

May 10, 2004

DOCKET OFFICE
California Public Utilities Commission
505 Van Ness Avenue, Room 2001
San Francisco, CA 94102

Re: Order Instituting Rulemaking to Examine the Commission's Future Energy
Efficiency Policies, Administration and Programs – R.01-08-028

Dear Docket Clerk:

Enclosed for filing are the original and five (5) copies of "**Reply Comments of Quality Conservation Services On Administrative Structures for Energy Efficiency**" in the above-referenced matter.

Very truly yours,

Allan Rago

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Examine
the Commission's Future Energy Efficiency
Policies, Administration and Programs.

R.01-08-028
(Issued August 23, 2001)

**Reply Comments of Quality Conservation Services On Administrative
Structures for Energy Efficiency**

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May 10, 2004

Reply Comments of Quality Conservation Services On Administrative Structures for Energy Efficiency

**Prepared by:
Allan Rago, Quality Conservation Services, Inc.
May 10, 2004**

Quality Conservation Services, Inc. ("QCS"), an energy efficiency service provider specializing in residential, low income and small commercial installations, has been providing EE services in California for the past five years. QCS has not been a third party or a "non-Utility" implementer, nor have we submitted any proposal for the Commission's consideration in either of the 2002-03 or the 2004-05 solicitations. We have acted as subcontractor or contractor for several Utility and non-Utility programs, operating in the service areas of all four major California utilities. Therefore, we feel we have no vested or pre-determined interests in supporting any single type of program. In fact, we hope to continue our activities in the future providing energy efficiency services in California under whatever administrative structure is selected.

Quality Conservation is a member of the California Coalition on Energy Efficiency¹ (CCEE) and we support the administrative approach recommended by the

¹ The CCEE is comprised of the following organizations and individual members: California Coalition for Energy Efficiency: Organizational Signers: "California Interfaith Power & Light, San Francisco CA", California Public Citizen "Clean Power Works, Arcata CA" "Community First Coalition, San Francisco CA" "Custom Distributors, Inc., Monrovia CA" "Donald Aitken Associates, Berkeley CA" "Energen Controls, Inc, Cypress CA" "Free Lighting Corporation, Houston TX" "Greenpeace, San Francisco" "ACTERRA (formerly A Bay Area Action), Palo Alto, CA" "HOPE - Helping Our Peninsula's Environment, Monterey CA" "Local Power, Oakland CA" "P.L.A.N., People for Livable and Affordable Neighborhoods, Atherton CA" "Pacific Environment, San Francisco, CA" "Public Citizen's National Energy Program, Washington, DC" "Quality Conservation Services, Inc., South San Francisco CA" "Renee's Garden, Felton CA" "Schmidt Creative, Sebastopol CA" "SESCO, Inc., Claremont CA" "TEDCO Energy Services, Inc., Amarillo TX" "The Green Party of San Francisco, San Francisco CA" "Winegard Energy, Inc., Duarte CA" "Women's Energy Matters, San Francisco"

Plus the following environmental, consumer and Energy Activists are members as individuals: "Ardys De Lu, Berkeley CA" "Carol Denney, Berkeley CA" "Dan Meek, Attorney, Portland, OR" "Don Eichelberger, Abalone Alliance, San Francisco CA" "Elaine Hebert, Sacramento CA" "Harry Kershner, San Francisco CA" "Irmi Meindl, Committee to Minimize Toxic Waste, Berkeley CA" John Schaefer" "Joshua English, Davis Citizens Task Force, Davis CA" "Judith Iam, Iam Presentations, Sebastopol CA" "Laurie Salen, San Francisco CA" "Lorene S. Lamb, Oakland CA" "Loretta Goclowski, Sacramento CA" "Mary Prophet, Women for Peace-SF, San Francisco CA" "Nan Schweiger, Albany CA" "Pamela Coxson, President, Fair Oaks Neighbors, San Francisco CA" "Pat Martin, Berkeley CA" "Perla Ni, Publisher, Stanford Social Innovation Review, Stanford" "Sarabecca Barnett, Davis CA" "William D. Bogert, Berkeley CA"

CCEE: a non-utility administrator, selecting programs and implementers who are un-affiliated, with the primary selection mechanism being a series of open solicitation Standard Offer Programs targeted to the various customer sectors with the respective program incentives set at a fixed percentage of the avoided costs. However, these reply comments are made solely by Quality Conservation in response to the numerous initial comments made concerning the proposed California Standard Offer Program and the history of the Standard Offer concept in other locations, particularly in Texas, where it is the cornerstone of EE administration.

In general, the most of the negative comments were based upon personal perceptions and/or isolated anecdotal indicators. QCS' information on the Texas Standard Offer Programs (SOPs), on the other hand, is taken from the detailed filed reports of the eight Texas IOUs to the Texas PUC² made on or about April 1, 2004 on their thirty-one 2003 SOPs and market transformation programs. It is vital when making decisions on the administrative structure to rely upon actual data when available rather than upon suppositions or upon anecdotal information.

Standard Offer Structure Works Very Well With HTR Customers.

ICF Associates, Inc. believed (ICF, p. 5) that the Standard Offer programs did not “work well with small business and residential markets” and were not “suited to hard-to-reach markets.” ICF also claimed that the Texas SOP programs were “significantly undersubscribed” in 2003 and the HTR program was “difficult to administer.” It also questioned their “efficacy” in all program areas (ICF, p.3). American Lighting (p.2) felt that the Standard Offer might be “fine for non-residential customers” but it is not suited for others (residential customers). However, the record shows the opposite to be true in each case.

² The annual report by each IOU is available at www.puc.state.tx.us. Click on “Filings-Interchange”, then “Filings Retrieval”, then “Login”, then for “Control Number” enter the docket number “29440”.

There were 8 Residential and Small Commercial SOPs in 2003; these were collectively **over-subscribed** by 12%. The 10 Texas HTR SOPs in 2003 were collectively **over-subscribed** by 25%. The actual savings produced by each were significantly greater than the budgeted targets. In New Jersey, the major residential SOP program was oversubscribed in last five of the six electric and gas two-year SOP programs. The administrative cost for the Texas HTR SOP programs was 9.7% (including EM&V and modest Marketing and Outreach), compared to 12.0% for the large commercial and industrial programs. The administrative cost for the Residential and Small Commercial SOPs was even lower at 7.4%. The Standard Offer concept works well with residential, small commercial and HTR customers and apparently has had relatively little administrative difficulty with them.

Standard Offer Structure Provides for a Balanced, Complex Portfolio.

ICF states (ICF, p.5), without any explanation, that the SOP structure “could not support a balanced portfolio” and the Standard Offer structure’s reliance upon the deemed values of the DEER database does not allow for “more complex projects or processes.” (ICF, p.6) Both of these are incorrect.

The direct one-to-one correlation between expended budgets and savings benefits allows the Standard Offer concept to be more precisely structured and “predictable” (see ICF, p. 5) to assure a balance among the different customer classes and groups for program budgets and for program benefits. For example, the overwhelming majority of the net savings benefits from California IOU programs went to Commercial and Industrial customers (SESCO Reply Comments, p.5-6); however, under the Texas SOP structure, 17% of the savings went to HTR customers and another 32% went to residential and small commercial customers. Given a freer hand, the marketplace, like nature, will move quickly to fill a void. For example, in Texas, the fastest growing EE sector is that serving previously underserved rural customers (TEDCO Energy Comments, pp. 2-3).

While ICF incorrectly expresses concern about the use of deemed savings in SOPs, they ignore the extensive use of deemed savings in almost all California EE programs, particularly the IOU rebate programs. The **only** California IOU program to use a measurement procedure “more complex” than deemed savings is the Standard Offer based Standard Performance Program. It is up to the Commission or the Program Administrator/Designer to determine how much to rely upon deemed savings for the Standard Offer. In Texas, only the residential and the HTR-residential are allowed to use deemed savings. All small and large commercial and industrial SOP programs must use pre-approved IMVMP EM&V procedures to determine actual savings. Plus, residential projects have the option of using more rigorous program-specific EM&V procedures. This allows a sponsor to use any measure or application without the need to wait for a deemed savings to be approved for the database. It also allows innovative programs that want to rely on their own savings to be readily implemented. This is far more flexible than the current over reliance by California IOUs on deemed savings for their programs. [Note: The New Jersey Standard Offer Program is at the other extreme, allowing no deemed savings and no deemed EULs, requiring all savings to be measured.] It is interesting that while ICF criticizes the lack of EM&V, American Lighting (p. 2) complains that it focuses “too heavily on measurement and verification” especially for residential customers.

Standard Offer Concept a Structural Concept Not Merely One Program.

A few parties (e.g., NRDC. p.3) have suggested that the Standard Offer approach is but a single program, not an administrative approach. This is akin to suggesting that rebates are a single program. The IOUs have built their EE savings portfolios around this single concept. Measure-specific rebates are the basis for the IOU statewide SF Retrofit, MF Retrofit, Small Commercial Express Efficiency, Upstream Lighting, parts of the Large Commercial SPC program, the MF New Construction, the SF New Construction, the Non-Residential New Construction and many other statewide and local IOU programs. Are “rebates” therefore a single program or an administrative approach to secure energy savings.

The difference is that the IOU rebates are micro-managed tightly nuanced measure-specific items by which the IOUs seek to determine on a top-down basis which measures and program are “most-deserving” of implementation. The Standard Offer concept provides the same incentive per unit of savings delivered to a particular customer segment (e.g., HTR residential, large commercial, governmental or institutional, etc.), giving the marketplace and the customer the freedom to determine which measures are most desirable and needed to deliver those benefits. The range of programs and measures used is likely to be wider and more innovative under the Standard offer concept than under the rebate or the current one-time selection by committee process. Unlike a top-down IOU or committee determination of “desirable” programs, the determination and design of cost-effective programs is totally up to the sponsors, allowing for a much greater breadth and innovativeness in the delivery of EE services.

In addition, the Commission will also continue the statewide marketing and outreach programs, as recommended by the CCEE. It can also approve and authorize market transformation programs, as are covered under the Texas Standard Offer program (QCS, p.11). Finally, the standard offer program can accommodate any correcting limitation to encourage a greater breadth of programs, such as is done in Texas with the 65% limitation on lighting (Ibid, p.12) or the introduction of specially targeted SOPs (e.g., for not-for-profit facilities, Ibid, p.4).

Appreciation for ICF Support of Standard Offer Approach.

While ICF prefers an alternate administrative structure (the IOUs to select, administer and implement EE programs), we appreciate their comments supportive of the Standard Offer program. Specifically, ICF states (ICF, p. 5-6), that the Standard offer structure has “been very effective...for acquiring energy efficiency gains” and that the Standard Offer structure “could integrate well with utility procurement processes, since the standard offer programs can be associated with more predictable streams of

costs and energy/demand savings.” ICF also recognizes that the “administrative costs are likely to be lowest” under the Standard Offer program. ICF cautions that the program needs to be “properly structured”, but then this caution is true of all alternatives.

City of Berkeley Questions.

We appreciate the interest of the City of Berkeley in the Standard Offer approach (“intriguing as a proposal selection process,” Berkeley pp. 5-6) and provide the following comments in response to their questions.

Market Transformation and Information. CCEE supports the continuation of statewide marketing efforts and of selected information and market transformation programs. The Texas portfolios include both of these along with the Standard Offer efforts; implementers are selected by competitive bids, as recommended by Efficiency California. However, this has not proven as necessary with the Standard Offer programs. The key to realize is that the Standard Offer procedure is intrinsically ideal for most market transformation efforts. A new or innovative Widget normally has years worth of trouble getting known and accepted even to the level of securing support for a separate or pilot market transformation effort. However, assuming the Widget is cost-effective, any Widget developer or advocate can implement a Widget program and receive incentives based upon the savings delivered. This will greatly accelerate the development and commercialization of new measures and savings techniques. Also, information programs that result in measure installations (such as audits or consultations) can receive standard offer incentives for the resulting savings (assuming there is no “double dipping” on the savings claims). This is already happening with the Texas High Efficiency A/C Market Transformation program, which was undersubscribed in 2003, at least partly because so many A/C dealers and contractors instead used the less restrictive Standard Offer programs to implement their high efficiency A/C efforts.

Term of Implementer Contracts. Standard Offer contracts may last as long as determined needed and desirable by the Commission/Administrators, with different

types taking longer terms. For example, in Texas, residential and HTR contracts range are commonly 30 days, 75 days, or up to a year, with requirements for security deposits and milestones to assure implementation and progress on the longer contracts. In New Jersey, the Standard Offer implementation periods extended from a few months up to three years.

Collaboration Procedures. The CCEE was remiss in not including more information on a collaborative and advisory group to advise on policy and implementation. QCS and many others supportive of the Standard Offer proposal also support an advisory and collaborative support structure similar to that proposed by the Efficiency California team. Texas has a Commission-led stakeholders group which includes all of the IOUs, residential and commercial contractors, manufacturers, consumer and environmental organizations, etc. While all policy decisions remain with the Commission, almost all matters are first brought before this group, which is consensus guided. In addition there are numerous unofficial collaborations that go on, including among various program implementers that often share customers and contracts to maximize their respective programs. For example, QCS which is primarily a weatherization contractor often works collaboratively with local air conditioning contractors to maximize the savings at our (and their) facilities.

Use of IOU Capabilities: Short Term, Long Term

The comments of CCEE and Efficiency California (and the comments of many other groups not affiliated with any coalition) have supported allowing IOUs to implement programs, but not to administer them. An even larger number have opposed having any entity acting as both administrator/selector and implementer due to the conflicts inherent in this dual relationship.

However, NRDC (p.9) feels this would not give ratepayers the “advantage” of accessing all of the existing resources in program administration, design and implementation. As both Tedco Energy (pp. 3-4) and QCS have pointed out, the IOUs

administer the Texas SOPs (this is also true of the New Jersey SOPs). In both states, the IOUs' own subsidiaries participate in the program without controversy. The reason has been that the IOUs are not in a position to favor their own proposals in selection or implementation. This can certainly be used in California to allow the use of IOU experience and capabilities in both the administrative and the implementation side.

QCS definitely believes that the best scenario would be that the IOUs are not administrators and that there be no relationship of any kind between the administrators and the implementers (the "Caesar's wife" concept). This ideal should be immediately implemented. However, if the Commission determines that the IOUs should stay in the administrative mix, even if only in the short run, then the use of the Standard Offer concept would minimize the actual and the perceived conflict. In fact, the IOUs could themselves sponsor programs, and as long as they met the cost-effectiveness and savings standards, they would have receive the incentives, just as would any other sponsor.

By requiring the same levels of cost-effectiveness and adherence to procedures by the IOU implementers as required of non-utility implementers, the Commission could secure access to all resources while dealing with the concerns of those worried about IOU favoritism or by the lack of effectiveness by IOU programs (SESCO Reply Comments, pp. 6-7, 12-14).

Standard Offer Contains Desired Attributes.

Many of the attributes desired by parties supporting IOU administration are best found in the Standard Offer Approach.

Conflict of Interest. ICF states that the "principal strength of the [Efficiency California] proposal is the elimination of the potential conflict of interest inherent in unchecked utility selection and administration of programs (ICF. p. 7). The Standard Offer Approach does the same – even if the IOUs are the administrators (the procedure used

in Texas). This is because the IOUs are not involved in program selection –only administration. The only program selection is the self-selection of the marketplace. Only those sponsors that believe they can deliver demonstrable energy savings at a cost-effective price will enter the program. Only those who actually deliver those savings will receive payments and stay in the marketplace. The IOU has not part in the selection of programs or in the determination of success.

Integrated Resource Planning. ICF (p.9), and NRDC (p.7) support IOU administration because of its ability to provide for integrated resource planning and portfolio management. However, ICF also recognizes that this is also a strength of the SOP (ICF, p.5) because of the high correlation and predictability of savings and budgets to allow for the accurate projection of energy savings that may be needed in procurement procedures.

Maximizing Cost-Effective EE Investments. NRDC (p.6) seeks to maximize investments in cost-effective energy efficiency. The Standard Offer, because it requires all programs to be cost-effective and to meet or exceed pre-set cost-effectiveness limits provides for the greatest assurance of highly cost-effective EE investments. Ratepayers will, unlike other administrative model proposals, not have to pay for the mistake of the administrator in selecting and/or managing programs that turn out to be much less cost-effective than predicted (SESCO Reply, pp. 6-7).

Open or Rolling Program Selection. ICF supports a “rolling solicitation” (ICF, p.9) as a “potential improvement” over the “all-or-nothing” for 2-3 years program selection process. NAESCO (p. 5) also criticizes the “current biennial RFP process”. However, the only administrative proposal to embrace such a “rolling solicitation” is the Standard offer Program, allowing quality and innovative programs to be implemented and funded at any time during the cycle.

Innovation and Pockets of Untapped Savings. American Synergy (p.2-3) and NAESCO (pp. 5-6) express concern about the need to locate and capture “pockets

of untapped cost-effective savings” and the need for advisory committees to “prioritize” and “identify [areas] needing innovation.” They would then conduct competitive solicitations to determine which implementers the IOUs believe would offer the best program that might reach these targets. Or .. **Anyone** (including American Synergy, an IOU or any other entity) who identifies a “pocket of untapped cost-effective savings” could immediately design and implement a Standard Offer program that would capture those savings. If they are correct, they will receive the proper incentives. And if there are lesser savings or their efforts are unsuccessful, they will receive incentives in proportion to their success. The NAESCO/American Synergy/IOU administrators would have the ratepayers pay for the “innovative” programs believed to be effective, regardless of their ultimate success. The Standard Offer program would have ratepayers pay for innovative programs only to the extent that they deliver the promised savings. This transfers the risk to those parties that can best control it – the implementers. And it transfers the risk from the parties that can least control it – the ratepayers. American Synergy (p. 2) uses the “HTR tenant market” as a primary example of current methodologies having left EE savings “on the table.” The Texas HTR Standard Offer program secured more than 60% of its savings from this very “pocket of untapped cost-effective savings.” Since prior EE programs had so clearly missed this group, contractors flocked to serve this market where they knew the opportunities to be significant. Given the freedom to chose, we expect the lure of untapped markets will encourage contractors and sponsors in California to seek out and serve exactly those areas which have the least competition and been historically underserved.

Conclusion

After having reviewed all of the submittals and comments made, Quality Conservation Services continues to believe that the Commission’s energy savings goals and the people of California would be best served by adopting an EE administrative structure based upon the California Standard Offer. This should feature a clear separation between the administrator and the implementers to avoid an inherent conflict

of interest. Because of the suspicion and distrust of an IOU administrator, the administrator and certainly the selector of programs should not be the IOUs. The primary energy savings structure should feature a series of Standard Offer programs targeted to key types of customers. The size of the Standard Offers would be based upon the funds available and the amount of savings needed to be achieved.

We do believe that the CCEE program should be modified to include more specific procedures for public and stakeholder inputs, along the line as proposed by the Efficiency California team (TURN, et al). We also believe that the selection of any needed outreach and marketing efforts and any non-SOP market transformation programs needed should, as recommended by the EC team, be selected through a competitive bidding process.

QCS stands ready to work with other interested parties to further develop these procedures or to work to incorporate the best features of all the proposals into a single program effort.

Respectfully submitted,

Allan Rago
Quality Conservation Services, Inc.
May 10, 2004

CERTIFICATE OF SERVICE

I certify that I have by electronic mail in PDF format, to the parties for which an electronic mail address has been provided, this day served a true copy of the following document dated May 10, 2004 to all parties of record in this proceeding or their attorneys of record: **Reply Comments of Quality Conservation Services On Administrative Structures for Energy Efficiency.** I also certify that I caused copies of the attached comments to be served to the ALJ, to the Assigned Commissioner and other required filings for the Commission for this proceeding.

Allan Rago
May 10, 2004

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