

**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 EDISON COMPANY
BY
THE COALITION FOR ENERGY EFFICIENCY
(Questions 43 – 48)**

This second set of data requests is 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 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 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 TWO (QUESTIONS 43 – 48)

43. 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 SCE “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.
44. The responses to Data Request Questions 16, 17 and 18 state that the “risk factors for degradation of the performance of energy efficiency (EE) measures are factored into the installation rates found in workpapers ... and subsequently updated in DEER as Gross Savings Installation Adjustments (GSIA). Energy savings (with deductions for installation rates) are one input into cost-effectiveness calculations, so these installation rate reductions are reflected in cost effectiveness calculations as well.”
- a. The responses to Data Request Questions 16, 17 and 18 refer to “installation rate reductions.” An “installation rate reduction” appears to be an adjustment to account for equipment that was not actually installed, not an adjustment for energy losses due to poor installation. Is that correct?
 - b. Please identify specifically each energy efficiency measure whose energy savings are discounted due to the risk of lost energy savings due to poor or improper installation. This question does not encompass reductions for incentives that were found to not actually have been installed.
 - c. For each measure identified in response to part (b) of this question, state the specific discount attributable to the risk of lost energy savings due to poorly installed measures (e.g., 10%).
 - d. For each measure identified in response to part (b) 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).
45. Response to Data Request Question 22 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 SCE 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 SCE 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.
46. Response to Data Request Question 28 states that the Business Plan presents the “IOUs’ overall 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 SCE Business Plan presents this approach.
 - b. Response to Data Request 28 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.

47. Response to Data Request Question 31 did not provide the information requested. Question 31 asks why SCE's 2018-2025 Energy Efficiency Rolling Portfolio Business Plan does not disclose or address "lost energy savings from poorly installed retrofits" as a market barrier to meeting each sector's energy efficiency goals. Please provide the substantive rationale for not including this as a barrier despite the recommendation of stakeholders.
48. Have any SCE 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? Please answer with a *yes* or *no* prior to providing any explanation. If yes, please identify the programs, measures and the identified KSAs. Please provide copies of any studies or reports upon which the KSAs are based.

Dated: May 23, 2017

Respectfully submitted,

/s/

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on behalf of the Coalition for Energy Efficiency