



**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
(Filed November 14, 2013)

**COMMENTS OF THE COUNTY OF LOS ANGELES,
ON BEHALF OF THE SOUTHERN CALIFORNIA REGIONAL ENERGY
NETWORK (CPUC #940), ON ADMINISTRATIVE LAW JUDGE'S RULING
INVITING COMMENTS ON DRAFT POTENTIAL AND GOALS STUDY**

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For the Southern California Regional
Energy Network

May 21, 2019

I. INTRODUCTION

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission's ("Commission") and in response to the *Administrative Law Judge's Ruling Inviting Comments on Draft Potential and Goals Study* ("Potential & Goals Ruling") dated May 1, 2019, the County of Los Angeles, on behalf of the Southern California Regional Energy Network (SoCalREN), respectfully submits these comments in response to the questions for parties offered in the ruling.

II. RESPONSES TO QUESTIONS REGARDING THE DRAFT 2019 POTENTIAL & GOALS STUDY

SoCalREN supports the Commission's ongoing efforts to identify potentially achievable cost-effective electricity and natural gas efficiency savings and establish efficiency targets as a guide for PAs. SoCalREN respectfully submits these comments addressing some of the questions raised in the Potential & Goals Ruling:¹

6. Given the changes in potential for 2020, should there be any changes to the required components of annual budget advice letters (ABALs) due from the PAs in September 2019, and/or to the process or criteria for reviewing the September 2019 ABALs (Sections 7.2 and 7.3 of D.18-05-041)? Explain why or why not.

The SoCalREN does not believe that the Commission should apply any changes to the required components, process or criteria for reviewing the PAs September 2019 ABALs. It would be premature and unwarranted. The Commission Decision (D.)18-05-041 addressing Business Plans provided an appropriate level of guidance on components and a considerate number of details regarding the process and criteria on which ABALs would be reviewed.² In addition, establishing new components or processes at this time would be too late in the filing year to implement and would be disruptive to the scheduled filing which is due on September 3, 2019. Many PAs have already begun work on their ABAL drafts and data collection in preparation not only for the filing but for the required California Energy Efficiency Coordinating Committee (CAEECC) meeting

¹ *Potential and Goals Ruling*, pp. 4-5.

² D.18-05-041, pp. 122-134.

where all PA draft ABALs are to be presented in early August.

Furthermore, the development, approval for implementation and impactful results for new programs are often greater than a 12-month period. The Commission should allow for sufficient time for programs to demonstrate program efficacy under D.18-05-041 guidance prior to establishing any new processes or criteria for reviewing annual programmatic funding levels.

III. CONCLUSION

SoCalREN appreciates the opportunity to provide comments on the ALJ's Ruling regarding the Navigant Public Draft Report - 2019 Potential & Goals Study.

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Respectfully Submitted,

/s/ Minh S. Le

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