

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

Application of Southern California Edison Company (U 338 E) for adoption of its Energy Efficiency Rolling Portfolio Business Plan and related relief.

And Related Matters

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

Application 17-01-015

Application 17-01-016

(CONSOLIDATED)

**REPLY FROM THE COUNTY OF VENTURA ON BEHALF OF 3C-REN, IN
RESPONSE TO COMMENTS ON ATTACHMENT B AND OTHER KEY ISSUES**

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June 29, 2017

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I. Introduction

Pursuant to Rules of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure and the rulings of the Assigned Commissioner(s) and Administrative Law Judge(s), the County of Ventura for itself and on behalf of County of San Luis Obispo and County of Santa Barbara and for the Tri-County Regional Energy Network (3C-REN), respectfully submits this Reply to Comments on the requested supplemental information (Scoping Memo Attachment B) filed June 22, 2017 to Applications A17-01-013, A17-01-014, A17-01-015, A17-01-016 and A17-01-017.

The comments provided by the IOUs and other stakeholders have been fully reviewed by 3C-REN. Many of these comments have been raised previously, and 3C-REN continues to respond appropriately to comments, clarifications and additional details of 3C-REN Business Plan (BP) filings. Responses to comments have been addressed in the June 22 *Response To Scoping Memo Attachment B From The Ventura County On Behalf Of 3C-REN* and other prior filings.¹

In summary 3C-REN responds to comments² specifically from Office of Ratepayer Advocates (ORA), Pacific Gas & Electric Company (PG&E), Southern California Edison Company (SCE), and Southern California Gas Company (SoCalGas), addressing the following key points:

¹ January 23, 2017: Motion Of Ventura County On Behalf Of The 3C-REN, Tri-County Regional Energy Network, For Approval Of Its Residential Energy Efficiency Rolling Portfolio Business Plan And Budget; May 10, 2017: Reply Of The County Of Ventura On Behalf Of 3C-REN, On Comments To The Motion Of The 3C-Ren, Tri-County Regional Energy Network, For Approval Of Its Energy Efficiency Rolling Portfolio Business Plan And Budget Proposal; May 15, 2017: Supporting Document Response To Scoping Memo Of Ventura County On Behalf Of The 3C-REN, Tri-County Regional Energy Network, For Approval Of Its Residential Energy Efficiency Rolling Portfolio Business Plan And Budget; June 12, 2017: Response Of The Ventura County On Behalf Of 3C-REN To The April 14, 2017 Administrative Law Judge's Ruling Seeking Supplemental Budget Information From Program Administrators, publically available by visiting the County of Ventura website at <http://www.ventura.org/environment/energy-efficiency>.

² SCE Response to Attachment B, June 22, 2017, p. 10-12; PG&E Response to Attachment B, June 22, 2017, p. 20-26; SoCalGas Response to Attachment B, June 22, 2017, p. 9-11; ORA Response to Attachment B, June 22, 2017, p. 10-13.

- 3C-REN is necessary and clearly meets the guidance and criteria established by the CPUC, as in Decision D.12-11-015 and confirmed in D.16-08-019.
- 3C-REN BP provides a pathway toward comparable cost-effective program strategies.
- 3C-REN provides value through innovative intervention strategies, tactics and energy saving targets tailored to hard-to-reach communities to overcome the barriers to energy efficiency (EE) adoption.
- 3C-REN BP effectively and efficiently fills critical service gaps and does not provide duplicative activities.

II. 3C-REN Clearly Meets Criteria³ for REN Program Approval

In response to comments regarding the need and appropriateness of a REN in the Tri-County Region, 3C-REN contends that it clearly meets the CPUC's intent and purpose of the RENs, and the programs outlined in the BP directly address the key criteria outlined by the CPUC for RENs. The 3C-REN BP carefully outlines the large and significant gaps in residential programs, training, and all market actors in the Tri-County Region, but specifically the moderate income, rural and hard-to-reach communities.

The current and proposed IOU offerings are deficient for a variety of audiences and services, and are not effectively delivered by the IOUs. The proposed coordinated, streamlined residential services outlined by the 3C-REN BP across Ventura, Santa Barbara and San Luis Obispo Counties, are clearly representative of a Regional approach. As stated in 3C-REN BP⁴ and as authorized by the CPUC in Decision D.12-11-015,⁵ 3C-REN meets the criteria for the creation of a REN. The 3C-REN BP sufficiently addresses concerns of existing programs' gaps that the utilities cannot or do not intend to undertake in the Region, identifies Tri-Counties' audiences that are hard-to-reach

³ D.16-08-019 (R.13-11-005), p. 10

⁴ 3C-REN BP, 1.2 Regulatory Requirements, p. 5; 1.3 Strategic Plan and Legislative Direction, p. 6-7

⁵ D.12-05-015 (R.09-11-014), 6.1.3 Local Government Regional Energy Efficiency Pilots, p 145-147; 8.1.5.2 Discussion, p. 174; 8.1.5 Energy Upgrade California: Role of Local Governments, p.173

(HTR) and underserved, and exemplifies scalability potential as required by the CPUC's guidance.⁶

III. 3C-REN is Committed to Moving on a Path Towards Cost-Effectiveness⁷

In response to the comments asking for REN Business Plan Proposals to be evaluated for cost-effectiveness⁸ and to work within frameworks for EM&V that are to be determined by the CPUC, given the needs of the Region and the requirements from the CPUC regarding REN Business Plan Proposals, 3C-REN is committed to moving towards a pathway that leads to more cost-effective program delivery for resource and non-resource services overtime.

The Commission, PAs, and other stakeholders, all aspire to provide programs that are as cost-effective (or equivalent) as possible. The use of TRC for RENs across resource and non-resource services does not currently make sense given the constraints on RENs programs, but there is achievable programmatic resource TRC. The 3C-REN, along all PAs, are in agreement that all must be committed to providing the most effective strategies while being as cost effective as possible.

3C-REN appreciates the collaborative spirit expressed in PG&E's comments that acknowledged a need for a more applicable cost-effectiveness requirement for RENs due

⁶ 3C-REN BP, 1.2 Regulatory Requirements, p. 5 and 1.3 Strategic Plan and Legislative Direction, p. 6-7, and 3C-REN BP, 5.3 Strategies and Tactics, p.45-64

⁷ *Id.*, "The Commission will not set a threshold cost-effectiveness level, either TRC or PAC, for RENs at this time. Rather the dual test for overall portfolio cost effectiveness, taking into consideration passing both the TRC and PAC tests for each service territory and for the entire approved portfolio, including RENs, will continue to govern the CPUC's cost effectiveness for the energy efficiency programs." p. 19

⁸ D. 12-11-015, 3.1.3 Cost-effectiveness Considerations, "...even if some REN proposals are not cost effective, if the same proposals had been made by utilities, they would have had the opportunity to be approved as part of a larger portfolio. The same should therefore be true for REN proposals, since they will become part of the larger portfolio that the Commission will approve. The REN proposals should not be held to a higher standard than similar utility programs. The difference is that the utilities are not fully in control of the REN proposals and cannot make the cost effectiveness tradeoffs themselves within their own portfolios. Instead, it becomes the responsibility of the Commission to approve a portfolio, including both utility and REN proposals, that is cost effective overall." p. 18

to the limited nature of their approved activities, and their recognition that RENs and IOU PAs have opportunities to “share best practices and optimize offerings to maximize cost effectiveness.”⁹ PG&E also acknowledges that the programs designed by 3C-REN (and Bay-REN) have cost effectiveness performance forecasts that “align with cost effectiveness of PG&E’s Residential sector programs.”¹⁰

3C-REN is dedicated to utilizing ratepayer funds in the most effective way possible. Certain markets incur additional costs to provide equity in service. For example, hard-to-reach markets in outlying rural areas require more investment to ensure EE programs are adequately available than do metropolitan city centers where IOU service hubs are located.

As stated in previous responses, it is 3C-REN’s intention to develop improved programs that enhance services, cost savings, energy savings and other benefits to increase participation and encourage the progress of all interconnected energy benefits while continuing to improve overall cost-effectiveness. RENs engage in market change activities and seek to serve hard-to-reach customers, which does not feature attributable savings for the majority of activities, or savings levels that do not scale comparatively to activities carried by larger portfolios. Therefore, it is appropriate for REN activities to be assessed at the program level and only as included within all IOU activities at the portfolio level. 3C-REN’s programs are designed to fill gaps and provide value to customers as well as to be as cost-effective for the market sectors it addresses. 3C-REN recognizes that the residential sector is the most reliant of all sectors on human interaction. To produce results that lead to a doubling of efficiency by 2030, the 3C-REN BP fills gaps and provides value through the use of qualified experts in a way that leverages energy savings outcomes, utilizes technology and automation, and will continue to coordinate with other PAs to streamline administrative operations and avoid overlap.

⁹ PG&E Response to Attachment B, June 22, 2017, p. 3

¹⁰ PG&E Response to Attachment B, June 22, 2017, p. 26

Ultimately, 3C-REN will be approved and evaluated according to CPUC guidance and will abide by CPUC requests for additional information related to cost-effectiveness and requirements.¹¹ 3C-REN, operating within the local government landscape, is the most efficient and effective way to provide services in our Region. The following table,¹² *Table 1: Workbook of 3C-REN Residential Program Elements and the Total Resource Costs (TRC) and Program Administration Costs (PAC)*, provides a breakdown of resource activities proposed by 3C-REN and the incorporated administrative efficiencies that reflect incremental savings over time.

Table 1: Workbook of 3C-REN Residential Program Elements and the TRC and PAC

| WORKBOOK: 3C-REN TRC and PAC | | | | | | | | | | | | | | | | | | |
|------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| | Yr1 | | Yr2 | | Yr3 | | Yr4 | | Yr5 | | Yr6 | | Yr7 | | Yr8 | | All Years | |
| | 2018 | | 2019 | | 2020 | | 2021 | | 2022 | | 2023 | | 2024 | | 2025 | | TRC | PAC |
| | TRC | PAC | TRC | PAC | TRC | PAC | TRC | PAC | TRC | PAC | TRC | PAC | TRC | PAC | TRC | PAC | TRC | PAC |
| DI & DI Copay | 0.65 | 0.84 | 0.68 | 0.89 | 0.71 | 0.92 | 0.74 | 0.97 | 0.76 | 1.00 | 0.78 | 1.03 | 0.80 | 1.05 | 0.82 | 1.08 | 0.76 | 1.00 |
| Smart Bundles | 0.40 | 1.55 | 0.41 | 1.62 | 0.43 | 1.74 | 0.44 | 1.81 | 0.46 | 1.87 | 0.47 | 1.98 | 0.49 | 2.04 | 0.50 | 2.09 | 0.46 | 1.90 |
| Resource Portfolio | 0.50 | 1.07 | 0.52 | 1.13 | 0.53 | 1.21 | 0.55 | 1.27 | 0.57 | 1.31 | 0.58 | 1.39 | 0.59 | 1.43 | 0.61 | 1.47 | 0.57 | 1.33 |
| | Yr1 | | Yr2 | | Yr3 | | Yr4 | | Yr5 | | Yr6 | | Yr7 | | Yr8 | | All Years | |
| | 2018 | | 2019 | | 2020 | | 2021 | | 2022 | | 2023 | | 2024 | | 2025 | | TRC | PAC |
| | TRC | PAC | TRC | PAC | TRC | PAC | TRC | PAC | TRC | PAC | TRC | PAC | TRC | PAC | TRC | PAC | TRC | PAC |
| Resource Programs | 0.50 | 1.07 | 0.52 | 1.13 | 0.53 | 1.21 | 0.55 | 1.27 | 0.57 | 1.31 | 0.58 | 1.39 | 0.59 | 1.43 | 0.61 | 1.47 | 0.57 | 1.33 |
| Non-resource Programs | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Portfolio | 0.27 | 0.39 | 0.31 | 0.46 | 0.35 | 0.55 | 0.39 | 0.65 | 0.41 | 0.70 | 0.43 | 0.76 | 0.43 | 0.76 | 0.45 | 0.79 | 0.40 | 0.66 |

3C-REN agrees with NRDC comments¹³ that state a need for a new cost-effectiveness paradigm, for a better assessment of the benefits, costs, and to ensure the accurate valuing of efficiency it provides to customers, the environment, and the grid.

VI. 3C-REN BP Does Not Duplicate Existing or Planned IOU Services

In response to comments that 3C-REN will provide duplicative activities to existing programs, 3C-REN is distinct in program framework from emPower financing program,

¹¹ 3C-REN BP, passim; p. 20-23.

¹² 3C-REN May 15, 2017, Supporting Document Response To Scoping Memo Of Ventura County On Behalf Of The 3c-Ren, Tri-County Regional Energy Network, For Approval Of Its Residential Energy Efficiency Rolling Portfolio Business Plan And Budget, *3C-REN TRC and PAC Workbook* in Appendix B.

¹³ NRDC Response to Attachment B, June 22, 2017, p 6-7.

LGP programs, and existing and planned IOU programs. 3C-REN aims to accomplish for the Tri-Counties' residential sector what other programs have been unable or unwilling to provide in our Region.

SoCalGas suggested that the 3C-REN is simply an expansion of existing programs and that the Commission should postpone evaluation¹⁴ and approval of the 3C-REN BP until the Regional Finance Program Attribution and Cost-Effectiveness Study has been completed. However, the scope of that study is limited to gaining an understanding of the value that financing brings to increasing energy savings from whole home retrofits. The results of the cited Cost-Effectiveness Study, as they apply to the emPower program, has little, if any, relevance to the proposed 3C-REN BP as the program offerings are substantially different. It is not appropriate to postpone consideration of 3C-REN's BP to provide services for the Region's hard-to-reach and underserved audiences.¹⁵ Further, *Table 2: Comparison of 3C-REN to Single Family emPower Central Coast Program*. It outlines the fundamental difference of emPower versus 3C-REN activities.

¹⁴ SoCalGas Response to Attachment B, June 22, 2017, p. 10.

¹⁵ D.12-11-015, 3.1.3 Cost-effectiveness Considerations, "It should also be noted that many of the REN program plans address hard to reach market segments that are generally more expensive than average to deliver. REN proposals should not be punished for that, because, if successful, their pilot approaches could lead to breakthroughs for more cost effective solutions in the future. They should, however, be encouraged to find cost savings and additional energy savings and other benefits to the extent possible, and improve their cost effectiveness over time."p.19.

Table 2: Comparison of 3C-REN to Single Family emPower Central Coast Program

| 3C-REN COMPARED TO EMPOWER CENTRAL COAST PROGRAM | | |
|--|--|--|
| | 3C-REN | emPower Central Coast |
| Serves Renters | YES | NO |
| Serves Multifamily | YES | NO |
| Serves Single Family | YES | YES |
| Targets Spanish Speaking Residents | YES | NO |
| Targets Hard-to-Reach Markets | YES | NO |
| Utilizes Direct Install to Build Base for Deeper Savings | YES | NO |
| Provides Energy Coach Services | YES | YES – Limited to ONLY SF Homeowners |
| Provides Incentives for Bundled Packages | YES | NO |
| Integrates Energy Management Systems into Packages | YES | NO |
| Provides Training for Residential Building Professionals (Contractors) | YES | YES - Limited to ONLY SF home performance related trainings |
| Provides HEScore | YES | NO |
| Provides Financing | YES - Via leveraged funding for all EE and Solar PV projects | YES – Limited to Home Upgrade Program (HUP) Rebates and select Solar PV projects for SF Homeowners |
| Provides Assistance to Building Departments | YES | NO |
| Provides Code Compliance Tools | YES | NO |
| Reengagement Strategies that lead to Whole Home Upgrades through phased approach | YES | NO |

The IOUs, again, erroneously assert in their comments that 3C-REN intends to duplicate existing or “planned” IOUS programs, yet they provide little details as to what specific tactics are being compared to the local touch provided by 3C-REN. In previous comments, the IOUs made similar claims that 3C-REN refuted.¹⁶ The difference between the programs’ offerings are further outlined below. *Table 3: Comparison of 3C-REN to IOU Existing and Planned Residential Offerings*, represents how the current and historically proposed regional offerings are deficient in strategies for the variety of audiences within the Tri-Counties, and services are not effectively delivered by the IOUs to meet the needs in the Tri-County Region.

Table 3: Comparison of 3C-REN to IOU Existing and Planned Residential Offerings

| 3C-REN TO IOU EXISTING & PLANNED RESIDENTIAL OFFERINGS | | |
|---|--|---|
| ACTIVITY | 3C-REN OFFERINGS¹⁷ | IOU OFFERINGS¹⁸ |
| Direct Install Bundles | <ul style="list-style-type: none"> • Targeted to HTR markets • Access to DI bundled measures for ALL residential customers • Provides “starting point” for customer path to capture Whole Home savings through customer journey approach • Coordinated Energy Coach Service for immediate savings and deeper EE customer journey • Build confidence in EE leading to deeper project savings over time | Moderate Income Direct Install (MIDI) program |
| Single-Family, Multi-Family, Renter/Owner, Multi-Measure Bundles | <ul style="list-style-type: none"> • Neighborhood approach to address targeted markets, focusing on HTR audiences • On-site Energy Coach Service • Bundled Options • Directly addresses individual home EE path and financing needs | EUC HUP |

¹⁶ 3C-REN May 10, 2017 submission of *Reply Of The County Of Ventura On Behalf Of 3C-REN, On Comments To The Motion Of The 3C-Ren, Tri-County Regional Energy Network, For Approval Of Its Energy Efficiency Rolling Portfolio Business Plan And Budget Proposal*.

¹⁷ 3C-REN BP, 5.3 Strategies and Tactics, p. 44-71.

¹⁸ PG&E BP, Residential, p. 35 and 38.

| | | |
|---|--|---|
| <p>Energy Management Technologies (EMTs)</p> | <ul style="list-style-type: none"> • Directly address individual home needs, especially in HTR target markets • Provide information and incentives for home energy management systems • Utilize on-site Energy Coach Service to demystify technology | <p>Education and incentives for EMTs, per AB 793</p> |
| <p>Residential Valuation Tools</p> | <ul style="list-style-type: none"> • Utilize on-site Energy Coach Service to demystify technology for residents, especially in HTR markets • Utilize existing valuation tools to promote value of EE in the real estate market • Provide consistent messaging, assistance and training for local real estate associations to drive awareness and demand for EE homes | <p>Working with real estate industry to create value for energy efficiency during transactions, SCE Enhanced Energy Advisor Tool (EEAT)</p> |
| <p>Local, Targeted Workforce Education & Training (WE&T)</p> | <ul style="list-style-type: none"> • Target HTR workforce, such as Spanish-speaking contractors • Regular and in-person trainings in locations throughout Tri-County Region • On-site mentorship support to ensure best EE practices are implemented • Local support navigating multiple IOU programs and local government offerings | <p>In-person and webcast trainings in Tri-County Region</p> |
| <p>Code Compliance, Regional Building Department And Jurisdiction Assistance (Energy Code Coach)</p> | <ul style="list-style-type: none"> • Regional and IOU collaboration to streamline and track code compliance with deploying permitting tool • Regional collaboration to simplify local codes and alignment with State requirements • Local Energy Code Coach for contractors and building departments • Coordinated Regional EE tracking for permitted projects | <p>Streamlined processes, code compliance tools, and online permit processes, EnergyCodeAce, website</p> |

VII. Hard-to-Reach Communities are the Core of the 3C-REN BP

In response to comments regarding activities in HTR and disadvantaged communities (DACs) markets,¹⁹ based upon definitions²⁰ of language, geography, income and housing type, 3C-REN has a primary intention to include these markets that have been underserved by the IOUs in the Tri-County Region.²¹ PG&E claims that 3C-REN does not meet geography, income, or housing type HTR criteria. This comment depends on a HTR definition that is not applicable to the REN business plan evaluation process. PG&E's cited HTR definition stated in Resolution G-3497,²² focuses narrowly on the approval of 2013 shareholder incentives for IOUs. The reference is in the context of DI services and savings attribution, principally as related to small to medium-sized businesses DI programs. The Resolution provides criteria to identify if **a customer** is HTR for the purpose of assigning net-to-gross (NTG) values in the context of calculating shareholder incentives. G-3497, and therefore PG&E's proposed definition, **does not provide** criteria for identifying if **a region** or **a market** is HTR. The definition used to define HTR customers in the context of Resolution G-3497 is not applicable to the REN review process, because it would contradict the CPUC decisions that enabled the SoCAL REN and BayREN (both of which are in the Combined Statistical Areas of the San Francisco Bay Area and the Greater Los Angeles Area).

PG&E also asserts in its comments that a REN is not HTR if a portion of it is in an adjacent Metropolitan Statistical Area. As mentioned above, this definition is not applicable to the REN approval process. The Tri-Counties share HTR commonalities across each county in the Region including agriculturally based economies, climate, rural geography, low population density, and high costs of living. Furthermore, Ventura

¹⁹ PGE RESPONSE, p. 9; and The Greenlining Institute's Response To Program Administrator Applications For Business Plan Approval (GREENLININGS RESPONSE), p. 5.

²⁰ Resolution G-3497, Attachment 3, Ex Ante Savings, Provides specific criteria for assigning NTG values for Direct Install program considerations for hard-to-reach, and that the IOUs erroneously and inappropriately assigned meaning for those HTR values. p. 56-57.

²¹ 3C-REN BP, passim; A Holistic Approach, Looking To The Future, Informed By the Past, p. 1.

²² Resolution G-3497, p. 56-57.

County²³ is largely rural and HTR, and PG&E's assertion against such indicates the utility's lack in understanding of the 3C-REN Region.

NRDC recommends that the current definition of DACs be clarified and that once a decision is made, the CPUC should update its guidance. In addition, 3C-REN supports NRDC's proposal that the issue of defining "hard-to-reach customers" be included within scope of this proceeding. 3C-REN agrees with NRDC that the issue of HTR customers should be addressed in the implementation planning phase to ensure that EE programs are specifically targeted to meet the needs of these residents.

3C-REN proposes a full suite of services specifically designed to meet the needs of residential customers in the Tri-County Region. The 3C-REN BP targets homeowners and renters, Spanish speaking communities, and rural areas of the Tri-County Region.²⁴ This is clear indication that 3C-REN will offer services and implement strategies designed to serve HTR communities.

VIII. 3C-REN Fills the Gaps and Provides Value to Statewide Programs

The Tri-Counties previous experience with the IOUs only providing restricted and limited movements to collaboration with our counties and service areas has 3C-REN cautiously optimistic of the potential benefits of the IOU's statewide and expected third-party implementer models. While the plans state an intent for consistency between service territories, the Tri-Counties have been dealing with three IOU's and EE programs for more than five years, making 3C-REN aware of the challenges to come. 3C-REN has developed and implemented best practices to address the previous inconsistency in program delivery from three of the four IOUs in our territory. The Tri-Counties worked with all three IOUs and understand their program delivery and their shortcomings when it comes to IOU end of service territories. While we support the movement towards statewide approaches, it will take time. The recommendation from the IOUs to delay approval of 3C-REN to an unknown date, will be detrimental to an already hard-to-reach

²³ 3C-REN BP, passim; p. 30-38.

²⁴ *Id.*, 1.0 3C-REN Overview, p. 6 and 20.

and underserved area. 3C-REN's provides solutions to the gaps in services for the Tri-County Region and add value to the overall statewide portfolio of EE strategies.

IX. Conclusion

For all the foregoing reasons, the County of Ventura, on behalf of the 3C-REN, appreciates the opportunity to provide this Reply to Comments made to Scoping Memo Attachment B, and respectfully urges the CPUC to authorize and adopt the 3C-REN Business Plan.

Dated: June 29, 2017

Respectfully submitted,

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