

**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	Rulemaking 01-08-028 Filed August 23, 2001
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**WOMEN'S ENERGY MATTERS
REPLY COMMENT ON ADMINISTRATIVE STRUCTURE**

MAY 10, 2004

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REPLY COMMENT ON ADMINISTRATIVE STRUCTURE**

Women's Energy Matters appreciates this opportunity to reply to comments on Administrative Structure. Our comments reflect WEM's role as one of the authors of the California Standard Offer Program for Energy Efficiency (CSO) proposal of the California Coalition for Energy Efficiency (CCEE). We respond to comments and questions on our proposal, provide comparisons with other proposals in areas where concern or confusion was expressed, and offer responses on issues of general interest.

We also include comments of Dan Meek as Attachment A.

NRDC Merger with Investor-Owned Utilities Requires Additional Comments

Originally, there were five proposals. Currently, there are only four, since NRDC and the four investor-owned utilities (IOUs) merged their proposals just before the comments deadline. The proposals by TURN et al., Cal-UCONs et al. and CCEE remain on the table.

WEM notes that reply comments are supposed to be used to respond to comments, however there are no comments on the merged proposal by NRDC/IOUs. Therefore WEM requests an additional round of comments and replies on the new proposal, and any other mergers that may appear in the next week.

Widespread Support for Separating Administration/Implementation

The pithy one-page comment of the South Bay Cities Council of Governments sums up themes common to many parties:

The SBCCOG strongly recommends the Commission adopt an administrative structure that separates the responsibility of program selection from any entity that also implements programs. The SBCCOG recognizes the important role of the utilities in the provision of the delivery of electricity and natural gas, but believes that innovative programs delivered by local governments, non-profits,

for-profit firms, should compete with utility programs on a level playing field in future solicitations.

The SBCCOG also believes that future arbitrary set-asides for utility or non-utility program funding is inappropriate, and that the Commission should clearly establish policy and portfolio objectives, then allow all parties to form natural partnerships to achieve these objectives. (South Bay Cities COG. p. 1)

WEM notes that the NRDC and IOU groups generally disagreed with these themes, however nearly all other commenting parties voiced strong feelings on one or more of these points.

The California Standard Offer Program for Energy Efficiency (CSO) provides the strongest assurance of separation of program selection and administration vs. implementation, ends arbitrary setasides, provides for all parties to compete on a level playing field, and allows parties to form natural partnerships to provide innovative programs that are guaranteed to achieve policy and portfolio objectives set by the Commission or its chosen System Director.

California Standard Offer Combines the Benefits of a Single Statewide Director with the Benefits of Multiple Administrators

ABAG comments:

Moreover, the administration of the energy efficiency portfolio is now very fractured, with the three IOUs acting as partial administrators. This makes statewide coordination of programs significantly more difficult. (ABAG)

WEM agrees that the current IOU administrative model prevents true statewide coordination and makes it more difficult for implementers who actually do function statewide across all territories.

TURN's comments tout their single Program Administrator:

By proposing an administrative structure with four portfolio administrators, IPM and RNH perpetuate the inefficiencies in the current administrative structure. Currently, the IOUs must coordinate to implement statewide programs. Coordination comes at an administrative cost to ratepayers and yields imperfect results. With a single statewide portfolio administrator, the administrative burden of coordinating programs across IOU service territories would be significantly lessened. (TURN)

WEM reminds parties that the Community Choice legislation (AB 117) requires the CPUC to weigh proposals by Community Choice Aggregators (CCAs) to be administrators, therefore multiple administrators are inevitable.

The CSO proposal finesses this issue – providing the statewide coordination and oversight of a single System Director, plus the greater ability to tailor goals and oversight to the needs and capabilities of different regions and localities by multiple administrators.

In addition, the CSO offers streamlined procedures in the areas most important to implementers operating statewide, for instance, applications are simple and standardized across all territories, and the proposal process is quick, efficient and ongoing. This provides implementers to control their timing and “strike while the iron is hot” – a feature that no other structure offers.¹

We believe this also answers a point ICF raises:

The second briefly discusses an issue we believe has received relatively less consideration than it is due in these proceedings – the impacts of administrative structure on the market for energy efficiency services... (ICF)

The market for energy efficiency services is booming in Texas, which has adopted a Standard Offer structure, with dozens of implementers busily working away in each territory.

Further ICF comments reveal puzzling approval/disapproval of the CSO:

This proposal [CSO] has several attractive features:

- The structure is streamlined and simple and administrative costs are likely to be lowest under this structure.
- Standard offer programs have shown themselves in a number of jurisdictions, if properly structured, to be very effective tools for acquiring energy efficiency gains.
- If properly structured, this structure could integrate well with utility procurement processes, since standard offer programs can be associated with more predictable streams of costs and energy/demand savings.

ICF goes on to state that standard offer programs “tend to work less well in small business and residential markets.” Apparently, its understanding of the Texas Standard

¹ There is also an opportunity for companies with statewide operations to perform energy efficiency on their own facilities. We note that the commercial/industrial program has the lowest payments per avoided costs (35% in Texas) recognizing that these jobs require less marketing because there is more savings to be realized at a single facility, and that larger companies are in a position to provide more financing for EE and to recognize that the Return On Investment is good business.

Offer programs is incomplete. These areas are working extremely well in Texas. (See comments of TEDCO, SESCO and others, analyzing the Texas results.)

The California Standard Offer Provides Rigorous EM&V

ICF makes an odd remark suggesting that good Evaluation, Measurement & Verification (EM&V) is somehow more necessary under Standard Offer programs than others:

Effective standard offer programs, as evidenced by early program experience in California and New York, require careful design with respect to both payment structures and EM&V. (ICF)

WEM and CCEE support rigorous EM&V, regardless of administrative structure. The CSO proposal is the only one that recognizes the considerable conflict of interest in the current EM&V structure, where EM&V contractors who evaluate utilities are also hired by utilities for statewide studies.

WEM provides for EM&V contractors to be licensed by the System Director, and hired by Administrators, who are not allowed to be implementers in their territories. In addition, the CSO EM&V Committee provides the most independent advisory body of all the proposals. It is directly under the supervision of the System Director, with input by the CPUC Energy Division and California Energy Commission for development of much more reliable Deemed Savings than we have today.

WEM has commented on the inappropriateness of utility domination of the many versions of CALMAC offered in other proposals, including TURN's.

The City of Berkeley believes the CSO proposal "would benefit from an advisory group(s) similar to the other proposals." WEM is not opposed to considering an advisory group. However, we believe the multiple advisory groups of NRDC and IOU proposals are a terrible waste of money, dominated as they are by utilities and their sweethearts who have conflicts of interest with saving energy.

The Record for CPUC's Decision on Administrative Structure Is Not Yet Complete

UCAN urges the Commission to take time to review the many formal filings submitted to the Commission by the CBEE during the 1998-1999 time frame. The key elements in the three proposals reviewed by UCAN [i.e. NRDC, IOUs and TURN] are strikingly similar to proposals considered by CBEE. It would be, indeed, a shame and a waste of significant time and money if the very salient observations of that advisory board were not heeded by the Commission.

WEM agrees that there is a need for parties to review what happened during the CBEE process. Several comments mentioned CBEE as a reason why this or that wouldn't work, or would be needed.

WEM strongly recommends that the Commission schedule further workshops to discuss important issues that have not been thoroughly aired and resolved. The following topics could be grouped together or be topics of single workshops:

- Reviewing what happened during the CBEE efforts, including presentations by legal experts on the barriers encountered and how they were or were not ultimately resolved;
- A thorough exploration of all conflicts of interest, and options for eliminating them. TURN's opening comments provided an extraordinarily valuable brief on utility conflicts of interest, but no doubt everyone would benefit from being able to ask questions, in order to gain a better understanding of the complexities of utility finance underlying their conflicts of interest;
- A discussion of what CALMAC actually does and does not do, and why that creates loopholes in EM&V;
- An evaluation of the cost-effectiveness of IOU and third party programs;
- A discussion on Environmental Justice, to make sure energy efficiency provides jobs and benefits for low-income and minority communities who are disproportionately impacted by power plant pollution;
- A presentation on the Texas Standard Offer experience, which was omitted from the RAP's report and presentation that purported to discuss the range of program designs available for emulation;
- Presentations by cities and counties who are actively exploring options for becoming Community Choice Aggregators;
- A thorough discussion, including Cal-ISO, Load-Serving Entities, the Energy Commission, and the Governor's office, to explore what administrative structure and controls are necessary for energy efficiency to be taken into account as a viable resource.

We also note that ALJ Gottstein requested parties to discuss what role CPUC should have. Energy Division has done some excellent work. They hosted workshops,

conducting them with a fair amount of opportunity for input and dialog. Unfortunately, workshop panels were mostly one-sided, featuring utilities and their sweethearts.

Energy Division has improved reporting requirements to make sure it is possible to see in finer detail how dollars are spent and what are the results. WEM believes they should have gone further and done what Richard Esteves of SESCO had to do instead: examining the cost-effectiveness of different programs, ferreting out loopholes in Deemed Savings, and recommending program changes to improve ratepayer benefits.

The California Coalition for Energy Efficiency is Growing

WEM welcomes two new members to CCEE: Greenpeace, headquartered in San Francisco, and Acterra, formerly Bay Area Action, of Palo Alto, a premier environmental group active in Silicon Valley.

WEM invites everyone reading these comments to join us now, and (or) invite your customers, business associates, public officials to sign on to the California Standard Offer Proposal for Energy Efficiency. CCEE members now include:

Coalition member groups
(*authors & initial signers)

California Interfaith Power & Light, San Francisco

*California Public Citizen

Clean Power Works, Arcata

Community First Coalition, San Francisco

Custom Distributors, Inc., Monrovia CA

Donald Aitken Associates, Berkeley

Energx Controls, Inc, Cypress CA

Free Lighting Corporation, Houston TX

HOPE - Helping Our Peninsula's Environment, Monterey

*Local Power, Oakland

National Public Citizen's Energy Program, Washington, DC

Pacific Environment, San Francisco, CA

P.L.A.N., People for Livable and Affordable Neighborhoods, Atherton

Quality Conservation Services, Inc., South San Francisco CA

Renee's Garden, Felton

San Francisco Green Party

Schmidt Creative, Sebastopol

*SESCO, Inc., Claremont CA

TEDCO Energy Services, Inc., Amarillo TX

*Women's Energy Matters, San Francisco

Winegard Energy, Inc. of Duarte CA

Environmental and Energy Activists (group names for ID only):

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

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Respectfully Submitted,

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Attachment A

Women's Energy Matters

by

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AMENDED PROPOSAL OF NRDC and the IOUs

On April 26, NRDC submitted an amended "Reaching New Heights" (RNH) proposal. The Commission's schedule did not call for parties to submit new or amended plans after the March 8, 2004, deadline. We do not object to the opportunity for parties to amend their plans, as long as it applies to all parties that have submitted proposals. As the IOUs have joined the NRDC plan, we refer to it as the NRDC/IOU Plan.

The WEM Comments on Administrative Structure Proposals (April 26, 2004), pp. 10-14, addressed the NRDC plan. We see no significant difference in the new NRDC plan, so all of our previous comments remain applicable.

The new NRDC/IOU Plan describes the Efficiency Solutions Team (EST) as advising both the Commission and the IOUs (as predetermined administrators). Again, the plan apparently calls for a subgroup of non-financially interested parties, but (as explained in WEM's April 26 comments) NRDC's definition of "financially interested" appears to exclude from the EST only those persons who are connected with implementers who are not the IOUs. NRDC's definition of "implementer" appears to exclude the IOUs, even though they would be implementing their own programs. Nor does the NRDC plan indicate what financial disclosures would be required of potential members of the EST. At a minimum, each should be required to disclose all business dealings they have ever undertaken with the IOUs or with any current implementer.

The new NRDC/IOU Plan abolishes the Efficiency Leadership Council (ELC) and replaces it with 3 regional Program Advisory Groups (PAGs). As for the ELC, NRDC envisions PAG membership rife with financial conflicts of interest, and NRDC does not propose that such conflicts be avoided. NRDC's suggested PAG membership includes firms and entities that would be seeking funds for implementation of their own programs.

The new NRDC/IOU Plan has the Energy Division (ED) in the role of "Independent Observer" (IO), while the previous NRDC plan called for the ED to hire the IO. We see little difference here. But, NRDC and the IOUs recognize that Commission staff are readily capable of providing a "fair and transparent process" for designing portfolios and choosing implementers (NRDC/IOU Plan, p. 4). They should then support the California Coalition for Energy Efficiency (CCEE) plan, which calls for a System Director that is part of the CPUC itself, with CPUC staff (or, alternatively, is a non-profit entity).

The new NRDC/IOU Plan (pp. 4-5) then modifies its EM&V scheme, but it leaves the IOUs completely in control of the measurement and evaluation of program types and of individual programs. NRDC/IOU calls for some ill-defined vague protocols to be "clarified" by the utility-dominated MEC, which "will develop techniques and methods necessary for their successful implementation." Whoever controls the details controls the protocols.

As for evaluation of program types or individual programs, it appears that the new NRDC/IOU Plan calls for the IOUs to evaluate their self-implemented programs. The plan calls for the "high-level individual program EM&V plans" to be "developed by implementers in collaboration with the utility administrator's EM&V staff." Since the implementer will in most cases be the utility administrator itself, the new NRDC/IOU Plan calls for the IOU to collaborate with itself to develop the EM&V plans.

The new NRDC/IOU Plan then calls for implementers (apparently including the IOUs) to select the EM&V consultants in charge of measuring actual program results. The TURN Comments (April 26, 2004) explain why this remains a severe conflict of interest.

Having implementors choose their own evaluators will cause a "race to the bottom," as evaluators compete on the basis of who can provide more lenient and generous evaluations.

OPENING COMMENTS OF NRDC AND TURN

We generally concur with the TURN Comments, although we believe that the TURN proposal does not sufficiently remove the conflicts of interest from the administration function or from the EM&V function, as indicated in the WEM Comments (April 26, 2004).

NRDC (p. 3) claims that the CCEE proposal "leaves open many of the key questions about what entities should perform the administrative functions identified by the Commission." In fact, the CCEE proposals covers every single function. NRDC claims that the CCEE proposal means "abandon[ing] the model of using a portfolio of programs and strategies to capture the available cost-effective savings." Apparently, NRDC did not read the CCEE proposal. The portfolio creation function is placed in the System Director (SD). CCEE Proposal, p. 10. Achievement of the portfolio is the responsibility of the Administrators, who can offer modified incentives for savings in particular sectors or particular times or using particular technologies. CCEE Proposal, pp. 11-12. The comments of Quality Conservation Services, Inc. (QCS) show how a Standard Offer Program (SOP) can implement new technologies far faster than the IOU-administered top-down approach.

The CCEE Plan is not just "use standard offers." It is a complete plan of administration, implementation, and EM&V. It also rather closely resembles the description of an "improved status quo" program in the TURN Comments (p. 21), where TURN states that the "status quo would be more desirable than an IOU administrative model," if the CPUC were to take specific steps outlined by TURN. The CCEE's System Director is envisioned as part of the CPUC itself and could well be part of the Energy Division. Thus, we concur with TURN's recommendations that the CPUC hire more ED staff,

"allow[] all parties to compete for all funds," remove all administrative functions from the IOUs for non-IOU programs, and adopt a portfolio planning process prior to conducting bid solicitations. That is not a bad description of the CCEE Plan, except that our plan includes rolling solicitations that remain available at all times, not just once every 2 or 3 years.

NRDC repeatedly states that changing to a non-IOU administration system would cause "high transition costs" and "considerable delays in implementation, further prolonging the damaging uncertainty that the energy efficiency industry has suffered with for the past several years." NRDC Comments, p. 4. But it is the IOUs that would be the cause of such high transition costs and delays. The IOUs have fought all attempts to have any PGC or other EE funding removed from their absolute control, including the filing of lawsuits against the CPUC (in 2002) and repeated attempts to impose their own, CPUC-unapproved conditions upon implementers. The CPUC should not acquiesce to this form of pressure.

The remainder of the NRDC Comments consists of NRDC commenting on its own proposal. It consists of many undocumented assertions of fact and conclusions without stated bases. One might advantageously ask after each sentence for the appropriate documentation or reasoning for the facts asserted and conclusions stated.

NRDC offers substantive discussion of the benefits of using regulation rather than contracting to control the use of funds. We disagree. The Commission can completely control the use of funds through contracting with far more flexibility than through regulation. With contracting, the contractual language defines the relationship between the parties. NRDC claims (p. 11) that the Commission could do nothing to a contractor unless she were in "material breach" and that somehow the Commission would have to prove in court that its "reasonable expectations" were disappointed. This is not how contract law works. The contract itself can define its breach and the remedies for breach in just about any way the parties agree upon. For example, IOU-drafted contracts contain a long list of trivial matters that are nevertheless deemed to be "material breaches" and also contain long lists of remedies for the IOUs in case of a breach, including seizing

deposits made by the implementer. The parties can certainly agree to specific performance in the contract itself. They can also agree to penalties for nonperformance or bonuses for superior performance.

If the Commission wishes control of the use of funds, it can do so with far greater flexibility--and power--with contract language than by "regulating" the utilities. Regulation is burdened by the need for the Commission to abide by literally thousands of pages of statutes, rules, and applicable court decisions. The IOUs are only too ready to challenge in court those CPUC decisions they do not like, and they have many well-funded lobbyists in Sacramento ever willing to propose changes to the law governing the CPUC, if necessary to achieve their aims. Conversely, an implementer cannot lobby the California Legislature to get his contract terms changed.

As for NRDC's comments on state contracting rules, we went through this in great detail in 2002, when the IOUs were refusing to contract with third-party proposal implementers, claiming that such contracts would be "state contracts" which could be issued only after compliance with state contracting procedures. The end result was that the challenge failed, and the contracts were executed without following such procedures. The CCEE Plan calls for the IOUs to be the fiscal agents, if necessary. Just as with the current third-party proposals, the Commission would order the IOUs to pay the funds to other entities.

NRDC states that finding new administrators would take so much time. We disagree. Under the CCEE plan, the System Administrator is part of the CPUC. The SD would select administrators who then would not be implementers. There would be dozens of firms and government entities qualified to be administrators. NRDC's argument seems similar to those who said that in 2001-02 that the Commission should not bother with opening PGC EE solicitation to third-party proposals, because there would be so few. Instead, the Commission was inundated with hundreds of qualified proposals. Make the funds available, and they will come.

Dated: May 10, 2004

Respectfully Submitted,

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**CERTIFICATION OF SERVICE
R.0108028**

I, Barbara George, certify that on this day May 10, 2004 I caused copies of the attached WOMEN'S ENERGY MATTERS REPLY COMMENT ON ADMINISTRATIVE STRUCTURE to be served on all parties by emailing a copy to all parties identified on the electronic service list provided by the California Public Utilities Commission for this proceeding, and also by hand-delivering an original and six paper copies to the CPUC Docket office, with a copy to Administrative Law Judge Kim Malcolm, Administrative Law Judge Meg Gottstein and Presiding Commissioner Susan Kennedy.

Dated: May 10, 2004 at San Francisco, California.

DECLARANT

(Electronic service List attached to original only)

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