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**ORAL STATEMENT BY GREG WIKLER FOR 5/17 PRE-HEARING CONFERENCE FOR
A.22-02-005, et. al.
May 17, 2022**

Round 1 (Roll Call):

Greg Wikler for the California Energy Efficiency and Demand Management Council. Present.

Round 2 (Scope of Issues and Schedule):

The Council supports the Commission's proposal to include in the scope of this proceeding the following topics that were specifically identified in our opening comments from April 15th and were identified in the draft list of scoping issues:

- Issue 9: Consider PA proposals for improvements to the cost-effectiveness tool (CET).
- Issue 9: Fund efforts aimed at making the CEDARS database more user friendly.
- Issue 13: 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.
- Issue 13: Direct the relevant PAs to modify their third-party contracting provisions to equitably spread the burden of risk between PAs and 3P implementers.

In addition, we did not see reference to the following issues in the draft list of scoping issues that we identified in our April 15th comments that we strongly believe need to be included in the scope of this proceeding:

- Develop a framework for non-energy benefits (NEB) for equity programs and we would like to see the NEB framework expanded to other program segments including market support and resource acquisition.
- 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.

Regarding schedule, the Council urges the Commission to adopt the general timeline for this proceeding that was agreed to by most parties resulting from the May 4th meet and greet organized by PG&E. Specifically, we request the Commission to commit to issuing a final decision for this proceeding by no later than August 31, 2023.

Round 3 (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.