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Date: Thursday, October 27, 2016 at 11:25 AM

To: Ted Pope <TedPope@2050partners.com>

Subject: RE: Comments on Statewide PA assignments

ORA still is not satisfied that there is any basis or analysis for the assignment of PAs for statewide leads. For example, It is not clear how SoCalGas would have relevant in-house skills and expertise in Plug Loads. The IOUs did not provide a rationale as to why the Emerging Tech leads are split between utilities, and how/why this is beneficial. What was [presented](#) did not provide any analysis.

If no evidence is provided, perhaps the Commission should issue a ruling with determinations of which PA should be the lead based on ED analysis, and parties could comment, and then the Commission could assign administrative roles.

Recall my comments at the San Diego meeting where I quoted D.15-10-028 where the Commission expressed pessimism about the CAEECC being successful where past working groups were not. Specifically, the Commission noted that if the CAEECC “becomes a ‘forum for the utilities to present decisions already made rather than seek input in a collaborative manner’ rather than a source of input then we will be back to the drawing board.” (p.78)

At the first meeting where the IOUs presented the statewide leads, multiple parties (TURN, NRDC, CEEIC, ORA) expressed concern with the assignment of roles, and recommended that the IOUs revise the statewide lead roles and provide their basis/analysis. On the 19th, we learned that there had been some changes to the Statewide PA lead roles, but we still have not been provided any analysis. As stated previously, ORA cannot support the recommended Statewide Program Administrator lead assignments without some rationale, analysis, and justification.

Thanks,

Mike Campbell