

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

Application of Southern California Edison  
Company (U338E) for Approval of Energy  
Efficiency Rolling Portfolio Business Plan.

And Related Matters.

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

Application 17-01-014

Application 17-01-015

Application 17-01-016

Application 17-01-017

**RESPONSE ON BUSINESS PLAN ENERGY EFFICIENCY METRICS BY  
COUNTY OF VENTRA ON BEHALF OF THE 3C-REN, TRI-COUNTY REGIONAL  
ENERGY NETWORK**

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For the 3C-REN, Tri-County Regional Energy Network  
San Luis Obispo County, Santa Barbara County and Ventura County

**Dated: July 14, 2017 in Ventura, California**

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REGIONAL ENERGY NETWORK**

The County of Ventura on behalf of the Tri-County Regional Energy Network (3C-REN), which includes the Counties of Ventura, San Luis Obispo and Santa Barbara, respectfully submits this comment document in response to requests in **“ADMINISTRATIVE LAW JUDGE’S RULING SEEKING COMMENT ON ENERGY EFFICIENCY BUSINESS PLAN METRICS”** (ALJ RULING EE BP METRICS) filed May 10, 2017 to this proceeding for Applications A17-01-013, A17-01-014, A17-01-015, A17-01-016 and A17-01-017 and ADMINISTRATIVE LAW JUDGES RULING MODIFYING SCHEDULE issued June 9, 2017 to Applications A17-01-013, A17-01-014, A17-01-015, A17-01-016 and A17-01-017. This response is intended to provide clarification on residential sector-level and program-level metrics for the purpose of evaluating the reasonableness of the 3C-REN Energy Efficiency Business Plan (3C-REN BP).

## **I. Introduction**

The attached 3C-REN Revised Metrics (Attachment A) build upon all previous filings<sup>1</sup> and reflects 3C-REN's strategies to overcome the barriers for residential program uptake across the customer journey, the success metrics associated with them, and the overall savings of the proposed residential sector. 3C-REN metrics show the cumulative energy efficiency (EE) savings and reflects the holistic approach of the 3C-REN BP to reach moderate-income, single family residents with a range of interventions. The 3C-REN will track the number of participating households and EE savings that will increase through 2025, as well as achieve other non-energy efficiency benefits including program-specific workforce education and training (WET), energy code compliance, and filling service gaps to hard-to-reach and underserved communities achieved through the customer journey suite of services.

## **II. Revised 3C-REN Metrics**

Please see Attachment A for Revised Metrics it includes all requests from the Metrics Ruling and discussion at the various metrics discussion meetings. These are consistent with Energy Division (ED) staff guidance. 3C-REN anticipates to continue work and research if additional data is needed.

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<sup>1</sup> 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; May 22, 2017: Comment On Business Plan Energy Efficiency Metrics By County Of Ventra On Behalf Of The 3C-REN, Tri-County Regional Energy Network, June 22, 2017: Response to Scoping Memo Attachment B From The County Of Ventura On Behalf Of The 3C-REN, Tri-County Regional Energy Network publically available by visiting the County of Ventura website at <http://www.ventura.org/environment/energy-efficiency>.

### **III. Multifamily units and multifamily properties in 3C-REN geographic areas**

The 3C-REN Business Plan will focus on single family residential homes for the first phase of the plan. In approximately 2020, the 3C-REN anticipates rolling out its still-to-be-designed multifamily program, catering to local needs and based on lessons learned from the other Regional Energy Networks (RENs) in the State. Metrics specific to the multi-family segment will be presented following ED and Commission guidance. 3C-REN has provided an overview here and related metrics in Appendix B. While the 3C-REN BP outlines the household characteristics for the Tri-County Region<sup>2</sup> showing each County's estimated housing occupancy, owner/renter counts, and housing per unit counts, it has not estimated the penetration of the market as it depends on the ultimate program design and audience focus (i.e. will it be occupant focused or owner focused). Department of Finance report analysis showed total occupied housing units<sup>3</sup> for the Tri-County Region estimated at 512,000, and about 37% of those homes are rental units. The analysis further showed a total multifamily (2 or more attached units) count of 128,205 units or approximately one-quarter of the Tri-County Region occupied households. The 3C-REN knows that this is an important market and recognizes the following key points:

- Multifamily EE measures offer the opportunity to provide higher energy savings than single family homes.
- Multifamily programs, if designed correctly, can be cost-effective.
- 3C-REN will utilize its proposed BP budget to deliver these savings.
- Most, if not all of the multifamily projects, are considered hard-to-reach.
- Multifamily programs will also target DAC's.

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<sup>2</sup> 3C-REN BP, Table 9. 3C-REN Owner and Renters, Units Per Household, p. 33

<sup>3</sup> California Department of Finance. 2016. "Report E5 - Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2016, with 2010 Benchmark"

- Will strive for a 2-5% market penetration by 2025.

#### **IV. Other Proposed 3C-REN Programs**

See attachment B that illustrates activities, target audience, metrics for 3C-REN programs WET and codes and standards (C&S) that will add to the value of 3C-REN deployment in residential programs.

#### **V. Conclusion**

3C-REN files revised proposed metrics developed by Commission ED staff, it incorporates feedback from ED staff, and from participation in the Ad hoc California Energy Efficiency Coordinating Committee (CAEECC) and PA meetings. 3C-REN understands that new metrics and clarifications provided by ED will continue the discussion among PAs, ED staff, and stakeholder's 3C-REN will continue to actively participate in the common metrics engagement.

3C-REN, as a potential PA, has followed all commission rulings and requests, but still has had to anticipate future program activities under evolving procedures and policies to the best extent possible without having existing programs, data, or funding in place. Likely further revision or explanation will be addressed in the implementation plan should the new 3C-REN be adopted. As a new PA, 3C-REN will inherit a lack with which to establish a baseline. Once approved, 3C-REN will start to collect data and establish a data pool that will address and accurately gather data to track metrics directed by the Commission.

## **VI. Service**

In alignment with requirements by the Public Utilities Code and the Commission's Rules of Practice and Procedure, this supporting document will be served to all parties on the official CPUC service list for the application proceedings A.17-01-013, A17-01-014, A.17-01-015, A.17-01-016 and A.17-01-017, and a copy of this and other documents relating to the 3C-REN BP are publicly available online at: <http://www.ventura.org/environment/energy-efficiency>.

Respectfully submitted,

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For the 3C-REN, Tri-County Regional Energy Network  
San Luis Obispo County, Santa Barbara County and Ventura County

**Dated: July 14, 2017 in Ventura, California**

ATTACHMENT A  
3C-REN Revised Metrics

Red text indicates modifications to common metric language provided by the Commission

3C-REN is presenting residential sector metrics, with details for single-family (SF). We are presenting this data as one section to align with our Business Plan, and to provide context to the data. 3C-REN relies on data from PG&E, SCE and SCG; therefore, 3C-REN is bound to data presented by IOU collection systems. Moving forward, 3C-REN will collect data where feasible in order to align with CPUC requests. The contents of the table are based on the best available data at the time of filings and will be revised as new information becomes available.

| Problem                  | Metric  |                          | Year  | Targets (and Unit of Measure) |                     |                      |                    |                   |                    | Notes |  |  |
|--------------------------|---|--------------------------|---|-------------------------------|---------------------|----------------------|--------------------|-------------------|--------------------|-------|--|--|
|                          |   |                          |   | First Year Gross KWh          | First Year Gross KW | First Year Gross Thm | First Year Net KWh | First Year Net KW | First Year Net Thm |       |  |  |
| Capturing Energy Savings | First year annual ex-ante gas, electric, and demand savings (gross and net) for Single Family customers | Short Term               | 2018  | 563,109                       | 392                 | 50,597               | 446,470            | 328               | 42,350             |       |  |  |
|                          |   |                          | 2019  | 806,226                       | 561                 | 72,463               | 639,258            | 470               | 60,655             |       |  |  |
|                          |   | Mid Term                 | 2020  | 1,048,949                     | 760                 | 98,058               | 836,092            | 640               | 82,548             |       |  |  |
|                          |   |                          | 2021  | 1,552,430                     | 1125                | 145,114              | 1,237,399          | 947               | 122,161            |       |  |  |
|                          |   |                          | 2022  | 2,118,449                     | 1535                | 198,015              | 1,688,554          | 1,292             | 166,695            |       |  |  |
|                          |   | Long Term                | 2023  | 2,420,444                     | 1817                | 234,364              | 1,938,673          | 1,538             | 198,265            |       |  |  |
|                          |   |                          | 2024  | 2,638,636                     | 1981                | 255,486              | 2,113,429          | 1,676             | 216,132            |       |  |  |
|                          |   |                          | 2025  | 2,935,707                     | 2204                | 284,268              | 2,351,393          | 1,865             | 240,483            |       |  |  |
|                          |   |                          |   |                               |                     | NetElecCO2           | NetGasCO2          |                   |                    |       |  |  |
|                          |   | Greenhouse Gas Emissions | Greenhouse gasses (MT CO2eq) Net kWh and therm savings, reported on an annual basis | Short Term                    | 2018                | 245.81               | 247.75             |                   |                    |       |  |  |
| 2019                     | 351.94  |                          |   |                               | 354.83              |                      |                    |                   |                    |       |  |  |
| Mid Term                 | 2020  |                          |   | 460.31                        | 482.91              |                      |                    |                   |                    |       |  |  |
|                          | 2021  |                          |   | 681.25                        | 714.64              |                      |                    |                   |                    |       |  |  |
|                          | 2022  |                          |   | 929.64                        | 975.16              |                      |                    |                   |                    |       |  |  |
| Long Term                | 2023  |                          |   | 1,067.34                      | 1,159.85            |                      |                    |                   |                    |       |  |  |
|                          | 2024  |                          |   | 1,163.55                      | 1,264.38            |                      |                    |                   |                    |       |  |  |
|                          | 2025  |                          |   | 1,294.56                      | 1,406.83            |                      |                    |                   |                    |       |  |  |





|                     | (defined by zip code and/or census tract in CalEnviroScreen Tool)                | Year       |                         | DAC Participating Homes      | % DAC Participating Homes    |                                |                                | CalEnviroScreen score; the percentage is a portion of what is projected. Value is based on census code data for projects completed to date, which is expected to remain consistent over time.  |  |
|---------------------|--|------------|-------------------------|------------------------------|------------------------------|--------------------------------|--------------------------------|--|--|
|                     |  |            |                         |                              |                              |                                |                                |  |  |
|                     |  |            | 2022                    | 6368                         | 2.7%                         |                                |                                |  |  |
|                     | Long Term  |            | 2023                    | 6368                         | 3.0%                         |                                |                                |  |  |
|                     |  |            | 2024                    | 6368                         | 3.2%                         |                                |                                |  |  |
|                     |  |            | 2025                    | 6368                         | 3.5%                         |                                |                                |  |  |
|                     |  |            |                         |                              |                              |                                |                                |  |  |
|                     |  | Year       | HTR Participating Homes |                              |                              |                                |                                |  |  |
|                     | Short Term   |            | 2018                    | See Notes                    |                              |                                |                                | Hard to reach residential customers are defined as "those customers who do not have easy access to program information or generally do not participate in energy efficiency programs due to a language, income, housing type, geographic, or home ownership (split incentive) barrier." (California Public Utilities Commission, 2013)<br>For our purposes, our primary criteria are geographically hard to reach and split incentive barrier. |  |
|                     |  |            | 2019                    | See Notes                    |                              |                                |                                |  |  |
|                     | Mid Term   |            | 2020                    | See Notes                    |                              |                                |                                |  |  |
|                     |  |            | 2021                    | See Notes                    |                              |                                |                                |  |  |
|                     |  |            | 2022                    | See Notes                    |                              |                                |                                |  |  |
|                     |  |            | 2023                    | See Notes                    |                              |                                |                                |  |  |
|                     | Long Term  |            | 2024                    | See Notes                    |                              |                                |                                |  |  |
|                     |  |            | 2025                    | See Notes                    |                              |                                |                                |  |  |
|                     |  |            |                         |                              |                              |                                |                                |  |  |
|                     |  |            |                         |                              |                              |                                |                                |  |  |
| Cost per Unit Saved | Levelized cost of energy efficiency per kWh, therm and kW (use both TRC and PAC) | Short Term |                         | Levelized Cost per kWh - TRC | Levelized Cost per kWh - PAC | Levelized Cost per therm - TRC | Levelized Cost per therm - PAC | Taken directly from CET outputs  |  |
|                     |  |            |                         |                              |                              |                                |                                |  |  |
|                     |  |            | 2018                    | 0.52                         | 0.24                         | 2.74                           | 1.27                           |  |  |
|                     |  |            | 2019                    | 0.51                         | 0.23                         | 2.74                           | 1.26                           |  |  |
|                     | Mid Term   |            | 2020                    | 0.51                         | 0.22                         | 2.80                           | 1.22                           |  |  |
|                     |  |            | 2021                    | 0.50                         | 0.22                         | 2.82                           | 1.22                           |  |  |
|                     |  |            | 2022                    | 0.49                         | 0.21                         | 2.84                           | 1.23                           |  |  |
|                     |  |            | 2023                    | 0.50                         | 0.21                         | 2.91                           | 1.21                           |  |  |
|                     | Long Term  |            | 2024                    | 0.49                         | 0.20                         | 2.94                           | 1.22                           |  |  |
|                     |  |            | 2025                    | 0.49                         | 0.20                         | 2.96                           | 1.23                           |  |  |

| Problem          | Metric   | Year | Targets (and Unit of Measure) |    |        | Notes  |
|------------------|--|------|-------------------------------|----|--------|--|
|                  |  |      | kWh                           | kW | Therms |  |
| Energy Intensity | Average energy use intensity of single family homes (average usage per household – not adjusted) | 2018 |                               |    |        | As a non-utility, 3C-REN does not have access to this data; we would request this data from PG&E, SCE and SCG broken out for the Counties of Ventura, San Luis Obispo, and Santa Barbara |
|                  |  | 2019 |                               |    |        |  |
|                  |  | 2020 |                               |    |        |  |
|                  |  | 2021 |                               |    |        |  |
|                  |  | 2022 |                               |    |        |  |
|                  |  | 2023 |                               |    |        |  |
|                  |  | 2024 |                               |    |        |  |
| 2025             |  |      |                               |    |        |  |

ATTACHMENT B  
3C-REN Proposed Programs

**Attachment B: 3C-REN Proposed Programs**

| 3C-REN ANTICIPATED PROGRAMS* |   |   |  |  |  |  |   |
|------------------------------|---|---|--|--|--|--|---|
| Sector                       | Program / Activity  | Target Audience   | Possible Metrics   | Activities that utilities cannot or do not intend to undertake | Pilot activities where there is no current utility program | Pilot activities in hard to reach markets, whether or not there is a current utility program that may overlap. | Is there an overlap between REN program and the IOU's LGP programs? |
| Residential-WET              | Program Training and orientation  | Home Performance, General B, HVAC and Insulation Contractors              | # of contractors participating in the program (survey)         | X  | X  | X  | No  |
| Residential-WET              | Online and in-person technical, codes and standards and soft skill training | Home Performance, General B, HVAC and Insulation Contractors, HERS Raters | % of participants who report applying the training (survey)    |  | X  | X  | No  |
| Residential-WET              | In-the-field training   | Home Performance, General B, HVAC and Insulation Contractors, HERS Raters | % of participants who report applying the training (survey)    | X  | X  | X  | No  |
| Residential-C&S              | Energy Code Coach/Technical Assistance                                      | Building Departments  | Increase in permit close rates for T24 Part 6 (data tracking)  | X  | X  | X  | No  |
| Residential-C&S              | Code compliance tools/online permitting platform                            | Building Departments/Contractors  | Increase in permit closer rates for T24 Part 6 (data tracking) | X  | X  | X  | No  |

\*Residential, not commercial resulting in no overlap with IOU or LGP programs