

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 26, 2013

Advice Letters 3432-G/4319-E

Brian K. Cherry
Vice President, Regulation and Rates
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

**Subject: Joint AL Filing by SDG&E, SoCalGas, SCE, and PG&E - Request for
Approval New, Emerging Lighting Equipment to be Included in On-Bill
Financing Programs in Compliance with D.13-09-044**

Dear Mr. Cherry:

Advice Letters 3432-G/4319-E are effective November 19, 2013.

Sincerely,

A handwritten signature in cursive script that reads "Edward F. Randolph".

Edward F. Randolph, Director
Energy Division



Clay Faber - Director
Regulatory Affairs
8330 Century Park Court
San Diego, CA 92123-1548

Tel: 858.654.3563
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cfaber@semprautilities.com

November 19, 2013

ADVICE LETTER 2538-E/2240-G
(U902-M)

ADVICE LETTER 4559-G
(Southern California Gas Company – U904-G)

ADVICE LETTER 2970-E
(Southern California Edison Company – U338-E)

ADVICE LETTER 3432-G/4319-E
(Pacific Gas and Electric Company – U39-M)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: SAN DIEGO GAS & ELECTRIC COMPANY, SOUTHERN CALIFORNIA GAS COMPANY, SOUTHERN CALIFORNIA EDISON COMPANY, AND PACIFIC GAS AND ELECTRIC COMPANY REQUEST FOR APPROVAL OF NEW, EMERGING LIGHTING EQUIPMENT TO BE INCLUDED IN ON-BILL FINANCING PROGRAMS IN COMPLIANCE WITH DECISION 13-09-044

PURPOSE

San Diego Gas & Electric Company (SDG&E), on behalf of itself, Southern California Gas Company (SCG), Southern California Edison Company (SCE), and Pacific Gas and Electric Company (PG&E) (together the Investor-Owned Utilities (IOUs)), hereby submits for approval by the California Public Utilities Commission (Commission) a method for identifying new, emerging lighting equipment that may be financed through the IOU's On-Bill Financing (OBF) Program and excluded from the 20% single end-use lighting cap adopted in Decision (D.) 13-09-044 Ordering Paragraph (OP) 9.

BACKGROUND

D.13-09-044 Ordering Paragraph 9 states:

Southern California Edison Company, Pacific Gas and Electric Company, Southern California Gas Company, and San Diego Gas & Electric Company (collectively "IOUs") shall modify their On-Bill Financing (OBF) programs so that single end use lighting

measures shall comprise no more than 20% of total project costs for business customers, excluding institutional customers. No later than sixty (60) days after this decision is issued, the IOUs shall submit a joint Tier 2 Advice Letter which identifies new, emerging lighting equipment which may be excluded from the 20% calculation due to their technologically-higher efficiencies and frequently higher initial costs, and amend the statewide OBF program implementation plan.

SCG joins in this filing in order to ensure compliance with D.13-09-044 OP 9. However, SCG, as a gas-only utility, does not have a lighting program; thus the directives in OP 9 are not applicable to SCG. The proposed modifications will not apply to SCG's OBF program implementation plan (PIP).

Modification for Single End Use Lighting Measures

PG&E, SCE and SDG&E have communicated with their participating contractors, customers, and partnership program participants informing them of the change to the OBF program reflecting that single end use lighting measures shall comprise no more than 20% of total project costs for business customers, excluding institutional customers. Basic lighting measures will not be eligible for exemption from the 20% lighting cap. Basic lighting includes all non-LED lighting retrofits (e.g., CFLs and linear fluorescents), and basic lighting controls measures. The IOUs request that the program change be made effective November 19, 2013, consistent with D.13-09-044 OP 9. The updated OBF program PIPs will be available on the Commission's California Energy Efficiency Statistics website.¹ In addition, the IOUs have updated their respective websites to convey this program change.

Emerging Technology Lighting Exemptions

In order to promote consistency across EE programs, the IOUs recommend that the OBF Program use the Statewide Commercial, Industrial, and Agricultural Programs' framework for identifying "targeted" lighting measures to identify new, emerging lighting equipment that can be excluded from the 20% lighting cap. Targeted lighting framework can be found in the 2013-2014 Statewide Commercial, Industrial, and Agricultural Program Implementation Plans (PIP). See PG&E's Commercial Energy Efficiency Program PIP, p.188; Industrial Energy Efficiency Program PIP, p. 54, and Agriculture Energy Efficiency Program, p. 58. See SCE's Commercial Energy Efficiency Program PIP, p. 313, Industrial Energy Efficiency Program PIP, p. 445, and Agriculture Energy Efficiency Program, p. 532. See SDG&E's Commercial Energy Efficiency Program PIP, pp. 65-66; Industrial Energy Efficiency Program PIP, pp. 49-50, and Agriculture Energy Efficiency Program, pp. 52-53.

The Statewide Programs identify "targeted" measures as measures that are new, emerging or costly, and for which higher incentives are therefore offered. In contrast, "basic" measures are generally those that are less costly and more well-established, and therefore are paired with lower incentives. As such, the IOUs believe that the OBF Program should leverage the Statewide Programs' framework for identification of "targeted" lighting measures in order to maintain consistency across program offerings, maximize program efficiencies in identifying measures for which more emphasis should be placed, and allow the OBF Program to continually adapt to market conditions.

¹ California Energy Efficiency Statistics is available at <http://eestats.cpuc.ca.gov/>

Targeted lighting: includes LED retrofits and advanced lighting controls measures. For the OBF Program, only LED retrofit measures (such as LED integral lamps, LED retrofit kits, and LED fixtures), and lighting controls that exceed the requirements of Title 24 as of January 2014 will be exempt from the 20% cap at this time. This framework will be applied to both deemed and customized lighting measures. In addition, the OBF Program will adhere to all current Commission directives related to lighting.

Should the definition of targeted lighting be expanded in the future, beyond the above definition of Targeted Lighting, to include other new/emerging lighting measures in the Statewide Programs, these measures will also be eligible for exemption from the 20% lighting cap. The IOUs will provide appropriate new/emerging lighting work papers for review and approval by Energy Division through the Commission's approved work paper process and in this process notify Energy Division work paper, custom program and non-residential deemed program analysts that the candidate technologies are also proposed for OBF program cost cap exemption. Upon approval of the exemption of the targeted lighting measures, the IOUs will then update the OBF Program Implementation Plan (PIP) through the existing PIP addendum process and implement the program update.

EFFECTIVE DATE

The IOUs request that this Tier 2 advice letter be approved by December 19, 2013, which is 30 days from the filing date, with an effective date of November 19, 2013. Approving this Advice Letter with an effective date of November 19, 2013, the date of filing, is consistent with D.13-09-044 OP 9 and will allow the IOUs to expedite processing of pending OBF projects with the proposed new emerging lighting measures that are submitted while this Advice Letter is reviewed and approved.

PROTEST

Anyone may protest this Advice Letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received no later than December 9, 2013, which is 20 days of the date this Advice Letter was filed with the Commission. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. A copy of the protest should also be sent via both e-mail and facsimile to the addresses shown below on the same date it is mailed or delivered to the Commission.

For SDG&E:

Attn: Megan Caulson
Regulatory Tariff Manager
8330 Century Park Court, Room 32C
San Diego, CA 92123-1548
Facsimile No. (858) 654-1879
E-mail: MCaulson@semprautilities.com

For SoCalGas:

Sid Newsom
Tariff Manager – GT14D6
Southern California Gas Company
555 West 5th Street
Los Angeles, CA 90013-1011
Facsimile: (213) 244-4957
E-mail: snewsom@semprautilities.com

For SCE:

Megan Scott-Kakures
Vice President, Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Facsimile: (626) 302-4829
E-mail: AdviceTariffManager@sce.com

Leslie E. Starck
Senior Vice President, Regulatory Policy & Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

For PG&E:

Brian K. Cherry
Vice President, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177
Facsimile: (415) 973-7226
E-mail: PGETariffs@pge.com

NOTICE

A copy of this filing has been served on the utilities and interested parties shown on the attached list, including interested parties in A.12-07-001, A.12-07-002, A.12-07-003 & A.12-07-004, by providing them a copy hereof either electronically or via the U.S. mail, properly stamped and addressed.

Address changes should be directed to SDG&E Tariffs by facsimile at (858) 654-1879 or by email to SDG&ETariffs@semprautilities.com.

CLAY FABER
Director – Regulatory Affairs

Attachments

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **SAN DIEGO GAS & ELECTRIC (U 902)**

Utility type:

☒ ELC

☒ GAS

☐ PLC

☐ HEAT

☐ WATER

Contact Person: Christina Sondrini

Phone #: (858) 636-5736

E-mail: csondrini@semprautilities.com

EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2538-E/2240-G, et al.

Subject of AL: Joint IOU Filing: Request for Approval of New, Emerging Lighting Equipment to be Included in 2013-2014 On-Bill Financing Programs in Compliance with Decision 13-09-044

Keywords (choose from CPUC listing): Compliance, Energy Efficiency

AL filing type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

D.13-09-044

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL N/A

Summarize differences between the AL and the prior withdrawn or rejected AL¹: N/A

Does AL request confidential treatment? If so, provide explanation: N/A

Resolution Required? ☐ Yes ☒ No

Tier Designation: ☐ 1 ☒ 2 ☐ 3

Requested effective date: 11/19/13

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division

Attention: Tariff Unit

505 Van Ness Ave.,

San Francisco, CA 94102

EDTariffUnit@cpuc.ca.gov

San Diego Gas & Electric

Attention: Megan Caulson

8330 Century Park Ct, Room 32C

San Diego, CA 92123

mcaulson@semprautilities.com

¹ Discuss in AL if more space is needed.

General Order No. 96-B
ADVICE LETTER FILING MAILING LIST

cc: (w/enclosures)

Public Utilities Commission

DRA

S. Cauchois
R. Pocta
W. Scott

Energy Division

P. Clanon
S. Gallagher
D. Lafrenz
M. Salinas

CA. Energy Commission

F. DeLeon
R. Tavares

Alcantar & Kahl LLP

K. Cameron

American Energy Institute

C. King

APS Energy Services

J. Schenk

BP Energy Company

J. Zaiontz

Barkovich & Yap, Inc.

B. Barkovich

Bartle Wells Associates

R. Schmidt

Braun & Blaising, P.C.

S. Blaising

California Energy Markets

S. O'Donnell
C. Sweet

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

Children's Hospital & Health Center

T. Jacoby

City of Poway

R. Willcox

City of San Diego

J. Cervantes
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CP Kelco

A. Friedl

Davis Wright Tremaine, LLP

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J. Pau

Dept. of General Services

H. Nanjo
M. Clark

Douglass & Liddell

D. Douglass
D. Liddell
G. Klatt

Duke Energy North America

M. Gillette

Dynegy, Inc.

J. Paul

Ellison Schneider & Harris LLP

E. Janssen

Energy Policy Initiatives Center (USD)

S. Anders

Energy Price Solutions

A. Scott

Energy Strategies, Inc.

K. Campbell

M. Scanlan

Goodin, MacBride, Squeri, Ritchie & Day

B. Cragg

J. Heather Patrick

J. Squeri

Goodrich Aerostructures Group

M. Harrington

Hanna and Morton LLP

N. Pedersen

Itsa-North America

L. Belew

J.B.S. Energy

J. Nahigian

Luce, Forward, Hamilton & Scripps LLP

J. Leslie

Manatt, Phelps & Phillips LLP

D. Huard

R. Keen

Matthew V. Brady & Associates

M. Brady

Modesto Irrigation District

C. Mayer

Morrison & Foerster LLP

P. Hanschen

MRW & Associates

D. Richardson

Pacific Gas & Electric Co.

J. Clark

M. Huffman

S. Lawrie

E. Lucha

Pacific Utility Audit, Inc.

E. Kelly

San Diego Regional Energy Office

S. Freedman

J. Porter

School Project for Utility Rate Reduction

M. Rochman

Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

F. Chiang

Southern California Edison Co.

M. Alexander
K. Cini

K. Gansecki

H. Romero

TransCanada

R. Hunter

D. White

TURN

M. Hawiger

UCAN

D. Kelly

U.S. Dept. of the Navy

K. Davoodi

N. Furuta

L. DeLacruz

Utility Specialists, Southwest, Inc.

D. Koser

Western Manufactured Housing

Communities Association

S. Dey

White & Case LLP

L. Cottle

Interested Parties In:

A.12-07-001

A.12-07-002

A.12-07-003

A.12-07-004

**PG&E Gas and Electric
Advice Filing List
General Order 96-B, Section IV**

1st Light Energy	Douglass & Liddell	OnGrid Solar
AT&T	Downey & Brand	Pacific Gas and Electric Company
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	Praxair
Anderson & Poole	G. A. Krause & Assoc.	Regulatory & Cogeneration Service, Inc.
BART	GenOn Energy Inc.	SCD Energy Solutions
Barkovich & Yap, Inc.	GenOn Energy, Inc.	SCE
Bartle Wells Associates	Goodin, MacBride, Squeri, Schlotz & Ritchie	SDG&E and SoCalGas
Braun Blasing McLaughlin, P.C.	Green Power Institute	SPURR
California Cotton Ginners & Growers Assn	Hanna & Morton	San Francisco Public Utilities Commission
California Energy Commission	In House Energy	Seattle City Light
California Public Utilities Commission	International Power Technology	Sempra Utilities
California State Association of Counties	Intestate Gas Services, Inc.	SoCalGas
Calpine	K&L Gates LLP	Southern California Edison Company
Casner, Steve	Kelly Group	Spark Energy
Cenergy Power	Linde	Sun Light & Power
Center for Biological Diversity	Los Angeles Dept of Water & Power	Sunshine Design
City of Palo Alto	MRW & Associates	Tecogen, Inc.
City of San Jose	Manatt Phelps Phillips	Tiger Natural Gas, Inc.
Clean Power	Marin Energy Authority	TransCanada
Coast Economic Consulting	McKenna Long & Aldridge LLP	Utility Cost Management
Commercial Energy	McKenzie & Associates	Utility Power Solutions
County of Tehama - Department of Public Works	Modesto Irrigation District	Utility Specialists
Crossborder Energy	Morgan Stanley	Verizon
Davis Wright Tremaine LLP	NLine Energy, Inc.	Water and Energy Consulting
Day Carter Murphy	NRG Solar	Wellhead Electric Company
Defense Energy Support Center	Nexant, Inc.	Western Manufactured Housing Communities Association (WMA)
Dept of General Services	North America Power Partners	
Division of Ratepayer Advocates	Occidental Energy Marketing, Inc.	