

**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 17-01-014
Application 17-01-015
Application 17-01-016
Application 17-01-017
(CONSOLIDATED)

**FINAL REPLY COMMENTS OF THE COUNTY OF VENTURA ON BEHALF OF
3C-REN, TRI-COUNTY REGIONAL ENERGY NETWORK REGARDING 2018-2025
ROLLING PORTFOLIO ENERGY EFFICIENCY BUSINESS PLAN AND BUDGET**

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

Dated: October 13, 2017

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I. Introduction

Pursuant to the California Public Utilities Commission's (CPUC or Commission) Rules of Practice and Procedure and the August 4, 2017 Administrative Law Judge (ALJ) Ruling providing leave for parties to provide final comments in this proceeding,¹ the County of Ventura for itself and on behalf of the County of San Luis Obispo, County of Santa Barbara, and for the Tri-County Regional Energy Network (3C-REN), respectfully submits final reply comments urging the CPUC to adopt the proposed MOTION OF THE 3C-REN, TRI-COUNTY REGIONAL ENERGY NETWORK, FOR APPROVAL OF ITS RESIDENTIAL ENERGY EFFICIENCY (EE) ROLLING PORTFOLIO BUSINESS PLAN AND BUDGET PROPOSAL (3C-REN BP)² as filed and discussed throughout this proceeding³ and on the record of the Energy Efficiency Rolling Portfolio Business Plans 2018-2025 for the proceeding R.13-11-005 and the consolidated Investor Owned Utility (IOU) Applications A.17.01.013, A.17.01.014, A.17.01.015, A.17.01.016, and A.17.01.017.

3C-REN's BP and the subsequent information provided within this proceeding present clearly 3C-REN's intent and ability to collaborate with all program administrators (PAs) and provide innovative and gap-filling programs that will help the State achieve its energy efficiency goals and mandates. These final reply comments are intended to both cite and clarify any matters raised and explored in this proceeding. The County of Ventura, in this reply, addresses specific comments as follows.

3C-REN Supports Specific Comments Within This Proceeding:

- 3C-REN supports the Natural Resources Defense Council (NRDC) request that the Commission adopts the Business Plans and addresses any outstanding issues in accordance with the Rolling Portfolio approach.

¹ August 4, 2017 ALJ Ruling Clarifying July 25, 2017 Ruling and Denying, In Part, PG&E's Motion to Amend its Application, p. 2 and 8.

² 3C-REN BP, passim.

³ All documents filed by the County of Ventura on behalf of the 3C-REN and related to the 3C-REN Business Plan Energy Efficiency were filed on time with the CPUC docket office, served to the proceeding service list, and are all publically available online by visiting <http://www.ventura.org/environment/energy-efficiency>.

- 3C-REN supports the approval of Bay Area Regional Energy Network (BayREN) and Southern California Regional Energy Network (SoCalREN) Business Plans, and restates the need for expanded and coordinated REN activities.
- 3C-REN supports the Community Choice Aggregator (CCA) Marin Clean Energy (MCE) Business Plan.
- 3C-REN continues to seek guidance from the CPUC for a clear definition of hard to reach (HTR).

3C-REN Refutes Specific Comments Within This Proceeding:

- 3C-REN refutes Pacific Gas & Electric's (PG&E) discussion of REN/CCA duplication.
- 3C-REN refutes the need to wait until after IOU 3rd-party solicitation are complete for REN approvals.
- 3C-REN refutes PG&E's statement⁴ that BayREN and 3C-REN have not met the criteria in Decision D.12-11-015 and D.16-08-019⁵ and that REN programs should not be expanded.

3C-REN Meets CPUC Criteria and Supports Statewide EE Goals:

- 3C-REN complies with D.12-11-015 and D.16-08-019, meets the criteria for becoming a REN, and fills gaps necessary to achieve statewide EE goals.
- 3C-REN's program design fills gaps and targets HTR ratepayers.
- 3C-REN offers valuable local government perspective on local program development and is ready to implement in 2018.

II. 3C-REN Support for Specific Comments

Requests Commission to Approve EE Business Plans

In agreement with NRDC's comments⁶, 3C-REN requests the Commission approve the EE business plans and address any outstanding issues within the Rolling Portfolio process.

⁴ Pacific Gas and Electric Company's Opening Comments on the Energy Efficiency Business Plans, p. 31.

⁵ D.12-11-015, p. 17, and D.16-08-019, p. 11, Energy Efficiency Policy Manual, p. 15.

⁶ NRDC Opening Final Comments on Program Administrator Business Plans and Related Items, p.2.

Specifically, NRDC recommends approval of all business plans to allow “improvements over time” in the next phases of planning and implementation to refine programs and support an unencumbered course.

In addition to approval of the 3C-REN BP, 3C-REN supports the Commission’s approval of the BayREN and SoCalREN Business Plans. These business plans provide solutions that fill gaps in services, provide regional and innovative approaches to programming, meet the needs of HTR and underserved populations, and add value to the overall statewide portfolio of EE programs. The current and proposed IOU offerings are deficient for a variety of audiences and services, and are not effectively delivered by the IOUs. There is a need for expanded regional programs, and for coordinated activities among IOUs, CCAs, and existing and new RENs. 3C-REN also supports the MCE BP proposal.⁷

III. 3C-REN Replies to Refute Specific Comments

Reply to Pacific Gas and Electric (PG&E)⁸

PG&E provided in its comments multiple suppositions that coordination with public PAs encumbers its efforts to achieve the state’s goals regarding the reduction of energy consumption.⁹ PG&E states that all RENs in their service territory should not be supported or expanded because they indicate that *they intend to deliver similar sounding programs sometime in the future, that* Local Government Partnerships (LGP) deliver Direct Install services to the residential sector, and that 3C-REN’s cost-effective engagement strategy creates duplication with its MIDI program. PG&E erroneously assert that RENs intend to duplicate existing or “planned” IOU programs, yet provide little detail as to what those specific IOU programs are and how they compare to the innovative and community centric tactics provided by 3C-REN and the other REN business plans. The majority of LGPs deliver DI programs to Small to Medium-sized

⁷ Application of MCE for Approval of its Energy Efficiency Business Plan (January 17, 2017).

⁸ PG&E, September 25, 2017, Pacific Gas and Electric Company's (U 39 M) Opening Comments On The Energy Efficiency Business Plans, p. 8-20, 23—35.

⁹ PG&E, September 25, 2017, Pacific Gas and Electric Company's (U 39 M) Opening Comments On The Energy Efficiency Business Plans, p.26, 27.

Businesses and not the Residential Sector, and PG&E struggles to find participants for the MIDI program, which offers lesser savings at higher cost.

PG&E continues to misapply Resolution G-3497's definition of HTR, and blurs the distinction between a customer and a region in an effort to block the expansion of REN and CCA's. 3C-REN contends that the REN proposals adhere to the criteria set forth in Decisions D.12-11-015 and D.16-08-019 and the Energy Efficiency Policy Manual, and that final determination regarding a clear application of HTR criteria must come from the Commission, not PAs. PG&E also incorrectly asserts in its comments that a REN is not HTR if a portion of it is in an adjacent Metropolitan Statistical Area. The assignment of statistical area 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 County¹⁰ has significant rural and HTR constituents, and PG&E's assertion against such indicates the utility's lack of understanding in the 3C-REN Region.

IV. 3C-REN BP Meets CPUC Criteria and Supports Statewide EE Goals

The 3C-REN complies with D12-11-015 and D.16-08-019, and clearly meets the criteria¹¹ for becoming a REN, and has a framework that will help fill gaps toward achieving statewide EE goals. The 3C-REN BP consists of non-duplicative, gap-filling activities in HTR markets as the region it represents includes areas outside of the greater Los Angeles area, including, DACs, many rural areas, and plans to target Spanish language speakers and multi-family housing. 3C-REN represents more than 1.5 million residents living in the Tri-County Region, including three counties and 28 incorporated cities that would benefit from the creation of a REN. Staff has experience administering and implementing energy efficiency programs with funding from a variety of sources including the DOE, CEC and CPUC funded programs. Having been an active participant in California Energy Efficiency Coordinating Committee, 3C-REN has

¹⁰ 3C-REN BP, passim; p. 30-38.

¹¹ 3C-REN June 29, 2017 Reply From the County of Ventura on Behalf of 3C-REN, In Response to Comments on Attachment B and Other Key Issues, p. 4-5.

demonstrated competence for being a PA, and has established relationships with the IOUs implementing ratepayer-funded programs. 3C-REN offers a valuable local government perspective on program development, an understanding of local needs, and effective local resources to help meet aggressive state goals. 3C-REN is best poised to provide programs to fulfill the residential EE needs of the Tri-County Region and is prepared to implement in 2018.

V. Conclusion

Establishment of the 3C-REN will allow for the creation of a sustainable, trusted organization that will provide gap-filling services and act as EE advocates and stewards for all residents of the Tri-County Region. For all the foregoing reasons, the County of Ventura, on behalf of the 3C-REN, appreciates the opportunity to provide reply comments and support for the 3C-REN BP submitted on January 23, 2017, and respectfully urges the CPUC to authorize and adopt the 3C-REN BP.

Dated: October 13, 2017

Respectfully submitted,

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