



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 (U 39 M).

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

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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

**OPENING COMMENTS OF
THE CALIFORNIA EFFICIENCY + DEMAND MANAGEMENT COUNCIL ON
ADMINISTRATIVE LAW JUDGE'S RULING INVITING COMMENTS ON STAFF
PROPOSAL FOR GAS ENERGY EFFICIENCY INCENTIVES AND CODES AND
STANDARDS SUB-PROGRAMS AND BUDGETS**

Dated: September 23, 2022

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The California Efficiency + Demand Management Council¹ (“The Council”) appreciates the opportunity to submit these Opening Comments on the Administrative Law Judge’s Ruling Inviting Comments on Staff Proposal for Gas Energy Efficiency Incentives and Codes and Standards Sub-Programs and Budgets, submitted in these proceedings on August 2, 2022 (“ALJ Ruling”). These Opening Comments have been timely filed and served pursuant to the Commission’s Rules of Practice and Procedure, the instructions contained in the ALJ Ruling, and the instructions contained in an ALJ Ruling, submitted on August 18, 2022.

I. BACKGROUND

The Council is a statewide trade association of non-utility businesses that provide energy efficiency, demand response, and data analytics services and products in California. Our member companies employ many thousands of Californians throughout the state. They include energy efficiency (“EE”), demand response (“DR”), and distributed energy resources (“DER”) service providers, implementation and evaluation experts, energy service companies, engineering and architecture firms, contractors, financing experts, workforce training entities, and energy

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

efficient product manufacturers. The Council’s mission is to support appropriate EE and DR policies, programs, and technologies to create sustainable jobs, long-term economic growth, stable and reasonably priced energy infrastructures, and environmental improvement.

II. SUMMARY OF THE COUNCIL’S POSITION

The Council appreciates the opportunity to submit these comments. The Council supports the decarbonization goals established by the State of California and is committed to working to achieve those goals. Building electrification is expected to play a significant role in achieving these goals. Policy changes that may reduce or eliminate support for energy efficiency measures must be considered carefully, and based on objective data, validated resources, informed by research, and with input from stakeholders. As California continues to decarbonize its economy, it is essential we maintain a long-term view on energy affordability and equity. The Council’s responses to the ALJ’s questions reflect that perspective.

The Council is concerned about certain aspects of the Staff Proposal, including the absence of supporting data and bill impacts. Specifically, the Staff Proposal does not capture the dynamics regarding the likely purchasing behavior of customers weighing the decision to replace their gas appliances with 1) a minimally efficient gas appliance, or 2) a viable electric alternative.

III. THE COUNCIL’S RESPONSES TO ALJ RULING QUESTIONS ON THE STAFF PROPOSAL

1. Are there additional criteria that should be taken into account in the staff proposal?

Yes. Billing impacts associated electrification measures must be included in the list of criteria to determine whether an electric alternative is “viable.”

a. Is the existing criteria cited in Section 2.4.1 of the staff proposal sufficient to justify using energy efficiency ratepayers funds collected from natural gas utility customers for electric energy efficiency measures?

No. By statute,² the surcharge on gas consumed in California is required to fund various programs to benefit gas ratepayers.

In 2000, Assembly Bill (“AB”) 1002 (Wright, Chapter 932, Statutes of 2000) was enacted, requiring the California Public Utilities Commission (CPUC) to add a surcharge on gas consumed in California. This surcharge funded various energy efficiency programs and public

² Assembly Bill (“AB”) 1002 (Wright, Chapter 932, Statutes of 2000)

interest research and development (“R&D”) to **benefit gas ratepayers**. AB 1002 also required the CPUC to designate an entity to administer the research component of AB 1002. In 2004, the CPUC issued Decision 04-08-010, designating the California Energy Commission (“CEC”) as the research fund administrator.

For example, the CEC’s Energy Research and Development Division manages the Gas Research and Development Program (“Gas R&D Program”), which supports energy-related research, development, and demonstration not adequately provided by competitive and regulated markets. These research investments spur innovation in energy efficiency, renewable energy and advanced generation, energy and distribution, energy-related environmental research, and transportation.

The CEC Energy Research and Development Division conducts this public interest gas-related energy research by partnering with R&D entities, including public and private research institutions, businesses, utilities, and individuals. This program promotes greater gas reliability, lower costs, and increased safety for Californians.

As California progresses toward its clean energy and climate change mitigation goals, the role of the gas sector and the mix of fuels — including fossil gas, biomethane, and green hydrogen — will change. The Gas R&D Program supports this gas sector transition and cost-effective achievement of the state’s clean energy and climate goals. R&D investments lower the cost and improve the performance of low-carbon gas products, infrastructure, and services, supporting reductions in fossil gas consumption, advancing the production and utilization of renewable, low-carbon fuels, and delivering public health, environmental, and gas system safety benefits.

The CEC’s Energy Research and Development Division staff develops the Gas R&D Budget Plan based on state energy policies, plans, and guidance; analysis of research gaps; **coordination with the California Public Utilities Commission (“CPUC”)** and other agencies; and stakeholder input. Key policies, plans, and guidance include Executive Order B-55-18, Integrated Energy Policy Reports, the California Energy Efficiency Action Plan, and CPUC decisions and resolutions, among others.

The FY 2022–23 Gas R&D Budget Plan³ includes R&D funding for seven initiatives aligned with four themes:

1. Targeted Gas System Decommissioning
2. Decarbonization of Gas End Uses
3. Energy Efficiency
4. Entrepreneur Development

The proposed R&D serves to support gas system planning; advance low-carbon hydrogen for hard-to-decarbonize applications such as in industry, dispatchable generation, and heavy-duty transport; inform efficiency improvements in residential hot water distribution; and support entrepreneurs in advancing their concepts to commercialized products and services.

The FY 2022–23 Gas R&D Budget Plan benefitted from input from representatives of the Disadvantaged Communities Advisory Group (“DACAG”), CPUC coordination, and a public workshop, among other input received on CEC’s gas-related efforts. Following guidance from CPUC staff, if California’s 2022–23 state budget includes funding for hydrogen storage, Gas R&D Program funding for the initiative on Large-Volume Hydrogen Storage for Targeted Use Cases (\$3 million) is proposed to be redirected to augment the initiative on Scaled-Up Gas Decommissioning Pilots and Integrated Planning Tools.

b. What other information should be taken into account in supporting the claim that there are adverse public health impacts from natural gas appliances (Section 2.4.2 of staff proposal)?

The California Air Resources Board (“CARB”) is responsible for evaluating and recommending actions to address this issue. For example, CARB voted on September 22, 2022 to end the sale of new gas appliances starting in 2030.

2. How should “viable electric alternative” be defined?

Billing impacts must be included as a criterion to determine a “viable electric alternative” and that information is necessary to understand equity issues.

In the staff report, Pacific Gas and Electric Company (“PG&E”) stated that it wants to remove financial support for natural gas from its portfolio, **except where there are no viable**

³ Molin, Daphne. 2022. Energy Research and Development Division. 2022. [Gas Research and Development Program Proposed Budget Plan for Fiscal Year 2022–23](#). California Energy Commission. Publication Number: [CEC-500-2022-001](#).

alternatives.⁴ Southern California Edison Company (“SCE”) echoed this sentiment in recommending “that the Commission not permit energy efficiency funds to be spent on gas appliance incentives **if a similar electric measure is reasonably commercially available and can demonstrate a reduction in greenhouse gas emissions [emphasis added].**”⁵

Staff has proposed three initial criteria to determine viability.

1. Is there an electric alternative to the gas measure that has the same end use in any eTRM measure package?
2. Is the measure package for the electric alternative substituting either from a natural gas baseline to electric, or from a mixed-fuel (natural gas and electric) baseline to electric?
3. Is the sum of the labor and materials costs, as recorded in the eTRM permutations table, for the electric alternative no more than 116 percent greater than of the sum of the labor and materials costs for the baseline gas measure?

Staff concludes a “yes” answer to these three questions satisfies viability without consideration of bill impacts. This is a significant deficiency as a test to determine viability. Should expected savings fail to materialize in enough instances, public perception on electrification strategies could present a challenge to future adoption.

To avoid that, early adopters of electrification need to be confident that expectations are matched by results. Understanding billing impacts as electrification is increasingly deployed is critical to identifying “viable electric alternatives.”

Staff recognizes the relevance of this discussion in Section 4.2 **Electrification Impact on Customer Utility Bill Affordability**, because affordability influences customer decision-making related to the viability of electric appliance alternatives.

As mentioned by participants during the workshop, there methodologies and ‘tools’ to address this issue today. The CEC has recently published research on this topic and new research project is in underway.

The Council agrees with Staff that more information is necessary to understand the bill impact of electrification. We also agree consideration should also be given to customer perceptions, as some customers may be concerned about high electric bills, even after rate reform

⁴ Pacific Gas and Electric Company Energy Efficiency 2024 Business-Portfolio Plan: PG&E Energy Efficiency 2024-2031 Strategic Business Plan – Prepared Testimony – Exhibit 1, submitted in A.22-02-005, et al. on February 15, 2022, at p. 1-17.

⁵ Testimony in Support of Southern California Edison Company’s Application for Approval of its Energy Efficiency Business Plan for 2023-2031, Volume 1 – Business Plan, submitted in A.22-02-005, et al. on March 4, 2022, at p. 53.

takes place. For retrofits in particular, billing impacts are critical to understanding the probability a customer will switch to an electric alternative or replace it with another gas appliance.

**Other Billing Impact Considerations Should Be Updated on an Annual Basis
an Require Updating.**

In its 2019 report,⁶ E3 considered lifecycle costs and savings in the savings analyses, and also electricity rates and rate design, including **future rate assumptions for electricity and gas.**

In May, 2021, a CPUC study⁷ found that utility rates have been growing since 2013, and monthly bills in each electric investor-owned utility (“IOU”) territory are rising. The study estimates that in these regions rates will increase annually by between 3.5 and 4.7 percent in the next 10 years.⁸ This increase may result in bills rising at an annual rate of 4.5 percent compared to the anticipated 1.9 percent inflation rate.⁹ The study also notes, however, that a well-managed effort to move customers to all-electric homes and electric vehicles could lower energy bills by more than \$100 a month.¹⁰

Recent research indicates that in all modeled low-carbon future scenarios, maintaining the electric grid, including for wildfire upgrades, will increase rates.¹¹ Electricity rate increases may be partially offset by increasing sales volume, but there may also be increased energy burden and more customers enrolled in rate assistance. Gas rates are also expected to increase, independently of building decarbonization strategies, as utilities further invest in maintenance and upgrades of existing infrastructure.

⁶ “Residential Building Electrification in California” - https://www.ethree.com/wp-content/uploads/2019/04/E3_Residential_Building_Electrification_in_California_April_2019.pdf

⁷ “Utility Costs and Affordability of the Grid of the Future” - https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2021/senate-bill-695-report-2021-and-en-banc-whitepaper_final_04302021.pdf

⁸ *Id.*

⁹ *Id.*

¹⁰ *Id.*

¹¹ Aas, Dan, Amber Mahone, Zack Subin, Michael Mac Kinnon, Blake Lane, and Snuller Price. 2020. The Challenge of Retail Gas in California’s Low-Carbon Future: Technology Options, Customer Costs and Public Health Benefits of Reducing Natural Gas Use. California Energy Commission. Publication Number: CEC-500-2019-055-F page 52-53, April 2020, <https://ww2.energy.ca.gov/2019publications/CEC-500-2019-055/CEC-500-2019-055-F.pdf>

Today, a new report¹² was released from Next 10 and the Energy Institute at the UC Berkeley Haas School of Business, finding half to two-thirds of the electricity rates paid by California residents are, in effect, a “tax” on electricity that disproportionately burdens lower-income households and discourages adoption of electric vehicles, heat pumps, and other clean technologies.

The report also finds that these high costs are being distributed inequitably because electricity bills account for a larger share of income among lower-income households. For low-income households in the PG&E and SDG&E areas, this cost recovery burden amounts to three percent of annual income on average. That’s more than three times the share of income for wealthier households. The regressive effects are magnified during times of increased energy demand, such as Californians experienced during this month’s record-breaking heat wave.

Given the impact of rate forecasts on viability, forecasts should be updated at regular intervals.

a. How should infrastructure costs, such as electric panel upgrades, be included in determining what constitutes a viable electric alternative?

The California Standard Practice Manual establishes requirements for project and measure costs as required inputs for cost effectiveness tests. While the range of costs that must be quantified depends upon the test to be computed, the costs for the Total Resource Cost (“TRC”), the primary indicator of cost effectiveness for IOU energy efficiency programs, include “all equipment costs, installation, operations and maintenance, cost of removal (less salvage value), and administration costs” regardless of who pays for them.¹³

TRC requires lifecycle costs, which must include operations and maintenance (“O&M”), disposal, and other parameters that are not well-known and difficult to estimate. It may be appropriate to distinguish single measures requiring a panel upgrade in homes and dwellings from buildings with multiple installed technologies.

¹² [Paying for Electricity in California: How Residential Rate Design Impacts Equity and Electrification](#), authored by researchers at UC Berkeley’s Energy Institute at the Haas School of Business. September, 2020.

¹³ California Standard Practice Manual, at p. 18.

b. What would be the fastest and most accurate way to gather accurate data on infrastructure costs for electrification measures statewide?

The Council does not provide a response at this time but reserves the right to respond to this question in Reply Comments.

3. How should “exempt measures” be defined?

The Council does not provide a response at this time but reserves the right to respond to this question in Reply Comments.

4. Do you agree with the proposed steps and associated timeframes included in the staff proposal? If not, what should the transition timeline away from natural gas energy efficiency incentives be?

There are significant differences between New Construction, Retrofit, Custom projects and Normalized Metered Energy Consumption (“NMEC”) Programs that may warrant different timeframes.

For example, incentives play a significant role in making an investment decision in custom projects, particularly in commercial, industrial and agricultural applications. Project identification, evaluation, design, approval, financing, construction, start-up and Commercial Operation Date can extend over a period of years, depending upon project size and complexity. When a custom project final investment decision occurs, incentives are encumbered.

However, custom projects may experience delays before a final decision is made. If those delays extend across Steps as shown in Table 3- Timeline for incentive weighting for custom projects with electrification, there is a risk the project economics will no longer justify the investment. Staff should consider difference time steps appropriate for each category.

5. What assessment metric (total resource cost, total system benefit, others) should be used to assess cost effectiveness in the relevant steps in this proposal in determining the eligibility of gas measures for receiving incentives?

Similar to the previous answer, a TRC may be appropriate for measures, providing filing impacts are evaluated. For Custom Projects, which may include load shift shifting strategies and efficiency upgrades with gas equipment (e.g, gas-fired chillers) a total system benefit is appropriate.

6. Do gas appliances serve a market support and/or equity function given the state's goals and progress towards electrification?

Yes. Senate Bill 350 (De León, Chapter 547, Statutes of 2015) also advanced equity in California's clean energy transformation. As outlined in SB 350, the CEC co-established the DACAG in 2018 to advise the CEC and the CPUC on ways to help disadvantaged communities benefit from proposed clean energy and pollution reduction programs, expand access to clean energy technologies, and receive affordable energy services. Furthermore, in its SB 350 Barriers Report, the CEC recommended that the CEC and CPUC direct RD&D and market facilitation programs to include targeted benefits for low-income customers and disadvantaged communities.¹⁴

The CEC study, Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-income customers and Small Business Contracting Opportunities in Disadvantaged Communities, mandated by Senate Bill ("SB") 350, explores the barriers to and opportunities for expanding low-income customers' access to energy efficiency, weatherization, and renewable energy investments. It also examines barriers and opportunities related to contracting with small businesses located in disadvantaged communities. This study provides recommendations intended to have a transformative effect on access to clean energy investments for low-income customers and local small businesses in disadvantaged communities.

- Governor Brown signed the Clean Energy and Pollution Reduction Act of 2015 (SB 350) on October 7, 2015. SB 350 establishes new energy efficiency and renewable electricity targets to support California's climate goal of reducing greenhouse gas emissions to 40 percent below 1990 levels by 2030. In addition, SB 350 directs the Energy Commission to study:
- Barriers for low-income customers to energy efficiency and weatherization investments, including those in disadvantaged communities, as well as recommendations on how to increase access to energy efficiency and weatherization investments to low-income customers.
- Barriers to and opportunities for solar photovoltaic energy generation, as well as barriers to and opportunities for access to other renewable energy by low-income customers.

¹⁴ Scavo, Jordan, Suzanne Korosec, Esteban Guerrero, Bill Pennington, and Pamela Doughman. 2016. Low Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities. California Energy Commission. Publication Number: CEC-300-2016-009-CMF.

- Barriers to contracting opportunities for local small businesses in disadvantaged communities.
- Barriers for low-income customers to zero-emission and near-zero-emission transportation options, including those in disadvantaged communities, as well as recommendations on how to increase access to zero-emission and near-zero emission transportation options to low-income customers, including those in disadvantaged communities (addressed in Part B of this study, to be completed by the Air Resources Board).

Excerpts from the report:

Some barriers are structural, inherent to the conditions of poverty in California. These barriers may be mitigated but are difficult to eradicate. Other barriers stem from policy and program decisions, and these may be overcome through new policy development or program refinement. Many challenges overlap, compounding one another. Several existing programs have mechanisms for targeting low-income residents or goals for increasing disadvantaged communities' access to energy efficiency or renewable energy. However, rural and tribal communities unserved by a utility have been difficult to reach through traditional utility programs.

Structural Barriers Limiting Access to Clean Energy for Low-Income Customers

Structural barriers limiting access to clean energy for low-income customers include:

- Low home ownership rates
- Complex needs, ownership, and financial arrangements for low-income multifamily housing
- Insufficient access to capital
- Building age
- Remote or underserved communities

Most low-income Californians are renters. Ensuring low-income renters and property owners participate and benefit from energy upgrades poses a unique barrier commonly referred to as split incentives. The issue is particularly acute among the low-income multifamily housing sector, as low-income Californians are 39 percent more likely to live in multifamily housing than the general population. The split incentive has long vexed program administrators seeking to increase access to energy upgrade options for low-income residents.

Low-income multifamily housing faces unique barriers, such as diverse building characteristics and needs, complex ownership and financial arrangements, and limited budgets with restricted opportunities to take on additional debt.

Low-income customers who own their homes do not face split incentives, but they face other challenges gaining access to energy efficiency and renewable energy opportunities. Because they have limited disposable funds, they may be more risk-averse and less capable of participating in programs with high upfront payments or copayments for energy efficiency or renewable equipment. At the same time, poor credit or lack of collateral may restrict access to financing options.

Older buildings are more likely to have structural or design issues that make energy efficiency and renewable energy retrofits unviable, particularly for people in disadvantaged communities, who are more likely to live in such housing. Remote or underserved low-income communities, including tribal communities, may pay a high proportion of their income for home heating and cooling. Customers in these jurisdictions may have limited access to utility-based energy efficiency and renewable energy programs.¹⁵

CPUC equity progress can be measured by comparing progress address these barriers.

- 7. What are the other options for uses of the gas incentives that staff proposes to phase out?**
 - a. Decrease gas energy efficiency collections?**
 - b. Use for other measures?**
 - i. Examples: wildfire-proof soffits, passive solar houses, awnings**
 - c. Provide gas to ratepayers for fuel substitution?**
 - d. Use the gas incentives for electric measures? If you recommend this option, explain any legal implications.**

The Council does not provide a response at this time but reserves the right to respond to this question in Reply Comments.

- 8. What other options should the Commission examine for promoting electrification through the staff proposal, beyond redirecting incentives from gas measures?**

The Commission could encourage providers to focus on targeted electrification taking into account the lessons learned from the San Joaquin Valley Affordable Energy Pilot.¹⁶

In September 2019, Gridworks published, [*California's Gas System in Transition: Equitable, Affordable, Decarbonized and Smaller*](#). Among other recommendations, the report

¹⁵ Scavo, Jordan, Suzanne Korosec, Esteban Guerrero, Bill Pennington, and Pamela Doughman. 2016. Low Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities. California Energy Commission. Publication Number: CEC-300-2016-009-CMF.

¹⁶ [Lessons Learned \(So Far\) In Targeted Building Electrification](#), dated September 21, 2021

highlighted that one of the strategies for mitigating these adverse outcomes would be *targeted* electrification. Such targeting could serve two distinct but potentially overlapping purposes:

- 1) Geographically Targeted: By electrifying all of the homes served by a particular segment of the gas distribution system, those portions of the system could be retired, reducing the gas utility's operations and maintenance (O&M) expenses and potentially avoiding the need for costly upgrades of older equipment—thereby mitigating rate increase pressures; and
- 2) Demographically Targeted: Targeting financial incentives for electrification at low-income and disadvantaged communities to ensure that they share in the economic and environmental benefits of decarbonization.

Two years later, Gridworks interviewed 12 leading experts to gain insight to successes and setbacks of the SJV Affordable Energy Pilot. Lessons learned from the SJV Affordable Energy Pilot include:

- Importance of Direct Customer Outreach from Trusted Partners
- Distribution System Upgrades Cause Delays
- Unique Needs of Mobile Homes
- Concerns Over Electric Reliability and Affordability
- Space Constraints
- Landlord-Tenant Problem
- Lack of Broadband Access Limits Participation
- Customer Service Matters
- Customer Service Matters

9. Custom Projects

- a. How should the CPUC determine what aspects of custom projects are feasible for electrification? Is it more appropriate to make this determination at a more overarching equipment/process level (i.e., instead of on a case-by-case basis)?
- b. What should the difference in incentives between gas and electric custom measures be? Over what duration should that difference be phased in?
- c. What more can be done to encourage electrification and decarbonization in custom projects?

The nature of custom projects presents different challenges and raises new questions:

- A what stage of development would Custom Project need to evaluate the viability of electric alternatives?
- Will there be a budget to cover the costs of preparing that analysis?
- Are there specific criteria or conditions that would negate the need for comparisons for certain types of projects?
- What about project owner input factor into the review?

The Council recommends a meeting among knowledgeable practitioners to explore this issue in greater depth.

10. How does the transition and timeline to phase out energy efficiency gas incentives align with other related proceedings?

The Council does not provide a response at this time but reserves the right to respond to this question in Reply Comments.

11. How does the transition to phase out energy efficiency gas incentives align with the nine objectives of the CPUC’s Environmental and Social Justice Action Plan?

The Council does not provide a response at this time but reserves the right to respond to this question in Reply Comments.

12. How does the transition to phase out energy efficiency gas incentives align with the vision and benefits of the CPUC’s Distributed Energy Action Plan?

The Council does not provide a response at this time but reserves the right to respond to this question in Reply Comments.

13. Are there any legal implications of phasing out energy efficiency gas incentives?

Please see the Council’s Response to Question Number 1.

VI. THE COUNCIL’S RESPONSES TO ALJ RULING QUESTIONS ON CODES AND STANDARDS SUB-PROGRAMS AND BUDGETS

1. Describe how the Codes and Standards Advocacy programs should expand their scope to address additional clean energy goals, such as transportation electrification and decarbonization.

The Council does not provide a response at this time but reserves the right to respond to this question in Reply Comments.

2. **The Codes and Standards program consists of additional sub-programs that do not claim savings, such as Planning and Coordination, Code Readiness, and Reach Codes. The budgets for these ‘non-resource’ sub-programs have increased over the years, while the advocacy portion has remained more consistent. The below chart shows Statewide Codes and Standards Advocacy budgets compared to the investor-owned utilities’ non-resource budgets [TABLE OMITTED] Should the non-resource Codes and Standards sub-program budgets increase commensurate with increases in the advocacy budget, or vice versa? Should the non-resource Codes and Standards budgets be limited to a maximum percentage of a program administrator’s portfolio budget, or in some other way?**

The Council does not provide a response at this time but reserves the right to respond to this question in Reply Comments.

3. **For non-resource Codes and Standards sub-programs, describe what milestones or minimum performance requirements should be met in order to increase or substantiate the proposed budget allocations.**

The Council does not provide a response at this time but reserves the right to respond to this question in Reply Comments.

VII. CONCLUSION

The Council appreciates the opportunity to provide these Opening Comments.

Respectfully submitted,

September 23, 2022

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