

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



July 9, 2014

**Advice Letter 3461-G/4366-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: Request for Approval to Close 2013-2014 Energy Efficiency Portfolio Third Party Subprograms**

Dear Mr. Cherry:

Advice Letter 3461G/4366-E is effective July 8, 2014.

Sincerely,

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

Edward F. Randolph, Director  
Energy Division

February 28, 2014

**Advice 3461-G/4366-E**  
(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

**Subject: Request for Approval to Close 2013-2014 Energy Efficiency Portfolio  
Third Party Subprograms**

Pacific Gas and Electric Company (PG&E) requests approval to close four third-party (3P) subprograms approved for PG&E's 2013-2014 Energy Efficiency (EE) Portfolio in Decision (D.)12-11-015: Energy-Efficient Parking Garage Program, Monitoring Based Commissioning (MBCx), Enhanced Automation Initiative (EAI), and Ozone Laundry Energy Efficiency.

**Background**

On September 24, 2009, the California Public Utilities Commission (CPUC or Commission) adopted D.09-09-047, *Approving 2010-2012 Energy Efficiency Portfolios and Budgets*. The decision states that for the 2010-2012 programs, "the utilities shall not eliminate any program or subprogram except through the advice letter process."<sup>1</sup> The Energy Efficiency Policy Manual confirms this requirement for the 2013-2014 EE programs, stating that the "IOUs shall not eliminate any energy efficiency program or sub-program except through the energy efficiency portfolio application or an Advice Letter seeking such a change."<sup>2</sup>

**Purpose**

PG&E evaluates its EE portfolio on an ongoing basis to ensure its programs are meeting the goals and objectives set forth at the beginning of the portfolio cycle. The purpose of the review is to ensure that ratepayer funding is used efficiently and effectively to support the State's energy objectives and help customers save energy and money. After reviewing the 2013 performance of these four third-party subprograms and their performance towards goals, PG&E proposes to close these third-party

---

<sup>1</sup> D.09-09-047 at p. 310

<sup>2</sup> Energy Efficiency Policy Manual, Version 5, July 2013, Section II.7 at p.13,  
<http://www.cpuc.ca.gov/NR/rdonlyres/7E3A4773-6D35-4D21-A7A29895C1E04A01/0/EEPPolicyManualV5forPDF.pdf>

subprograms after each implementer meets existing customer commitments. Customers interested in participating in similar offerings going forward will be referred to other available third-party subprograms.

1. Energy-Efficient Parking Garage Program (PGE201117), implemented by EFM Solutions, LLC;
  - o The program delivered 10% of its savings goal in 2013, and has not been able to develop a robust project pipeline to deliver savings in 2014.
2. Monitoring Based Commissioning (MBCx) (PGE210120), implemented by EnerNOC;
  - o The program has been in place since 2010, and several projects were started and slated for completion in the 2010-2012 EE program cycle. The program was continued for the 2013-2014 EE program cycle based on expectations that existing projects would be completed by the end of 2012 and new projects would be developed to deliver savings in 2013 and 2014. However, the projects started in 2010-2012 did not deliver savings until 2013, the program has not been able to grow a robust project pipeline in 2013, and new projects that were scheduled to be completed in 2013 have been delayed to 2014 or will not be completed.
3. Enhanced Automation Initiative (EAI) (PGE210019), implemented by KEMA (now DNV GL);
  - o The program delivered 0% of its MWh savings goals and 36% of its MMTh savings goals in 2013. The program was innovative when it was started in 2004, but increased competition in the building controls sector, and market saturation have reduced the effectiveness of the program.
4. Ozone Laundry Energy Efficiency (PGE21019), implemented by Willdan Energy Services;
  - o The program delivered 29% of its savings goal in 2013. There were a number of active vendors who participated in the program in the 2010-2012 EE program cycle, but many of those vendors have ceased operation in California or discontinued their work in this area. As such, the program has not developed a robust project pipeline in the 2013-2014 program cycle. In addition, the single technology offered through this program is also available through the Healthcare Energy Efficiency Program (implemented by Willdan) and PG&E's Commercial Deemed Program.

The target date for completion of all current projects under these third-party subprograms is September 30, 2014. Once this Advice Letter is approved, the third-party subprograms will be closed when the current projects are complete.

The filing would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

**Protests**

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than March 20, 2014, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, California 94102

Facsimile: (415) 703-2200  
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

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

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

**Effective Date**

PG&E requests that this Tier 2 advice letter filing become effective on regular notice, March 30, 2014, which is 30 calendar days after the date of filing.

**Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the service list for R.13-11-005. Address changes to the General Order 96-B service list should be directed to PG&E at email address [PGETariffs@pge.com](mailto:PGETariffs@pge.com). For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov). Send all electronic approvals to [PGETariffs@pge.com](mailto:PGETariffs@pge.com). Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs>

Handwritten signature of Brian Cherry / IG in black ink.

Vice President, Regulatory Relations

cc: Service List R.13-11-005

# 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. **Pacific Gas and Electric Company (ID U39 M)**

Utility type:

ELC       GAS  
 PLC       HEAT       WATER

Contact Person: Igor Grinberg

Phone #: (415) 973-8580

E-mail: ixg8@pge.com and PGETariffs@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas  
PLC = Pipeline      HEAT = Heat      WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **3461-G/4366-E**

**Tier: 2**

Subject of AL: **Request for Approval to Close 2013-2014 Energy Efficiency Portfolio Third Party Subprograms**

Keywords (choose from CPUC listing): Energy Efficiency

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

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

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: \_\_\_\_\_

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: N/A

Confidential information will be made available to those who have executed a nondisclosure agreement:  Yes  No

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information:

Resolution Required?  Yes  No

Requested effective date: **March 30, 2014**

No. of tariff sheets: N/A

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 proposed: N/A

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

Protests, dispositions, 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:

**California Public Utilities Commission**

**Energy Division**

**EDTariffUnit**

**505 Van Ness Ave., 4<sup>th</sup> Flr.**

**San Francisco, CA 94102**

**E-mail: EDTariffUnit@cpuc.ca.gov**

**Pacific Gas and Electric Company**

**Attn: Brian Cherry**

**Vice President, Regulatory Relations**

**77 Beale Street, Mail Code B10C**

**P.O. Box 770000**

**San Francisco, CA 94177**

**E-mail: PGETariffs@pge.com**

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

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