BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Joint Application of Pacific Gas and Electric Company (U 39E), Southern California Edison Company (U 338-E), San Diego Gas & Electric Company (U 902E), and Southern California Gas Company (U 904G) Submitting the California Energy Efficiency Strategic Plan

Rulemaking 08-07-011
Filed June 2, 2008

SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) INITIAL COMMENTS IN RESPONSE TO THE ORDER INSTITUTING RULEMAKING IN R.08-07-011

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Dated: July 17, 2008
I. INTRODUCTION

Southern California Edison Company (SCE) hereby submits these comments in response to the issues raised in Section five (“Schedule, Initial Comments”) of the Order Instituting Rulemaking¹ (OIR) for Rulemaking 08-07-011, issued July 14, 2008, which is consolidated with Application (A.) 08-06-004, the Joint Utility Application proposing a California Energy Efficiency Strategic Plan. SCE has no objections to the issues presented in the OIR and continues to support the California Public Utilities Commission (Commission)-sponsored strategic planning process in general.

As noted in the OIR, the Commission has opened this rulemaking to continue the development of a Commission-sponsored California Strategic Plan for Energy Efficiency (CPUC Strategic Plan) through the year 2020 and beyond. Earlier in this process, on June 2, 2008, SCE, with Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Gas Company (SCG) jointly filed A.08-06-004, proposing a California Energy Efficiency Strategic Plan.

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Energy Efficiency Strategic Plan (CEESP).  The CEESP, the filing of which had been ordered by D.07-10-032, included the aforementioned IOUs’ proposed statewide goals, outcomes, and strategies. We believe that these proposed measures, which grew out of a time-constrained but widely attended and high energy collaborative process, are necessary and appropriate for California’s energy and energy efficiency future and faithfully respond to the Commission’s directions regarding energy efficiency in general, and energy efficiency strategic planning in particular.

The following comments respond to the issues raised in Section five of the OIR.

II.

DISCUSSION

A. Issue 1: “Identification of the party and interest of the party in this proceeding”

SCE has a profound interest in this proceeding for a variety of reasons including: SCE’s responsibility to provide electric power to its customers; SCE’s central role to provide energy efficiency to its customers; SCE’s statewide, national, and international role in energy efficiency programs, measures and policies; and SCE’s expertise and experience with energy efficiency, including our co-authorship of the CEESP.

B. Issue 2: “Any objections to or recommendations regarding this order’s determinations as to categorization of the proceeding as quasi-legislative, the need for hearing, issues to be considered, or scheduling.”

SCE has the following reactions and recommendations:

1. SCE supports the categorization of this proceeding as quasi-legislative.

2. SCE does not object to hearings, but does not see the need for them at this point in the process. We note that over 500 individuals have participated in dozens of

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2 “California Energy Efficiency Strategic Plan”, June 2, 2008 (at [www.californiaenergyefficiency.com](http://www.californiaenergyefficiency.com)), filed by PG&E, SDG&E, SCE and SCG as CPUC Application 08-06-004.

3 CPUC Decision 07-10-032, October 18, 2007.
workshops and/or submitted comments on the draft and final versions of the CEESP and that this record is available to the Commission and other parties (at the www.californiaenergyefficiency.com web site). As discussed in paragraph four below, SCE believes it would be very valuable to finalize the strategic plan in advance of final Commission decisions regarding the IOUs’ 2009-11 energy efficiency program portfolios.

3. With respect to the issues to be considered, SCE is supportive of maintaining the broad range of issues that have been discussed, considered, and acted upon throughout the strategic planning process. As noted in D.07-10-032, the CEESP, the OIR and elsewhere, to be successful in this regard it is necessary to consider a wide range of issues; a broad host of government actors, market participants, and others; and the entire continuum of market transformation, from research and technology development at one end to codes and standards at the other end. We note only two constraints regarding the issues to be considered. One, we do not believe that it is necessary or appropriate to re-visit at this point past Commission energy efficiency decisions. Two, as described in paragraph four below, important scheduling constraints will significantly limit the ability to fully analyze all issues in this strategic planning cycle.

4. With respect to scheduling, SCE recommends that the Commission adopt an aggressive timetable that will produce a final strategic plan in advance of final Commission decisions regarding the IOUs’ 2009-11 energy efficiency program portfolios. SCE commends the Commission for establishing in the OIR the goal of a September 2008 final decision and encourages the Commission to make scheduling, process, and related decisions that will maintain the current momentum and meet that very valuable deadline.
III.

CONCLUSION

SCE appreciates the opportunity to provide these initial comments to the issues raised in Section five of the OIR. SCE enthusiastically support, the Commission-sponsored energy efficiency strategic planning process and looks forward to working with the Commission, parties, and other stakeholders in this next phase of the process.

Respectfully submitted,

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July 17, 2008
CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission’s Rules of Practice and Procedure, I have this day served a true copy of INITIAL COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO THE ORDER INSTITUTING RULEMAKING IN R.08-07-011 on all parties identified on the R.08-07-011 service list. Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this 17th day of July, 2008, at Rosemead, California.

/s/ Jennifer Alderete
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PROCEEDING: R0807011 - OIR - ENERGY EFFICIENCY
FILER: CPUC - ENERGY EFFICIENCY STRATEGIC PLAN
LIST NAME: INITIAL LIST
LAST CHANGED: JULY 16, 2008

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ROSEMEAD, CA  91770

PETE ZANZOT  
SOUTHERN CALIFORNIA EDISON COMPANY  
2131 WALNUT GROVE AVENUE  
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ROBERT J. BICKER
LEGISLATIVE ANALYST
CALIFORNIA APARTMENT ASSOCIATION
# State Service

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<td>CALIF PUBLIC UTILITIES COMMISSION ENERGY DIVISION</td>
<td>320 WEST 4TH STREET SUITE 500</td>
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<td>HARVEY Y. MORRIS</td>
<td>CALIF PUBLIC UTILITIES COMMISSION</td>
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*For: DRA*