



September 7, 2022

Via E-mail (EDTariffUnit@cpuc.ca.gov)

Energy Division

California Public Utilities Commission

Attention: Tariff Unit

505 Van Ness Avenue

San Francisco, CA 94102

Re: Comments of the California Efficiency + Demand Management Council on Draft Resolution E-5221 which Approves the Database for Energy-Efficient Resources Updates for Program Year 2024-2025 and Revised Version for Program Years 2023 and 2022.

Dear Energy Division,

The California Efficiency + Demand Management Council (“The Council”)¹ appreciates the opportunity to respond to the request for comment on the Draft Resolution E-5221 (“Draft Resolution”) which approves the Database for Energy-Efficient Resources (“DEER”) Updates for Program Year 2024-2025 and Revised Version for Program Years 2023 and 2022.

I. BACKGROUND

The Council is a statewide trade association of non-utility businesses that provide energy efficiency (“EE”), demand response (“DR”), and data analytics services and products in California.² Our member companies employ many thousands of Californians throughout the state. They include EE, 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 efficient product manufacturers. The Council’s

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

² Additional information about the Council, including the organization’s current membership, Board of Directors, antitrust guidelines and code of ethics for its members, can be found at <http://www.cedmc.org>. The views expressed by the Council are not necessarily those of its individual members.

mission is to support appropriate EE, DR, and DER policies, programs, and technologies to create sustainable jobs, long-term economic growth, stable and reasonably priced energy infrastructures, and environmental improvement.

II. THE COUNCIL'S COMMENTS ON DRAFT RESOLUTION E-5221

The Council is pleased to see the Commission's continued support for the California Technical Forum ("Cal TF") by ordering in Draft Resolution E-5221 that the investor-owned utilities ("IOUs") will continue to fund and administer the electronic Technical Reference Manual ("eTRM") from the IOU portion of the evaluation, measurement, and verification ("EM&V") "budgets and will address support activities for eTRM and CalTF in their 2024-2027 Business Plans."³ The Council also supports Draft Resolution E-5221 ordering that "[t]he IOUs may alter the structure of eTRM contract management upon completion of Phase 2 activities in order to alternate the role of lead contract manager and solicit contractors for software development and coordination."⁴

However, for successful and stable operation of Cal TF, it will be important for the Commission to establish stable funding for the next five years at the current authorized funding level. The Cal TF collaborative is an effective structure for engaging stakeholders to identify and implement program improvements that increase transparency, accuracy, consistency, and standardization statewide. This work involves extensive stakeholder engagement and multi-year planning and implementation efforts, requiring stable and predictable funding for successful execution.

III. CONCLUSION

Based on the arguments presented above, the Council requests that the Commission adopt the recommendations in these comments.

September 7, 2022

Respectfully submitted,

/s/ JOSEPH DESMOND

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Enclosure: Certificate of Service and Service List

³ Draft Resolution E-5221, at p. 25 (Ordering Paragraph 1).

⁴ *Id.*, at p. 26 (Ordering Paragraph 3).