

Southern California Edison
SCE EE Business Plan A.17-01-013

DATA REQUEST SET A.17-01-013-ORA-SCE-001

To: ORA
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Title: Senior Manager
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Question 08:

For each activity in (7) above, please provide a reference from your business plan or associated application filings and testimony that explains “why the program activity must be conducted by utility personnel” (D.16-08-019 at p. 73).

Response to Question 08:

SCE's response to this data request is based on the full quotation from D. 16-08-019 at page 73 which states "Basically, all program design and delivery would be presumed to be conducted by third parties, unless the utility specifically made a case for why the program activity must be conducted by utility personnel". SCE's response is also based on a similar quotation from page 74 of D. 16-08-019 which states "In cases where utilities propose to continue staffing program design and/or delivery functions with utility personnel, they should explain why this continues to be necessary". SCE interprets these full quotations to require the utility to explain why program design and/or delivery activity would continue to be conducted by utility personnel to the extent the utility makes such a proposal. SCE's Business Plan does not contain references to explain why program design and delivery activity "must be conducted by utility personnel" because SCE did not make a specific proposal to continue such program design and delivery activities.

In its Business Plan, SCE has included a proposal to transition a minimum of 60 percent of its budgeted portfolio to be third-party designed and delivered by the end of 2020. SCE is not able to specify which program design and/or delivery functions it will continue to perform until it conducts its third-party solicitations and determines what programs and activities third parties are willing and able to do. As SCE noted in its Business Plan, "If there are sectors for which SCE receives little to no interest, SCE will assess alternative solutions to achieve savings goals for those sectors. Alternative solutions could include more targeted solicitations for particular programs or programs implemented by SCE" (SCE Exhibit SCE-02 Amended EE Rolling Portfolio Business Plan for 2018-2025) at p. 19). The administrative and support functions identified in SCE's response to Question 7, are not the "program design and/or delivery functions" that D.16-08-019 requires that the utility justify to be conducted by utility personnel. In D.16-08-019, the Commission recognizes that there are certain "'back office' types of work" and "other functions that will require utility personnel in a portfolio design and coordination role."