ORA

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California Public Utilities Commission

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ORA DATA REQUEST No. ORA-A1701013-PGE001
CPUC Docket A.17-01-013, et al

Date: March 1, 2017

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Re: **Data Request No. ORA-A1701013-PGE001**
Response requested: March 15, 2017

INSTRUCTIONS

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. For any questions, email the ORA contact(s) above with a copy to the ORA attorney.

Each Data Request is continuing in nature. Provide your responses as they become available, but no later than the due date noted above. If you are unable to provide a response by this date, notify ORA as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each Data Request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. 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.

As to any Data Request consisting of a number of separate subdivisions, or related parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate data request.

If a request, definition, or an instruction, is unclear, notify ORA as soon as possible. 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.

Any objection to a Data Request should clearly indicate to which part or portion of the data request the objection is directed. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it.

DEFINITIONS

A. As used herein, the term "you," "your(s)," "PG&E" mean Pacific Gas and Electric Company and any and all of its respective present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.

B. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these data requests any information or documents which might otherwise be considered to be beyond their scope.

C. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these data requests any information or documents which might otherwise be considered to be beyond their scope.

D. The term "communications" includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.

E. The term "document" shall include, without limitation, all writings and records of every type in your possession, control, or custody, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand.

F. "Relate to," "concern," and similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of these data requests.

G. When requested to "state the basis" for any analysis (including studies and workpapers), proposal, assertion, assumption, description, quantification, or conclusion, please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, and analysis known to you which you believe to support the analysis, proposal, assertion, assumption, description, quantification, or conclusion, or which you contend to be evidence of the truth or accuracy thereof.

DATA REQUEST

Business Plan Metrics

1. What analysis did you perform to determine that *metrics* provided for each sector of the business plan address problems and market barriers identified in those sectors? Please provide all documents and workpapers showing analysis performed in the development and selection of appropriate metrics for the following business plan chapters:
    a. Residential
    b. Commercial
    c. Public Sector
    d. Industrial
    e. Agricultural
    f. Cross-cutting
2. What analysis did you perform to determine the proposed short, medium and long-term *targets* provided for each metric are reasonable and will indicate where your performance falls "on the continuum of success to failure" (D.15-10-028 at p. 54). Please provide all documents and workpapers showing analysis performed in the development and selection of appropriate targets for the following business plan chapters:
    a. Residential
    b. Commercial
    c. Public Sector
    d. Industrial
    e. Agricultural
    f. Cross-cutting
3. How did specific state goals and objectives – such as those in SB 350, AB 802, and the Energy Efficiency Strategic Plan – inform your analysis in setting short, medium and long term success targets?
4. How did analysis of market conditions inform your analysis in setting short, medium and long term success targets?
5. How did the relative success or failure of previous strategies to address market segments inform your analysis in setting short, medium and long term success targets?
6. How did you assess the likely rate of market adoption or penetration for your EE intervention strategies?
    a. Describe the assessment for strategies pertaining to new markets.
    b. Describe the assessment for strategies pertaining to mature markets.
    c. Describe the assessment for strategies pertaining to hard to reach markets.

Utility Implementation Activities

7. Please provide a list of all activities, including administration and support, proposed in your business plan that will not be bid out in compliance with the third-party definition in D.16-08-019.
8. 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).
9. For each activity in (7), please provide all documents and analysis used to determine that you can perform the activity at a lower cost to ratepayers than through solicitation to third-parties.
10. Please provide all documents and analysis that you performed to determine the each activity in (7) above is an essential program element that cannot be "proposed, designed, implemented, and delivered" by a third-party program (D.16-08-019, Ordering Paragraph (OP) 10).

Utility Procurement Plans

11. How do propose to structure your third-party solicitations?

   a. Will you conduct sector-specific third-party solicitations?
   b. Will you conduct cross-sector third-party solicitations?
   c. Specify the advantages of your solicitation structure over alternative solicitation strategies.
12. Will you seek to contract with a single, third-party implementer to design and implement a single intervention strategy?
   a. If so, why?
   b. If not, why?
13. Will you impose contract term limitations on contracts with third-party implementers?
   a. If so, why?
   b. If so, what do you expect those terms to be?
14. Please provide a detailed schedule of all solicitations in which energy efficiency (EE) programs or services may be procured between January 1, 2017 and December 31, 2020.
   a. For each solicitation, please provide the following information:
      i. The name of the solicitation
      ii. Procurement authorization, if applicable (please cite to a specific Commission decision, ruling, or resolution)
      iii. Solicitation Protocols, if available.
      iv. Solicitation objectives
      v. Eligibility criteria
      vi. Proposed budget
      vii. Proposed cost recovery mechanism
      viii. Energy savings targets
      ix. Evaluation methodologies
      x. Solicitation start and end dates
      xi. Contract start, end date, and any applicable extension terms (in months)
      xii. Projected contract term (in months) for winning bids
      xiii. Pro-forma contracts, if available
   b. For each solicitation, please detail how qualitative offer values will be evaluated and weighed against quantitative values.
15. Please provide all documents and analysis you performed to determine your portfolio needs for new programs
16. Please provide all documents and analysis you performed to determine that your procurement plan will meet the needs identified in (15) above.

Third-Party Transition

17. How do you propose to manage the transition to the Commission's third-party policy outlined in D.16-08-019?
18. Please provide a timeline for all utility implementation activities that will be outsourced to third-parties in the period January 1, 2017 to December 31, 2020?
19. Please provide a timeline for all third-party implementation activities that will commence in the period January 1, 2017 to December 31, 2020?
20. Please provide all documents and analysis you performed showing that the transitions in (18) and (19) above will not result in disruptions to customers.
21. What is your interpretation of the date by which you must comply with OP 11 of D.16-08-019?

Portfolio Budget

22. How did you forecast your portfolio budget? Please provide all models, documents, and analysis that informed your budget forecast.
23. What analysis did you perform to determine the reasonableness of your portfolio budget?

24. Please provide references from your business plan to the narrative description of any portfolio budget changes from your existing portfolio and the justifications for those changes as required in D.15-10-028, Appendix 3.
25. Please complete the following table to reflect your approved and proposed portfolio budget according to the CPUC-approved accounting categories:

Program Year	Administration	Marketing	Direct Implementation	Incentives	EM&V	Other Administrators	Total Portfolio Budget
2015							
2016							
2017							
2018							
2019							
2020							
2021							
2022							
2023							
2024							
2025							

Administrative Costs

26. What analysis did you perform to determine the reasonableness of your administrative costs?
27. How did you forecast your administrative costs? Please provide any models, documents and analysis used.
28. Please provide a narrative description of changes to administrative costs from your existing administrative costs along with justifications for those changes.
29. Describe how your proposed administrative costs are consistent with the requirements in D.09-09-047 OP 13, that administrative costs for utility energy efficiency programs (excluding third party and/or local government partnership budgets) be limited to 10% of total energy efficiency budgets? If not, explain why.
30. Please complete the following budget accounting table to reflect the administrative costs (separate from PA costs to administer these programs) of your third party and local government programs:

Program Year	Third Party Program Administrative Budget	Local Government Program Administrative Budget	PA Administrative Budget	Total Portfolio Administrative Budget
2015				
2016				
2017				
2018				
2019				
2020				
2021				
2022				
2023				
2024				
2025				

Questions in the following four sections on PA statewide program proposals refer to the "Statewide Administration Approach" proposed jointly by PG&E, SCE, SoCalGas, and SDG&E in their whitepaper authored on January 17, 2017 ("Whitepaper").

Statewide Lead Selection

31. Which non-utility entities were considered in the determination of statewide program administrator (PA) lead roles?
    a. List and describe any Lead PA proposals received by the utilities from non-utility entities.
    b. Explain why these non-utility proposals were disqualified.

Statewide Cost & Funding Allocations

32. What are the utilities' plans to allocate statewide program costs by service area in compliance with D.16-08-019 (p. 55)?
33. Was past program participation by service territory considered in determining statewide assignments?
34. Was cost allocation considered formally or informally as part the criteria for determining statewide lead assignments?
35. Under what conditions do the utilities intend to cross-fund statewide programs? Please describe:
    a. How funds will be allocated to a program from other PAs to the Lead PA for that program?
    b. How funds will be transferred between utilities to fund statewide programs of other PAs?

Statewide Governance Approach

36. What administrative elements would the governance structure apply to?
37. What dispute resolution process (if any) would be employed within the governance structure to resolve disagreements between PAs?
38. What rules (if any) would govern the dispute resolution process?
39. Please provide a description of the PA personnel that would be part of a proposed dispute resolution process (if any); including their respective:
    a. Roles,
    b. Responsibilities,
    c. Tasks,
    d. Length of appointment and
    e. Anticipated or expected time commitments.

Statewide Regulatory Filings and Compliance

40. The utilities propose that a Lead PA will file regulatory documents "on behalf of the overall statewide programs" (Whitepaper, p. 22). Please explain what is meant by the term "*overall statewide programs*" in this context.
41. Please explain the utilities' agreed processes for regulatory reporting and compliance filings by all Lead PAs administering statewide programs.

Statewide Program Council

42. What are the proposed criteria for authorizing representatives to participate on the Program Council?
43. Do you propose that members of the Program Council be limited to Lead PAs and/or IOU PAs?
44. How will the Program Council conduct dispute resolution?
45. Will Program Council meetings be open to stakeholders and/or the public?
46. What recordkeeping methods will be employed for Program Council meetings?
47. Will records of Program Council deliberations be available to the public for review?

END OF DATA REQUEST