared based on a discussion draft of the budget provided to SBCCOG by SCE. SBCCOG only saw the proposed budget when the application was filed in July.

BUDGET

Administrative Costs		
Overhead and G&A	$	149,330
Other Administrative Costs	$	334,550
Marketing/Outreach	$	**15,000**
Incentives and Rebates		
d.i. User Input Incentive	$	175,519
d.ii. Rebate	$	1,474,481
d.iii. Direct Install Labor	$	-
d.iv. Direct Install Materials	$	-
d.v. Upstream payments	$	-
Activity	$	550,000
Installation	$	-
Hardware & Materials	$	-
Rebate Processing & Inspection	$	-
EM&V Costs	$	-
Costs recovered from other sources	$	-

7.1 million

7 hrs

PROGRAM IMPACTS

Program Reductions for Measures installed through 2011

User Entered kW (kW)	1,140
Net Jul-Sept Peak (kW)	1,320
Net Dec-Feb Peak (kW)	607
Net NCP (kW)	1,512
Net CEC (kW)	1,560
Annual Net kWh	7,188,096
Lifecycle Net kWh	95,693,820
Annual Net Therms	-
Lifecycle Net Therms	-

Program Reductions for Measures installed through 2015

User Entered kW (kW)	1,140
Net Jul-Sept Peak (kW)	1,320
Net Dec-Feb Peak (kW)	607
Net NCP (kW)	1,813
Net CEC (kW)	1,560
Annual Net kWh	7,188,096
Lifecycle Net kWh	95,693,820
Annual Net Therms	-
Lifecycle Net Therms	-

Cost Effectiveness for all measures installed through 2015

TRC

Costs	$	5,897,225
Electric Benefits	$	7,540,009

Gas Annual CO2 (tons) - 2009	-
2010	-
2011	-
Gas Lifecycle CO2 (tons) - 2009	-
2010	-
2011	-
Gas Annual NOX (tons) - 2009	-
2010	-
2011	-
Gas Lifecycle NOX (tons) - 2009	-
2010	-
2011	-
Gas Annual SO2 (lbs) - 2009	
2010	
2011	
Gas Lifecycle SO2 (lbs) - 2009	
2010	
2011	

[illegible]

Data below not currently used in Energy Division workbook

Levelized Cost RIM ($/therm)		
Discounted Therms		-
Cost		#DIV/0!
Benefits		#DIV/0!
Benefit-Cost		#DIV/0!
Levelized Cost RIM ($/kWh)		
Discounted kWh		55,010,451
Cost	$	0.20
Benefits	$	0.14
Benefit-Cost		#DIV/0!
RIM		
Costs	$	11,265,918
Electric Benefits	$	7,540,009
Gas Benefits	$	-
Net Benefits (NPV)	$	(3,725,909)
BC Ratio		0.67

Impacts for all programs installed through 2015

Net July-Sept Peak (kW)	
Clothes Dryer	-
Clothes Washer	-
Consumer Electronics	-
Cooking	-
Dishwasher	-

Gas Benefits	$	-
Net Benefits (NPV)	$	1,642,784
BC Ratio		1.28
PAC		
Costs	$	2,514,401
Electric Benefits	$	7,540,009
Gas Benefits	$	-
Net Benefits (NPV)	$	5,025,608
BC Ratio		3.00
Levelized Cost		
Levelized Cost TRC ($/kWh)		
Discounted kWh		55,010,451
Cost	$	0.10
Benefits	$	0.14
Benefit-Cost	$	0.03
Levelized Cost PAC ($/kWh)		
Discounted kWh		55,010,451
Cost	$	0.05
Benefits	$	0.14
Benefit-Cost	$	0.09
Levelized Cost TRC ($/therm)		
Discounted Therms		-
Cost		#DIV/0!
Benefits		#DIV/0!
Benefit-Cost		#DIV/0!
Levelized Cost PAC ($/therm)		
Discounted Therms		-
Cost		#DIV/0!
Benefits		#DIV/0!
Benefit-Cost		#DIV/0!
Emission Annual Reductions (2009-2011)		
Electric Annual CO2 (tons) - 2009		848
2010		1,695
2011		1,695
Electric Lifecycle CO2 (tons) - 2009		11,259
2010		22,517
2011		22,517
Electric Annual NOX (tons) - 2009		0.11734
2010		0.23469
2011		0.23469
Electric Lifecycle NOX (tons) - 2009		1.55562
2010		3.11124
2011		3.11124
Electric Annual SO2 (lbs) - 2009		
2010		
2011		
Electric Lifecycle SO2 (lbs) - 2009		
2010		
2011		

CERTIFICATE OF SERVICE

I, Jody London, certify that I have, on this date, served a copy of "Response Of The Local Government Sustainable Energy Coalition To Utility Energy Efficiency Applications for 2009-2011" on all known parties to A.08-07-021, A.08-07-022, A.08-07-07-023, and A.08-07-031 by transmitting an e-mail message with the document attached to each party named in the official service list, and by serving a hard copy on the Administrative Law Judge.

I declare under penalty of perjury, pursuant to the laws of the State of California, that the foregoing is true and correct.

Dated August 28, 2008 in Oakland, California.

____

Jody London

Proceeding: A0807021 - Application of South
Filer: Southern California Edison Company
List Name: LIST
Last changed: August 26, 2008

Proceeding: A0807022 - Application of South
Filer: Southern California Gas Company
List Name: LIST
Last changed: August 26, 2008

Proceeding: A0807023 - Application of San D
Filer: San Diego Gas & Electric Company
List Name: LIST
Last changed: August 26, 2008

Proceeding: A0807031 - Application of Pacif
Filer: Pacific Gas and Electric Company
List Name: LIST
Last changed: August 26, 2008

sesco@optonline.net
mmoore@newportpartnersllc.com
keith.mccrea@sablaw.com
mharrigan@ase.org
jimross@r-c-s-inc.com
gtropsa@ice-energy.com
ckmitchell1@sbcglobal.net
spatrick@sempra.com
dmahmud@mwdh2o.com
nkarno@yahoo.com
michele@sbesc.com
pwuebben@aqmd.gov
larry.cope@sce.com
cfpena@sempra.com
liddell@energyattorney.com
jennifer.porter@energycenter.org
sephra.ninow@energycenter.org
mlewis@ctg-net.com
judi.schweitzer@post.harvard.edu
thunt@cecmail.org
wilkinson@es.ucsb.edu
pcanessa@charter.net
JeffreyH@hellermanus.com
RemiT@hellermanus.com
bfinkelstein@turn.org
hayley@turn.org
jeanne.sole@sfgov.org
marcel@turn.org
stephen.morrison@sfgov.org
achang@nrdc.org
rsa@a-klaw.com
cjn3@pge.com
saw0@pge.com
steven@moss.net
jsqueri@gmssr.com
edwardoneill@dwt.com
ssmyers@att.net
jak@gepllc.com
jerryl@abag.ca.gov
rknight@bki.com
jody_london_consulting@earthlink.net
hoerner@redefiningprogress.org
swentworth@oaklandnet.com
samuelk@greenlining.org
john@proctoreng.com
pmschwartz@sbcglobal.net
tim@marinemt.org
wem@igc.org
hryan@smallbusinesscalifornia.org
bill@jbsenergy.com
jweil@aglet.org
elee@davisenergy.com
mike@calcerts.com
tcrooks@mcr-group.com
glw@eslawfirm.com
chris@cuwcc.org
mboccadoro@dolphingroup.org
lmh@eslawfirm.com
ljimene@smud.org
cscruton@energy.state.ca.us
kmills@cfbf.com
rob@clfp.com
bburt@macnexus.org
jparks@smud.org
js@clearedgepower.com
tom@ucons.com
higgins@newbuildings.org

gandhi.nikhil@verizon.net
donaldgilligan@comcast.net
ameliag@ensave.com
Clark.Pierce@us.landisgyr.com
eosann@starpower.net
jthorneamann@aceee.org
snadel@aceee.org
CCole@currentgroup.com
srassi@knowledgeinenergy.com
staples@staplesmarketing.com
mking@staplesmarketing.com
nphall@tecmarket.net
skihm@ecw.org
gstaples@mendotagroup.net
annette.beitel@gmail.com
jmeyers@naima.org
pjacobs@buildingmetrics.biz
mmcguire@summitblue.com
bobbi.sterrett@swgas.com
emello@sppc.com
David.Pettijohn@ladwp.com
tblair@mwdh2o.com
bmcdonnell@mwdh2o.com
HYao@SempraUtilities.com
kwong@semprautilities.com
nhernandez@isd.co.la.ca.us
david@nemtzow.com
susan.munves@smgov.net
brad.bergman@intergycorp.com
southlandreports@earthlink.net
cdamore@icfi.com
dpape@icfi.com
sculbertson@icfi.com
thamilton@icfi.com
Case.Admin@sce.com
don.arambula@sce.com
Jennifer.Shigekawa@sce.com
Laura.Genao@sce.com
Stacie.Schaffer@sce.com
tory.weber@sce.com
dwood8@cox.net
rsperberg@onsitenergy.com
jlaun@apogee.net
ashley.watkins@energycenter.org
centralfiles@semprautilities.com
irene.stillings@energycenter.org
jyamagata@semprautilities.com
robert.gilleskie@energycenter.org
bob.ramirez@itron.com
jennifer.holmes@itron.com
rachel.harcharik@itron.com
david.gordon@efm-solutions.com
kjk@kjkammerer.com
cneedham@edisonmission.com
TFlanigan@EcoMotion.us
sthompson@ci.irvine.ca.us
sbarata@opiniondynamics.com
dale@betterbuildings.com
mlong@anaheim.net
cheryl.collart@ventura.org
Jeff.Hirsch@DOE2.com
hhuerta@rhainc.com
atencate@rsgrp.com
lcasentini@rsgrp.com
jcelona@sbcglobal.net
ann.kelly@sfgov.org
abesa@semprautilities.com
wblattner@semprautilities.com
pvillegas@semprautilities.com
norman.furuta@navy.mil
bcarver@nrdc.org
eric@ethree.com
kgrenfell@nrdc.org
lettenson@nrdc.org
andrew_meiman@newcomb.cc
andy.goett@paconsulting.com
ann_mccormick@newcomb.cc
cbaskette@enernoc.com
efm2@pge.com
j5b2@pge.com
yxg4@pge.com
John_Newcomb@newcomb.cc
lhj2@pge.com
matt_sullivan@newcomb.cc
rcounihan@enernoc.com
rbm4@pge.com
SRRd@pge.com
tmfry@nexant.com
WKR4@pge.com
rekl@pge.com
rreinhard@mofo.com
steven@moss.net
Cassandra.sweet@dowjones.com
jwiedman@goodinmacbride.com
sbuchwalter@icfi.com
policy.solutions@comcast.net
jimflanagan4@mac.com
lisa_weinzimer@platts.com
slda@pge.com
sellis@fypower.org
wmcguire@fypower.org
cem@newsdata.com
bkc7@pge.com
jkz1@pge.com
wcm2@pge.com
regrelcpuccases@pge.com
hxag@pge.com
rafi@pge.com
epetrill@epri.com
andrew.wood3@honeywell.com
Mary@EquipoiseConsulting.com
tlmurray@earthlink.net
ghamilton@gepllc.com
mistib@comcast.net
ashish.goel@intergycorp.com
grant.cooke@intergycorp.com
jay.bhalla@intergycorp.com
rfox@intergycorp.com
Patricia.R.Thompson@gmail.com
sbeserra@sbcglobal.net
wbooth@booth-law.com
michael.cheng@paconsulting.com
alex.kang@itron.com
Ann.Peterson@itron.com
fred.coito@kema.com
jennifer.fagan@itron.com
jtiffany@ase.org
john.cavalli@itron.com
kathleen.gaffney@kema.com
brbarkovich@earthlink.net
karl.brown@ucop.edu
mrw@mrwassoc.com
Bruce@BuildItGreen.org
p.miller@earthlink.net
awatson@quest-world.com
jesser@greenlining.org
robertg@greenlining.org
stevek@kromer.com
craigtyler@comcast.net
elvine@lbl.gov
mwbeck@lbl.gov
darmanino@co.marin.ca.us
jcluboff@lmi.net
rita@ritanortonconsulting.com
cpechman@powereconomics.com
gthomas@ecoact.org
emahlon@ecoact.org
sobrien@mccarthylaw.com
barry.hooper@sanjoseca.gov
mary.tucker@sanjoseca.gov

NancyKRod@conSol.ws
Rob@ConSol.ws
bobho@mid.org
joyw@mid.org
gsenergy@sonoma-county.org
tconlon@geopraxis.com
bmfinkelor@ucdavis.edu
rmccann@umich.edu
mbhunt@ucdavis.edu
dmahone@h-m-g.com
mgillette@enernoc.com
kenneth.swain@navigantconsulting.com
kdusel@navigantconsulting.com

lpark@navigantconsulting.com
david.reynolds@ncpa.com
scott.tomashefsky@ncpa.com
jjg@eslawfirm.com
asloan@rs-e.com
mclaughlin@braunlegal.com
Corlando@energy.state.ca.us
dgeis@dolphingroup.org
ehebert@energy.state.ca.us
jcastleberry@rs-e.com
wynne@braunlegal.com
klewis@energy.state.ca.us
katie@cuwcc.org
mharcos@rs-e.com
rsapudar@energy.state.ca.us
bernardo@braunlegal.com
pstoner@lgc.org
wwester@smud.org
vwood@smud.org
sjameslehtonen@yahoo.com
rmowris@earthlink.net
hgilpeach@scanamerica.net
paul.notti@honeywell.com
brian.hedman@quantecllc.com
Sami.Khawaja@quantecllc.com
janep@researchintoaction.com
samsirkin@cs.com
mbaker@sbwconsulting.com
jholmes@emi1.com
jbazemore@emi1.com
john@enactenergy.com
ppl@cpuc.ca.gov
atr@cpuc.ca.gov
aeo@cpuc.ca.gov
cf1@cpuc.ca.gov
cxc@cpuc.ca.gov

tam@cpuc.ca.gov
crv@cpuc.ca.gov
dmg@cpuc.ca.gov
dhn@cpuc.ca.gov
dil@cpuc.ca.gov
trh@cpuc.ca.gov
flc@cpuc.ca.gov
hcf@cpuc.ca.gov
jbf@cpuc.ca.gov
jl2@cpuc.ca.gov
cln@cpuc.ca.gov
jst@cpuc.ca.gov
jdr@cpuc.ca.gov
jws@cpuc.ca.gov
jci@cpuc.ca.gov
kwz@cpuc.ca.gov
keh@cpuc.ca.gov
lp1@cpuc.ca.gov
mwt@cpuc.ca.gov
mmw@cpuc.ca.gov
mkh@cpuc.ca.gov
nfw@cpuc.ca.gov
pw1@cpuc.ca.gov
snr@cpuc.ca.gov
smw@cpuc.ca.gov
tcr@cpuc.ca.gov
zap@cpuc.ca.gov
ztc@cpuc.ca.gov
awp@cpuc.ca.gov
bvalenci@energy.state.ca.us
crogers@energy.state.ca.us
dbeck@energy.state.ca.us
dks@cpuc.ca.gov
agarcia@energy.state.ca.us
msherida@energy.state.ca.us

sbender@energy.state.ca.us