

**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
SAN DIEGO GAS & ELECTRIC COMPANY
BY
THE COALITION FOR ENERGY EFFICIENCY
(Questions 38 – 47)**

This second set of data requests is submitted to San Diego Gas & Electric Company (“SDG&E”) 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:

Thomas A. Enslow
Adams Broadwell Joseph & Cardozo
520 Capitol Mall, Suite 350
Sacramento, CA 95822
(916) 444-6201
tenslow@adamsbroadwell.com

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 CEE SDG&E Data Request 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 SDG&E “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 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.

40. Response to CEE SDG&E Data Request Question 5 states that “future Implementation Plans will identify ways in which SDG&E and other IOUs will support disadvantaged workers.”

- a. Is this an enforceable commitment set forth in the Business Plan? If yes, where in the Business Plan is this commitment made?
- b. Will all Implementation Plans be required to identify ways in which the program will support disadvantaged workers? If the answer is no, identify specifically which

Implementation Plans will be required to identify ways in which the program will support disadvantaged workers.

41. Response to CEE SDG&E Data Request Question 13(d) did not provide the requested information. Question 13(d) asks “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?” Please provide a complete response to Question 13(d).

42. Response to CEE SDG&E Data Request Question 17 (a) states that “HVAC Commercial Quality Maintenance (QM) programs require skills standards and certification requirements 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.
 - 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. The Advice Letter references both HVAC Quality Installation and Quality Maintenance as programs that would initiate the adoption of skill certification requirements. 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?

43. Response to CEE SDG&E Data Request Question 17(c) does not provide the information requested. Question 17(c) asks “Will the adoption of ‘skill certification requirements for advanced lighting controls and HVAC Quality Installation and Quality Maintenance and other available skill standards and certification guidance’ remain a priority issue under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan? If yes, how does the Business Plan ensure that this will remain a priority?” In response SDG&E replies that, pursuant to SB 350, “the CEC shall adopt a responsible contractor policy to ensure that

ratepayer-funded EE retrofits meet high-quality performance standards and reduce energy savings lost or foregone due to poor-quality workmanship.” This is not responsive.

- a. Please answer the question asked in Question 17(c): “Will the adoption of ‘skill certification requirements for advanced lighting controls and HVAC Quality Installation and Quality Maintenance and other available skill standards and certification guidance remain a priority issue under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan? If yes, how does the Business Plan ensure that this will remain a priority?”
 - b. Is SDG&E asserting that the SB 350 responsible contractor policy will include skill certification requirements for advanced lighting controls and HVAC Quality Installation and Quality Maintenance and other available skill standards and certification guidance?
 - c. Is SDG&E asserting that a responsible contractor policy makes program-specific worker skill certification requirements unnecessary? If yes, please explain why.
44. Response to Data Request 23 states that the Business Plan presents the “IOU’s overall, holistic approach to the DVC recommendations.”
- 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 Business Plan presents this approach.
 - b. Your response 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, who specifically provided this direction and when and how this direction was provided.
45. Have any SDG&E 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.

46. Have any SDG&E 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.

47. Response to Question 35 states that “D.16-08-019 requires that all midstream and upstream programs are to be administered as Statewide programs to be funded with at least 25% of the portfolio budget (OP 6). Therefore, SDG&E will provide a minimum of 25% of its 2018-2025 budget to midstream/upstream programs.” CEE disagrees with this interpretation of D.16-08-019. D.16-08-019 directs SDG&E to direct at least 25% of the portfolio budget to statewide programs, but does not require all statewide programs to be midstream and upstream programs. To the contrary, the decision requires there to be at least four statewide downstream programs on a pilot basis, with potentially more as the 2018-2025 move forward. On what basis does SDG&E claim that the requirement in D.16-08-019 to fund Statewide programs with at least 25% of the portfolio budget is limited to just midstream and upstream programs?

Dated: May 23, 2017

Respectfully submitted,

/s/

Thomas A. Enslow
Adams Broadwell Joseph and Cardozo
520 Capitol Mall, Suite 350
Sacramento, CA 95814
tenslow@adamsbroadwell.com
on behalf of the Coalition for Energy Efficiency