



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Application of Southern California Edison
Company (U338-E) for Approval of its
2012-2014 California Alternate Rates for
Energy (CARE) and Energy Savings Assistance
Programs and Budgets.

A.11-05-017
(Filed May 16, 2011)

And Related Matters.

A.11-05-018
A.11-05-019
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SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
PETITION FOR MODIFICATION OF DECISION 12-08-044

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Dated: **November 1, 2013**

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STATE OF CALIFORNIA**

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I.

INTRODUCTION

Pursuant to Rule 16.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (CPUC or Commission) and the Joint Ruling by Assigned Commissioner and Assigned Administrative Law Judge, dated August 9, 2013, Southern California Edison Company (SCE) hereby submits this Petition for Modification of Decision (D.) 12-08-044 (Petition). D.12-08-044 (Decision), issued August 30, 2012, adopted Energy Savings Assistance (ESA) and California Alternate Rates for Energy (CARE) program activities and budgets of the investor owned utilities for the 2012-2014 program cycle.

For the reasons discussed herein, SCE, on behalf of itself, San Diego Gas & Electric Company, Southern California Gas Company, and Pacific Gas and Electric Company (collectively the “Joint Utilities”), requests that the Commission modify D.12-08-044 to allow the IOUs to satisfy the requirement that the Energy Education study include a field study component to assess the benefits of the current energy education offerings through a Phase II study to be proposed in the Joint Utilities’ ESA and CARE applications for the 2015-2017 program cycle.

II.

DISCUSSION

SCE, on behalf of the Joint Utilities, submitted a request on July 26, 2013, for an extension of the August 31, 2013 deadline described on page 243 of D.12-08-044 and authorization to complete the Energy Education study in two distinct phases. The Joint Utilities requested a new deadline of October 31, 2013, for Phase I of the Energy Education study and December 14, 2014, for Phase II of the study. Assigned Commissioner Sandoval and Assigned Administrative Law Kim granted the request in a Joint Ruling on August 9, 2013. The Joint Utilities and Energy Division agree that additional review of the Phase II scope and approach during consideration of the IOUs 2015-2017 ESA and CARE funding applications would be beneficial. The Joint Ruling instructed the Joint Utilities to file a petition to modify D.12-08-044 to ensure that that the Phase II Final Report due date is properly postponed to the next program cycle. SCE, on behalf of the Joint Utilities, requests that the Commission modify D.12-08-044 to separate the savings measurement component of the Energy Education study into a second phase to be proposed during the next program cycle.

A. The Commission Should Modify D.12-08-044 to Direct The Joint Utilities To Propose Phase II To Study Savings Attributable To Energy Education In Testimony Supporting Their 2015-2017 ESA And CARE Program Applications.

A viable proposal for measuring energy savings will require significant time and resources and developing such a proposal should be considered in the next program cycle. Measuring energy savings as ordered in the Decision cannot be accomplished within the time frame and budget allotted for the Energy Education study that currently is underway. The Decision ordered that the new and existing education be tested “to study any *actual* energy and bill savings gleaned from energy education.”¹ This billing analysis would require a minimum of nine months of pre- and post-treatment usage data to ascertain reliable results. Post-treatment usage data cannot be collected until *after* the “new education” is implemented based on Phase I results. Practically speaking, with this approach the measurement of

¹ D.12-08-044, p. 242.

any new educational materials or practices and contractor training is unlikely to occur until at least the middle of the next program cycle and would reflect an analysis of energy education practices that will be implemented in response to Phase I of the Energy Education study.

The Decision expects the study to provide results that will inform whether and “how to effectively deliver the energy education toward the lasting behavioral change in the low income household.”² While Phase I of the Energy Education study, scheduled to be completed by October 31, 2013, will offer recommendations on how to deliver efficient energy education, actually measuring the long term effects of energy education (whether current or future) requires a different study design and time frame than the current study can accommodate. For example, the design would require the measurement of savings well after the treatment (and preferably multiple measurements over time). Additional methodological considerations will be included as part of the upcoming applications. For these reasons, SCE requests that the Decision be modified to allow the Joint Utilities to propose a design for Phase II of the study in their 2015-2017 ESA and CARE program applications.

III.

CONCLUSION

SCE, on behalf of the Joint Utilities, hereby respectfully submits this Petition for Modification on behalf of the Joint Utilities, and urges the Commission to act expediently to modify D.12-08-044 as discussed herein.

² D.12-08-044, p. 241.

Respectfully submitted,

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Appendix A

SCE's Proposed Modifications To D.12-08-044

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SCE's Proposed Modifications To D.12-08-044

Insertions ~~Deletions~~

Pages 241-243: While the scope and details of the authorized energy education study must be finalized during the design phase, at a minimum, we direct that the evaluation should test whether and how the current energy education program could be improved to yield *actual* energy and bill savings and how to effectively deliver the energy education toward the lasting behavioral change in the low income household. An ~~The~~ energy education study in the subsequent program cycle should aim to explore how to measure success of such education. The study must include a field study component to help assess the benefits [of] the current energy education offerings, and a before and after test period and household bill analysis that measures any *actual* energy- and bill- savings and must be conducted in the next program cycle.

We also direct that an experimental group be added to this energy education study consisting of CARE participants with monthly usage of 200%-400% of baseline, and the new and existing education could be tested on this experimental group to study any *actual* energy and bill savings gleaned from energy education. The study should also look at all feasible methods of aligning and integrating ESA Program energy education with information from other demand-side programs offerings including the IOUs' CA-ICEAT hosted, free of charge, on each IOU's website.

This study will be invaluable in determining whether there are energy-and/or bill-savings associated with ESA Program energy education and whether this justifies energy education be considered a cost-effective, standalone measure. Without quantifiable energy and bill savings figures or other program benefits from such efforts, energy education cannot yet be considered a standalone measure, at this time. Once the energy education evaluation is completed, the IOUs can then petition for energy education to be counted as a measure - but only if the education component demonstrably results in actualized, independent energy and/or bill savings or other program benefits from such efforts.

The budget for this energy education study is not to exceed \$300,000. The IOUs shall pay for the contract, but otherwise shall involve the Energy Division at the earliest possible time in the request for proposal and bid evaluation process. The IOUs, along with the Energy Division staff will evaluate the bids, and the Energy Division shall make the final determination on the contractor selection. The process shall also follow the structure outlined in Resolution E-4237. The IOUs and the Energy Division must take all necessary and reasonable actions to ensure that by August 31, 2013, Phase I of the Energy Education Study and Report is completed, in order for the results to be incorporated into the CARE & ESA 2015-2017 program cycle applications process.

Ordering Paragraph 110: We approve the request for a \$300,000 Phase I shared energy education evaluation study proposed by Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas & Electric Company; and the Utilities shall pay for the contract from their Energy Savings Assistance Program budgets with the following split: PG&E: 30%; SCE: 30%; SCG: 25%; and SDG&E: 15%. The IOUs shall propose a Phase II energy education evaluation study in their 2015-2017 applications to be conducted in the next program cycle with budget sufficient to include a field study component to help assess the benefits of the current energy education offerings, and a before and after test period and household bill analysis that measures any *actual* energy- and bill- savings.