

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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

Rulemaking 13-11-005
(Filed November 14, 2013)

**OPENING COMMENTS OF THE
CALIFORNIA EFFICIENCY + DEMAND MANAGEMENT COUNCIL ON PROPOSED
DECISION PROVIDING DIRECTIONS FOR IMPLEMENTATION OF SCHOOL
ENERGY EFFICIENCY STIMULUS PROGRAM**

Dated: January 4, 2021

Serj Berelson
Policy Director
California Efficiency + Demand
Management Council
1111 Broadway, Suite 300
Oakland, CA 94607
Telephone: 415-690-0281
E-mail: policy@cedmc.org

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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

Rulemaking 13-11-005
(Filed November 14, 2013)

**OPENING COMMENTS OF THE
CALIFORNIA EFFICIENCY + DEMAND MANAGEMENT COUNCIL ON PROPOSED
DECISION PROVIDING DIRECTIONS FOR IMPLEMENTATION OF SCHOOL
ENERGY EFFICIENCY STIMULUS PROGRAM**

I. INTRODUCTION

The California Efficiency + Demand Management Council¹ (“The Council”) respectfully submits these Opening Comments on the Proposed Decision Providing Directions for Implementation of School Energy Efficiency Stimulus Program (“Proposed Decision” or “PD”), mailed in R.13-11-005 (Energy Efficiency Rolling Portfolio) on December 11, 2020. These Opening Comments are timely filed and served pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure and the instructions accompanying the Proposed Decision.

**II. ASSEMBLY BILL (“AB”) 841 FUNDING SHOULD NOT IMPACT EXISTING
PORTFOLIOS AND THIRD-PARTY SOLICITATIONS**

The Council remains concerned that AB 841 funding as currently conceived and represented in the Proposed Decision will infringe upon the existing energy efficiency (“EE”) portfolios. The Council strongly believes that the implementation of AB 841 should in no way be an impediment to the Commission’s ability to oversee the successful implementation of EE programs – particularly those under the administration of the four investor-owned utilities (“IOUs”). The Council has advanced our position in numerous venues before the Commission over the past year that –particularly during these times of economic hardship due to the COVID-19 pandemic and rapidly changing climate effects due to global warming– now is the time not just to continue existing EE efforts, but to aggressively expand EE offerings.

¹ The views expressed by the California Efficiency + Demand Management Council are not necessarily those of its individual members.

The Council urges the Commission to ensure that current and future EE portfolios – including third-party solicitations that enable an increasing proportion of EE portfolio savings– remain robust by stipulating that AB 841 funding is incremental and additive to IOU EE portfolios. Moreover, in addition to the use of unspent funds the Commission should immediately reform the myriad of outdated Commission rules and regulations (e.g. cost-effectiveness, net-to-gross discounts, custom project review processes, etc.) governing EE in order to unlock greater levels of potential. The Commission can enable California to meet the state’s ambitious climate and energy savings goals, as well as provide relief to Californians during this incredibly difficult period, by implementing these critical changes.

III. CONCLUSION

The Council appreciates the opportunity to comment on this Proposed Decision, and respectfully requests that the Commission enable a full and robust EE ecosystem.

Respectfully submitted,

January 4, 2021

/s/ SERJ BERELSON
Serj Berelson
Policy Director
California Efficiency + Demand
Management Council
1111 Broadway, Suite 300
Oakland, CA 94612
Telephone: 415-690-0281
E-mail: policy@cedmc.org