

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

Application of Pacific Gas and Electric Company for Approval of 2024-2031 Energy Efficiency Business Plan and 2024-2027 Portfolio Plan (U39M).

Application 22-02-005  
(Filed February 15, 2022)

And Related Matters.

Application 22-03-003  
Application 22-03-004  
Application 22-03-005  
Application 22-03-007  
Application 22-03-008  
Application 22-03-011  
Application 22-03-012

**PREHEARING CONFERENCE STATEMENT OF THE  
CALIFORNIA EFFICIENCY + DEMAND MANAGEMENT COUNCIL**

Date: May 13, 2022

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**PREHEARING CONFERENCE STATEMENT OF THE CALIFORNIA EFFICIENCY + DEMAND MANAGEMENT COUNCIL CALIFORNIA**

**I. INTRODUCTION**

The California Efficiency + Demand Management Council (the “Council”) respectfully submits this Prehearing Conference Statement in Application (A.) 22-02-005, et al. (Energy Efficiency Business Plans). On May 5, 2022, Administrative Law Judge (ALJ) Kao issued a Ruling which permitted parties to file prehearing conference statements (ALJ Ruling). This Prehearing Conference Statement is timely filed and served pursuant to the Commission’s Rules of Practice and Procedure and the instructions in the ALJ Ruling. The Council’s Prehearing Conference Statement addresses the need for hearings, issues to be addressed in this proceeding, and procedural next steps.

**II. NEED FOR HEARINGS**

The Council urges the Commission to consider not compelling testimony from intervening parties and to not hold hearings in this proceeding. Alternatively, we support parties coming together to collaborate with the applicants to find solutions to any outstanding issues. This will help speed up the regulatory approval process and ensure that the many important programs outlined within each of the Business Plans proceed on schedule such that our state can continue to realize important energy savings and carbon reduction impacts as soon as possible.

To that end, the Council stands ready to work with the program administrators (PAs) and any other stakeholders to find common ground and resolve our differences. Furthermore, the Council would like to remind the Commission that during the last Business Plan cycle (2018-2023), the Commission ultimately decided that hearings were not necessary. We would like to see that precedent continued during this proceeding.

### **III. ISSUES TO BE ADDRESSED IN THIS PROCEEDING**

The Council requests that the Commission include in the scope of this proceeding the following topics that were specifically identified in the Council's Response submitted in this proceeding on April 15, 2022:

- Consider PA proposals for improvements to the cost-effectiveness tool (CET).
- Fund efforts aimed at making the CEDARS database more user friendly.
- Direct the relevant PAs to make modifications to the third-party (3P) solicitations process, including reforming the 2-stage bid process, enhancing bidder feedback efforts, and creating more opportunities for disadvantaged business entities (DBE) to participate in the solicitation process.
- Develop a framework for non-energy benefits (NEB) for equity programs and expand the NEB framework to other program segments including market support and resource acquisition.
- Allow for consideration of alternative cost-effectiveness (CE) testing perspectives.
- Provide more guidance to the total system benefit (TSB) methodologies and frameworks.
- Allow for a revisitation and complete overhaul of the Net-to-Gross (NTG) framework.
- Direct the relevant PAs to modify their third-party contracting provisions to equitably spread the burden of risk between PAs and 3P implementers.

### **IV. PROCEDURAL NEXT STEPS**

The Council urges the Commission to adopt the general timeline for this proceeding that was agreed to by most parties resulting from the May 4, 2022 meet and greet organized by Pacific Gas and Electric (PG&E). Specifically, we request the Commission to commit to issuing a final decision on that matter by no later than August 31, 2023.

**V. CONCLUSION**

The Council appreciates this opportunity to submit this Prehearing Conference Statement.

Dated: May 13, 2022

Respectfully submitted,

/s/ GREG WIKLER

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