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 and Related Matters	Application 17-01-013 (filed January 17, 2017) Application 17-01-014 Application 17-01-015 Application 17-01-016 Application 17-01-017 (Consolidated)

FIRST SET OF DATA REQUESTS TO
SOUTHERN CALIFORNIA EDISON COMPANY
BY
THE COALITION FOR ENERGY EFFICIENCY

The following data requests are submitted to Southern California Edison Company ("SCE") by the Coalition for Energy Efficiency ("CEE" or the "Coalition"). Please provide your responses, via email or disc if available, by April 1, 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 the 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 ONE

1. Decision 12-11-015 at p. 126 directed the utilities to "develop pilot approaches collaboratively with stakeholders to incorporate workforce diversity and inclusion goals into their third-party contractor selection process."
   (a) Please describe what actions were taken in response to this direction and provide copies of any studies or reports prepared as a result of this decision.
   (b) Please provide a copy of any workforce diversity and/or inclusion requirements or goals that have been incorporated into energy efficiency programs (pilot or otherwise) and identify what programs have required compliance with these goals.

2. Does SCE agree that it has the authority or discretion to incorporate workforce diversity and inclusion goals into their requirements for energy efficiency programs? If no, on what basis is this claim made?

3. Does SCE agree with SDG&E's assertion that connecting disadvantaged workers to job and career pathways is out of the scope of the energy efficiency programs?[1] If yes, on what basis?

4. Does SCE agree with SDG&E's assertion that workforce development and job creation are not components of the workforce education and training ("WE&T") program?[2] If yes, on what basis?

5. In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), Southern California Edison Company ("SCE"), San Diego Gas & Electric Company ("SDG&E"), Pacific Gas and Electric Company ("PG&E"), and Southern California Gas Company ("SoCalGas") (jointly, the "IOUs") stated that they would address "EE skills building and fund training programs that connect disadvantaged workers to job and career pathways in EE," including developing "an EE career pathway framework for disadvantaged workers that identify pathways for at least three occupations."
   (a) Are these activities being continued under the under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan? If yes, how does the Business Plan ensure that these activities will be continued?
   (b) Did the IOUs develop "an EE career pathway framework for disadvantaged workers that identify pathways for at least three occupations"? If yes, please provide a copy.

[1] See SDG&E 2018-2025 Energy Efficiency Rolling Portfolio Business Plan, Appendix F External Stakeholder Observations, ID #075.
[2] See SDG&E 2018-2025 Energy Efficiency Rolling Portfolio Business Plan, Appendix F External Stakeholder Observations, ID #075.

(c) Please describe any other steps or activities that were taken to address "EE skills building and fund training programs that connect disadvantaged workers to job and career pathways in EE."

(d) Please provide any studies, reports, memorandums, data or other documents describing WE&T activities that connected disadvantaged workers to job and career pathways in EE.

6. In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would hire an "inclusion consultant" to advise regarding the potential development of a workforce inclusion program to broaden access to living wage jobs and career pathways in EE for workers from disadvantaged communities."

(a) Was an inclusion consultant" hired?

(b) If yes, please provide a copy of the RFP and consultant contract, and a copy of any reports, memorandums or studies prepared by the inclusion consultant.

7. In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would add "workforce inclusion as a factor in ranking proposals by third-party contractors."

(a) Has "workforce inclusion" been added as a factor in ranking proposals by third-party contractors?

(b) If yes, to what proposals does this requirement apply, what workforce inclusion information is required to be included in proposals, and how is it assessed in ranking proposals?

(c) Will workforce inclusion be included as a factor in ranking proposals by third-party contractors under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan? If yes, how does the Business Plan ensure this will occur?

8. Who are the members of the Joint IOU WE&T Team referenced ion page 302 of the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan? What is the Joint IOU WE&T Team's administrative structure?

9. On page 174, the SCE 2018-2025 Energy Efficiency Rolling Portfolio Business Plan asserts that "prevailing wage requirements, Disadvantaged Business Enterprise (DBE), Veteran Business Enterprise (VBE), and Women & Minorities Business Enterprise (WMBE) goals and statutes may create additional barriers for Public Sector customers."
   (a) Identify and explain the basis for this claim.
   (b) Please provide any studies, reports, data or other evidence relied upon to support this claim.
   (c) Has SCE evaluated and identified the benefits that prevailing wage, DBE and WMBE provide to the public or to Public Sector customers? If yes, please provide a copy of this evaluation.

10. On page 185, the SCE 2018-2025 Energy Efficiency Rolling Portfolio Business Plan states that a key strategy for Rural & Disadvantaged Community Outreach is to "Relax certain program parameters that hinder rural and disadvantaged community participation."
   (a) What parameters are asserted to hinder rural and disadvantaged community participation? Please provide any studies, reports, data or other evidence relied upon to support this claim.
   (b) What parameters are targeted for relaxation?
   (c) Has SCE evaluated how relaxing these parameters will affect program outcomes? If yes, please provide a copy of this evaluation.

11. On page 274, the SCE 2018-2025 Energy Efficiency Rolling Portfolio Business Plan states that SCE is working with stakeholders and regulatory agencies to implement new WE&T activities, including "increasing workforce and development training opportunities for, and within, disadvantaged communities." Please identify what stakeholders and regulatory agencies SCE is working with to increase workforce and development training opportunities for, and within, disadvantaged communities.

12. On pages 295 and 306, the SCE 2018-2025 Energy Efficiency Rolling Portfolio Business Plan states that the purpose of WE&T includes "gain skills that may lead to employment." Please explain why the purpose is described as gaining skills "that may lead to employment" rather than stating that the purpose includes gaining skills "that lead to employment"?

13. On page 300, the SCE 2018-2025 Energy Efficiency Rolling Portfolio Business Plan identifies the following as a metric: "Increased WE&T awareness and activity in disadvantaged communities."
    (a) Please explain why this outcome was chosen as a metric.
    (b) Please explain what is meant by increased WE&T "activity."
    (c) What outcome is the increased WE&T awareness and activity in disadvantaged communities supposed to achieve?
    (d) Increased WE&T awareness and activity in disadvantaged communities appears to be a strategy rather than a metric, please explain why a metric was not identified to measure the outcome of increased WE&T awareness and activity in disadvantaged communities.

14. In Table 75 on page 301 of the SCE 2018-2025 Energy Efficiency Rolling Portfolio Business Plan, what does the phrase "offerings that reach disadvantaged workers" mean?

15. On page 307, the SCE 2018-2025 Energy Efficiency Rolling Portfolio Business Plan states that "the joint IOUs also recently completed a program-funded initiative to address research questions related to training & advancement for disadvantaged workers in EE careers," but does not provide a citation to any report on this program-funded initiative. Please provide a copy of any reports, studies, memoranda, data or other documents related to the program-funded initiative to address research questions related to training & advancement for disadvantaged workers in EE careers.

16. Do energy savings and cost-effectiveness calculations for *upstream* energy efficiency programs take into account the risk of lost energy savings due to poorly installed energy efficiency measures? If yes, please describe and provide documentation showing: (a) how and where this is taken into account, (b) in what programs this is taken into account, (c) what adjustment factors (if any) were applied, and (d) the basis for the adjustment factor.

17. Do energy savings and cost-effectiveness calculations for *midstream* energy efficiency programs take into account the risk of lost energy savings due to poorly installed energy efficiency measures? If yes, please describe and provide documentation showing: (a) how and where this is taken into account, (b) in what programs this is taken into account, (c) what adjustment factors (if any) were applied, and (d) the basis for the adjustment factor.

18. Do energy savings and cost-effectiveness calculations for *downstream* energy efficiency programs take into account the risk of lost energy savings due to poorly installed energy efficiency measures? If yes, please describe and provide documentation showing: (a) how and where this is taken into account, (b) in what programs this is taken into account, (c) what adjustment factors (if any) were applied, and (d) the basis for the adjustment factor.

19. On what basis does the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan assume that increasing awareness of training opportunities would significantly reduce the number of HVAC and lighting system measures being installed by inadequately trained technicians?[3] Please provide the documents, studies, data, reports or other evidence on which this assumption is based.

20. Will ratepayer money be allowed to subsidize energy efficiency measures that are installed by contractors that do not employ adequately trained and skilled workers?

21. Please list all SCE upstream, midstream and downstream energy efficiency programs available over the past two years that impose training or skills standards, certification requirements, prevailing wage requirements, prequalification requirements, apprenticeship

[3] SCE 2018-2025 Energy Efficiency Rolling Portfolio Business Plan at p. 57.

requirements, or other workforce quality requirements. For each program that contains such requirements, please provide a description of the program and the requirements.

22. In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would initiate the following activity as a priority issue: "[a]dopting skill certification requirements for advanced lighting controls and HVAC Quality Installation and Quality Maintenance and other available skill standards and certification guidance."[4]
    (a) What skills standards or certification requirements have been adopted or initiated and to which programs do these requirements apply?
    (b) Please provide any studies, reports, memorandums, data or other documents describing the actions taken to initiate this activity.
    (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.

23. In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would adopt a responsible contractor policy for contractors that work directly with the IOUs.[5]
    (a) Was a responsible contractor policy adopted for contractors that work directly with the IOUs?
    (b) If yes, please provide a copy of the policy and identify what programs are required to comply with this policy.
    (c) If no, please provide any studies, reports, memorandums, data or other documents describing the steps taken to comply with this commitment.

[4] Advice Letter at p. 5.
[5] Advice Letter at p. 8.

24. In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would meet with WE&T stakeholders in 2016 to present their plans for the remaining UC-Berkeley Don Vial Center Workforce Guidance Plan recommendations summarized in Appendix 1 of the Advice Letter.[6]

   (a) Was a plan for the remaining UC-Berkeley Don Vial Center Workforce Guidance Plan recommendations ever presented to stakeholders?

   (b) If yes, please provide a copy of this plan and identify the stakeholders who were invited to the presentation.

25. In Appendix 1 of the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would initiate establishing prevailing wage and targeted hire goals for contractors that are preselected by the IOUs or have a direct contracting relationship with the IOUs.[7]

   (a) Were prevailing wage and targeted hiring goals established for contractors that are preselected by the IOUs or have a direct contracting relationship with the IOUs?

   (b) If yes, please provide a copy of these goals and identify what programs are required to comply with these goals.

   (c) If no, please explain why this did not happen.

26. In Appendix 2 (2015 WE&T PIP Addendum) of the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would "evaluate the impacts associated with implementing targeted hiring goals, prevailing wage and wage floors in the IOUs' Resource Programs."[8]

   (a) What is the status of this evaluation?

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[6] Advice Letter at p. 10.
[7] Advice Letter, Appendix 1 at p. 5.
[8] Advice Letter, Appendix 2 at p. 5.

(b) Please provide copies of any reports, memorandum, contracts, studies, updates, data, emails, correspondence or other documents related to this evaluation.

27. In Appendix 2 (2015 WE&T PIP Addendum) of the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would prepare the following studies: (1) "WE&T Skill Standards for IOU Resource Program," (2) "CALCTP Contractor Training Assessment," and (3) the "SCE and SDG&E Lighting Control Pilot Program."

(a) What is the status of each of these studies? If a study has not been completed, please state when the study is expected to be complete.

(b) Please provide copies of any reports, memorandum, contracts, studies, updates, data, emails, correspondence or other documents related to these studies.

28. In Appendix 1 of the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs identify numerous actions that they will explore in 2016 and beyond.

(a) Have any of these 2016 and beyond activities been initiated?

(b) If yes, please describe these activities.

(c) Which of the activities that the IOUs stated would be explored in 2016 and beyond will be initiated under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan?

29. The SCE 2018-2025 Energy Efficiency Business Plan states that it is abandoning the proposed cost-benefit analysis phase of the "Skill Standards for IOU Research Programs" study on the grounds that it was "deemed no longer viable or appropriate."[9]

(a) Have other phases of the "Skill Standards for IOU Research Programs" study been continued or completed, or was the entire study abandoned?

[9] SCE 2018-2025 Energy Efficiency Rolling Portfolio Business Plan at p. 310.

(b) If other phases of the "Skill Standards for IOU Research Programs" study have been completed or are continuing, please describe those other phases and when those phases were (or will be) completed.

(c) When and how was this study (or this phase of the study) "deemed no longer viable or appropriate"? Who made this determination?

(d) Please provide any reports, memos, data, correspondence or other documents related to the determination that this study (or this phase of the study) is no longer viable or appropriate.

(e) Please provide all reports, memos, data, findings, presentations, correspondence or other documents that have resulted from the "Skill Standards for IOU Research Programs" study.

30. In its comments on the draft Business Plans submitted during the CAEECC review, CEE recommended expressly identifying the "lack of economic incentives for contractors to invest in worker training" as a market barrier to achieving Long-Term Energy Efficiency Strategic Plan's goal of an adequately trained and engaged workforce to achieve California's economic energy efficiency potential. Please explain why the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan does not disclose or address this barrier.

31. In its comments on the draft Business Plans submitted during the CAEECC review, CEE recommended expressly identifying lost energy savings from poorly installed retrofits as a barrier to meeting each sector's energy efficiency goals. Please explain why the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan does not disclose this as a barrier to each sector's energy efficiency goals.

32. Please explain why the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan does not require energy efficiency programs to ensure that ratepayer-subsidized energy efficiency measures are installed by an adequately trained and skilled workforce.

33. Have the IOU 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 KSAs and please provide copies of any studies or reports upon which the KSAs are based.

34. Have the IOU 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.

35. How will the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan ensure that midstream and upstream programs do not subsidize energy efficiency equipment or measures that are installed by contractors that violate permit or code requirements?

36. What is meant by the compliance strategy to "simplify" the codes?[10]
    (a) What code requirements have been identified as too complex or amenable to simplification without reducing safety or energy efficiency?
    (b) Please provide any data, reports, studies or other evidentiary basis to support the assumption that simplifying the codes will increase code compliance?

37. Does SCE agree that it has the authority or discretion to support code enforcement efforts as part of its energy efficiency programs? If no, please explain.

38. Please describe how the proposed 2018-2025 Energy Efficiency Rolling Portfolio Business Plan Public Sector budget amounts were determined?

39. What is the definition of (a) downstream programs; (b) midstream programs; and (c) upstream programs?

[10] See, e.g., SCE 2018-2025 Energy Efficiency Rolling Portfolio Business Plan at page 230.

40. Does SCE intend to shift any incentive funds away from downstream programs to midstream and upstream programs during the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan? If yes, please respond to the following:

(a) Please describe the anticipated scope of this funding shift, including the amount of funds to be shifted, the sectors involved and the current downstream programs expected to be affected by this shift in funding.

(c) Please describe the purpose and justification for this funding shift, including the evidentiary basis for the justification.

(d) Provide any correspondence, notes, memos, emails, correspondence, reports, studies, or other documents related to the decision to shift incentive funds away from downstream programs to midstream and upstream programs.

(e) For budget years 2014, 2015 and 2016, what was the percentage of energy efficiency funding allocated to (a) downstream programs; (b) midstream programs; and (c) upstream programs?

(f) Under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan, what is the percentage of energy efficiency funding allocated to (a) downstream programs; (b) midstream programs; and (c) upstream programs?

41. The SCE 2018-2025 Energy Efficiency Business Plan at p. 39 proposes to "reduce costs" of energy efficiency programs "by increasing the utilization of upstream, midstream and self-service delivery channels and reducing the number of customer touch points."

(a) What are self-service delivery channels?

(b) On what basis does SCE assume these approaches will reduce costs?

(c) Will this strategy result in the elimination of, or reduction in funding for, any downstream HVAC or lighting programs? If yes, please identify the downstream programs that will be affected by this strategy.

(d) Is this strategy limited to residential programs? If it applies to other sectors, please identify which sectors will implement this strategy.

(e) Please provide any studies, reports, memoranda, data, or other documents relied upon to support the assumption that this approach will be more cost-effective.

42. In the Joint Investor Owned Utilities' November 23, 2016 Response to TURN's Data Request (DR-TURN-001), the IOUs state in Response to Question 14 (at p. 19) that the "IOUs do not intend to continue with Direct Install as a strategy for achieving energy efficiency."

(a) Is this statement still correct?

(b) Is this statement limited to residential replace-on-burnout programs, or does it apply to other programs or sectors as well?

(c) Do the IOUs expect the 2018-2025 Energy Efficiency Business Plans to result in the elimination or reduction of other Direct Install programs? Please list which direct install programs are anticipated to be eliminated or reduced.

(d) Please explain the justification for reducing or eliminating some or all direct install programs. Please provide any studies, reports, data or other evidence relied upon to support this justification.

43. Please provide the Curriculum Vitae of the supply-side Independent Evaluators.

Dated: March 20, 2017

Respectfully submitted,

/s/

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on behalf of the Coalition for Energy Efficiency