

Instructions: **Please make comments specific**, reference pages where appropriate, and be focused on Business Plan level strategies.

Commenter: Please Fill In This Part Of The Form				
Comment #	PA(s)	Sector	Page #	Comment
CFBF-1	All	Agriculture	General	<p><u>Link between Water and Electric Usage</u> Attached is a slide titled Electricity Rates and Water, which depicts the electricity usage changes relative to reduced surface water allocations, covering some drought years. The impact is particularly relevant for the SCE and PG&E territories, as SDG&E agricultural water sources differ from those in the other two territories. It is important to recognize that there is significant variability in load by agricultural customers, because determinative externalities – surface water and rainfall – are not under their control and predictions about those externalities must constantly be updated. Because usage can vary from one year to the next in a substantial way, measurements of usage must account for the variability and incorporate a level of flexibility that may be unique to agricultural customers.</p>
CFBF-2	All	Agriculture	General	<p><u>Water Pumping is the Common Link among Agricultural Operations</u> The PAs all recognize the diversity of the agricultural class, however, water usage and pumping equipment is central to substantially all agricultural operations, and thus is the key portal to energy savings on California farms.</p>
CFBF-3	All	Agriculture	General	<p><u>TOU Periods</u> Over the next few years, electric users will be facing significant changes to TOU periods, which will have an unknown effect on electric costs. As yet, no specific timeline is available for the transitions to new TOU periods. Depending upon how customers elect to adapt to the new periods, changes in usage could be driven by that new element.</p>
CFBF-4	All	Agriculture	General	<p><u>Regulatory Changes</u> Agricultural customers statewide are facing significant regulatory mandates affecting their operations in labor and water management. Because such mandates drive inputs into electricity usage in this sector, usage is driven by compliance with such requirements and may impact abilities to make or apply operational/equipment changes.</p>

CFBF-5	All	Agriculture	General	In response to previous comments on agricultural sector business plans, reference has been made by all PAs to the legalization of marijuana. Because it has been a product grown in the shadows and illegally, careful consideration should be given to the development of benchmarks for such operations and the administration of program funding to such operations. Balanced review and thought must be afforded between such new entrants to the sector and traditional producers who have undertaken continuing efforts to increase the efficiency at which all inputs are used to grow crops.
CFBF-6	SCE	Agriculture	48	See attached chart to augment importance of drought impact on customers.
CFBF-7	SCE	Agriculture	51	CFBF is very concerned about the restrictions being placed on available programs for pumping equipment and assessment of the equipment's functionality. As noted in Comment CFBF-2, pumping is the common link in this sector and the entry to other efficiency opportunities. Bringing energy efficiency options to agricultural customers should be supported.
CFBF-8	SCE	Agriculture	50	<u>Education</u> It is commendable to incorporate the knowledge of other parties who are connected with agricultural services. It should be recognized many such partners operate with limited resources and funding. Coordination with other entities must be accomplished in a manner that streamlines their involvement in order to be accomplished at minimum impact to such partners.
CFBF-9	PG&E	Agriculture	13	We support and believe that it makes sense to keep VFDs and pump measures as a dominant element of agricultural electric energy efficiency. As explained in other comments, that equipment is common to all types and sizes of farms in the State. VFDs provide benefits to the system, as well as on-farm energy usage, but are out of reach for many customers. With increasing regulatory costs in many other areas, incentives for pump measures are important for improving efficiency in this sector.

<p>CFBF-10</p>	<p>PG&E</p>	<p>Agriculture</p>	<p>15</p>	<p>Item 4 notes that smaller operations do not have sufficient resources to prioritize energy efficiency. The Statement encompasses several existing challenges for providing pathways to connect smaller operations with energy efficiency opportunities. First, large operations have dedicated account representatives who will direct them to savings opportunities, facilitate applications and ensure that programs are completed. Secondly, the process for energy efficiency measures can become overly complex before, during and after completion of the projects. To reach smaller operations, measures have to be simplified to interest customers in investing in the time to participate in programs. Finally, the amount of savings available needs to be commensurate with customer time and investment. Energy analysis is not easy and with the complexity of customers' bills, assessing whether or not it is worthwhile to invest the time to participate in programs can require an amount of time that's disproportionate to the benefit to the customer.</p>
<p>CFBF-11</p>	<p>PG&E</p>	<p>Agriculture</p>	<p>14</p>	<p>The types of crops grown in California is driven by a large variety of factors. For purposes of this Business Plan and the next several, the drought, surface water availability, regulatory changes and the world economy will impact crop choices more directly and immediately than climate change (referenced in Item 1). Such factors should be acknowledged. However, no matter what crops are grown, they all need access to water and a way to deliver water.</p>
<p>CFBF-12</p>	<p>PG&E</p>	<p>Agriculture</p>	<p>15, 17</p>	<p><u>Data</u> Access to data is essential and important to recognize its place in delivering energy efficiency opportunities. Agriculture is engaged in utilizing data to more effectively use resources. Focus on utilizing technology should be on labor-saving opportunities to account for limitations in this sector, such as labor availability. Many applications of temperature monitoring have been useful and can reduce travel for employees during odd hours of the night. As in other applications, usefulness is closely aligned to ease of operation and management of the tool.</p>
<p>CFBF-13</p>	<p>PG&E</p>	<p>Agriculture</p>	<p>36</p>	<p>A decline in the number of agricultural customers does not necessarily mean a drop in demand. If larger entities are acquiring smaller operations and the acreage stays the same, there's no basis to assume demand would necessarily decrease. The language in the parentheses should be struck.</p>

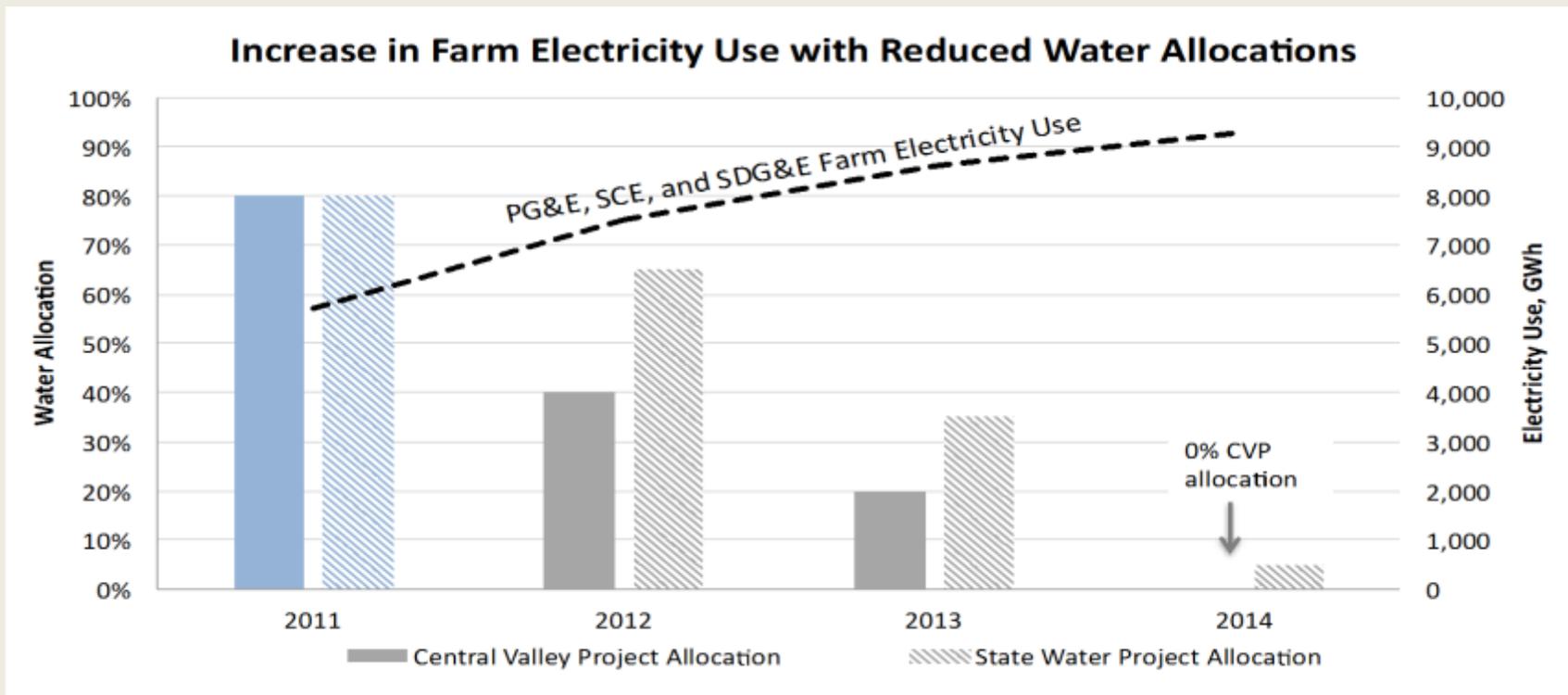
Commenter Name: Karen Mills

Commenter Affiliation: California Farm Bureau Federation

Date: 11/21/16

ELECTRICITY RATES AND WATER

Farmers and ranchers must supplement the loss of surface irrigation water by pumping groundwater, which is an energy intensive process.



(Does not include 2015 electricity usage data)