

**SECOND SET OF DATA REQUESTS TO  
SAN DIEGO GAS & ELECTRIC  
COMPANY**

**BY  
THE COALITION FOR ENERGY  
EFFICIENCY**

**(Questions 38 – 47)**

Dated May 23, 2017

Submitted: June 2, 2017

39. Response to CEE SDG&E Data Request Question 2 is vague and did not provide the information requested. Data Request Question 2 asks whether SDG&E agrees “that it has the authority or discretion to incorporate workforce diversity and inclusion goals into their requirements for energy efficiency programs?” SDG&E’s response states that “SDG&E does not agree that it has the authority or discretion to incorporate workforce diversity and inclusion goals into its requirements for energy efficiency programs *unless* ordered by the California Public Utilities Commission (CPUC) or by California state law.” (Emphasis provided.) SDG&E then states that SDG&E “may consider workforce diversity and inclusion goals to the extent that they are not detrimental to achieving cost-effective EE savings.”

- a. Does SDG&E take the position that the CPUC and California State Law currently provides SDG&E the authority or discretion to incorporate workforce diversity and inclusion goals into its requirements for energy efficiency programs as long as the goals are not detrimental to achieving cost-effective EE savings?
- b. What is SDG&E’s definition of “detrimental to achieving cost-effective EE savings”? Does SDG&E consider any reduction in cost-effectiveness to be “detrimental to achieving cost-effective EE savings” or does the reduction have to be significant enough to threaten an energy efficiency program’s ability to demonstrate cost-effectiveness?
- c. Does SDG&E have any evidence or documentation that diversity and inclusion goals are detrimental to achieving cost-effective EE savings? If the answer is yes, please identify and provide that evidence and documentation.

**SDG&E Response:**

**39(a):** SDG&E objects to this request to the extent that it calls for a legal conclusion regarding the interpretation of CPUC precedent and/or California state law. SDG&E reaffirms its response to

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Question 2 from CEE’s initial data request. As previously stated, SDG&E does not agree that that it has the authority or discretion to incorporate workforce diversity and inclusion goals into its requirements for energy efficiency programs unless ordered by the California Public Utilities Commission (CPUC) or California State Law. To clarify its original response, SDG&E raised the issue of cost-effectiveness to emphasize the primary focus it places on its programs achieving cost-effective energy efficiency savings, but did not intend to imply that it believes it has the authority to incorporate workforce diversity and inclusion goals which are not detrimental to achieving cost-effective savings, but are not ordered by the CPUC or California State Law. Please see response to Request No. 38 and the attached Diverse Business Enterprises 2016 Annual Report and 2017 Annual plan that describe SDG&E’s commitment and programs regarding DBEs.

**39(b):** SDG&E does not have a definition for the term “detrimental to achieving cost-effective EE savings.” Regarding cost-effectiveness, SDG&E incorporates by reference the CPUC’s threshold for cost-effectiveness that each IOU is required to demonstrate (See D.14-10-046).

**39(c):** No, SDG&E does not have any evidence or documentation that diversity and inclusion goals are detrimental to achieving cost-effective EE savings.