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SCE Comments on EBEE Action Plan

Please use these comments and disregard the initial comments filed by SCE on the EBEE AP. Thank you!

Additional submitted attachment is included below.

November 1, 2016

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 16-EBP-01
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: 2016 Existing Buildings Energy Efficiency (EBEE) Action Plan Update —
Comments of Southern California Edison Company (Docket No. 16-EBP-01)

Dear Commissioner McAllister:

Southern California Edison Company (SCE) appreciates the opportunity to provide comments on the California Energy Commission's (CEC's) 2016 update to the Existing Buildings Energy Efficiency Action Plan (Plan Update)¹, pursuant to Assembly Bill (AB) 758.

SCE also thanks the CEC for inviting the Investor Owned Utilities (IOUs), Public Owned Utilities (POUs), and stakeholders to provide input at the Staff Workshop on the Plan Update held on October 17th. SCE representatives participated at the workshop in person and via teleconference.

I. INTRODUCTION

SCE has long been a national leader in energy efficiency (EE) and has worked with Federal and State governments and the private sector to develop and implement EE programs that have provided California consumers with financial and energy-savings benefits. SCE continues to work with its customers to meet their EE goals in existing buildings and is currently collaborating with the California Public Utilities Commission (CPUC) and the California Energy Efficiency Coordinating Committee (CAEECC) to prepare SCE's Business Plan as part of the 10-year EE rolling cycle.

The Plan Update summarizes actions taken by IOUs, POUs and other market actors over the past year to implement the 2015 Existing Buildings Energy Efficiency Action Plan (Action

¹ Unless otherwise delineated, all references to the "Plan Update" refer to the 2016 Update to the 2015 Existing Buildings Energy Efficiency Action Plan. Retrieved from http://docketpublic.energy.ca.gov/PublicDocuments/16-EBP-01/TN213983_20161012T145616_Existing_Buildings_Energy_Efficiency_Action_Plan.pdf

Plan) adopted by the Energy Commission in September 2015. The Plan Update also summarizes forward looking changes to EE policies including Senate Bill (SB) 350, AB 802, and AB 793.

SCE supports the CEC's overall direction in the Plan Update and is working towards similar goals, including: procurement of distributed energy resources (DERs); enhanced building efficiency standards development and compliance; achievement of data-driven decision making; more comprehensive marketing, education, and outreach strategy; and a knowledgeable industry workforce that is trained in EE best practices and equipped with the knowledge and experience to optimize EE investments. SCE looks forward to ongoing collaboration with the CEC and CPUC, as well as with public and private stakeholders.

II. RECOMMENDATIONS

A. ACTION PLAN UPDATE SHOULD INCLUDE PROGRAM METRICS

SCE is committed to delivering a cost-effective portfolio of EE programs. As noted in recent CAEECC meetings and SCE's 2017 EE budget advice letter², SCE continues to address declining program cost-effectiveness as one of the key reasons for streamlining program offerings and aligning delivery channels to continue to support a robust, stable, and effective energy efficiency industry. Additionally, D.16-08-019³ takes steps to align statewide, mid- and up-stream programs under a single program administrator and transfer a portion of programs to the third party industry. SCE's business plan will outline efforts to support the CPUC's policy direction while addressing the best approach to achieve EE goals and balance a cost effective portfolio over the next ten years.

Overall, the Plan Update provides a good strategic framework to provide for a clean and energy efficient future. SCE recommends that additional details on cost effectiveness, funding and other program metrics be included to ensure that California's ambitious energy efficiency goals are achieved.

B. CLOSER ALIGNMENT ACROSS STATE AGENCIES FOR CUSTOMER DATA PROCEDURES

SCE supports Strategy 1.2 (Nonresidential and Multifamily Benchmarking and Public Disclosures) and encourages even closer collaboration with the CPUC in utilizing existing tools and standards to leverage support for these efforts. SCE follows CPUC policies that allow SCE to provide customer data to external entities. SCE is able to provide these data via Green Button or the existing Customer Information Service Request form 14-796. These processes align with Data privacy standards outlined and should be further leveraged rather than requiring policy change risking less privacy.

² Southern California Edison Company's 2017 Annual Energy Efficiency Program and Portfolio Budget Request, September 1, 2016, Advice 3465-E (U 338-E).

³ D.16-08-019 provides guidance for initial EE Rolling Portfolio Business Plan Filings

In addition to Green Button, SCE currently offers a number of energy management technology measures to help customers access and manage their utility bills and energy consumption. These offerings include SCE's Energy Efficiency Audit Tool, an online audit which helps customers understand their homes' and/or small businesses' energy use; and SCE's My Account, a centralized information hub to allow customers to view hourly energy consumption, forecast consumption, and compare current consumption trends to previous years' consumption. Also, SCE provides customers with Budget Assistant, a free tool to help customers more effectively manage their energy budgets while SCE's Rate Analyzer uses a customer's historical usage data to compare the current rate to other available rate options. Furthermore, SCE's Energy Manager provides business customers energy usage data, including peak-load data by 15 minute intervals. All of which can be accessed through SCE and usage data through Green Button.

The ability to make data-driven decisions is also important to SCE. For example, as the implementation of AB 802 benchmarking progresses, a dataset of building-level information and energy characteristics will develop over time. SCE anticipates utilizing this dataset to target low-performing buildings for EE program participation. This approach will ensure that we maximize the value of AB 802, and the associated information technology systems that have been developed, to help meet California's environmental goals.

C. SCE SUPPORTS THE PROCUREMENT OF DISTRIBUTED ENERGY RESOURCES AND MARKET TRANSFORMATION PROGRAM PORTFOLIOS THAT COST EFFECTIVELY COMPLEMENT DSM PROGRAMS

SCE continues to demonstrate its leadership and support for the procurement of clean Distributed Energy Resources (DERs) (Strategy 1.8) through its ongoing procurement strategy including:

- All-source solicitation of including energy efficiency, demand response, solar, and storage through the 2013 Local Capacity Requirements-Request for Offer (LCR-RFO), resulting in the execution of 2,150 MW worth of resources,
- All-source solicitation including demand response, solar, storage, and solar-storage hybrid through the 2015 Preferred Resources Pilot Request for Offer 2 (PRP RFO 2) resulting in the execution of 125 MW worth of resources
- Solicitation of demand response through the Aliso Canyon Demand Response Request for Offer resulting in the execution of 11 MW worth of resources

Furthermore, SCE is planning the launch of several more solicitations for DERs in the future including:

- Distribution Deferral RFO
- Goleta Resiliency RFO

Today, energy efficiency savings achieved through these procurement mechanisms cannot be used by program administrators to count toward the energy efficiency goals established by the

CPUC. SCE will continue to work with CPUC staff to assess the benefits of procurement-based DER acquisition in comparison to more traditional programmatic approaches.

SCE supports market transformational program designs, where appropriate and feasible, within the bounds of portfolio cost-effectiveness. Coordination among state agencies and stakeholders is necessary to ensure alignment of priorities and processes to address increasing needs for energy efficiency, including GHG reduction, grid reliability, workforce education and market transformation. Strategies that focus on administration of market transformation in particular should be harmonized across proceedings (e.g. EBEE, EE Order Instituting Rulemaking Phase III).

III. CONCLUSION

In conclusion, SCE appreciates the Energy Commission's consideration of these responses and looks forward to its continuing collaboration with the Energy Commission on the EBEE Action Plan and related initiatives. Please do not hesitate to contact me at (916) 441-3979 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Very truly yours,

/s/

Catherine Hackney