

TID's Comments on the CEC Draft Staff Report – Achieving Effective Energy Efficiency for California 2011-2020 dated July 2011

1. Table A-2 on page A-3 of Appendix A list the POU's Peak Demand Targets. The targets listed for TID in the table is not consistent with the targets adopted by TID's Board. The targets adopted by TID's Board is shown in the table below. Also, since TID's fiscal year is begins in January (not July for most POU's) our Board adopted updated targets for the years 2010 – 2019 not 2011-2020.

	2011	2012	2013	2014	2015	2016	2017	2018	2019
TID Board Adopted Targets	2,700	2,700	2,900	3,300	3,700	4,100	4,100	4,100	4,100
CEC Draft Report Numbers	2,854	2,828	2,832	3,094	3,518	3,928	4,278	4,351	4,304

2. On page 232 of the attached KEMA report. Kema concludes that TID's targets did not meet the feasibility criteria. We do not agree with that conclusion and it also inconsistent with KEMA's earlier comment on page 227 stating that "targets are higher than its market savings potential in some years but should be achievable since the utility's cumulative targets are close to its cumulative market savings potential". Furthermore, these results are based on numerous assumptions that all have a degree of error, so we believe it is unreasonable to conclude that TID's target is not feasible since it is higher than the results from a model that uses numerous assumptions. Note that when TID's targets were established, they were consistent with the market potential as predicted by the model at that time.