BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate Procurement Policies and Consider Long-Term Procurement Plans	FILED PUBLIC UTILITIES COMMISSION FEBRUARY 16, 2006 SAN FRANCISCO OFFICE RULEMAKING 06-02-013

WOMEN'S ENERGY MATTERS
POLICY PROPOSAL FOR INTEGRATED LONG-TERM PROCUREMENT

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Introduction

In accordance with the Feb 23, 2006 ACR in this Rulemaking, WEM presents herewith a Policy Proposal for consideration as a part of the Long Term Procurement Plans (LTPP) proceeding. WEM is a party to R0404003, of which this is the successor proceeding, and we are establishing party status in this proceeding by notifying the CPUC Process Office as provided in the OIR.

The 2/23/06 OIR states:

> After incorporating higher loading order resources, encourage the development of cost-effective, highly-efficient, and environmentally-sound supply resources to provide reliability and consistency with the State's energy priorities…. (OIR, p. 2)
>
> The first order of business for this proceeding will be to examine the need for additional policies that support new generation and long-term contracts in California, including consideration of transitional and/or permanent mechanisms (e.g., cost allocation and benefit sharing, or some other alternative) which can ensure construction of and investment in new generation in a timely fashion. (OIR p. 7, 2/23/06 Ruling, pp. 2-3)

This "integrated" proceeding should not race right by the Energy Action Plan's "higher loading order resources" without first stopping to consider to what extent energy efficiency, demand response, renewables (including distributed renewables), cogeneration, and better combinations of these resources could serve to fulfill reserve requirements and reduce (in some cases eliminate) the need for construction of new power plants and transmission.

WEM believes it is premature to "examine the need for additional policies…which can ensure construction of and investment in new generation" without first examining the need for additional policies that can ensure investment in resources that are higher in the "loading order." While current agreed policy places Energy Efficiency (EE) at the top of the loading order in the resource selection process, we believe that many routine current policies mandate against serious use of EE in that process. Insufficient attention to these resources unnecessarily increases energy costs, reduces energy security and reliability, and violates environmental justice.

To weather the "perfect storm" of climate change, dwindling domestic supplies of natural gas, and potentially massive economic dislocation from expensive and uncertain foreign energy supplies, California should act now to focus investment on energy efficiency and renewable energy infrastructure.

Therefore WEM offers a Policy Proposal focusing on the following remedies for barriers to energy efficiency. Some of these recommendations will also set the stage for more sensible consideration of cogeneration and renewables, and other resources if they are truly needed:

Put energy efficiency in the hands of independent program providers
Develop a Standard Offer EE template
Establish Community Choice energy efficiency opportunities for cities
Require LSEs to identify "procurement" vs. Public Goods Charge EE funds
Bring ISO and LSE resource planners to the table for EE planning
Require ISO and LSEs to genuinely consider EE as alternative resources
Develop data on location of EE resources
Require utilities and other LSEs to provide disaggregated data on energy use
Target EE by geographical location
Prioritize specific types of EE to reduce the need for supply resources
Emphasize peak reductions
Determine Avoided Costs by all the non-alternate costs
Link energy savings to payments
If EE is cost-effective, DO IT
Combine energy efficiency with water efficiency and cogeneration; provide for "over-the-fence" distribution
Utilize Energy Efficiency to buy time to allow investment in renewables

POLICY PROPOSAL

WEM is a party to all the CPUC's energy efficiency (EE) proceedings since 2001 — the Energy Efficiency Rulemaking (R0108028), the 06-08 EE proceeding (A0506004 et al.), the 2005 SCE Emergency summer program (A0502029) and the AEAPs (A0005002 et seq.). In addition, WEM was a party in the Jefferson Martin proceeding (A0209043), where we requested consideration of EE as an alternative. WEM was also a party in the CEC's 2005 Integrated Energy Policy Report (IEPR), offering oral and written comments on EE and related issues.

Put energy efficiency in the hands of independent program providers

Much has been written about the fact that utilities' self-interest in selling more energy presents a great barrier to energy efficiency when the utilities are in charge of

implementing and/or selecting and administering all programs, as they are today. Other barriers are the unwieldy, risk-averse utility bureaucracy and culture.

Another barrier that is less well-understood is that certain EE administrative systems require micromanagement and others do not. Trying to micromanage energy efficiency makes almost as little sense as trying to micromanage the internet. Like the internet, diversity, creativity, particularity and speed are great advantages of EE. None of these are compatible with micromanagement.

Develop a Standard Offer EE template

"Standard Offer" EE systems are non-micromanaged. The administrator simply offers a standard price for energy savings in various sectors, to be delivered within a certain amount of time. Program providers fill out brief applications demonstrating that they have a clean business record, contracts are awarded on a first-come-first served basis, and providers get paid when their work is achieved and measured. Standard Offer systems can be tweaked to increase focus on particular geographic areas, types of EE measures (air conditioning for example), and innovative pilot programs, but the basics are the same. A Standard Offer system has been hugely successful in Texas, where utilities are nominal administrators (but have no opportunity to micromanage). The system is achieving 40% more savings than California as well as much greater "comprehensiveness" and variety of savings, and has spawned a thriving infrastructure of hundreds of small, local providers as well as steady work for a number of medium-size companies.

The CPUC made a decision in January 2005 to return administration of EE to utilities, after a four-year experiment where the Commission solicited and selected independent programs with 20% of the funds. The experiment was successful – independent programs provided more energy savings per dollar than utilities — however the Commission termed that fact "irrelevant" and put utilities in charge again, as they were for 30 years.

Today, over a year later, the utilities have finally (but not completely) presented their huge, lumbering, intricate and confusing 06-08 program plans, in 700-1400 page documents that stink of the futility and oppression of micromanagement. The great danger and dirty secret of micromanaged systems is that they tend to become so overly

complex and riddled with internal contradictions that after a while nobody can follow what's really going on. In the confusion, petty tyrants establish fiefdoms and all manner of mediocrity and conniving runs rampant, too often aided and abetted by academics and consultants willing to lend their services to whoever pays their bills.

In its January 2005 decision, the Commission took over the EE measurement system, which had previously been run by utilities to measure their own and others' programs. For the past few years, the Commission had established greater oversight and better reporting requirements. Evidence of utility gaming of the energy efficiency system has gradually emerged although it is by no means complete, as the transition to Commission measurement has only just begun. Even so, a shocking view of program failure is now clear. Savings claims for 2004-05 programs are expected to be reduced 20-40% just from grossly inflated claims (400%) for one measure, compact fluorescent lights, which dominated utility programs in recent years.

To avert the impending train wreck in 2006-08 programs, the Commission should immediately develop a basic template for Standard Offer programs for any city (or utility) to utilize, providing for a smooth transition from current programs in any stage of development or implementation.

Establish Community Choice energy efficiency opportunities for cities

In 06-08 EE programs, California cities are big losers. The utilities offered "partnerships" for cities, promising them opportunities to design their own programs, but in a bait and switch, the utilities ignored cities' proposals, refused to meet with them, and in the end offered most of them only a role as marketers and subcontractors of utility-controlled programs and ineffectual "information-only" education projects. PG&E also slashed partnership program budgets by half and seeks further delay through April 1 to sign contracts. All utilities face protests by WEM and others to their compliance filings, and 06-08 programs are currently on hold while CPUC's Energy Division resolves the issues.

Cities are awaiting a long-delayed phase of the CPUC's Community Choice proceeding that would finally fulfill the mandate of the Community Choice law (AB117) to allow cities to administer their own energy efficiency programs. The Commission should move forward with this immediately, to provide cities an opportunity to escape the

partnership debacle. The Standard Offer template, recommended above, would provide an effective, easy-to-administer system that cities could use.

Require LSEs to identify "procurement" vs. Public Goods Charge EE funds

Currently, the utilities are collecting an additional "procurement EE" surcharge, in addition to the Public Goods Charge funds for energy efficiency. This enables utilities to increase expenditures on EE, avoiding the constraints on PGC funds that are based on an unvarying formula. Currently, utilities are not required to identify what funds are being used for their programs; it is unknown whether or not procurement is a straight percentage of all programs, or is used for specific things.

This is problematic for Community Choice cities, which will have to use their own procurement funds, as well as PGC funds, for energy efficiency programs included in their integrated resource plans. They will need to know what portion of current energy efficiency programs the utilities are funding with procurement, in order to know how much needs to be replaced when they plan expenditures for their own programs.

Bring ISO and LSE resource planners to the table for EE planning

WEM's comments in various venues have noted the remarkable absence of ISO and LSE resource planners in EE proceedings and workshops. This more than anything demonstrates the lack of integration of EE in resource planning. Utility EE planners admitted in a recent workshop that they had only recently begun to have internal meetings with their resource planners, and these discussions were frustrated by an obvious lack of understanding (apparently on both sides). If the CPUC and CEC intend for the Energy Action Plan's "loading order of resources" to have any impact in reality, integrated resource discussions must *begin* with the "higher order loading resources" rather than relegating these to side discussions and afterthoughts.

Require ISO and LSEs to genuinely consider EE as alternative resources

WEM has had first hand experience of the disconnect between EE and resource planners. In the Jefferson Martin proceeding, WEM and others requested consideration of using EE to eliminate or postpone the need for the planned 230 kV transmission line ($207 million +?). ISO and PG&E (and Aspen, the CPUC's EIR consultant) all quickly dismissed EE, stating that they were only required to take into account historical

estimates of energy savings (about 7MW in the project area) rather than current and projected savings. (By contrast, utilities are required to factor in any other resources that are built, under construction, or approved for construction.)

PG&E low-balled the estimate of increased energy savings due to current (at the time of hearings in 2004) increases in EE budgets. It argued that the additional $16.3 million being spent in 2003-04 in the project area could only be assumed to provide an additional 1-3 MW of savings, rather than the 16 MW the utility claimed it would produce (in EE proceedings). Both PG&E and ISO dismissed EE resources as inherently insignificant, pretending that double or triple digits of energy savings were unthinkable. PG&E's witness flatly refused to acknowledge the possibility WEM proposed, that substantial amounts of additional EE could be targeted to the project area immediately and in the foreseeable future. (For 2004-05 programs, PG&E nearly doubled its EE funds, adding approximately $75 million of procurement funds to over $100 million from the Public Goods Charge. The utilities had complete flexibility to use these additional funds however and wherever they chose, as long as they met certain criteria.)

Develop data on location of EE resources

WEM's comments over several years in the above proceedings have repeatedly requested the CPUC to order utilities to provide data on the geographical location of EE installations. Currently there is no geographical information at all on the location of most energy savings, and only the most general information for special programs (such as the San Francisco program described below). Geographical data would be useful for a variety of reasons, in particular because the ISO and LSEs base the need for more power and transmission resources on questions of congestion on specific power lines and increased load at specific substations. Genuine consideration of EE therefore requires geographical data that can be correlated to substations.

To date, WEM's repeated recommendations on this issue have met with silence in CPUC EE proceedings. Energy Commission EE staff have enthusiastically supported our proposals in workshops, but this has not so far resulted in any changes (CEC EE staff

participate along with CPUC Energy Division staff as "Joint Staff" in current EE proceedings).[1]

This is in stark contrast with Demand Response, in which geographical location is part of the deal. That is a major reason why ISO accepts projected Demand Response as a resource, but not EE.

The utilities already collect geographical information for all EE installations, because contractors have to report the locations where they did the work for quality control purposes (for potential spot-checks by utility inspectors and Evaluation, Measurement & Verification (EM&V) contractors). EE providers and administrators are required to report other detailed information on installations such as what specific measures were installed, the expected useful life (EUL) of those measures and their energy savings characteristics (kWh and kW). Adding geographical information to these reports would require very little additional work. (Also, this would not necessarily expose confidential customer data - customers could be shielded by translating locations into GIS data, rather than street addresses.)

Require utilities and other LSEs to provide disaggregated data on energy use

Once upon a time, utilities provided detailed data on energy use to the Energy Commission, but they no longer do this. The Energy Commission has done its best to estimate load with complex economic models, but there is nothing like the real thing, and CEC's data is so broad geographically as to be all but useless.

All LSEs should be required to promptly provide disaggregated data on energy use (by substation) on a quarterly basis to CEC and the CPUC. This would take the guesswork out of determining what resources are in fact needed. Such data would also provide objective verification of the success or failure of energy efficiency expenditures, providing more assurance for LSE and ISO resource planners to accept energy efficiency as a resource.

Target EE by geographical location

[1] Previously, CEC recommended collection of zip code data on EE. This would not be sufficient, as zip codes are not specific enough to ensure resources correlated by transmission and distribution substations.

In addition to reporting on where EE has been done, EE programs could be specifically targeted to relieve resource constraints and congested power lines. However, this is not happening except in the most general way, as revealed in the following examples:

1) SCE asked for and received $57 million to expedite EE programs in summer 2005, citing emergency shortages and potential blackouts. However, it failed to indicate in its EE filings precisely where in its territory it intended to perform EE. At least on paper, this diluted the effectiveness of the emergency savings. We heard anecdotally that the utility was approaching facilities that drew power from congested lines, however they were not required to concentrate on those areas and may or may not have done so. In addition, the utility failed to prioritize types of savings that would provide quick, effective and low-cost savings (see below, Need to prioritize specific types of EE to reduce supply side resources)

2) PG&E asked for and received $16.3 million for the San Francisco Peak Energy Program ("SFPEP"), citing the need for these savings in order to ensure reliability in the event of closure of the ancient Hunters Point Power Plant (HPPP). However, the plan originally envisioned all the work being done in downtown San Francisco. WEM and CFC, a coalition of Hunters Point community groups protested the focus on downtown buildings and requested EE resources targeted to the Bayview Hunters Point neighborhood. The utility resisted these demands until our coalition presented evidence that the downtown was served by separate power lines that received no power directly from HPPP. We obtained confirmation from PG&E's chief transmission planner that downtown San Francisco was the least effective place in the city to save energy, if the objective was ensuring reliability to allow shutdown of the Hunters Point Power Plant.

Prioritize specific types of EE to reduce the need for supply resources

The Commission should not just assume that utilities are making the best use of energy efficiency funds for resource purposes — even in cases such as the Edison emergency summer program, where the utility faced serious consequences — potential blackouts — for failing to do so. Edison ignored savings that were more certain, immediate, and less costly, in favor of other types of savings that were less certain to be achieved, likely to be delayed until the summer "emergency" was passed, and more costly as well. For example, Edison's summer program provided NO multifamily savings, although WEM demonstrated that these would have provided more certain, immediate, lower-cost (and therefore larger amounts of) savings than the programs and measures Edison proposed.

Emphasize peak reductions

It should be obvious to everyone that air conditioning is the greatest driver of the need for supply side resources in California; the afternoon "summer peak" load is the high number that everyone is trying to meet. The Commission's EE decisions appear unmoved by the fact that these are the hours that drive the need for more energy supplies, and also result in the oldest, dirtiest power plants continuing to be used. This is not only bad energy policy, it flies in the face of environmental justice, because power plants are almost all located in low-income communities of color, causing high levels of disease in these residents.

Nevertheless, several parties in the 06-08 EE proceeding and EE Rulemaking have been frustrated in our efforts to get the CPUC to require greater attention to HVAC savings (e.g. more efficient air conditioners, evaporative coolers, ceiling fans, and shade trees). Programs are overwhelmingly weighted towards lighting instead, because these are seen as the most "cost-effective" resources and the Commission's recent EE decisions weighed cost-effectiveness above all other considerations.

Unfortunately, cost-effectiveness calculations are still employing Avoided Costs that were created before the run-up in gas prices. An updated version of Avoided Costs is being considered this year (in Avoided Cost proceeding), however this was tragically mistimed, missing the period of development of 2006-08 EE programs.

2006-08 EE programs will be recalculated based on new Avoided Costs, but what is needed even more is a reconfiguration of the programs. This is allowable under 100% cost-shifting rules established by the Commission — but it is one thing to *allow* and quite different to *require* changes in programs.

Determine Avoided Costs by all the non-alternate costs

Avoided costs used to evaluate EE for cost-effectiveness should include the anticipated costs of planned generation, out to the horizon of the life of the EE being evaluated, e.g., EE savings that will last 20 years should be considered in the light of resources to be placed prior to that expiration. Re-evaluation of the avoided costs should be part of the annual 'true-up,' when existing LTPP costs and anticipated resources are reconsidered in the light of new information of all kinds.

At present, LTPP is mandated to eventually include 20% of alternate sources. To the extent that these sources are not required to cost-compete with conventional sources, their costs should not be part of the avoided cost calculation used to cost-evaluate EE projects.

Link energy savings to payments

Standard Offer programs establish a clear link between energy savings and payments. California's current system does not do this. The Commission's EE "goals" never even state that the programs should maximize energy savings per dollar. The rationale is that program providers would "cream-skim" — doing only the most cost-effective measures at any given site, and leaving behind "lost opportunities." This is not working, however. The micromanaged system requires administrators to develop all program plans in advance, and different programs are designed to do particular things and not others. This greatly hampers comprehensiveness.

The least expensive way to ensure comprehensiveness and capture lost opportunities is to enable contractors to do as many different things as possible at each site. Some of the greatest costs are simply moving crews and materials around. That's why Standard Offer programs achieve greater comprehensiveness than California's system, which prescribes what things contractors do at any given location. Standard Offer contractors can add to their energy savings totals even when some things are less cost-effective than others.

In contrast, California's conflicted emphasis on cost-effectiveness has failed to maximize savings per dollar or comprehensiveness, at the same time that it prevents a focus on EE as a resource. The Commission has never required each program to be cost-effective — only the overall "portfolio" is required to be cost-effective, and it is only required to meet the minimal cost-effectiveness standard.

Standard Offer programs can offer higher payments to award use of certain types of measures. Even with potential improvements in Avoided Costs, HVAC would not necessarily qualify as highly cost-effective savings, because air-cooling is needed far fewer hours than lighting. Ironically, utilities claim they must focus on lighting because of cost-effectiveness, but at the same time, they waste money on a great many non-cost-

effective measures and ineffective but very costly marketing, especially television ads that primarily greenwash utilities rather than providing useful EE education.

If EE is cost-effective, DO IT

Current procedures for implementing EE involve planned budgets, which seldom start in effect until February or March and often expire, with all funds gone, before year end. If EE is to be seriously used as a part of LTPP, this must be changed. This process makes poor use of EE and of the provider resources. If a provider can find an EE application that is cost-effective at ANY time of year, the provider should install it and be paid accordingly. This would provide the maximum amount of EE available and would make efficient use of provider resources, now often in a very inefficient 'standby' status for a significant part of each year.

Budgetary and planning coherence could be assured by an annual 'true-up' process where utility budgets would be adjusted to fit the costs of already placed EE and the LTPP process adjusted for the EE resources provided. This 'trueup' should be limited to consideration of new 'facts on the ground.' It should accept all costs, data and policies not directly affected by the amount and costs of EE added in the previous year.

Combine energy efficiency with water efficiency and cogeneration; provide for "over-the-fence" distribution

The Commission should follow the recommendations of the IEPR to expedite opportunities for combined energy and water efficiency programs, and make sure that cogeneration contracts are renewed. Improved efficiency in water and wastewater programs would combine all three. The Commission should expand opportunities for cogeneration (and distributed solar) by allowing for "over the fence" distribution.

Utilize Energy Efficiency to buy time to allow investment in renewables

Properly utilized, energy efficiency has the capability to stretch our current system to provide all the resources we need in the near future, at the lowest possible cost. This buys time and preserves resources for building renewable energy, which should be our next priority, as the "loading order" mandates.

Conclusion

WEM looks forward to the Commission's taking swift action on the above proposals, in order to ensure that California invests first in the cheapest, cleanest resource — energy efficiency — and prioritizes cogeneration and renewables next. There is no need for policies to encourage other types of new generation at this time; indeed that would be counterproductive.

DATE: March 2, 2006

Respectfully submitted,

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CERTIFICATION OF SERVICE
R0602013

I, Barbara George, certify that on this day March 2, 2006 I caused copies of the attached WOMEN'S ENERGY MATTERS POLICY PROPOSAL FOR INTEGRATED LONG-TERM PROCUREMENT 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 the R0602013 proceeding, and also by hand-delivering an original and six paper copies to the CPUC Docket office, with a copy to Administrative Law Judge Carol Brown and Presiding Commissioner Michael Peevey.

Dated: March 2, 2006 at Fairfax, California.

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DECLARANT

(Electronic service List attached to original only)

Service List R0602013

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