

DOCKETED

| | |
|-------------------------|--|
| Docket Number: | 16-OIR-02 |
| Project Title: | SB 350 Barriers Report |
| TN #: | 214705 |
| Document Title: | SCE Comments on SB 350 Recommendations |
| Description: | N/A |
| Filer: | System |
| Organization: | Southern California Edison |
| Submitter Role: | Public |
| Submission Date: | 12/8/2016 3:08:56 PM |
| Docketed Date: | 12/8/2016 |

Comment Received From: Andrew Dugowson

Submitted On: 12/8/2016

Docket Number: 16-OIR-02

SCE Comments on SB 350 Recommendations

Additional submitted attachment is included below.

December 8th, 2016

California Energy Commission
Docket Office, MS-4
Re: Docket No. 16-OIR-02
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Dear Commissioners:

On December 5th, 2016, the California Energy Commission (Energy Commission) released its “Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities” (Draft Final Report). Southern California Edison (SCE) respectfully provides comments on the Draft Final Report.

SCE commends the Energy Commission Staff for pulling together such a wide-ranging study of barriers over a relatively short timeframe. SCE appreciates that the Energy Commission incorporated much of the stakeholder feedback into this most recent version. It is important that all communities, including those that are low income or otherwise disadvantaged, are part of the journey to clean energy in California. SCE appreciates this discussion and looks forward to further participation, including the implementation workshops.

A. Comments

I. The Implementation Workshops Should Evaluate the Benefits and Cost Impacts of the Recommendations, and Use This Information to Prioritize the Recommendations

As the implementation workshops delve into further detail for each of the recommendations set forth by the Energy Commission, a considerable effort should be made to identify the quantitative and qualitative impacts of the recommendations. Comprehensive data should include not only the cost for a specific recommendation but also the expected amount of energy saved or generated. While cost-effectiveness is not the only criterion to evaluate these potential solutions, it can provide a common basis for decision-makers to compare different solutions, and to help maximize the impact of the portfolio of options they pursue.

II. SCE Supports Efforts to Improve Data Collection between the State and IOUs

As outlined in Recommendation 5, there is opportunity for the IOUs and the State to better coordinate their data. SCE look forwards to working with the Department of Community Services & Development, among other agencies, to develop efficient and effective ways to share data while protecting customers’ privacy and confidential data.

III. SCE Looks Forward to Further Discussion of the Proposed Pilot Programs

The Draft Final Report recommends that the legislature consider several pilots, including one for debt-free financing for energy efficiency upgrades whose energy savings exceed costs and another for a variant of the “CleanCARE” proposal that would enable CARE customers to buy into new Community Solar projects¹. Additionally, the Draft Final Report asks the legislature to revise the statute authorizing the Green Tariff and Shared Renewables Program in order to allow for subsidies and direct incentives for low-income and disadvantaged communities².

Each of these options has potential merit and SCE looks forward to discussing these options in more detail at the implementation workshops. At the workshops, one topic for discussion should be a comparison of the customer groups served by the pilots, existing programs, and pending programs, such as the Multifamily Affordable Housing Solar Roofs Program. SCE looks forward to the California Public Utilities Commission expeditiously directing the IOUs to administer the Multifamily Affordable Housing Solar Roofs Program. The IOUs already have the necessary skillsets, experience, and cost-efficient administration to deliver a successful MAHSR program.

IV. SCE Supports Investigating Opportunities for the EPIC Program to Invest in and Benefit Disadvantaged Communities, but it is Important to Ensure that we do not Unintentionally Limit EPIC’s Scope of Work.

One of the additional recommendations from the Draft Final Reports states, “The Energy Commission’s Electric Program Investment Charge (EPIC) Program should target 25 percent of technology demonstration and deployment funding for sites located in disadvantaged communities.”³ While SCE supports the general intent of this recommendation, we believe that this location restriction could potentially limit EPIC’s benefits and overall scope of work. The majority of SCE’s Technology Demonstration & Deployment (TD&D) projects funded by EPIC are implemented at one of SCE’s three labs located in Pomona and Westminster. Instead of the setting a target that 25% of the EPIC funding for TD&D projects be located in disadvantaged communities, SCE recommends that a portion of the funding provide benefit to disadvantaged communities.

B. Needed Clarifications and Edits

I. The Draft Final Report Under Reports CARE Enrolment

The draft final report cites an excerpt from Evergreen Economics that states, “according to survey data, 66 percent of eligible households were enrolled in CARE.”⁴ As the authors of the Evergreen study note, this estimate is limited due to the sampling methodology and does not include households enrolled in CARE through categorical program eligibility (e.g., customers eligible for CARE because a member of their household is enrolled in Medi-Cal or Medicaid). Instead of the 66% figure, we suggest using estimates of CARE penetration provided in the utilities’ regular reports which incorporate more up-to-date information. For example, as of October, SCE’s CARE enrolment is estimated at 82%.

¹ Recommendations 4, 4a, and 4b, Draft Final Report.

² Recommendation 2, Draft Final Report.

³ Additional Recommendation 11a, Draft Final Report.

⁴ Page 21, Draft Final Report.

C. Conclusion

SCE appreciates the Energy Commission's consideration of these comments and looks forward to further participation in the implementation workshops. Please do not hesitate to contact me at (916) 441- 3979 with any questions or concerns you may have.

Very truly yours,

Catherine Hackney