

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking Concerning
Energy Efficiency Rolling Portfolios,
Policies, Programs, Evaluation, and Related
Issues.

Rulemaking 13-11-005

**PUBLIC ADVOCATES OFFICE
NOTICE OF EX PARTE COMMUNICATION**

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March 22, 2019

Pursuant to Rule 8.4 of the California Public Utilities Commission's Rules of Practice and Procedure, the Public Advocates Office at the California Public Utilities Commission provides this notification of an ex parte meeting with Commissioner Liane Randolph's office to discuss its protest of Pacific Gas & Electric Company's (PG&E) supplemental energy efficiency (EE) annual budget advice letter (ABAL) (Advice Letter 4011-G-B/5375-E-B) related to the above-captioned proceeding.

The meeting took place from 1:00 to 1:30 PM on March 19, 2019 at the Commission's office located at 505 Van Ness Avenue, San Francisco, California. Rachel Peterson, Chief of Staff, attended from Commissioner Randolph's office. Attending on behalf of the Public Advocates Office were, Michael Campbell, Branch Manager, Daniel Buch, Supervisor, Henry Burton, Analyst, and Chris Clay, Attorney.

The Public Advocates Office summarized the basis for its protest detailing how PG&E's ABAL triggers the requirement for a new business plan. Specifically, the Public Advocates Office explained that: PG&E's ABAL PG&E incorrectly uses a market-effects adjustment to increase the forecast of savings and cost-effectiveness; PG&E forecasts that it will not achieve its gas savings goal; PG&E's gas savings forecast relies on unsubstantiated and implausible estimates of savings from the On-Bill Financing Alternative Pathway; PGE&'s ABAL does not comply with the Commission's cost-effectiveness threshold; PG&E relies on an unsubstantiated and aggressive forecast of electricity savings from the Primary Lighting Program.

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The Public Advocates Office stated that PG&E should file a new business plan after the new goals study is released and the Commission issues a decision on goals in the summer of 2019. The Public Advocates Office explained that the new decision on goals would help all of the investor-owned utilities craft more realistic plans.

Respectfully submitted,

/s/ CHRIS CLAY
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