

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Southern California Edison Company
(U338E) for Approval of Energy Efficiency Rolling
Portfolio Business Plan

Application 17-01-013
(filed January 17, 2017)

And Related Matters.

Application 17-01-014
Application 17-01-015
Application 17-01-016
Application 17-01-017
(Consolidated)

**SECOND SET OF DATA REQUESTS TO
SOUTHERN CALIFORNIA GAS COMPANY
BY
THE COALITION FOR ENERGY EFFICIENCY
(Questions 38 – 47)**

This second set of data requests is submitted to Southern California Gas Company (“SoCalGas”) by the Coalition for Energy Efficiency (“CEE” or the “Coalition”). Please provide your responses, via email or disc if available, by June 2, 2017 to:

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INSTRUCTIONS

1. When available, provide documents in their original electronic format. Documents produced in response to the Data Requests should be Bates-numbered, and indexed if voluminous. Responses to Data Requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.
2. Restate the text of each request prior to providing the response.

3. Identify the person providing the answer to each Data Request and identify the individual who would be designated as a witness for cross-examination of the response if hearings are held in this proceeding. If witnesses have not yet been selected at the time a data response is provided, please supplement the response once witnesses have been selected.
4. For questions that seek a “yes” or “no” answer, please respond if possible with an unqualified yes or an unqualified no. If it is not possible to provide either an unqualified yes or no to a particular question as posed, please include in each response an explanation as to why an unqualified yes or no is not possible.
5. To the extent you object to a request or portion of a request, or assert privilege, please describe in detail the basis for the objection and/or assertion of privilege.
6. If a request is unclear, please contact CEE immediately to seek clarification. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the data request.
7. Responses to these data requests are requested as soon as possible, and no later than 10 business days of receipt of the requests. If you are unable to meet this schedule, please inform CEE as soon as possible.

CEE DATA REQUEST SET TWO (QUESTIONS 38 – 47)

38. Response to Data Request Question 1 is vague and did not provide the information requested.

- a. In order to clarify your response, please respond with a “yes” or “no” to the following revised question: *Did SoCalGas “develop pilot approaches collaboratively with stakeholders to incorporate workforce diversity and inclusion goals into their third-party contractor selection process” in response to Conclusion of Law 70 of D.12-11-015?*
- b. If the answer is yes, please describe what pilot approaches were developed collaboratively with stakeholders and provide any notices, memoranda, reports, studies or other documents that support this claim.

39. Response to Data Request Question 2 is vague and did not provide the information requested. Data Request Question 2 asks whether SoCalGas agrees “that it has the authority or discretion to incorporate workforce diversity and inclusion goals into their requirements for energy efficiency programs?” SoCalGas’s response states that “It is SoCalGas’ position that its authority and discretion to implement requirements for energy efficiency programs stems from state and federal mandates.” Does SoCalGas take the position that state and federal mandates do not currently provide SoCalGas the authority or discretion to incorporate workforce diversity and inclusion goals into its requirements for providing and participating in its energy efficiency programs?
40. The responses to Data Request Questions 10 and 11 state that “Discounts applied to prescribed energy savings include, but are not limited to, the risk of lost energy savings due to poorly installed measures for energy efficiency measures and are accounted for in the revision of energy efficiency measure workpapers and measure implementation. Discounts are typically derived from Energy Division ex ante review dispositions as well as from direct measure impact evaluations which integrates in the evaluation installation rate examining, as applicable, measure existence, installation quality, and correct operation and potential to generate savings.”
- a. Please identify specifically each energy efficiency measure whose energy savings are discounted due to the risk of lost energy savings due to poorly installed measures for energy efficiency measures. This question does not encompass reductions for incentives that were found to not actually have been installed.
 - b. For each measure identified in response to part (a) of this question, state the specific discount attributable to the risk of lost energy savings due to poorly installed measures (e.g., 10%).
 - c. For each measure identified in response to part (a) of this question, identify the ex ante review dispositions, energy efficiency measure work papers or other specific documents that provide the basis for the discount attributable to the risk of lost energy savings due to poorly installed measures, and identify where in each document this information is contained (by page number and paragraph).

41. Response to Data Request Question 13(d) did not provide the requested information.

Please provide a response to Question 13(d): “How are customers supposed to know if the contractor they hire is using workers who have the knowledge, skills and training necessary to properly install or maintain the energy efficiency measure?”

42. Response to Data Request Question 15(a) did not provide the requested information. In

Question 15(a), CEE asked “how will SoCalGas determine the existing baseline and the future number of properly installed and maintained HVAC systems” under its proposed metric of “increasing the number of properly installed and maintained HVAC systems by 15% over 2015 levels by 2025.” In response to Question 15(a), SoCalGas responded “As presented in the Business Plan, the existing baseline for the referenced metric is the number of properly installed and maintained HVAC units (p. 144) in SoCalGas’ 2015 energy efficiency programs supporting this sector. The 2018-2025 program results will be used to calculate metric progress, relative to this baseline, towards achieving targets over the short, mid, and long-term, as presented in the Business Plan (p. 144).” This does not respond to the question. CEE understands that the proposed baseline for the referenced metric is the number of properly installed and maintained HVAC units. The question asked was how the baseline (and future) number of properly installed and maintained HVAC units will be determined.

- a. Please respond to the question asked in Data Request Question 15(a): “how will SoCalGas determine the existing baseline and the future number of properly installed and maintained HVAC systems” under its proposed metric of increasing the number of properly installed and maintained HVAC systems by 15% over 2015 levels by 2025?
- b. What percentage of HVAC systems that participated in SoCalGas’s energy efficiency programs in 2015 were properly installed? Please explain how this was determined and provide any documents or data supporting this determination.
- c. What percentage of HVAC systems that participated in SoCalGas’s energy efficiency programs in 2015 were properly maintained? Please explain how this was determined and provide any documents or data supporting this determination.
- d. How was the metric of 15% determined. Why wasn’t a higher goal set?

43. Response to Data Request Question 18 states that “For contractors who participate in HVAC Commercial Quality Maintenance (QM) programs, applicable IOUs require skills standards and certification requirements in alignment with the recommendation, fulfilling the commitment outlined in the February 23, 2015 Advice Letter and PIP Addendum.” This response does not indicate whether any *new* skill standards or certification requirements were adopted *in response* to the February 23, 2015 Advice Letter and PIP Addendum. In addition, this response refers only to “applicable IOUs” and does not indicate whether SoCalGas adopted skills standards or certification requirements for any of its energy efficiency programs.

- a. Please identify specifically what, if any, skills standards or certification requirements were added to the HVAC Commercial Quality Maintenance (QM) programs after the February 23, 2015 Advice Letter and PIP Addendum.
- b. Did SoCalGas add any skills standards or certification requirements to its energy efficiency programs in response to the February 23, 2015 Advice Letter and PIP Addendum? If the answer is yes, please identify the programs and the requirements and provide supporting documentation.
- c. The February 23, 2015 Advice Letter references both HVAC Quality *Installation* and Quality *Maintenance* as programs that would initiate the adoption of skill certification requirements. Response to Question 18 only refers to requirements adopted for Quality Maintenance. Were skill certification requirements adopted for HVAC Quality Installation programs as a result of implementation of the February 23, 2015 Advice Letter and PIP Addendum? If the answer is yes, please identify the programs and the requirements and provide supporting documentation.

44. Response to Data Request Question 24 states that the Business Plan presents the “IOUs’ overall approach to the DVC recommendations as holistic approach to feedback.”

- a. Please explain in detail what this “approach” is and how it addresses the UC-Berkeley Don Vial Center Workforce Guidance Plan recommendations. Please identify by page number and paragraph where the SoCalGas Business Plan presents this approach.
- b. Response to Data Request Question 24 states that the “approach” in the Business plan is consistent with the direction provided by the CAEECC process. Please

describe the “direction” provided by the CAEECC process, identify who specifically provided this direction and state when and how this direction was provided. If you have documentation of this direction, please provide a copy of the document and indicate by page number where this direction was provided.

45. Response to Data Request Question 26 states that “The Business Plan identified major barriers to increased energy efficiency levels for each sector. However, only the commercial sector identified improper HVAC equipment installations as a market barrier to capturing lost energy efficiency. Specifically, a study conducted by the University of California, Davis, identified that properly installed and maintained commercial HVAC systems can reduce energy losses. SoCalGas did not uncover similar market barriers in other sectors that would capture significant energy efficiency levels.” This response is inconsistent with the information contained in PG&E Business Plan Residential Section, Appendix F (“Comprehensive HVAC”). Appendix F finds that improper HVAC equipment installation is also a market barrier to capturing energy efficiency in the residential sector. In addition, there is no reason to believe that the commercial sector barriers from improper HVAC equipment installations would not also apply to public sector buildings since they generally use the same equipment. This response is also inconsistent with the findings in Appendix 2B of the Don Vial Center Workforce Guidance Plan, which identifies poor installation as a barrier to achieving energy savings in residential, commercial, and public sectors and which identifies poor installation as a barrier to achieving energy savings for HVAC, insulation, solar water heating and lighting control measures. Please explain this inconsistency.
46. Have any SoCalGas energy efficiency programs (not just the WE&T programs) established the minimum knowledge, skills and abilities (KSAs) necessary to ensure quality installation for any specific energy efficiency measures or energy efficiency occupations? If yes, please identify the programs and measures and the identified KSAs. Please provide copies of any studies or reports upon which the KSAs are based.
47. Have any SoCalGas energy efficiency programs (not just the WE&T programs) established a worker quality baseline for any specific energy efficiency measures or energy efficiency

occupations (i.e. the percentage of workers installing specific energy efficiency measures determined to have the appropriate skills, training, and certifications)? If yes, please provide a copy of any studies, reports or data on which this baseline is estimated.

Dated: May 23, 2017

Respectfully submitted,

/s/

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on behalf of the Coalition for Energy Efficiency