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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

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

R.13-11-005

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338 E) REPLY COMMENTS ON
ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENT ON FUTURE OF
REGIONAL ENERGY NETWORKS**

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Dated: **April 26, 2019**

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I.

INTRODUCTION

Pursuant to the Rules of Practice and Procedure of the California Public Utilities Commission (Commission or CPUC), and in compliance with the Administrative Law Judge’s (ALJ) Ruling Seeking Comments on future policy on regional energy networks (RENs), both existing and newly-proposed, issued on March 27, 2019 (Ruling), Southern California Edison Company (SCE) respectfully submits these reply comments.

II.

DISCUSSION

A. The Commission Should Not Adopt SoCalREN's Proposal to Direct Local Governments to Propose Program Strategies to Existing RENs.

As an alternative to considering new REN proposals, SoCalREN proposes that the Commission direct local governments or their council of governments within existing REN territories to propose program strategies that could be piloted under the existing REN and implemented by their local government agency or council of governments.¹ SCE does not recommend that the Commission adopt SoCalREN's proposal because SCE will be conducting a third party solicitation requesting interested bidders to propose new and innovative programs for the Public sector. Consistent with D.18-01-004, SCE will be performing third party solicitations for nearly all program implementation activities, including in the Public sector, to achieve the Commission's requirement that, at a minimum, 60 percent of SCE's EE program portfolio budget be used for programs proposed, designed and implemented by third parties.² Allowing multiple venues for program proposals and approvals may cause duplication of activities and confusion in the marketplace.

SCE anticipates that third party solicitations in the Public sector will lead to programs that will increase the cost effectiveness in the Public sector. Additionally, PG&E is currently working on a Public Sector market characterization Study to help inform and quantify co-benefits and other non-energy benefits. SCE expects that the results of this study will help to guide future policy toward cost-effectiveness in Public sector programs. As such, SCE recommends that the Commission does not adopt SoCalREN's proposal because it may duplicate SCE's third party solicitation efforts thereby causing confusion in the marketplace.

¹ SoCalREN Comments, p.4.

² D.18-01-004, Ordering Paragraph 1.

III.

CONCLUSION

SCE appreciates the opportunity to provide these reply comments.

Respectfully submitted,

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