

**DOCKETED**

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*Comment Received From: Catherine Hackney*  
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**SCE Comments on Doubling EE Workshop**

*Additional submitted attachment is included below.*

June 21, 2018

California Energy Commission  
Docket Office, MS-4  
Re: Docket No. 18-IEPR-07  
1516 Ninth Street  
Sacramento, CA 95814-5512  
[docket@energy.ca.gov](mailto:docket@energy.ca.gov)

Re: Southern California Edison Company's Comments on the California Energy Commission Docket No. 18-IEPR-07: Doubling Energy Efficiency Savings

Dear Commissioners:

On May 30, 2018, the California Energy Commission (CEC) held a workshop to discuss programs and projects that aim to double energy efficiency ("EE") savings in Southern California as part of the 2018 Integrated Energy Policy Report (IEPR) Update Proceeding ("the workshop"). Southern California Edison (SCE) participated in the workshop and appreciates the opportunity to provide these written comments.

SCE supports the CEC's leadership in driving advancements in statewide EE programs to meet the goals of SB 350. SCE thanks the CEC for providing an opportunity to discuss recent developments on SCE's 2018-2025 Energy Efficiency Business Plan ("Business Plan") and conservation voltage reduction program in these comments.

**SCE supports the CEC's efforts to combine the SB 350 framework and the AB758 Existing Building Action plan, recognizing the inherent need to connect strategies, goals and their funding sources.** SCE appreciates that the CEC continues to explore different means of achieving SB 350's ambitious EE goals and recognizes that there is a shared goal alongside market activities outside of utility programming among the state's Investor-Owned and Publicly-Owned Utilities. SCE looked to industry best practices, such as the Existing Building Energy

Efficiency Action Plan, to inform its Business Plan, which outlines how EE programs are evolving in their capacity to contribute significantly to the State's overall goal. To achieve the defined goals of the Business Plan, these programs will necessitate partnerships across state agencies and marketplace participants.

SCE looks forward to the emergence—through upcoming solicitations—of new business models and offerings that incorporate and test new practices, such as: behavioral, retro-commissioning, operational savings, and Pay-for-Performance models. We also anticipate future updates, contributions, and identification of necessary policy changes or funding sources to achieve the State's SB 350 goal.

**SCE's Distribution Volt VAR Control Program has demonstrated some promising results in Conservation Voltage Reduction.** The CEC has actively encouraged utilities to investigate how Conservation Voltage Reduction (CVR), as specified in SB 350, could contribute to the State's ambitious energy savings targets. SCE's CVR effort, known as Distribution Volt VAR Control (DVVC), has made meaningful strides in leveraging the use of existing resources to deploy the project at nearly 300 substations (a substantial scale).

Prior to DVVC, SCE controlled distribution voltage and VARs with automated field capacitors on distribution circuits and substation capacitors. Although the control was automated, each device acted autonomously, based on location-specific conditions. This resulted in less optimal distribution voltages which, in some cases, drove unnecessary energy consumption. DVVC uses SCE's patented Volt/VAR approach to optimize customer voltage profiles and save customers energy. The primary benefit is CVR, or the reduction of energy through the reduction of average voltage. SCE estimates that for every one percent reduction in voltage, there is a one percent actual savings in avoided costs of energy procurement and capacity to the customer. This estimate also assumes that no action is taken by the customer.

As customer load changes with the introduction of new technology, SCE encourages the CEC to continue its investigation of CVR benefits as it relates to the achievement of SB350's doubling EE goals for the state. SCE also looks forward to continuing the conversation on CVR, by continuing its development, deployment, and investigation of DVVC benefits.

**In conclusion, SCE's Business Plan and DVVR program are some of the ways in which SCE is making a concerted effort to meet the State's doubling EE goals.** SCE appreciates the CEC's consideration of these comments and looks forward to continuing its collaboration with the CEC and stakeholders. 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