

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

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Advice Letters SCE 4302-E, PG&E 4317-G/5963-E, SDG&E 2911-G/3617-E, SoCalGas 5696-G

November 24, 2020

Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770

SUBJECT: Advice Letter Detailing the eTRM Phase 1 and Phase 2 Software and Web Administration Budgets and Contract in Compliance with Resolution E-5082

Dear Mr. Stern:

On September 28, 2020, SCE filed Advice Letter 4302-E et al., jointly with PG&E, SDG&E and SoCalGas as directed in Resolution E-5082. This advice letter described incremental costs associated with the adoption and further development of an electronic technical reference manual (eTRM) and the energy efficiency budgets to which these costs would be assigned in 2020 and 2021. While the advice letter was not protested, this non-standard disposition summarizes comments from members of the California Technical Forum (CalTF) who are impacted by the IOUs' budgetary decisions in the advice letter, as well as Energy Division Staff's consideration of the matter.

The eTRM is an online database platform developed by the CalTF under a competitive solicitation for a software developer and project manager. Specifically, the eTRM supports utilities' consolidation and standardization of individual territory measures into a statewide measure framework. The CalTF was formed in 2015-2016 to address market-wide need for improved transparency in the deemed ex ante measure development, review and approval process. It is guided by a Policy Advisory Committee (PAC) that includes the IOUs and POU's, environmental advocates, local government, regulators, ratepayer advocates, and subject matter experts from industry. While the eTRM has been *one* hallmark of CalTF's expert contributions, their core mission is to support energy efficiency and integrated demand side management through technically rigorous peer review of California energy efficiency values and other related technical information, including ex ante measure workpaper and savings estimates, guidelines, templates, and protocols to support statewide measure development and updates. Staff considers their mission essential to continued progress in measure development and standardization, particularly at a time when third party implementers assume responsibility for delivering an increasing proportion of portfolio savings.

On October 19, 2020, California Efficiency + Demand Management Council, National Association of Energy Service Corporations, Natural Resources Defense Council, the Energy Coalition—all members of the PAC--and Energy Solutions (the Joint Parties) submitted comments expressing concern about possible IOU reductions to the CalTF budget for both 2020 and 2021, as well as affirming their position that the CalTF provides valuable services to energy

efficiency and California ratepayers. They claimed that the IOU PAC members appeared to be taking a non-incremental approach to eTRM funding in the overall CalTF budget, and that this would be inconsistent with the E-5082 Ordering Paragraphs (OP) directing the IOUs to maintain the same management structure through 2021 (OP 6)¹, and include *incremental* funding for the new software enhancements ordered in the resolution for 2020 in OP 7 and, implicitly in OP 8, through 2021.²

Energy Division staff met with representatives from the IOUs on a WebEx call on October 30, 2020 to discuss the incrementalism issue and provide interpretive guidance; namely, that the incremental funding need in 2021 was *implied* in the ordering paragraphs. The IOUs explained that the additional enhancements needed to be in place by January 1, 2021 would be funded by their 2020 program budgets through the existing fund shifting mechanism. The IOUs pointed out that the 2021 CalTF business plan and funding have not been approved and “the PAC Funding members would not necessarily need CalTF to provide the exact same services as was provided in 2020.” They assured staff that the 2021 CalTF budget would include enough funds to cover the eTRM enhancement activities required by the resolution, as well as other activities that they determined would provide value.

Energy Division Staff shares the Joint Parties’ assessment of the services CalTF provides on behalf of ratepayers and wishes to express support for the IOUs’ continued funding, at appropriate levels, for CalTF activities in 2020 and 2021. Staff understands the IOUs’ due diligence in their assessment of the 2021 CalTF business plan, but we are also concerned that through their budgetary discretion the IOUs essentially have a stronger influence over activities that are widely considered valuable to the other PAC members and many third party energy efficiency implementers and market participants.

Staff advises the IOUs to carefully consider all parties’ positions when making decisions for the 2021 CalTF budget. Advice Letter 4302-E is effective September 28, 2020.

Sincerely,



Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

¹ E-5082 Ordering Paragraph 6, “The DEER databases and eTRM shall continue to be administered and maintained by the IOU funders without changes to contract management structure until completion of both Phase 1 and Phase 2 activities.”

² E-5082 Ordering Paragraph 7, “The IOUs shall fund 2020 eTRM enhancement activities identified in Appendix 1 from their approved 2020 budgets under their existing vendor contract, ensuring sufficient funding for the incremental software development described in this resolution.” E-5082 Ordering Paragraph 8, “The IOUs may fund Phase 2 eTRM software enhancements, website administration and maintenance from their 2021 EM&V budgets.”

September 28, 2020

ADVICE 4302-E
Southern California Edison Company (U 338-E)

ADVICE 4317-G/5963-E
Pacific Gas and Electric Company (U 39-M)

ADVICE 2911-G/3617-E
San Diego Gas & Electric Company (U 902-M)

ADVICE 5696-G
Southern California Gas Company (U 904-G)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Joint Tier 1 Advice Letter Detailing the eTRM Phase 1 and
Phase 2 Software and Web Administration Budgets and
Contract in Compliance with Resolution E-5082

PURPOSE

Southern California Edison Company (SCE), San Diego Gas & Electric Company (SDG&E) Southern California Gas Company (SoCalGas) and Pacific Gas and Electric Company (PG&E) (collectively, "the utilities") hereby submit its 2020-2021 Electronic Technical Reference Manual (eTRM) Budget as required by Ordering Paragraph (OP) 9 of Resolution E-5082 (Resolution), Approval of the Database for Energy-Efficiency Resources (DEER) updates for Program Year 2022 along with a revised version for Program Years 2020 and 2021. This advice letter details the utilities' requested eTRM Phase 1 and Phase 2 budgets for 2020 and 2021.

BACKGROUND

The development of the eTRM has been funded by the utilities as well as Sacramento Municipal Utility District (SMUD) and Los Angeles Department of Water and Power (LADWP) under a competitive bidding process. Funding for the eTRM has historically been from the Energy Efficiency (EE) portfolio budget. The Resolution describes a plan to transition from the DEER to eTRM in two phases.¹ The utilities may fund eTRM using EM&V budgets because activities in support of DEER and workpaper systems are

¹ See Resolution E-5082 P. 9.

generally funded using EM&V budgets.² The utilities were allowed to shift authorized 2020 funding to meet eTRM needs because some of the activities needed to transition the eTRM to the data source of record are scheduled to occur in 2020.³ Furthermore, the Resolution allows that the utilities “may fund phase 2 eTRM software enhancements, website administration and maintenance from their 2021 EM&V budgets.”⁴

DISCUSSION

The Resolution provides the details of the transition to eTRM as the data source of record. In summary, Phase 1 will enable eTRM to serve as the public source of deemed estimated savings values and will be completed by Q1 2021. Phase 2 will include several enhancements including: 1) facilitating workpaper submission, review, tracking, approval, and updates; 2) restructuring DEER/Ex Ante Review data to make this data accessible from eTRM; and 3) integrating eTRM with the Cost-Effectiveness Tool (CET) and California Energy Data and Reporting System (CEDARS) reporting functions.

Table 1 shows the total costs required for eTRM for 2020 and 2021.

Table 1: Summary 2020-2021 Budget for eTRM Transition Activities

	2020	2021
Software Development	\$104,379	\$583,666
Labor	\$143,190	\$348,179
Web Administration	\$12,500	\$6,500
Totals	\$260,069	\$938,345

The costs in Table 1 will be allocated among the utilities and LADWP as follows: PG&E 38.78%; SCE 30.05%; SoCalGas 7.55%; LADWP 13.12%; and SDG&E 10.50%.

Table 2 provides a brief description of the eTRM funding source for 2020 and 2021 by utility.

² Id.

³ Id. P. 11.

⁴ Id. OP 9.

Table 2: Funding Source for 2020-2021 eTRM Budgets

Organization	2020 Funding Source	2021 Funding Source
PG&E	Funding through 2020 program portfolio budget via fund shifting, will use unspent 2020 EM&V funds as available.	Funding through 2021 EM&V and/or EE portfolio budget via fund shifting, as allowed by Resolution E-5082 OP 8. PG&E's EM&V share is being requested through its 2021 Annual Budget Advice Letter, Advice 4304-G/5936-E.
SCE	Fund shift from across the EE portfolio proportional to individual EE program expenditures / budgets.	2021 EM&V budget. If SCE reaches the 27.5% cap, then SCE will fund shift from across the EE portfolio proportional to individual EE program expenditures / budgets.
SoCalGas	Funded through Residential, Commercial, Agricultural, Industrial Deemed program budgets (SCG 3702, SCG 3711, SCG 3716, SCG 3720)	2021 EM&V budget. If SoCalGas reaches the 27.5% cap, then SoCalGas will charge any remaining expenditures within the deemed programs as in 2020.
SDG&E	Funded through Residential, Commercial, Agricultural, Industrial Deemed program budgets (SDGE 3204, SDGE 3207, SDGE 3223, SDGE 3226, SDGE 3233, SDGE 3239, SDGE 3279)	2021 EM&V budget. If SDG&E reaches the 27.5% cap, then SDG&E will charge any remaining expenditures within the deemed programs as in 2020.

TIER DESIGNATION

Pursuant to the Resolution, OP 9, this advice letter is being submitted with a Tier 1 designation.

EFFECTIVE DATE

This advice letter will become effective September 28, 2020, the same day as submitted.

No cost information is required for this advice letter.

This advice letter will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

NOTICE

Anyone wishing to protest this advice letter may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice letter. Protests should be submitted to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone: (626) 302-9645
Facsimile: (626) 302-6396
E-mail: AdviceTariffManager@sce.com

Diana Gallegos
Senior Advisor, State Regulatory 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

Attn: Erik Jacobson
Director - Regulatory Relations
c/o Megan Lawson
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177
Facsimile No.: (415) 973-3582
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Attn: Ray B. Ortiz
Tariff Manager - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
Facsimile No.: (213) 244-4957
E-mail: ROrtiz@socalgas.com

There are no restrictions on who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

In accordance with General Rule 4 of General Order (GO) 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached GO 96-B and R.13-11-005 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-4039. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by submitting and keeping the advice letter at SCE's corporate

headquarters. To view other SCE advice letters submitted with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Brandon Sanders at (626) 302-0949 or by electronic mail at Brandon.Sanders@sce.com.

Southern California Edison Company

/s/ Gary A. Stern, Ph.D.
Gary A. Stern, Ph.D.

GAS:bs:jm



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

☒ ELC ☐ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Darrah Morgan

Phone #: (626) 302-2086

E-mail: AdviceTariffManager@sce.com

E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4302-E

Tier Designation: 1

Subject of AL:

Joint Tier 1 Advice Letter Detailing the eTRM Phase 1 and Phase 2 Software and Web Administration Budgets and Contract in Compliance with Resolution E-5082

Keywords (choose from CPUC listing): Compliance

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: Resolution E-5082

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

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

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? ☐ Yes ☒ No

Requested effective date: 9/28/20

No. of tariff sheets: -0-

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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: None

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets: None

¹Discuss in AL if more space is needed.

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

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Gary A. Stern, Ph.D.
Title: Managing Director, State Regulatory Operations
Utility Name: Southern California Edison Company
Address: 8631 Rush Street
City: Rosemead
State: California Zip: 91770
Telephone (xxx) xxx-xxxx: (626) 302-9645
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Email: advicetariffmanager@sce.com

Name: Diana S. Gallegos c/o Karyn Gansecki
Title: Senior Advisor, State Regulatory Affairs
Utility Name: Southern California Edison Company
Address: 601 Van Ness Avenue, Suite 2030
City: San Francisco
State: California Zip: 94102
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Facsimile (xxx) xxx-xxxx: (415) 929-5544
Email: karyn.gansecki@sce.com

Clear Form

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtailable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

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

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	
	Ellison Schneider & Harris LLP	Redwood Coast Energy Authority
Alta Power Group, LLC	Energy Management Service	Regulatory & Cogeneration Service, Inc.
Anderson & Poole	Engineers and Scientists of California	SCD Energy Solutions
		San Diego Gas & Electric Company
Atlas ReFuel		
BART	GenOn Energy, Inc.	SPURR
	Goodin, MacBride, Squeri, Schlotz & Ritchie	San Francisco Water Power and Sewer
Barkovich & Yap, Inc.	Green Power Institute	Sempra Utilities
California Cotton Ginners & Growers Assn	Hanna & Morton	
California Energy Commission	ICF	Sierra Telephone Company, Inc.
California Public Utilities Commission	IGS Energy	Southern California Edison Company
Calpine	International Power Technology	Southern California Gas Company
	Intestate Gas Services, Inc.	Spark Energy
Cameron-Daniel, P.C.	Kelly Group	Sun Light & Power
Casner, Steve	Ken Bohn Consulting	Sunshine Design
Cenergy Power	Keyes & Fox LLP	Tecogen, Inc.
Center for Biological Diversity	Leviton Manufacturing Co., Inc.	TerraVerde Renewable Partners
		Tiger Natural Gas, Inc.
Chevron Pipeline and Power		
City of Palo Alto	Los Angeles County Integrated	TransCanada
	Waste Management Task Force	Utility Cost Management
City of San Jose	MRW & Associates	Utility Power Solutions
Clean Power Research	Manatt Phelps Phillips	Water and Energy Consulting Wellhead
Coast Economic Consulting	Marin Energy Authority	Electric Company
Commercial Energy	McKenzie & Associates	Western Manufactured Housing
Crossborder Energy		Communities Association (WMA)
Crown Road Energy, LLC	Modesto Irrigation District	Yep Energy
Davis Wright Tremaine LLP	NLine Energy, Inc.	
Day Carter Murphy	NRG Solar	
Dept of General Services	Office of Ratepayer Advocates	
Don Pickett & Associates, Inc.	OnGrid Solar	
Douglass & Liddell	Pacific Gas and Electric Company	
	Peninsula Clean Energy	