

The Council's Policy Call

October 30, 2020



C A L I F O R N I A

→
**Efficiency
+ Demand
Management**

C O U N C I L

→
Advancing Our Clean Economy

→ Today's Agenda

Council News

- Upcoming Council Events
- News from the Board
- Member Working Group Report
- Member Services Summary Report
- What's Coming Up
- Capitol Update

Issues/Topics

- CPUC AB 841 Ruling (Serj)
- ESPI PD + APD comments + reply comments (Serj)
- CPUC all-party solicitations process meeting (Greg)
- IDER proceeding comments (Greg)
- Click-through proceeding Ruling (Greg)

→ Upcoming Council Events ... Don't miss our Fall Conference!



- Mark your calendars for **November 12th Noon – 5pm**
- Our list of speakers is nearly final:
 - Assemblymember Chris Holden
 - CEC Commissioner Andrew McAllister
 - CAISO COO Mark Rothleder
 - Former Cal EPA Deputy Secretary Ashley Conrad-Saydah
 - Former Green Mountain Power President and CEO Mary Powell
 - UC Berkeley Professor Daniel Kammen
 - Grid Forward CEO Bryce Yonker
 - Decarbonization experts Neil Veilleux (Cadmus), Arlis Reynolds (Opinion Dynamics), Joanne O'Neill (CLEAResult)
 - DER experts Patty Cook (ICF), Jarred Metoyer (DNV GL), Rich Barone (TRC)
 - Plus remarks from Board members and sponsor highlight videos
- Register [here](#)! For more information, visit the Fall Conference page on our [website](#)

➤ Scheduling updates!

- The Council is **CANCELING** the following Policy/DR Calls:

Policy/DR Call Date	Canceled?	Why?
Friday, November 13 th	Canceled!	Day after Fall Conference
Friday, November 27 th	Canceled!	Thanksgiving
Friday December 25 th	Canceled!	Christmas
Friday, January 1 st	Canceled!	New Year's Day

- We will be sending calendar cancelations for each of these, as well as email reminders. Please make a note on your calendars!
- Please note we *will* be having our usual Policy/DR Call on December 11th

➤ Member Working Group Report

- We currently have **10 active working groups** where we tackle various technical issues, shape positions, and strategize on how to engage with various parties

Working Group	Meetings over Past 2 Weeks	Upcoming Meetings
Solicitations	October 27	November 24
Custom Review	October 14	November 11
Capitol	October 21	November 18
Federal Legislation	October 14	November 11
NMEC	October 21	November 18
Market Transformation	October 26	November 30
DR Regulatory	October 28	TBD
DR Action Plan	October 8	November 5
Cost-Effectiveness	October 27	November 10
CAISO Advocacy Service	Separately Funded (contact Greg for more information)	

- All Full and Sustaining members are welcome to join any of the first 9 working groups listed above; contact Greg or Serj for more information



➤ What's Coming Up?

- **CAEECC Meetings w/ CPUC ED on NRDC Motion on EE Filing Process**
 - November 9th, 1 pm
 - Registration, background documents: <https://www.caeecc.org/11-09-20-ee-filing>
 - Note: registration required ahead of time
- **2020 Workforce Education and Training Stakeholder Engagement Forum**
 - November 4th, 3 – 4 pm
 - IOU EE Workforce Education and Training (WE&T) program team-hosted event
 - Registration: <https://register.gotowebinar.com/register/7782492145888977933>
- **Demand Analysis Working Group workshop: 2021 CPUC Efficiency Potential and Goals Study**
 - November 5th, 9 – 11 am
 - <https://cpuc.webex.com/webappng/sites/cpuc/meeting/download/b07e39b15d754a7d9e0d05e18d171d56?siteurl=cpuc&MTID=m62429e102da88a58541cd3f5a720111e>
 - Meeting number (access code): 146 535 2525; Meeting password: JFwXmWPy658
- **CPUC Workshop on COVID Impacts on Customers in the Energy Sector**
 - November 12th, 9 am – 12:30 pm
 - <https://cpuc.webex.com/cpuc/onstage/g.php?MTID=ea070b39642261412c2c986fa1b94b141>
 - Final agenda: <https://drive.google.com/file/d/1eURmq5ZnkFrGu33N5YNIvgyyPzRP6BGv/view?usp=sharing>
- **SCE's Semi-Annual Third-Party Solicitation Workshop**
 - November 19th, afternoon (exact time TBD)
 - Will cover: 1) Updates to meeting the 25% and 40% goals; 2) Updates from the CET working group
 - Please send the topics you would like to have addressed and any other feedback to Brandon.Sanders@sce.com
 - You can also provide SCE with your thoughts on how IOU feedback has been going and what can be improved.

More details on additional events are available from the [Most Recent Council Newsletter](#)

➤ What's Coming Up?

SOLICITATION NOTIFICATION

- Energy efficiency program third-party solicitation information and links found on the CAEECC [Website](#).
- **Market Transformation Administrator (MTA) RFP – DELAYED**
 - CPUC has indicated this RFP is delayed until at least November 24th
- **SCE Community Renewables – Renewable Auction Mechanism (CR-RAM) 6 Request for Offers (RFO)**
 - RFO Responses are due by November 10, 2021 at noon PT
 - Details available at <https://www.sce.com/procurement/solicitations/cr-ram6>
 - Once Power Advocate registration is complete, applicants can apply to the event through the “Opportunities” portal; search for the SoCalGas event, click the key to request access to the event.
- **SCE 2020 Disadvantaged Communities (DAC) Green Tariff (DAC-GT) and Community Solar Green Tariff (CSGT) RFO**
 - RFO Responses are due by November 10, 2021 at noon PT
 - Details available at <https://www.sce.com/procurement/solicitations/dac>
 - Once Power Advocate registration is complete, applicants can apply to the event through the “Opportunities” portal; search for the SoCalGas event, click the key to request access to the event.

More details on additional events are available from the [Most Recent Council Newsletter](#)

→ Capitol Update from Our Lobbyists



Erin Niemela

Tiffany Phan

➤ CPUC AB 841 Ruling + Responses

- **CPUC released a [Ruling](#) on 10/7 to operationalize AB 841**
 - Redirects IOU unspent EE funds to schools for HVAC system, water fixtures upgrades
 - Will be administered by CEC, with unspent funds ported over through EOY 2023
- **The Ruling requests responses to two key sets of questions**
- **First set of questions focuses on the exact funding amount available**
 - CPUC estimates PY2020 unspent funds at \$293,793,755, but confusion remains
 - The Council filed Opening comments on 10/16 and Reply comments on 10/23
 - Opening Comments asserted funding should be incremental to EE portfolio budgets
 - Reply Comments agreed with NRDC that CPUC has authority to leverage additional funds to enable full funding of EE portfolios + AB 841, especially during COVID
- **Second set of questions focuses on programmatic implementation of 841**
 - Many of Ruling's questions indicate a lack of understanding of AB 841 by CPUC
 - CPUC clearly envisions a role for itself aligned with neither the letter nor the intent of the law, and would result in a more complicated (and expensive) implementation
 - CEDMC's comments use language of the law to emphasize most of the oversight and implementation functions belong to CEC, rather than CPUC as Ruling asserts
 - e.g. Costs, benefits of SEESP should not be included in cost-effectiveness analysis
 - SEESP should not count towards 60% 3P program requirement

➤ ESPI PD & APD Comments, Replies

- CPUC released PD and Alternate Proposed Decision (APD) to reform Energy Savings Performance Incentive (ESPI) mechanism
- [ALJ Fitch's PD](#) pauses ESPI reform –but continues ESPI payments– until procedural activities are resolved
 - CPUC would reevaluate, potentially modify structure of ESPI after policy issues associated with the setting of EE potential and goals are resolved
- [Commissioner Randolph's APD](#) places a moratorium on ESPI payments
 - Moratorium would continue until the Commission resolves P&G issue, and would stay in effect during the transition period to greater percentage of statewide, 3P programs
 - APD provides no end-date for moratorium, creating a de facto closing of the ESPI
- CEDMC filed [Opening](#), Reply Comments in response
 - Opening Comments filed 10/23 highlighting the damaging effect APD will have on the EE ecosystem (particularly during this critical time)
 - Underscored importance of ESPI in motivating the IOUs (and their shareholders!) to appropriately resource management of EE portfolios
 - Nonetheless, Opening Comments noted legitimate desire to reform ESPI, but better to improve existing tool than throw out valuable incentive mechanism
 - Reply Comments entered into proceeding record ACEEE letter to service list expressing opposition to APD, highlighting the value of incentives across the country

➤ CPUC All-Party Solicitations Process Meeting

- On Thursday October 29, the CPUC held an all-party meeting with Commissioners Randolph and Shiroma regarding the third-party solicitations process.
- The IOUs offered perspectives and the commissioners asked a few questions on these topics:
 - Two-stage process
 - Contract negotiations
 - Risk-sharing
 - Bidder communications
- The Council was invited to offer stakeholder [comments](#), and we offered our perspectives on:
 - Transparency
 - Timing
 - Risk Burden
- Presentations and a recording will be posted to the CPUC's website next week; we will provide links in next week's newsletter.

➤ IDER Proceeding Update

- On October 6, ALJ Hymes issued a [Ruling](#) introducing a staff proposal for a DER Tariff structure and Directing Comments and Responses to a number of questions.
- Opening Comments on the Ruling are due today and Reply Comments due on November 10.
- The Council will file comments today addressing the following areas:
 - Proposed guiding principles regarding technology neutrality, private investment leveraging, and program coordination.
 - DERMS functionality needs to stay at the broad meter level rather than taking a device-specific level of control.
 - We support the development of a pilot standard offer contract mechanism that captures all DERs rather than the current siloed approach.
 - We noted that an NMEC type of approach to documenting impacts is the most appropriate construct for DER programs and should be applied.
 - We are critical of the rules on incrementality and believe that such rules should at least be streamlined and potentially eliminated.

➤ Click-Through Proceeding Ruling

- On July 13, the Council joined other parties including Mission:data, CESA, and Council members Home Energy Analytics and OhmConnect to object to the IOU's response to Issue #12 which suggests that IOUs not be required to expand click-through programs beyond current DR providers to all DER providers.
- On October 23, the CPUC issued an amended [Scoping Memo and Ruling](#) to address various issues associated with this proceeding.
 - The Ruling effectively eliminates DERs from consideration in the docket (i.e., stripping Issue #12 from the scope).
 - The Ruling suggests that this issue will be taken up at a future time.
- We are very disappointed with this Ruling as it effectively eliminates for the time being essential meter data access for DER providers and is contradictory to a previous 2017 resolution on this matter.
- Next step is to push on Issue #12 during the next stage of the proceeding; but unfortunately the IOUs' position holds.

→ Discussion and Q&A

Thank you!

Please contact us if you have any questions.

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Mary Dockter - mdockter@cedmc.org



Hopefully you
have too!