

November 8, 2010

California Energy Commission
Docket Office, MS-4
Re: Docket No. 10-IEP-1A
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.state.ca.us

DOCKET	
10-IEP-1A	
DATE	NOV 08 2010
RECD.	NOV 08 2010

Re: California Energy Commission Docket No. 10-IEP-1A: Comments Regarding Draft 2010 Integrated Energy Policy Report (“IEPR”) Update

To Whom It May Concern:

The California Energy Commission (“Energy Commission”) released its Draft 2010 Integrated Energy Policy Report Update (“Draft Report”) on October 14, 2010. The Draft Report assesses California’s transition to a clean energy economy and reports on the impact that federal funds provided pursuant to the American Recovery and Reinvestment Act of 2009 (“ARRA”) are expected to have on that transition. Southern California Edison Company (“SCE”) would like to take this opportunity to commend the Energy Commission for its efforts in considering the ARRA-funded energy programs currently being implemented in California. The Energy Commission has requested that parties submit written comments on the Draft Report. Accordingly, SCE provides the following brief comments.

The Draft Report discusses the considerable measures that were taken to expedite the permitting process for renewable power projects. The Renewable Energy Action Team (“REAT”) made significant strides to streamline the renewable energy project permitting process and SCE applauds the REAT team for their efforts. The Draft Report further contemplates that the Energy Commission and other REAT agencies undertake a “lessons learned” exercise to examine and record the measures that were successful and identify areas that need improvement. Because the REAT agencies may consider broad changes to permitting (such as transmission siting regulations), which could have a direct impact on SCE, we would like to participate as an active stakeholder in the lessons learned exercise. Additionally, SCE encourages the Energy Commission to continue to push for expedited permitting protocols and practices as well as increased coordination with other responsible agencies.

Throughout Chapter 4 of the Draft Update, the Energy Commission provides estimates of the impacts that ARRA funded programs will have on (i) the number of jobs created or retained; (ii) the energy cost savings; (iii) the annual electricity savings; and (iv) annual greenhouse gas

emissions reductions. The Energy Commission references individual program proposals as the sources to substantiate these estimates. In order to facilitate a better understanding of these estimates and their consistency across programs, SCE suggests that the Energy Commission include an appendix to the Draft Report, which explains the methodology used in arriving at these estimates and describes the assumptions upon which the estimates are based. More specifically, the appendix should include:

- information on the duration and quality of jobs created or retained;
- sources and methodology for calculating unit electricity and natural gas savings; and
- support for greenhouse gas emissions reduction estimates.

SCE is concerned that the Draft Report appears to express an overly optimistic view of the expected achievements of the ARRA-funded programs and their potential impacts on California's economy. SCE cautions the Energy Commission to scrutinize the basis for the estimates in proposals and other referenced reports to prevent inadvertently reporting misinformation.

SCE also requests that the Energy Commission provide interim reports from the comprehensive measurement, verification and evaluation ("MV&E") assessment that the Energy Commission is conducting in order to shed light on the progress of ARRA-funded programs going forward. Additionally, because the MV&E assessment will compare the relative contributions of energy efficiency programs (including programs provided by the California IOUs) to identify which programs are most effective, SCE encourages the Energy Commission to involve the IOUs as well as the CPUC in this process.

SCE appreciates having the opportunity to submit its comments on the Draft Report. Feel free to contact me regarding any questions or concerns.

Sincerely,

/s/ Manuel Alvarez
Manuel Alvarez, Manager
Regulatory Policy and Affairs
Southern California Edison Company
1201 K Street, Ste. 735
Sacramento, California 95814
(916) 441-2369