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"To enrich lives through effective and caring service"

November 22, 2017

Advice No. #6-E-G-A
(CPUC Identification #940)

Public Utilities Commission of the State of California

SUBJECT: SUPPLEMENT: COMPLIANCE FILING REGARDING SOUTHERN CALIFORNIA REGIONAL ENERGY NETWORK 2018 ENERGY EFFICIENCY PROGRAM PORTFOLIO CHANGES AND FUNDING REQUEST

The Southern California Regional Energy Network (SoCalREN) submits this Advice Letter to the California Public Utilities Commission (Commission), in compliance with Ordering Paragraph 4 of Decision (D.) 15-10-028 and the Administrative Law Judges' Ruling Modifying Schedule, issued June 9, 2017 ("Modifying Schedule Ruling") in proceeding A.17-01-013 (et al.), which restored the annual budget advice letter filing deadline of September 1, 2017.

The Commission's direction for this Supplement created a unique shift from conventional portfolio design, which is dominated by market transformation, sector focus, or mass-stakeholder collaborative constructs followed by a savings calculus. Instead, the Commission directed Program Administrators (PAs) to reverse the portfolio development strategy, ***backing into*** *design from a specific cost-effectiveness threshold. This runs somewhat counter to the framework established under D.12-11-015 that established the scope of REN Programs; however, the SoCalREN appreciates this disruption for the critical doors it has opened. This approach: 1) promotes design flexibility and access; (2) highlights a paradox in non-IOU portfolios that arguably perpetuates a faulty interpretation of the cost-effectiveness of non-IOU portfolios; and (3) has liberated the SoCalREN to use equal candor and innovation in addressing the stubborn immutability of Single Family performance. This Supplement speaks more directly to these matters below under "Paragraph E: Future Scenario Considerations".*

Purpose

This supplemental filing provides supplementary information to SoCalREN's Advice No. 6-E-G, filed on September 1, 2017. This supplement has been prepared in response to Energy Division's request that SoCalREN file a supplement to Advice Letter 6-E-G, which includes:[1]

- New cost-effectiveness showings using Cost Effectiveness Tool (CET) v18.1, released September 25, 2017, and including interim GHG adder.
- 2018 goals as established in D.17-09-025
- In addition to the use of the above updated parameters, SoCalREN's supplemental filing must also include additional Portfolio scenarios, supported by outputs from the CET version 18.1, in order to demonstrate possible approaches to improving and realizing portfolio cost-effectiveness.

SoCalREN filed Advice Letter 6-E-G on September 1, 2017 using CET v18.0 (2017 Avoided Cost version), which was the approved version at the time of the September 1st filing. Therefore, SoCalREN utilized the most current version available at the time of filing to determine the TRC & PAC for SoCalREN's 2018 Portfolio. Subsequently, the new GHG adder was adopted in D.17-08-022 for use in the avoided costs calculator and was released September 25, 2017. The Commission adopted 2018 energy savings goals established in D.17-09-025, also issued after the PAs' September 1st budget compliance filings were submitted. The SoCalREN now submits this supplemental advice letter, in order to (1) adjust values using CET v18.1 (2018 Avoided Cost version) and incorporating parameters newly-adopted by the Commission, (2) proffer alternative scenarios, and (3) provide the Energy Division an updated portfolio cost-effectiveness for the SoCalREN 2018 portfolio.

Background

The SoCalREN was authorized in 2012 by the Commission to harness the resources and unique capabilities of public agencies to deliver innovative and effective energy efficiency solutions. Programs successfully underway align with the recommended local government actions detailed in the Energy Efficiency Strategic Plan and are on track to achieve deep energy savings. A rigorous 2017 assessment process and design adjustments have increased performance of the SoCalREN Multifamily Program by roughly 2100% from its 2016 savings. The SoCalREN has built the capacity and expertise essential for public agencies to meet California's energy goals, and has even been recruited by incumbent IOUs to support Public

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[1] Energy Division Letter to SoCalREN 2018 on Budget, dated October 30, 2017.

Agency activities under their Local Government Partnerships. SoCalREN's original 2018 Annual Budget Advice Letter (ABAL) 6-E-G detailed the SoCalREN program offerings for 2018 based on implementing the current authorized programs throughout 2018. This supplemental 2018 ABAL 6-E-G-A deviates from its original 2018 ABAL and reflects new scenarios - three (3) in total - that would modify the SoCalREN program offerings for 2018 based on implementing improved and achievable portfolio cost-effective strategies. SoCalREN provides in Attachments A, B, and C the results of these additional scenarios for Commission Staff reference and consideration.

Once program administrator Business Plans are approved in proceeding A.17-01-013 (et al.), a subsequent compliance filing will be filed in March 2018 as directed in the Modifying Schedule Ruling.[2]

Discussion

SoCalREN submits in this supplemental advice filing responses to Energy Division Staff's direction per the letter received on October 30, 2017.[3] SoCalREN has prepared a baseline scenario and two (2) additional scenarios using CET v18.1 (output files attached). The two (2) additional scenarios provide new approaches to increasing portfolio cost-effectiveness by optimizing the current portfolio of CPUC approved programs. The baseline portfolio scenario provides a "status quo" comparison with no changes to the original filed Advice Letter portfolio of programs, adjusted for the adoption and application of the CET v.18.1. The two additional scenarios submitted within this filing show how changes in program strategies can positively affect overall portfolio performance and cost-effectiveness.

Scenario 1 reflects the simple discontinuation of *prima facie* non-cost-effective programs. Scenario 2 reflects the discontinuation of (*prima facie*) non-cost-effective programs while optimizing cost-effective programs which incorporate pay for performance incentive strategies to generate driving deeper energy savings achieved. SoCalREN also has worked on scenarios which could provide **greater cost-effective portfolios** than Scenario 1 & 2, yet due to time constraints, SoCalREN was unable to include them in this filing. We look forward to further developing these new scenarios as part of our 2018 Business Plan RFA process, and the Commission's further consideration.

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[2] Administrative Law Judges' Ruling Modifying Schedule, A.17-01-013 (et al.), issued June 9, 2017, p. 6.
[3] Energy Division Letter to SoCalREN 2018 on Budget, dated October 30, 2017.

Portfolio scenario parameters, assumptions, and applicable budget modifications are detailed below for each portfolio scenario modeled. Justification for Scenario 2, portfolio uploaded to CEDARs, is also provided. Detailed CET output files from all modeled scenarios in CET v18.1 are provided as reference in Attachment A, B and C.

A. SoCalREN Baseline Scenario: Recalculate existing using CET v18.1

The 2018 Baseline Scenario provided in this filing reflects a continuation of the original programs approved in D.14-10-046 from the 2013-2014 cycle (with slight modifications, as detailed in SoCalREN's original 2018 ABAL filing Advice Letter 6-E-G) adjusted for application of CET v18.1, released September 25, 2017, which includes the interim GHG adder. Table 1 and 2 below outline the TRC values and the Goal Attainment Savings values attributed to the 2018 SoCalREN baseline scenario.

Table 1. SoCalREN Baseline Scenario Cost-Effectiveness Calculation[4]

CET Output (Version 18.1)		
Portfolio TRC	**Single Family Program TRC**	**Multifamily Program TRC**
0.44	0.14	1.25

Table 2. SoCalREN Baseline Scenario Savings Goal Attainment[5]

CET Output (Version 18.1)		
Goal Attainment KWh	**Goal Attainment KW**	**Goal Attainment Therms**
8,304,733[6]	2,049	227,802

1) Baseline Scenario - Budget Assumptions

Baseline scenario remains unchanged to the budget filed in SoCalREN's 2018 ABAL 6-E-G. No budget modifications were addressed in this scenario.

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[4] Please see Attachment A_SoCalREN Baseline Scenario
[5] *Ibid.*
[6] This calculation does <u>not</u> include SoCalREN performance and delivery under its Public Agency Upgrade Program, which by example is projected in 2017 to generate 12.5 Million kWh in energy savings. Current rules of attribution result in SoCalREN ***solely*** having to claim the cost of this Program without the ability to claim any of the savings (which is assumed by Southern California Edison, free of any ownership of Program cost).

B. SoCalREN Scenario 1: Discontinue Non-Cost-Effective Programs

Scenario 1 reflects the discontinuation of non-cost-effective programs and the re-allocation of funds to cost-effective programs. Scenario 1 assumes SoCalREN's discontinuation of the Single Family Home Upgrade program, with funding re-allocated to the Multifamily program. Also, this scenario reflects "status quo" as filed in its 2018 ABAL 6-E-G for Public Agency and Financing sub programs. Table 3 and 4 below outline the TRC values and the goal attainment savings values attributed to the 2018 SoCalREN **Scenario 1**.

Table 3. SoCalREN Scenario 1 Cost-Effectiveness Calculation[7]

CET Output (Version 18.1)		
Portfolio TRC	**Single Family Program TRC**	**Multifamily Program TRC**
0.55	------	1.19

Table 4. SoCalREN Scenario 1 Savings Goal Attainment[8]

CET Output (Version 18.1)		
Goal Attainment KWh	**Goal Attainment KW**	**Goal Attainment Therms**
10,236,357[9]	2,064	255,143

1) Scenario 1 - Budget Assumptions

Scenario 1 assumes program budget reductions for programs which have been deemed either unsuccessful in achieving cost-effective savings, or where objectives have been fully satisfied and exhausted over the bridge years supporting development of the 'rolling portfolio' cycle. SoCalREN continues to demonstrate a continued focus on optimizing SoCalREN's existing portfolio and establishing an escalating path of energy savings, resourcefulness, and cost-effectiveness.

The overall proposed 2018 Residential & Business Programs budget remains unchanged as the Baseline Portfolio scenario, however sub-program budgets have been adjusted to move funding

[7] Please see Attachment B_SoCalREN Scenario 1
[8] *Ibid.*
[9] See footnote 4 above regarding calculus of cost vs. energy "earnings" (or savings) in non-IOU and the SoCalREN Portfolios.

to cost-effective programs, specifically the Multifamily program. The scenario reflects a Multifamily program budget increase of $2,000,000 compared to the Multifamily program budget in the baseline scenario, as a result of shifting Residential Home Upgrade and Flex Path funding from these under-performing programs to the high-performing Multifamily initiative. The Flex Path Incentives program has been defunded primarily due to downward-spiraling cost-effectiveness year over year. The Multifamily program budget increase is due to a strong market acceptance, cost-effective TRC, and significant reductions in implementation costs, allowing more funds to be allocated to customer incentives. Low Income Single Family Residential was not impacted and remains the same. The original ABAL also included budget reductions in Local Marketing and Outreach, Green Building Labeling, and Contractor Outreach and Training to allow increased funding for program activities in Multifamily, which has a significantly higher TRC than the Single Family resource program. These cost reductions present a portfolio optimization project started in January 2017 by SoCalREN, with demonstrated success – an approximate 2100% increase in energy savings and a significant improvement in TRC.

The overall Southern California Regional Energy Center (SoCalREC, aka. Public Agency), Workforce Development, and Financing budgets are unchanged as originally filed in SoCalREN’s 2018 ABAL 6-E-G

C. SoCalREN Scenario 2: Multifamily Program with Tiered Incentives

Scenario 2 also reflects the discontinuation of non-cost-effective programs and re-allocation of funds to programs with demonstrated cost-effectiveness and programmatic performance, yet also incorporates more aggressive program strategies to further increase cost-effectiveness. **Scenario 2** assumes SoCalREN’s Single Family Home Upgrade program is discontinued with resources now allocated to the Multifamily program. This scenario pursues even greater multifamily energy savings, however, through a tiered incentive structure providing larger incentives for projects incorporating comprehensive measures that produce greater savings per multifamily project. Further, this scenario adds a 50% incentive paid cap for each project. **Scenario 2** also reflects “status quo” as filed in its 2018 ABAL 6-E-G for its Public Agency and Financing sub-programs. Table 5 and 6 below outline the TRC values and the Goal Attainment Savings values attributed to the 2018 SoCalREN Portfolio **Scenario 2**.

Table 5. SoCalREN Scenario 2 Cost-Effectiveness Calculation[10]

CET Output (Version 18.1)		
Portfolio TRC	**Single Family Program TRC**	**Multifamily Program TRC**
0.72	------	1.40

Table 6. SoCalREN Scenario 2 Savings Goal Attainment[11]

CET Output (Version 18.1)		
Goal Attainment KWh	**Goal Attainment KW**	**Goal Attainment Therms**
14,400,000[12]	2,642	326,583

1) Budget Assumptions

Scenario 2 includes the same budget assumptions as **Scenario 1**.

D. Scenario Submitted

Based on the results and the output files using CET v18.1, SoCalREN believes **Scenario 2** provides the best approach to improving and realizing a continued path to increased Portfolio cost-effectiveness. This approach mitigates continuing strategies not cost-effective for ratepayers, or optimally effective in meeting the State's bold energy goals. **Scenario 2** has been submitted to CEDARs for Commission consideration and confirmation of submittal is located in Attachment D of this filing.

E. Future Scenario Considerations

Due to time constraints SoCalREN limits its submittal to three (3) scenarios. The work required for scenario development and this Supplement identified other key modifications to consider, which may stimulate yet even greater return on investment of ratepayer dollars under the Energy Efficiency Portfolio. This deeper plan development, scenario-building and calculation requires more detailed analyses and analytics which the current timeframe could not accommodate. We urge the Commission to create a standing path for increasing levels of savings-based change and Portfolio-building, as the Supplement directive stimulated our

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[10] Please see Attachment C_SoCalREN Scenario 2
[11] *Ibid.*
[12] See footnote 4 above regarding calculus of cost vs. energy "earnings" (or savings) in non-IOU and the SoCalREN Portfolios.

thinking on how other program design modifications could further optimize portfolio cost-effectiveness via targeted measure groupings, market supply chain approaches, and financing options to drive more comprehensive projects.

For example, the SoCalREN is confident that its current Portfolio could be measured as an "attainment" (~1.0) portfolio TRC provided it was able to receive direct or "ghost" attribution savings for its Public Agency Sector program which, for purposes of SoCalREN cost-effectiveness, is currently treated as a non-resource program. In brief, the SoCalREN is burdened on paper with assuming all the costs and expenses of that Program, without a concurrent ability to claim the energy savings measurably generated by it. Instead, the SoCalREN generates the savings, but only serves as a pass-through for those savings to migrate to and be claimed by the incumbent IOU. The IOU, however, is not compelled to factor the program's cost. Given greater time to identify the best solution for assessing "ghost" attribution savings, programs currently labeled non-resource could provide improvements to, and attainment levels for, Portfolio cost-effectiveness.

Also, while SoCalREN presented Scenarios 1 & 2 with no Single Family programs, the intent of SoCalREN is to develop single family cost-effective solutions in 2018 through an RFA-RFP process. We do not believe that the State's goals are best served by alienating or sidelining the Single Family market, despite its obvious challenges. The IOUs have voiced a preference to pursue mid- and upstream solutions; and we support and encourage this approach by them. The IOUs may be more (but not exclusively) suited for this role. At the same time, the SoCalREN posits that non-IOU PAs may be better suited to innovate downstream programs and deliver greater savings than the history of residential programs illustrates. This approach is consistent with D. 12-11-015, which assigned to RENs program options where IOUs could not or would not operate.

We have used the 2017 cycle to develop potential downstream solutions, and the SoCalREN plans to work collaboratively with our IOU partners once the Business Plans have been approved to identify gaps in the Single Family residential offerings where SoCalREN can implement a cost-effective program. SoCalREN plans to have a Single Family cost-effective pilot implemented in 2019 or sooner.

2018 Proposed Budget

The scenarios submitted utilized modifications to program budgets which did not modify the larger subprogram budgets listed below in Table 7. For SoCalREN's original 2018 ABAL, filed on September 1, 2017, the subprogram budget for the Public Agency Sector was increased and the Financing budget was reduced. This reduction is due to SoCalREN's focus on leveraging existing statewide financing and Commercial PACE offerings while migrating away from Loan Loss Reserve (LLR) style financing offerings (a mechanism we contend imparts limited impact). The SoCalREN will continue to create new financing offerings, leveraging existing private markets and Commercial PACE programs. SoCalREN is dedicated to finding cost-effective financing solutions for Public Agency Sector customers, Multifamily property owners, and Residential customers to help drive a greater adoption of deep, comprehensive retrofits.

Table 7. Subprogram Approved and Proposed Budget Comparison

Subprogram	2017 Approved Budget	2018 Proposed Budget	Difference
A: Residential & Business Programs	$10,577,552	$10,553,000	-24,552
B: Financing	$2,779,250	$2,347,000	-432,250
C: SoCalREC (Public Agency)	$8,294,198	$8,751,000	+456,802
Total SoCalREN	$21,651,000	$21,651,000	

Last and per Energy Staff direction,[13] the SoCalREN includes in this Advice Letter the updated "CEDARS Filing Confirmation" which reflects 2018 SoCalREN Scenario 2 and can be found in Attachment D.

Funds Requested

SoCalREN has been approved by CPUC a total budget of $21,651,000 for 2018 per D.15-10-028 Figure 6. A summary budget is provided below.

Budget by Subprogram

Subprogram	2018
A: Residential & Business Programs	$10,553,000
B: Financing	$2,347,000
C: SoCalREC (Public Agency)	$8,751,000
Total SoCalREN	$21,651,000

2018 Goals as Established in D.17-09-025

[13] Per Energy Division Staff direction received at the July 25, 2017 PCG Meeting.

While the 2018 goals established in D.17-09-025 do not apply to SoCalREN directly, they are provided in response to Commission Staff's request made in the Energy Division Letter to SoCalREN 2018 on Budget, dated October 30, 2017. Tables 8, 9 and 10 reflect the adopted energy savings goals established in D.17-09-025 and represent SoCalREN's partner IOU service territory values, specifically Southern California Edison (SCE) and Southern California Gas Company (SoCalGas).

Table 8. SCE Territory Annual Electric Savings Goals (GWh)[14]

Southern California Edison		
Incentive Programs	Codes & Standards	Total
409	552	961

Table 9. SCE Territory Annual Demand Savings Goals (MW)[15]

Southern California Edison		
Incentive Programs	Codes & Standards	Total
82	124	206

Table 10. SoCalGas Territory Annual Gas Savings Goals (MMTherms)[16]

Southern California Gas Company		
Incentive Programs	Codes & Standards	Total
20	26	46

Protests

Anyone may protest this Advice Letter. The protest must state the grounds upon which it is based. The protest must be made in writing and received by the Commission within 20 days of the date this Advice Letter was filed with the Commission. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

Public Utilities Commission
CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

[14] D.17-09-025, p. 37.
[15] *Ibid, p. 38.*
[16] *Id, p. 39.*

Copies of the protest should also be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. It is also requested that a copy of the protest be sent by email to address shown below on the same date it is mailed or delivered to the Commission.

Demetra J. McBride
Environmental Initiatives Division Manager
County of Los Angeles Office of Energy +
Environment
1100 North Eastern Avenue
Los Angeles, CA 90063-3200
(323) 881-3971
DMcbride@isd.lacounty.gov

Effective Date

Per D. 14-10-046 this Advice Letter is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to General Order (GO) 96-B. SoCalREN respectfully requests that this Advice Letter be made effective on December 22, 2017, which is 30 calendar days after the date filed.

Notice

A copy of this Advice Letter is being sent to the Commission's service lists for R.13-11-005 and A.17-01-013 (et al.). For changes to R.13-11-005 or A.17-01-013 (et al.) service lists, please contact the Commission's Process Office at 415-703-2021 or by electronic mail at process_office@cpuc.ca.gov.

Respectfully Submitted,

/s/ Demetra J. McBride

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Attachment A

CET (Version 18.1) SoCalREN Baseline Scenario Output Files

Please see file SoCalREN Baseline Scenario_CET Output.xls

Attachment B

CET (Version 18.1) SoCalREN Scenario 1 Output Files

Please see file SoCalREN Scenario 1_CET Output.xls

Attachment C

CET (Version 18.1) SoCalREN Scenario 2 Output Files

Please see file SoCalREN Scenario 2_CET Output.xls

Attachment D

CEDARS Filing Confirmation

The Appendix is also available on CEDARS at this link:

https://cedars.sound-data.com/

Supplemental information on SoCalREN's portfolio, including Program Implementation Plans and forecast data, is available at the same link.

CEDARS FILING SUBMISSION RECEIPT

The SCR portfolio filing has been submitted and is now under review. A summary of the filing is provided below.

PA: Southern California Regional Energy Network (SCR)

Filing Year: 2018

Submitted: 09:50:50 on 21 Nov 2017

By: Sheena Tran

Advice Letter Number: 6-E-G-A

* Portfolio Filing Summary *

- TRC: 0.7172
- PAC: 0.8349
- TRC (no admin): 1.6272
- PAC (no admin): 2.3922
- RIM: 0.8349
- Budget: $21,651,000.00

* Programs Included in the Filing *

- SCR-EUC-A1: Local Marketing and Outreach
- SCR-EUC-A2: Green Building Labeling
- SCR-EUC-A3: Flex Path Incentives
- SCR-EUC-A4: Contractor Outreach and Training
- SCR-EUC-A5: Multifamily Incentives
- SCR-EUC-A6: Low-Income Single Family Residential
- SCR-FIN-B1: Public Building Loan Loss Reserve
- SCR-FIN-B2: EUC Residential Loan Loss Reserve
- SCR-FIN-B4: Non-Residential PACE
- SCR-FIN-B5: Public Agency Revolving Loan Fund
- SCR-REC-C1: Aggregated Regional Procurement
- SCR-REC-C2: Integrated Comprehensive Whole Building Retrofits
- SCR-REC-C3: Regional Climate Action and Energy Plan
- SCR-REC-C4: Water-Energy Nexus
- SCR-REC-C5: Regional Energy Project Tracking and Permitting (CEEPMS)
- SCR-REC-C6: Marketing, Outreach, Education, and Training
- SCR-REC-C7: Workforce Development

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY
ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. Southern California Regional Energy Network (#940)

Utility type:

☒ ELC ☒ GAS

☐ PLC ☐ HEAT ☐ WATER

Contact Person: Demetra McBride

Phone #: (323) 881-3971

E-mail: DMcbride@isd.lacounty.gov

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
PLC = Pipeline HEAT = Heat WATER = Water

Tier: ☐1 ☒2 ☐3

Advice Letter (AL) #: 6-E-G-A

Subject of AL: Supplement: Compliance Filing Regarding Southern California Regional Energy Network 2018 Energy Efficiency Program Portfolio Changes and Funding Request

Keywords (choose from CPUC listing): Compliance, Energy Efficiency

AL filing type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.15-10-028

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL N/A

Summarize differences between the AL and the prior withdrawn or rejected AL[1]: N/A

Resolution Required? ☒ Yes ☐ No

Requested effective date: 12/22/2017 No. of Tariff Sheets: N/A

Estimated system annual revenue effect: (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed[1]: Supporting Information for the SoCalREN's energy efficiency programs in compliance with D.15-10-028

Pending advice letters that revise the same tariff sheets:

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Ave., 4th Flr.
San Francisco, CA 94102
EDTariffUnit@cpuc.ca.gov

Utility Info (including e-mail)
Demetra J. McBride
Environmental Initiatives Division Manager
County of Los Angeles Office of Energy + Environment
1100 North Eastern Avenue
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[1] Discuss in AL if more space is needed.