

PUBLIC UTILITIES COMMISSION

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Ronald van der Leeden
Director, Regulatory Affairs
Southern California Gas Company
555 W. Fifth Street, GT14D6
Los Angeles, CA 90013

December 20, 2019

Dear Mr. Leeden:

Energy Division approves Southern California Gas Company's (SoCalGas) Annual Budget Advice Letter U904-G/5510-E, pursuant to the Annual Budget Advice Letter (ABAL) review criteria laid out in Decision (D.) 18-05-041, which addressed the energy efficiency business plans. Accordingly, SoCalGas budget spending request of \$104,064,000 to administer energy efficiency (EE) programs for 2020 is approved, effective January 1, 2020.¹

Regarding the amount SoCalGas is approved to recover in 2020 rates, its spending budget is adjusted both by the unspent and uncommitted funds from prior years (see footnote 1) and the amount of funds needed to be collected on behalf of Regional Energy Networks (RENs) and Community Choice Aggregators (CCAs) in its territory. Discrepancies exist between SoCalGas' budget recovery requests on behalf of Southern California REN (SoCalREN) and Tri-County REN (3C-REN), and the budget recovery amounts approved for these program administrators (PAs) in 2020. These discrepancies are due to updates made to budget recovery amounts by the RENs after the Investor Owned Utilities (IOUs) filed ABALs, as well as differences in how IOUs that share responsibility for budget recovery calculate the recovery amount for a REN that exists within multiple IOU territories. Thus, within 30 days of the issuance of this disposition, SoCalGas shall file a Tier 1 Compliance filing in which the recovery budgets on behalf of SoCalREN and 3C-REN align with their approved recovery budgets.

1. Background

On September 3, 2019, SoCalGas filed its ABAL U904-G/5510-E. On September 23, 2019, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) filed its protest of SoCalGas's ABAL U904-G/5510-E. On October 1, 2019, SoCalGas filed its reply to Cal Advocates' protest.²

2. Cal Advocates Protest and SoCalGas Reply Comments

Cal Advocates' protest included 16 "*recommendations*" for the California Public Utilities Commission (CPUC) regarding PAs 2020 ABALs. These recommendations include an overarching theme that

¹ SoCalGas's total proposed spending budget for 2020 is \$104,064,000, less prior year unspent and uncommitted funds of \$3,019,000, resulting in an approved budget recovery of \$101,045,000 for SoCalGas' EE program administration.

² See SoCalGas' *Reply to Protest of from the Public Advocates Office regarding Advice Letter U904-G/5510-E, (SoCalGas's 2020 Energy Efficiency Annual Budget Advice Letter in Compliance with Decisions 15-10-028 and D. 18-05-041)*, pp. 1 (hereafter referred to as "SoCalGas Reply").

the entire statewide energy efficiency portfolio, including the portfolio of RENs, should be cost-effective. Of these 16 recommendations, the 7 recommendations relevant to SoCalGas are addressed below in 4 sections.

2.1. Issues Regarding Cost Effectiveness

This section addresses the following recommendations from Cal Advocates:

- *The Commission must ensure that the statewide EE portfolio is cost-effective*
- *The Commission cannot approve the PAs' proposed budgets because they will not produce a statewide portfolio that is cost-effective*
- *The Commission must adopt remedies to improve the cost-effectiveness of all PAs' EE portfolios*
- *The Commission should require each PA to improve the net benefits of its portfolio*

In its protest filed September 23, 2019, Cal Advocates argues that Public Utilities (PU) Code Section 381 (b)(1) “directs the Commission to allocate public purpose funds to cost-effective energy efficiency and conservation activities.”³ Cal Advocates also argues that prior CPUC Decisions, including D. 09-09-047⁴, D. 12-11-015⁵, and D. 14-10-046⁶, state that:

- the CPUC may only allocate funds to activities that are cost-effective;
- EE portfolios must be cost-effective on both a forecast and evaluated basis;
- the CPUC may only approve an EE portfolio, including both utility and REN proposals, that is cost-effective overall.⁷

Cal Advocates concludes by stating that, in light of the PU Code as well as prior CPUC decisions, the CPUC may not in this instance approve any of the 2020 ABALs, as doing so would produce a statewide portfolio that is not cost-effective.⁸ Instead, Cal Advocates recommends that the CPUC should require all PAs to collectively submit revised supplemental 2020 ABALs that “constitute a cost-effective statewide portfolio.”⁹

In its reply, SoCalGas argues that D.12-11-015 does not require overall cost-effectiveness on a statewide basis. SoCalGas cites Findings of Fact 19 from that decision, which states that “[t]he Commission should consider the REN and Marin Energy Authority proposals in concert with the utility portfolios to approve an overall cost-effective portfolio in each utility service territory on behalf of its ratepayers.” SoCalGas further emphasizes that Ordering Paragraph 13 of D.18-05-041 specifies that “the investor owned utilities must achieve cost effective portfolios”, thereby excluding RENs and the Marin Energy Authority from the requirement.

³ See *The Public Advocates Office Protest of Energy Efficiency Annual Budget Advice Letters for Program year 2020 (September 3, 2019)*, p. 3. (hereafter referred to as “Cal Advocates Protest”).

⁴ D. 09-09-047 approved 2010 to 2012 Energy Efficiency Portfolios and Budgets.

⁵ D. 12-11-015 approved 2013-2014 Energy Efficiency Programs and Budgets.

⁶ D. 14-10-046 Established EE Savings Goals and Approved 2015 EE Programs and Budgets.

⁷ See Cal Advocates Protest, p. 4.

⁸ The 2020 portfolio, including budgets and savings from the IOUs, RENs, and Marin Clean Energy (MCE), but excluding budgets and savings from ESA programs and Codes and Standards, has a TRC of 0.89. Portfolio cost-effectiveness information available at <https://cedars.sound-data.com/filings/list/>.

⁹ See Cal Advocates Protest, p. 46.

Additionally, SoCalGas asserts that Cal Advocates is incorrect in concluding that the CPUC is legally responsible for managing the cost-effectiveness of a statewide portfolio. In D.18-05-041, the CPUC determined a cost effectiveness standard which would be utilized for “assessing whether the business plans [generated] cost-effective portfolios for each utility and among all the energy efficiency PAs.”¹⁰ SoCalGas argues that this language implies that cost-effectiveness standards are applied at an individual PA portfolio, rather than statewide, level.

Discussion

The CPUC approves SoCalGas’s 2020 ABAL on the grounds that it meets the ABAL review criteria laid out in D. 18-05-041, which addressed energy efficiency business plans. Specifically, D. 18-05-041 states that a PA’s ABAL must meet energy savings goals, be cost-effective with a Total Resource Cost (TRC) ratio equal to or greater than 1.0 and propose a budget that is less than or equal to the previously authorized amount for the program year.

SoCalGas’s 2020 ABAL, as filed, forecasts a benefit/cost ratio, as measured by the TRC, that is cost-effective. Specifically, SoCalGas’s 2020 ABAL has a TRC of 1.25 (excluding savings from Codes and Standards)¹¹ which is above the 1.0 TRC threshold set by D. 18-05-041. Additionally, SoCalGas meets or exceeds its 2020 energy efficiency savings goals and proposes a spending budget that is below the authorized budget cap.¹²

In citing D. 12-11-015, which states that “the Commission may only approve an EE portfolio, including both utility and REN proposals, that is cost-effective overall,” Cal Advocates relies on general CPUC guidance provided prior to the onset of the Rolling Portfolio, the advent of expanded third-party administration designed to produce higher savings at lower cost, and lower energy efficiency goals reflecting reduced potential. Regardless, D. 18-05-041, which is the more recent decision than the 2012 decision cited by Cal Advocates, provided very clear and limited criteria under which Energy Division staff should review a PA’s ABALs. Those limited ABAL review criteria do not include policy considerations from D. 12-11-015, as cited by Cal Advocates.

Furthermore, Cal Advocates’ claim that a PA’s ABAL could only be approved if the proposals from all PAs, together, demonstrate cost-effectiveness overall, is out of scope of Energy Division’s ABAL review process. Energy Division’s review process was conceived as ministerial, in which CPUC staff would narrowly address whether an ABAL meets the review criteria laid out in D. 18-05-041, rather than broader policy questions more suited for consideration in a proceeding.¹³

Additionally, while D. 12-11-015 stated the CPUC’s general intent for portfolio approval *at that time* when energy efficiency was defined by limited-term, multi-year program cycle applications, D. 18-05-041 provided specific guidance for portfolio approval as it exists under the new Rolling Portfolio framework and the Annual Budget Advice Letter review process. Specifically, in D. 18-05-041, the CPUC acknowledged its concern regarding the cost-effectiveness of the PAs’ respective portfolios

¹⁰ D.18-05-041, p. 67

¹¹ At this time CPUC policy requires portfolio cost-effectiveness to be measured in the absence of savings from Codes and Standards programs, regardless of their magnitude as a percentage of total portfolio savings.

¹² See SoCalGas 2019 Annual Budget Advice Letter U904-G/5510-E. Available here: <https://www.socalgas.com/regulatory/tariffs/tm2/pdf/5510.pdf>.

¹³ See D. 15-10-028, p. 62: “The question for Commission Staff in reviewing a budget advice letter should be “does this conform to the approved business plan?””

in 2018, noting the “non-trivial amount of uncertainty regarding third-party programs and, relatedly, the IOUs reorienting their focus toward prudent portfolio management.” Therefore, the CPUC opted to treat program years 2018-2022 as “ramp years,” i.e. an *interim time* during which individual PA ABALs would be evaluated on their respective abilities to meet energy savings goals, be cost-effective, and stay within an authorized budget cap.¹⁴

Lastly, Energy Division agrees that additional CPUC guidance is needed regarding whether and how all eight PAs would work together to create a single-statewide portfolio that is cost-effective. CPUC staff will review PA ABALs according to the criteria established in D. 18-05-041, which include meeting individual energy savings goals, individual portfolio cost-effectiveness, and staying within the individual authorized budget cap(s). Larger questions related to collective portfolio cost-effectiveness among portfolios administered separately by different administrators, as cited by Cal Advocates in its protest, will be taken up in the rulemaking as the CPUC examines overall cost-effectiveness policy topics.¹⁵

The CPUC has acknowledged diminished portfolio cost-effectiveness of PA portfolios as well as the need to achieve savings goals. For example, recent CPUC actions set in place the support needed to improve PA portfolio cost-effectiveness, including:

- adopting updated energy efficiency savings goals that reflect changes to measures’ cost effectiveness;
- allowing the IOU PAs to pursue greater third-party program administration with the intent to achieve higher savings at lower cost; and,
- opening a discussion on issues related to additional RENs.

The CPUC supports these actions to ensure that at the conclusion of the ramp years, IOU portfolios are cost-effective.

In summary, Energy Division approves SoCalGas’s annual budget advice letter pursuant to the ABAL review criteria identified in D. 18-05-041 which provided a limited scope under which Energy Division staff was to review the ABALs.

2.2. Substantiation of Forecast Values

This section addresses the following recommendation from Cal Advocates:

- *The Commission should require SDG&E, SoCalGas, and MCE to submit supplemental advice letters that substantiate their forecasts.*

Cal Advocates argues that SoCalGas submitted implausible and unsubstantiated forecasts and that they should be required to submit a supplemental advice letter.¹⁶ Cal Advocates posits that SoCalGas’s forecast includes assumptions regarding cost effectiveness, longevity, or volume of

¹⁴ See D. 18-05-041, p. 71.

¹⁵ See D. 19-12-021, p. 40 (“Decision Regarding Frameworks for Energy Efficiency Regional Energy Networks and Market Transformation,” approved by the CPUC on December 5, 2019).

¹⁶ Cal Advocates Protest, p. 17.

installations which were unreasonable. Specifically, Cal Advocates claims that SoCalGas's forecasts for industrial measures are unobtainable.¹⁷ Furthermore, Cal Advocates states that SoCalGas did not provide a credible explanation for how the forecasts could be achieved.

In its reply, SoCalGas states that its 2020 ABAL contained all the required information to justify its forecast and that the forecasts are based on realistic assumptions. In addressing measures which Cal Advocates claimed were unrealistic, SoCalGas states that cost effectiveness estimates for tankless water heater and tank insulation measures were developed using CPUC-approved statewide workpapers.

Discussion

SoCalGas' 2020 ABAL references measure-level assumptions when forecasting TRC. The assumed measure attributes must comply with workpapers and comport with service territory characteristics and potential. Energy Division finds that the assumptions comply with current CPUC-approved workpapers and provides aggregate forecast values of installations and savings that comport with the recent Potential and Goals Study at an end-use level. Energy Division staff cannot disallow PAs from utilizing measures with approved forecasted (i.e. ex-ante) savings values that result in high TRC.

Energy Division also considered performance trends, per D. 18-05-041, which states:

Verification of a PAs ability to meet their TRC or saving shall include review of actual evaluated TRC for two previous years and analysis of provided program/ portfolio information so an energy efficiency expert would reasonably conclude the forecast will be achieved.¹⁸

A review of SoCalGas' forecasts and claims for the previous two years create concern that SoCalGas may not meet goals and achieve a TRC of 1.0. While SoCalGas filed portfolios with forecasted TRCs well above 1.0 in both 2017 and 2018, SoCalGas' 2017 claimed and evaluated TRCs were below 1.0.¹⁹ The TRC evaluated to forecasted ratio for 2017 is 0.55 the evaluated portfolio TRC for 2018 is not yet available, but applying the same evaluated to forecasted ratio would suggest the evaluated TRC will fall below 1.0. However, this assumes SoCalGas did not make key adjustments to troubled programs based on 2017 program learnings. Without a 2018 evaluated portfolio TRC, the CPUC is unable to confirm a trend and determine that SoCalGas will not achieve a cost-effective portfolio TRC on an evaluated basis.

In the 2020 ABAL, it is evident that SoCalGas took steps to remedy programs which drove forecasting inaccuracies in 2017. In 2017, SoCalGas had six programs which achieved a TRC claimed to forecasted ratio less than 0.50. In 2017, the filing budget for these six programs accounted for approximately 29% of the total portfolio filing budget. The following table displays those programs:

¹⁷ Cal Advocates Protest, p. 29.

¹⁸ D. 18-05-041, p. 133.

¹⁹ Budget Filing Detail Report accessed from California Energy Data and Reporting System (CEDARS) on November 30, 2019, <https://cedars.sound-data.com/filings/download-bfdr>.

Table 1: 2017 Forecasted and Claimed TRC

Program Name	Forecasted TRC	Claimed TRC	Claimed/Forecasted Ratio
AG-Calculated Incentives	2.51	0.27	0.11
RES-On Demand Efficiency	1.72	0.46	0.27
3P-IDEEA365-ODE for Campus Housing	1.71	0.50	0.29
IND-Calculated Incentives	3.59	1.20	0.33
RES-Manufactured Mobile Home	1.81	0.85	0.47
IND-Deemed Incentives	2.24	1.05	0.47

In 2018, claimed performance for the Agricultural (AG) Calculated Incentives program and Residential (RES) Manufactured Mobile home program both improved. The calculated claimed / forecasted ratio for these programs was 1.29 and 1.03 respectively. SoCalGas discontinued the Third Party IDEEA 365 On-Demand Efficiency (3P-IDEEA365-ODE) for Campus Housing program in 2018. The Residential On-Demand Efficiency program continued in 2018, but again under-performed and received a calculated claimed / forecasted ratio of 0.30. The Residential On-Demand Efficiency program was not included in SoCalGas' 2020 ABAL.

The Industrial Calculated Incentives program and the Industrial Deemed Incentives program under-performed in both 2017 and 2018 and are included in the 2020 ABAL. Energy Division respects SoCalGas as the administrator of its own portfolio. Energy Division finds the explanation and rationale provided by SoCalGas regarding industrial measures to meet the requirements of the ABAL²⁰, but is concerned by multiple instances of high forecasting and under-performance. Energy Division expects SoCalGas to consider the results of all recent evaluations and the 2020 forecasts of these programs and adjust for the 2021 portfolio cycle, if necessary.

Though concerning, the CPUC concludes that SoCalGas' 2020 ABAL should not be rejected based on the doubt created by the 2017 evaluation cycle alone.

2.3. Reduced Budget for Low TRC Programs

This section addresses the following recommendation from Cal Advocates:

- *The Commission should require SoCalGas and SDG&E to reduce spending on programs with low cost-effectiveness.*

Cal Advocates asserts that the CPUC should require SoCalGas and SDG&E to reduce or eliminate spending on low-performing programs. Cal Advocates states that, even though SoCalGas and SDG&E forecast that their respective portfolios will be cost effective, the forecasts are not credible, and the portfolio net savings could be improved. Specifically, Cal Advocates argues that cutting non-cost-effective programs could reduce SoCalGas's overall spending by \$13.0 million and increase the

²⁰ SoCalGas Response to Cal Advocates' Protest, p.5.

net benefits of its portfolio by \$14.5 million.²¹ In its reply, SoCalGas does not directly respond to Cal Advocate's argument.

Discussion

SoCalGas is the PA is responsible for building a portfolio of programs to meet portfolio cost-effectiveness threshold and savings goals. SoCalGas' forecast portfolio reflects adjustments to the measure and program offerings needed to meet the cost-effectiveness threshold requirements set by the CPUC. Directing specific adjustments to compliant measures and programs goes beyond the scope of the ABAL review process, as outlined in D.15-10-028 and D.18-05-041. Specifically, according to D.18-05-041 the "standard of review for staff disposition of the ABALs does not include review of PAs' decisions on reducing, cancelling, expanding or adding individual programs or program areas."

For the reasons discussed above, Energy Division will not direct SoCalGas to adjust its measure offerings to improve forecast TRC or cut programs.

2.4. Suspend Energy Savings Performance Incentive (ESPI) Payments

This section addresses the following recommendation from Cal Advocates:

- *The Commission should suspend Energy Savings Performance Incentive (ESPI) payments*

Cal Advocates argues that anticipated ESPI payments of approximately \$25.9 million within the larger 2020 IOU ABAL forecasts are an unreasonable burden on ratepayers that also diminish portfolio cost-effectiveness.²² Cal Advocates subsequently asks that the CPUC either suspend payments until the statewide EE portfolio is cost-effective or that the IOUs voluntarily forgo ESPI payments as one way to improve the overall cost-effectiveness of their portfolios.²³

Discussion

Cal Advocates' request for either the CPUC to suspend ESPI payments or have the IOUs voluntarily forgo ESPI payments in order to improve portfolio cost-effectiveness is a policy question that is not outside the scope of the ABAL review process. In D. 13-09-023, which adopted the ESPI mechanism, the CPUC did not require an overall portfolio cost-effectiveness as a condition of ESPI payments. Consequently, Energy Division rejects Cal Advocates' protest request that the CPUC suspend ESPI payments at this time.

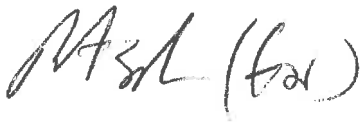
Please direct any questions regarding Energy Division's findings in this non-standard disposition to Jessica Allison (jessica.allison@cpuc.ca.gov).

²¹ Cal Advocates Protest, p. 50.

²² See Cal Advocates Protest, p. 52.

²³ Ibid.

Sincerely,

A handwritten signature in black ink, appearing to read "ERAND" with a circled "D" at the end.

Edward Randolph,
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

Cc: Service Lists R. 13-11-005 and A.17-01-013
Pete Skala, Energy Division
Jennifer Kalafut, Energy Division
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September 3, 2019

Advice No. 5510
(U 904 G)

Public Utilities Commission of the State of California

Subject: Southern California Gas Company Request for Approval of Annual Energy Efficiency Budget Filing for Program Year 2020

Southern California Gas Company (SoCalGas) hereby submits for approval by the California Public Utilities Commission (Commission) its 2020 Energy Efficiency (EE) Program Portfolio budget. The EE Program Portfolio, along with supporting documentation, is incorporated as Attachment A, which have been uploaded to the California Energy Data and Reporting System (CEDARS) website.¹

Purpose

This Advice Letter is submitted in compliance with Ordering Paragraph (OP) 4 of Decision (D.) 15-10-028,² which directs program administrators to file a Tier 2 Advice Letter containing a budget for the next calendar year's EE portfolio by the first business day in September; and with OPs 41 and 43 of D.18-05-041, which directs Program Administrators (PAs) to include information identified in D.18-05-041.

Background

On October 24, 2014, the Commission issued D.14-10-046, which authorizes funding for EE programs until 2025.³ On October 22, 2015, the Commission issued D.15-10-028, which approved the EE rolling portfolio mechanics for 2016 and beyond and

¹ <https://cedars.sound-data.com>.

² D.15-10-028, at p. 123.

³ D.14-10-046, at p. 167.

explains that Annual Budget Advice Letter (ABAL) filings will propose detailed budgets for cost recovery, transfer, and contracting purposes.⁴

On June 5, 2018, the Commission issued D.18-05-041, which approved the PAs Energy Efficiency Business Plans. D.18-05-041 directed the PAs to, beginning with the ABALs due on September 4, 2018, provide the following information in the ABAL submittals⁵:

- Forecasted Total Resource Cost (TRC) must meet or exceed 1.25, except during program years 2019-2022, when the forecasted TRC must meet or exceed 1.0;
- Forecasted energy savings goals must meet or exceed Commission established savings goals for each investor-owned utility (IOU);
- Forecasted budget must not exceed the PA's annual budget in the approved business plans, or (if applicable) the revised annual budget in this ABAL;
- Sector-level Metrics;
- A description of program and portfolio changes; and
- Supplemental budget information in the format of the June 12, 2017 supplemental budget filings.

On May 21, 2019, the Commission issued D.19-05-019 adopting three new cost-effectiveness analysis framework policies for distributed energy resources. OP 2 of D.19-05-019 directed all Commission filings and submissions requiring cost-effectiveness analysis of distributed energy resources, to review and consider the results of the Program Administrator Cost (PAC) Test and the Ratepayer Impact Measure (RIM) Test.

On August 23, 2019, the Commission issued D.19-08-034 which established energy efficiency savings goals for 2020-2030.

At the direction of the Energy Division, Attachment A has been uploaded to the CEDARS website and made available on <http://www.socalgas.com/regulatory/R13-11-005.shtml>. Attachment B of this Advice Letter provides the CEDARS Filing Confirmation which was printed from the confirmation dashboard upon confirmed completion of the filing through CEDARS.

SoCalGas' 2020 Budget and Savings

SoCalGas' 2020 program year budget is \$104,064,000, consistent with D.18-05-041. The 2020 funding request does not include the program budget for the SoCalGas Statewide Marketing, Education & Outreach (ME&O) program, nor the 2020 program budget for the Statewide Financing Pilots.⁶ The Southern California Regional Energy Network (SoCalREN) and Tri-County Regional Energy Network (3C-REN) are

⁴ D.15-10-028, at p. 56.

⁵ D.18-05-041, at pp. 124-129 and OP 44.

⁶ Budgets for these programs were approved in D.19-01-005 and D.17-03-026, respectively.

submitting their own Advice Letters to implement programs and associated budgets for PY 2020. Table 1 lists SoCalGas' 2020 budget and the forecasted energy savings, by sector.

SoCalGas Portfolio Cost-Effectiveness

SoCalGas is proposing a portfolio cost-effectiveness based upon approved energy savings and cost-effectiveness inputs to its program and measure mixes, as shown in Table 2 below. The portfolio cost-effectiveness may change as the Commission releases measure dispositions and other key inputs which could reduce or improve portfolio savings and cost-effectiveness. SoCalGas will continue to evaluate its portfolio as cost-effectiveness inputs change.

Table 2: 2019 EE Portfolio Cost-Effectiveness

	Cost-Effectiveness		
	TRC	PAC	RIM
Without Codes & Standards	1.25	1.53	1.53
With Codes & Standards	1.59	3.16	3.16

The SoCalGas TRC and PAC cost-effectiveness results reflect the inclusion of the following inputs:

- Uses the updated avoided cost values for 2020 in the Cost-Effectiveness Tool (CET), version 18.1, adopted in Resolution E-5014.
- Excludes the 5% market effects adjustment from PA forecasts, as required in D.19-08-034.⁸
- Uses approved workpaper values based on the July 12, 2019 guidance provided by Energy Division.
- General Rate Case (GRC) loaders associated with the EE program labor, as directed by D.12-11-015, OP 39.
- A projected shareholder incentive amount associated with the approved portfolio budget and projected therm savings activity. This assumption conforms to the methodology adopted in the Efficiency Savings and Performance Incentive (ESPI) Mechanism in D.13-09-023.

D.18-05-041 requires claimed and evaluated TRC and PAC of each program and of each sector for the two most recent years for which data is available.⁹ Claimed TRC and PAC for 2017 and 2018 are available on CEDARS. D.18-05-041 also requires a showing of forecasted, claimed and evaluated TRC and PAC at the portfolio level going back to the beginning of the Rolling Portfolio (2016).¹⁰ SoCalGas provides this information in Table 3 below.

⁸ D.19-08-034, at p. 27.

⁹ D.18-05-041, at p. 124.

¹⁰ D.18-05-041, at p. 125.

Table 3: Forecasted, Claimed, and Evaluated TRC and PAC

SoCalGas Energy Efficiency Portfolio (without C&S)						
Program Year	Portfolio-level Cost-Effectiveness¹					
	Forecast TRC²	Reported TRC	Evaluated TRC	Forecast PAC²	Reported PAC	Evaluated PAC
2016	-	0.74	Not Available	-	1.07	Not Available
2017	1.22	0.81		1.58	1.12	
2018	1.38	1.07		1.77	1.25	
2019	1.19	-	N/A	1.41	-	N/A

1 Forecasted and Reported in CEDARS; TRC values exclude costs from SoCalREN, includes benefits from Market Spillover effects, and includes non-resource program costs and forecasted/approved ESPI payments (as applicable).

2 Forecasted PAC and TRC values include General Rate Case (GRC) loaders associated with the EE program labor as directed by D.12-11-015, OP 39.

3 Adopted budget for 2016 was approved via D.14-10-046; no budget compliance filing was completed for 2016.

SoCalGas Energy Efficiency Portfolio (with C&S)						
Program Year	Portfolio-level Cost-Effectiveness¹					
	Forecast TRC²	Reported TRC	Evaluated TRC	Forecast PAC²	Reported PAC	Evaluated PAC
2016	-	1.49	Not Available	-	3.72	Not Available
2017	1.50	1.74		3.45	5.42	
2018	1.88	1.78		4.70	5.00	
2019	1.64	-	N/A	4.16	-	N/A

1 Forecasted and Reported in CEDARS; TRC values exclude costs from SoCalREN, includes benefits from Market Spillover effects, and includes non-resource program costs and forecasted/approved ESPI payments (as applicable).

2 Forecasted PAC and TRC values include General Rate Case (GRC) loaders associated with the EE program labor as directed by D.12-11-015, OP 39.

3 Adopted budget for 2016 was approved via D.14-10-046; no budget compliance filing was completed for 2016.

Plan for Achieving a Forecasted TRC of 1.25 and Evaluated TRC of 1.0

Pursuant to D.18-05-041, any ABAL that includes a forecast portfolio TRC between 1.0 and 1.25 during the 2018-2022 ramp years should include: 1) an explanation of why the PA is not proposing a portfolio that meets a 1.25 TRC; 2) why the PA is confident that it will meet the evaluated 1.0 TRC for each year; and 3) how the PA intends to lower costs or increase savings going forward. Further, D.18-05-019 directed PAs that propose a portfolio forecast TRC below 1.25 to hold a workshop for stakeholders to explain why its forecasted TRC does not meet or exceed 1.25 and propose how it will transition to a TRC forecast of 1.25 during the ramp years. Additionally, a PA must include information describing how the PA will address the portfolio challenges that caused it to propose a portfolio forecast TRC below 1.25.

On January 30, 2019, SoCalGas held its Energy Efficiency Annual Budget Workshop, to demonstrate how it reached a forecasted TRC value of 1.19 and how it planned to comply with the statewide funding requirements of D.18-05-041 for the 2019 ABAL. In addition, SoCalGas filed its 2019 Energy Efficiency Annual Budget Workshop report on February 14, 2019, which summarized the discussion presented at the workshop.

On August 6, 2019, SoCalGas presented its plan for achieving a forecasted TRC of 1.25 in PY 2020 to its Energy Efficiency Procurement Review Group, as directed in D.18-05-041.

SoCalGas' has taken significant steps in working towards achieving its forecasted TRC. In PY 2020, SoCalGas will continue its work towards achieving a cost-effective Energy Efficiency portfolio that meets the objectives of D.18-05-041. As part of program year 2019, SoCalGas adopted significant programmatic changes (i.e., more than 40% change in funding) approved through the 2019 ABAL (Advice Letter No. (AL) 5349-A) to better align program offerings, meet expected energy savings, and target a forecasted 1.25 TRC in future years.

SoCalGas' strategies will continue to focus on cost-effectiveness to both exceed an evaluated 1.00 TRC and forecasted 1.25 TRC through the ramp years. A listing of these strategies is provided below:

- Increasing the comprehensiveness of current programs offerings and/or delivery to minimize lost energy efficiency opportunities and reduced program cost.
- Continuing the expansion of program partnerships with municipal electric utilities, water agencies, and air quality districts to drive down administrative costs, develop more holistic program offerings that provide added benefits to customers and increased cost-effectiveness to the PA.
- Focus on expanding the cost-effective behavioral program offerings, such as Home Energy Reports.
- Eliminating or scaling of non-cost-effective programs and approaches based on program level metrics and key performance indicators.
- Continuous improvement of internal processes and program delivery strategies.
- Adding new measures and technologies as they become available.
- Leveraging expanded financing offerings to drive the conversion of energy efficiency project opportunities.

Further, focus on cost-effectiveness within SoCalGas' portfolio will be placed on the third-party solicitation process whereby SoCalGas plans to refresh market segment approaches with new cost-effective contracts.

SoCalGas PY 2020 Portfolio and Program Changes

SoCalGas provides the following discussion regarding significant program changes (i.e., more than 40 percent change in funding) that are necessary to better align with programs offered, meet expected energy savings, and target a forecasted TRC of 1.25, shown in Table 4.

Table 4: SoCalGas Program Changes for Program Year 2020

Program Number	Program Name	Program Change Description
SCG3711	COM-Deemed Incentives	SoCalGas will increase program funding based on customer needs and segmentation. Additionally, SoCalGas will be increasing its partnering efforts with various municipal utilities and agencies to co-fund cost effective measures and programs. SoCalGas will continue to evolve the Metropolitan Water District (MWD) and Los Angeles Department of Water and Power (LADWP) partnership programs. Lastly, within this program, SoCalGas is exploring co-funded programs with South Coast Air Quality Management District (AQMD).
SCG 3714	IND-SEM	The Industrial SEM program was initiated by all the IOUs in 2018. Specifically, in SoCalGas' service territory, the SEM program delivers this program for Industrial customers across Southern California. Since its inception, the program delivered strong results that include a pipeline of Behavior, Retrocommissioning, and Operations (BRO) and Capital project savings. For the first cohort, the SEM program team successfully recruited eight large industrial customers. With the program's initial success and high interest from customers, SoCalGas is increasing the SEM budget for 2020 to continue the first cohort through the end of 2020 and add two additional cohorts, in addition to the extension of years 3 and 4 of the program. Budget information regarding years 3 and 4 will be provided in future year's ABALs.
SCG3815	PUB-Calculated Incentives	SoCalGas will increase program funding based on customer needs and segmentation. Additionally, SoCalGas will be increasing its partnering efforts with various municipal utilities and agencies to co-fund cost-effective measures and programs. SoCalGas will continue to evolve the MWD and LADWP partnership programs. Lastly, within this program SoCalGas is exploring co-funded programs with AQMD.

SCG3816	PUB-Deemed Incentives	SoCalGas will increase program funding based on customer needs and segmentation. Additionally, SoCalGas will be increasing its partnering efforts with various municipal utilities and agencies to co-fund cost-effective measures and programs. In 2020, SoCalGas will partner with LA County's Internal Services Department to support its grant from the California Department of Food and Agriculture Healthy Stores program. This partnership will aid the collaboration with entities such as Los Angeles Unified School District to provide multiple cost-effective measures. In addition, SoCalGas has food service programs to compliment the upgrade and/or purchase of new refrigeration equipment in 85 corner stores to sell produce.
SCG3726	C&S-Compliance Enhancement	To support the implementation of the new 2020 Title 24 building codes that will be in effect starting January 1, 2020, SoCalGas will increase its funding for incremental activities in this local program. All jurisdictions in SoCalGas' service territory will need training on the aspects of the new code that will be changed, including CALGreen.
SCG3727	C&S-Reach Codes	In 2020, SoCalGas will increase its budget. SoCalGas will explore other opportunities for reach codes in its service territory. SoCalGas will educate/introduce how reach codes can help meet customer climate action plan goals.
SCG3805	COM-Direct Install Program	In 2020, SoCalGas will increase program funding based on customer needs and segmentation. Additionally, SoCalGas will be increasing its partnering efforts with various municipal utilities and agencies to co-fund cost effective measures and programs. SoCalGas will continue to evolve its programs in which it has partnered with Municipal utilities, such as LADWP and MWD.
SCG3728	C&S Planning Coordination	To support the implementation of the new 2020 Title 24 building codes that will be in effect starting January 1, 2020, SoCalGas will increase its funding for incremental activities in this local program. All jurisdictions in SoCalGas' service territory will need training on the aspects of the new code that will be changed,

		including CALGreen. In addition, there will be several changes to our existing resources as well as new resources for the new code cycle to be made available to all stakeholders.
SCG3836	RES-LADWP HVAC	In 2020, SoCalGas will increase program funding based on the need of its municipal utility partner to co-fund cost-effective measures.
SCG3703	Plug Load and Appliance (PLA) - Point of Sale (POS)	In an effort to align with the Commission direction identifying Plug Load and Appliance (PLA) - Point of Sale (POS) - SCG3703 as a statewide program, ¹¹ SoCalGas will decrease the program budget since to coincide with the statewide launch in 2021.
SCG3705	Home Upgrade Program (HUP)	In 2020, SoCalGas will reduce the budget for the HUP by more than 40% due to the programs failure to achieve cost-effectiveness energy savings.
SCG3707	RES-SW-RNC	In an effort to align with Commission direction identifying Residential New Construction as statewide program, ¹² SoCalGas will decrease the budget since the statewide program will begin in 2020.
SCG3713	IND-Energy Advisor	To better align with the implementation of SoCalGas Business Plan, the budget of the Industrial Energy Advisor will decrease. SoCalGas will shift its focus on a combined effort of audits and direct install in SoCalGas' Industrial Direct Install.
SCG3719	AG-Calculated Incentives	In anticipation of the broader new Agriculture third-party program solicitation expected to launch in 2021, SoCalGas will slowly ramp down this program.
SCG3765	RES-Manufactured Mobile Home	In anticipation of the new manufactured homes third-party program solicitation expected to launch in 2021, SoCalGas will slowly ramp down this program.
SCG3817	PUB-Direct Install Program	In anticipation of the new public small and medium third-party program(s) launching in 2020, SoCalGas will slowly ramp down this program.

¹¹ D.18-05-041, at p. 91.

¹² Id.

SCG3820	RES-Direct Install Program	In anticipation of the new single and multifamily third-party program(s) launching in 2020, SoCalGas will slowly ramp down this program.
SCG3823	RES-HVAC QI/QM	In an effort to align with Commission direction identifying RES-HVAC Quality Installation/Quality Maintenance as a downstream statewide pilot, ¹³ SoCalGas will decrease its budget in anticipation of the new program coming on board in 2021.
SCG3825	COM-HVAC QI/QM	Due to nominal program uptake, SoCalGas is lowering its QI/QM budget. SoCalGas will explore other avenues to increase QI/QM activities in 2020 and 2021.

SoCalGas PY 2020 Program Closures

As part of SoCalGas' portfolio, SoCalGas plans to close the following programs in 2020, shown in Table 5. Given the dynamic changes in Energy Efficiency, these programs are no longer viable.

Table 5: SoCalGas Program Closures for Program Year 2020

Program Number	Program Name	Reason for Closure
SCG3758	PUB-K-12 Performance Program	SoCalGas is sunsetting the SCG3758 Public K-12 Performance program in anticipation of the upcoming K-12 third-party program solicitation expected to launch in Q1 2021.
SCG3822	AG-Direct Install Program	In AL 5349-A, SoCalGas opened this program as a placeholder for the third-party programs that were forthcoming through SoCalGas' solicitation efforts beginning in 2019. In early 2019, SoCalGas revised its solicitation approach to address the agricultural segment in a broader solicitation. Therefore, SoCalGas is no longer in need of this program.
SCG3826	COM-Lodging Program	In AL 5349-A, SoCalGas opened this program as a placeholder for the third-party programs that were forthcoming through SoCalGas' solicitation efforts beginning in 2019. In early 2019, SoCalGas revised its solicitation approach to address the commercial segment in a broader solicitation. Therefore, SoCalGas is no longer in need of this program.

¹³ D.18-05-041, at p. 91

SCG3827	COM-Mixed Use Building Program	In AL 5349-A, SoCalGas opened this program as a placeholder for the third-party programs that were forthcoming through SoCalGas' solicitation efforts beginning in 2019. In early 2019, SoCalGas revised its solicitation approach to address the agricultural segment in a broader solicitation. Therefore, SoCalGas is no longer in need of this program.
SCG3759	On Demand Efficiency	SoCalGas is sunsetting this program. This Program currently focuses solely on the installation of recirculation Pump controls in multifamily properties with central hot water recirculation systems. The opportunity exists to improve the cost-effectiveness of this measure by bundling with other measures offered through other existing multifamily direct install program(s). By bundling its measures, SoCalGas will be able to offer its customers a comprehensive suite of measures resulting in a better customer experience and reduced costs. Program funds will be shifted to other cost-effective programs.
SCG3804	On-Premise Ozone Laundry	SoCalGas is closing this program due to underperformance. Program funds for this program will be shifted to other cost-effective programs.
SCG3828	Home Intel Program	SoCalGas is sunsetting this program due to the lack of achieved gas or electric savings since program inception. Implementer costs for engineering and outreach have been higher than they expected with outreach failing to achieve a sustained enrollment. This cancellation is undertaken with the current partner, Southern California Edison (SCE). SoCalGas has another pay for performance program in our portfolio at this time with a suite of measures which may result in a better customer experience and energy savings. Program funds will be shifted to other cost-effective programs.
SCG3807	HOPPS-CRR	SoCalGas launched the High Opportunity Projects and Programs-Commercial Restaurant Retrofit program in March of 2017. As part of the program design, the HOPPS-CRR was envisioned to close in Q4 2020. SoCalGas is prepared to conclude all program activities as directed by AL 4965-A.

SCG3808	HOPPS-CWHMBS	SoCalGas launched the High Opportunity Projects and Programs Central Water Heating Multifamily Building Solutions (CWHMFBS) program in August 2016. As part of the program design, the program will sunset at the end of 2019. SoCalGas is prepared to conclude all program activities for the CWHMFBS program as directed by AL 4965-A. Additional time will be needed to finalize remaining projects: EM&V, Processing, Post-Verification and final incentive. The program is expected to utilize all its allocated funds to close out all projects in the pipeline.
SCG3743	Kern County Partnership	In cooperation with the County of Kern, SoCalGas will end the Kern County Partnership also known as the Energy Watch Local Government Partnership. SoCalGas remains committed to supporting the communities in Kern County and will continue to support Public Sector Customers in the Region through existing rebate and incentive program offerings, via SoCalGas' Account Executives, and the forthcoming new third-party programs.
SCG3753	Desert Cities Partnership	In cooperation with the Coachella Valley Association of Governments, SoCalGas will end the Desert Cities Partnership. SoCalGas remains committed to supporting the communities in Coachella Valley and will continue to support Public Sector customers through existing programs, and new programs being developed through the third-party solicitation process.

SoCalGas PY 2020 New Programs

The following programs are solicitation placeholders in anticipation of the third-party programs that will be forthcoming through SoCalGas' solicitation efforts as well as the statewide program solicitations.

- SCG3843 – RES-SF Solicitation
- SCG3844 – RES-MF Solicitation
- SCG3845 – COM-Small/Medium Solicitation
- SCG3846 – PUB-Small/Medium Solicitation
- SCG3847 – RES-SW-New Construction
- SCG3848 – COM-SW-New Construction
- SCG_SW_CSA_Bldg – C&S-SW-Codes and Standards Advocacy
- SCG_SW_CSA_Appl – C&S-SW-Appliance Standards Advocacy
- SCG_SW_CSA_Natl – C&S-SW-Federal Codes Advocacy

SoCalGas' 2020 Portfolio Budget Caps and Target

Pursuant to OP 13 of D.09-09-047, the Commission determined that administrative costs are limited to 10% of the total authorized energy efficiency budget, and ME&O costs have a budget target of 6% of the adopted portfolio budget. SoCalGas has calculated its portfolio caps and targets for its 2020 portfolio and included them in Table 6 below.

Table 6: 2020 EE Portfolio Budget Caps/Targets

	<u>Budgets</u>					<u>Total Budget</u>
	<u>Admin</u>	<u>Marketing</u>	<u>Direct</u>	<u>Incentives</u>	<u>EM&V</u>	
2020 EE Budget	\$ 7,139,845	\$ 5,075,469	\$ 40,449,184	\$ 47,063,462	\$ 4,336,040	\$ 104,064,000
GRC Labor Loaders	\$ 5,836,638	\$ 150,504	\$ 1,204,901			\$ 7,192,043
OBF Loan Pool						\$ -
New Financing Pilots	\$ 170,100	\$ 204,120	\$ 646,380	\$ 680,400	\$ -	\$ 1,701,000
Statewide ME&O	\$ 59,699	\$ 1,850,683			\$ 79,599	\$ 1,989,981
Total EE Funding						\$ 114,947,025
SoCalREN & 3C-REN						\$ 4,918,583
Total EE Funding with SoCalREN & 3C-REN						\$ 119,865,608
Cap & Targets Requirements						
Parameter Type	<u>Cap</u>	<u>Target</u>	<u>Target</u>		<u>Budget</u>	
Cap / Target Level	\$ 9,987,503	\$ 5,075,469	\$ 29,039,636	\$ 47,063,462	\$ 4,336,040	
Total Budget for Calculation	\$ 114,947,025	\$ 114,947,025	\$ 114,947,025	\$ 114,947,025	\$ 108,401,000	
Cap / Target Percent	8.7%	4.4%	25.3%	40.9%	4.0%	
Cap / Targets	10%	6%	20%	60%	4%	

SoCalGas notes the following assumptions:

- Funding for the SoCalGas On-Bill Financing Program loan pool recovered in gas transportation rates is included but does not impact the calculations because the adopted level for 2020 is zero.
- Pursuant to D.13-12-038, the Statewide ME&O program costs are excluded from the marketing budget target.
- SoCalGas has calculated the IOU administrative cost cap in accordance with D.09-09-047, OP 13, which excludes associated third party and local government partnership administrative costs, as well as non-resource programs which meet the requirements as further described in D.09-09-047.¹⁴ These programs include EM&V, Marketing and Outreach, Emerging Technologies, Codes & Standards, Workforce Education & Training, and programs supporting market transformation.
- SoCalGas excluded those program costs identified by Energy Division to be exempt from the cap and target calculation.

¹⁴ D.09-09-047, at pp. 50-51.

- D.14-10-046, as corrected by D.15-01-002, confirms the EM&V budget at 4% of the total budget.

SoCalGas will report the status of its budget caps and targets based on actual expenditures in its quarterly reports submitted through the Commission's EESTATS website.

Statewide Programs

Consistent with Energy Division direction, SoCalGas provides the budget allocation for all statewide programs in Attachment C. Two of the third-party solicitations for statewide programs where SoCalGas is the statewide lead began in 2019. These programs are not expected to begin implementation until 2021, as such SoCalGas has not included a budget in PY 2020 for these specific programs. PY 2020 budget allocations are only provided for those programs that are set to launch in PY 2020.

When forecasting savings for third-party programs, SoCalGas used the forecasting method used for custom projects, where possible, in compliance with D.19-08-034,¹⁵ otherwise, forecasted savings are based upon available inputs and information from its third-party solicitations and historical program and sector knowledge to inform assumptions and forecasted savings. SoCalGas' savings from statewide third-party programs used the funding share method approved in the Joint IOUs Supplemental Advice Letter of the Shared Funding Mechanism Proposal submitted on November 15, 2018 (San Diego Gas and Electric Company Advice 3268-E-A/2701-G-A; SoCalGas Advice 5346-G-A; SCE Advice 3861-E-A; and Pacific Gas and Electric Company Advice 5373-E-A/4009-G-A).

Supplemental Budget Information

Pursuant to OP 44 of D.18-05-041, SoCalGas must provide its PY Supplemental Energy Efficiency Business Plan Budget Information for 2020. On June 12, 2017, SoCalGas provided its initial supplemental budget information in response to the Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge, dated April 14, 2017. The Scoping Ruling directed PAs IOUs and the non-IOU PAs, to submit supplemental budget information using the common budget template developed in consultation with The Utility Reform Network (TURN) and The Office of Ratepayer Advocates (ORA), as well as the PAs. SoCalGas' supplemental budget information for PY 2020 is provided in Attachment D.

¹⁵ D.19-08-034, at p. 30.

Metrics

Pursuant to D.18-05-041, SoCalGas' 2018 sector-level metrics are available through the Commission's Energy Efficiency Statistic website in the following link:

<http://eestats.cpuc.ca.gov/EEGA2010Files/SCG/AnnualReport/SCG.AnnualNarrative.2018.2.zip>.¹⁶

In compliance with D.18-10-008, SoCalGas proposes portfolio-level indicators for third-party programs for disadvantaged worker participation. Under the terms and conditions included in D.18-10-008, third-party implementers are required to report data on participation of disadvantaged workers in their EE programs.

Specifically, Conclusion of Law 34 and OP 5 of D.18-10-008 directs the following:

- Add a requirement that, in addition to tracking disadvantaged worker participation in training programs, the PAs should also track overall disadvantaged worker participation in all programs in their business plan portfolios.

Table 7 below contains SoCalGas' proposed indicators related to third-party EE programs and disadvantaged worker participation.

Table 7: SoCalGas Proposed Third-Party Indicators

Description	Indicator	Unit
Participation in Third-Party EE Projects	Number of disadvantaged worker participants in energy efficiency projects	#

SoCalGas recommends the Commission approve these proposed indicators. SoCalGas anticipates that third-party programs will start and ramp-up in late-2020 to early-2021, thus, reporting of these indicators will likely begin with the PY 2021 EE Annual Report (filed May 1, 2022), following the first full year of third-party programs.

Revenue Requirements

Table 8 below summarizes the revenue requirement impact by class of service. In addition, SoCalGas provides herein as Attachment A the Gas Bill Payer Impacts table comparing present and proposed rates associated with the inclusion of SoCalGas' proposed 2020 budget in its gas transportation rates.

¹⁶ D.18-05-041, p. 127.

Table 8: Revenue Requirement by Customer Class

Customer Class	Applicable Rate Schedules	Increase/(Decrease) (\$000s)
Core	GR, GS, GM, GO-AC, G-NGVR, GL, G-10, G-AC, G-EN, G-NGV	\$2,836
Non-Core	GT-F, GT-I, GT-TLS	\$235
Total		\$3,071

Protests

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and received within 20 days of the date of this Advice Letter, which is September 23, 2019. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division
Attn: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the Energy Division Tariff Unit (EDTariffUnit@cpuc.ca.gov). A copy of the protest should also be sent via both mail and facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Ray B. Ortiz
Tariff Manager - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
Facsimile No.: (213) 244-4957
E-mail: ROrtiz@socalgas.com

Effective Date

SoCalGas believes that 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. This submittal is consistent with D.18-05-041. Therefore, SoCalGas respectfully requests that this submittal be approved on October 3, 2019, which is 30 calendar days from the date submitted.

Notice

A copy of this Advice Letter is being sent to SoCalGas' GO 96-B service list and the Commission's service lists for R.13-11-005. Address change requests to the GO 96-B service list should be directed via e-mail to tariffs@socalgas.com or call 213-244-2837. For changes to all other service lists, please contact the Commission's Process Office at 415-703-2021 or via e-mail at Process_Office@cpuc.ca.gov.

Ronald van der Leeden
Director – Regulatory Affairs

Attachments



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:

E-mail:

E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

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

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name:
Title:
Utility Name:
Address:
City: State:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City: State:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

ATTACHMENT A

Advice No. 5510

Energy Efficiency Program Portfolio

Table 1 - Bill Payer Impacts - Rates by Customer Class

Table 2b - Gas Bill Payer Impacts - Current and Proposed Revenues and Rates, Total and Energy Efficiency, by Customer Class

Table 3 - Budget and Cost Recovery by Funding Source

Table 4 – Budget, Spent, Unspent, Carryover Details

Table 5 - Total 2020 Requested and 2013-2019 Authorized Budgets (\$000)

Table 6 - Committed Energy Efficiency Program Funding Not Yet Spent

Table 7 - 2019 Authorized and Spent/Unspent Detail (June YTD 2019)

Attachment A - Energy Efficiency Program Portfolio

PA Name: SoCalGas

Budget Year: 2020

Table 1 - Bill Payer Impacts - Rates by Customer Class				
	Electric Average Rate (Res and Non-Res) \$/kwh	Gas Average Rate (Res and Non-Res) \$/therm	Total Average Bill Savings by Year (\$)	Total Average Lifecycle Bill Savings (\$)
Present Rates - System Average				
2013	\$ -	\$ 0.97	\$ 25,170,200	\$ 254,241,085
2014	\$ -	\$ 1.16	\$ 31,505,918	\$ 338,528,091
2015	\$ -	\$ 1.16	\$ 29,661,771	\$ 187,282,582
2016	\$ -	\$ 1.10	\$ 39,684,666	\$ 187,073,863
2017	\$ -	\$ 1.10	\$ 44,183,430	\$ 161,920,337
2018	\$ -	\$ 1.10	\$ 71,743,456	\$ 462,464,628
2019	\$ -	\$ 1.09	\$ 77,900,162	\$ 382,775,531
2020	\$ -	\$ 1.26	\$ 76,326,545	\$ 480,592,413

[1] Average first year gas bill savings is calculated by multiplying an average gas rate with first year gross therm energy savings.

[2] Total Average Bill Savings by Year includes C&S and ESA Programs.

[3] Total Average Lifecycle Bill Savings does not include C&S and ESA programs.

[4] Average lifecycle gas bill savings is calculated by multiplying an average gas rate with lifecycle gross therm energy savings.

[5] Forecasted savings for 2013-2015 savings are taken from the 2015 energy efficiency annual report.

Attachment A - Energy Efficiency Program Portfolio

PA Name: SoCalGas

Budget Year: 2020

Table 2b - Gas Bill Payer Impacts - Current and Proposed Revenues and Rates, Total and Energy Efficiency, by Customer Class

Customer Classes	2018 Total Gas Annual Revenue \$000	2018 Energy Efficiency Portion of Total Gas Annual Revenue \$000	2019 Energy Efficiency Portion of Total Gas Annual Revenue \$000	2020 Proposed Energy Efficiency Gas Annual Revenue Change \$000	2020 Proposed Percentage Change In Gas Revenue and Rates	2018 Gas Average Rate \$/kwh	2018 Energy Efficiency Portion of Gas Average Rate \$/kwh	2019 Gas Average Rate \$/kwh	2019 Energy Efficiency Portion of Gas Average Rate \$/kwh	2020 Proposed Gas Average Rate Change \$/kwh	2020 Proposed Percentage Change In Gas Revenue and Rates
Residential	\$ 214,123	\$ 29,470	\$ 40,460	\$ 41,674	\$ 0.03001	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
Core Commercial/Industrial	\$ 64,853	\$ 38,561	\$ 52,941	\$ 54,530	\$ 0.03001	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
Gas Air Conditioning	\$ 75	\$ 55	\$ 76	\$ 78	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
Gas Engine	\$ 1,273	\$ 741	\$ 1,017	\$ 1,048	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
Non-Core Commercial/Industrial	\$ 43,085	\$ 5,700	\$ 7,825	\$ 8,060	\$ 0.03001	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0

Attachment A - Energy Efficiency Program Portfolio

PA Name: SoCalGas

Budget Year: 2020

Table 3 - Budget and Cost Recovery by Funding Source

	2020
2020 EE Portfolio Budget	\$ 108,982,583
Unspent/Uncommitted EM&V Carry over Funds from 2019	\$ -
Unspent/Uncommitted Program Carry over Funds from 2019	\$ 3,592,365
Total Funding Request for 2020 EE Portfolio	\$ 105,390,218

Budget by Funding Source

2020 Authorized (Before Carryover)	2020 Budget	Allocation
Electric Procurement EE Funds	\$ -	\$ -
Gas PPP Surcharge Funds	\$ 108,982,583	\$ 108,982,583
Total Funds	\$ 108,982,583	\$ 108,982,583

Revenue Requirement for Cost Recovery by Funding Source

2020 Authorized Funding in Rates (including 2019 and prior year carryover)	2020 Revenue Requirement	Allocation after Carryover adjustment
Electric Procurement EE Funds	\$ -	\$ -
Gas PPP Surcharge Funds	\$ 105,390,218	\$ 105,390,218
Total Funds	\$ 105,390,218	105390218

Unspent/Uncommitted Carryover Funds (in positive \$ amounts)

Total Unspent/Uncommitted Funds	Electric PGC	Electric Procurement	Total Electric	Gas	Total
2019				\$ 3,592,365	\$ 3,592,365
2018				\$ -	\$0
2017				\$ -	\$0
2016				\$ -	\$0
2013-2015				\$ -	\$0
Total Pre-2020				\$ 3,592,365	\$ 3,592,365

EM&V Unspent/Uncommitted Funds	Electric PGC	Electric Procurement	Total Electric	Gas	Total
2019				\$ -	\$ -
2018				\$ -	\$ -
2017				\$ -	\$ -
2016				\$ -	\$ -
2013-2015				\$ -	\$ -
Total Pre-2020				\$ -	\$ -

Program Unspent/Uncommitted Funds	Electric PGC	Electric Procurement	Total Electric	Gas	Total
2019 ¹				\$ 3,592,365	\$ 3,592,365
2018				\$ -	\$ -
2017				\$ -	\$ -
2016				\$ -	\$ -
2013-2015				\$ -	\$ -
Total Pre-2020				\$ 3,592,365	\$ 3,592,365

[1] 2019 unspent figure includes 3C REN's \$572,433 unspent fund.

Attachment A - Energy Efficiency Program Portfolio

PA Name: SoCalGas

Budget Year: 2020

Table 5 - Total 2020 Requested and 2013-2019 Authorized Budgets (\$000).

Category (2013-19 Authorized ¹ and 2020 Request)	Electric Demand Response Funds	Electric Energy Efficiency Funds	Natural Gas Public Purpose Funds	Total Energy Efficiency Funds
2013-2015 Annualized Program Funds - Utility			\$ 79,470	\$ 79,470
2013-2015 Annualized Program Funds - REN			\$ 4,390	\$ 4,390
2013-2015 Annualized Program Funds - CCA			\$ -	\$ -
2013-2015 Annualized EM&V			\$ 3,550	\$ 3,550
2013-2015 Total Annualized Portfolio			\$ 87,410	\$ 87,410
2016 Program Funds - Utility			\$ 76,019	\$ 76,019
2016 Program Funds - REN			\$ 4,337	\$ 4,337
2016 Program Funds - CCA			\$ -	\$ -
2016 EM&V			\$ 3,348	\$ 3,348
2016 Annualized Total			\$ 83,704	\$ 83,704
2017 Program Funds - Utility			\$ 76,019	\$ 76,019
2017 Program Funds - REN			\$ 4,337	\$ 4,337
2017 Program Funds - CCA			\$ -	\$ -
2017 EM&V			\$ 3,348	\$ 3,348
2017 Annualized Total			\$ 83,704	\$ 83,704
2018 Program Funds - Utility			\$ 94,647	\$ 94,647
2018 Program Funds - REN			\$ 3,257	\$ 3,257
2018 Program Funds - CCA			\$ -	\$ -
2018 EM&V			\$ 4,166	\$ 4,166
2018 Annualized Total			\$ 102,070	\$ 102,070
2019 Program Funds - Utility			\$ 97,696	\$ 97,696
2019 Program Funds - REN			\$ 3,473	\$ 3,473
2019 Program Funds - CCA			\$ 1,193	\$ 1,193
2019 EM&V			\$ 4,265	\$ 4,265
2019 Annualized Total			\$ 106,627	\$ 106,627
2020 Requested Program Funds - Utility			\$ 99,728	\$ 99,728
2020 Requested Program Funds - REN			\$ 3,666	\$ 3,666
2020 Requested Program Funds - CCA			\$ 1,253	\$ 1,253
2020 Requested EM&V			\$ 4,336	\$ 4,336
2020 Total Portfolio Request			\$ 108,983	\$ 108,983

[1] Authorized budget excludes reductions from past unspent funds, carryover and is consistent with funding approved in D.09-09-047, D.12-11-015, D.14-10-046, D.15-10-028, and D.18-05-041

Attachment A - Energy Efficiency Program Portfolio

PA Name: SoCalGas

Budget Year: 2020

Table 6 - Committed Energy Efficiency Program Funding Not Yet Spent

Committed funds not yet spent (\$000).	Electric Procurement Funds	Natural Gas Public Purpose Funds	Total
Category			
2013-2015 EM&V Funds		\$7,372	\$7,372
2013-2015 Program Funds - Utility		\$21,666	\$21,666
2013-2015 Program Funds - REN		\$6,197	\$6,197
2013-2015 Program Funds - CCA		\$0	\$0
2016 EM&V Funds		\$0	\$0
2016 Program Funds - Utility		\$0	\$0
2016 Program Funds - REN		\$0	\$0
2016 Program Funds - CCA		\$0	\$0
2017 to date EM&V Funds		(\$268)	(\$268)
2017 to date Program Funds - Utility		\$6,880	\$6,880
2017 to date Program Funds - REN		(\$158)	(\$158)
2017 to date Program Funds - CCA		\$0	\$0
2018 to date EM&V Funds		\$3,627	\$3,627
2018 to date Program Funds - Utility		\$8,973	\$8,973
2018 to date Program Funds - REN		\$1,010	\$1,010
2018 to date Program Funds - CCA		\$0	\$0
2019 to date EM&V Funds		\$4,074	\$4,074
2019 to date Program Funds - Utility		\$59,656	\$59,656
2019 to date Program Funds - REN		(\$5,710)	(\$5,710)
2019 to date Program Funds - CCA		\$0	\$0
Total		\$113,319	\$113,319

Attachment A - Energy Efficiency Program Portfolio

PA Name: SoCalGas

Budget Year: 2020

Table 7 - 2019 Authorized and Spent/Unspent Detail (June YTD 2019)

Authorized, spent and unspent program funds (excludes EM&V) (\$000)	Electric Procurement Funds	Natural Gas Public Purpose Funds	Total
Category			
2019 Annualized Authorized Program Budget		\$102,361	\$102,361
2019 Actual Spent		\$44,823	\$44,823
2019 Unspent		\$3,592	\$3,592
2019 Committed funds		\$53,946	\$53,946
2019 Unspent/uncommitted - estimated available for 2020		\$3,592	\$3,592
2018 and prior Unspent/uncommitted - estimated available for 2020		\$0	\$0
Total Unspent/uncommitted - estimated available for 2020		\$3,592	\$3,592

APPENDIX B

Advice No. 5510

**California Energy Database and Reporting System
SoCalGas Submittal Receipt**

CEDARS FILING SUBMISSION RECEIPT

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

PA: Southern California Gas (SCG)

Filing Year: 2020

Submitted: 13:13:17 on 30 Aug 2019

By: Paul Deang

Advice Letter Number: 5510

* Portfolio Filing Summary *

- TRC: 1.5938

- PAC: 3.1558

- TRC (no admin): 2.2961

- PAC (no admin): 8.0031

- RIM: 3.1558

- Budget: \$104,063,999.50

* Programs Included in the Filing *

- SCG3701: RES-Energy Advisor
- SCG3702: RES-Residential Energy Efficiency Program
- SCG3703: RES-Plug Load and Appliances - POS
- SCG3705: RES-Home Upgrade Program
- SCG3706: RES-Residential HVAC Upstream
- SCG3707: RES-RNC
- SCG3708: COM-Energy Advisor
- SCG3710: COM-Calculated Incentives
- SCG3711: COM-Deemed Incentives
- SCG3712: COM-NonRes HVAC Upstream
- SCG3713: IND-Energy Advisor
- SCG3714: IND-SEM
- SCG3715: IND-Calculated Incentives
- SCG3716: IND-Deemed Incentives
- SCG3717: AG-Energy Advisor
- SCG3719: AG-Calculated Incentives
- SCG3720: AG-Deemed Incentives
- SCG3721: ET-Technology Development Support
- SCG3722: ET-Technology Assessment Support
- SCG3723: ET-Technology Introduction Support
- SCG3724: C&S-SW-Building Codes & Compliance Advocacy
- SCG3725: C&S-SW-Appliance Standards Advocacy
- SCG3726: C&S-Compliance Enhancement
- SCG3727: C&S-Reach Codes

- SCG3728: C&S-Planning Coordination
- SCG3729: WE&T-Integrated Energy Efficiency Training
- SCG3730: WE&T-Connections
- SCG3733: SW-ME&O-ME&O
- SCG3735: FIN-On-Bill Financing
- SCG3737: FIN-SW-New Financing Offerings
- SCG3738: PUB-CA Department of Corrections Partnership
- SCG3739: PUB-California Community College Partnership
- SCG3740: PUB-UC/CSU/IOU Partnership
- SCG3741: PUB-State of CA/IOU Partnership
- SCG3742: PUB-LA Co Partnership
- SCG3744: PUB-Riverside Co Partnership
- SCG3745: PUB-San Bernardino Co Partnership
- SCG3746: PUB-Santa Barbara Co Partnership
- SCG3747: PUB-South Bay Cities Partnership
- SCG3748: PUB-San Luis Obispo Co Partnership
- SCG3749: PUB-San Joaquin Valley Partnership
- SCG3750: PUB-Orange County Cities Partnership
- SCG3751: PUB-SEEC Partnership
- SCG3754: PUB-Ventura County Partnership
- SCG3755: PUB-Energy Efficiency Pilots
- SCG3757: IND-Small Industrial Facility Upgrades
- SCG3760: WE&T-HERS Rater Training Advancement
- SCG3762: RES-CLEO

- SCG3763: RES-MF Direct Therm Savings
- SCG3764: RES-LivingWise
- SCG3765: RES-Manufactured Mobile Home
- SCG3771: SOL-IDEEA365
- SCG3772: EM&V-Evaluation Measurement & Verification
- SCG3773: PUB-Public Sector Resource
- SCG3774: PUB-LG Regional Resource
- SCG3776: PUB-Gateway Cities Partnership
- SCG3777: PUB-San Gabriel Valley COG Partnership
- SCG3779: PUB-West Side Community Energy Partnership
- SCG3783: PUB-Western Riverside Energy Partnership
- SCG3793: COM-Instant Rebates! Foodservice POS
- SCG3801: PUB-North Orange County Cities Partnership
- SCG3802: PUB-San Bernardino Regional Energy Partnership
- SCG3803: FIN-SW-California Hub for EE Financing
- SCG3805: COM-Direct Install Program
- SCG3809: COM-AB793-CEMTL Program
- SCG3810: RES-AB793-REMTS Program
- SCG3813: COM-Savings By Design
- SCG3814: COM-Midstream Water Heating
- SCG3815: PUB-Calculated Incentives
- SCG3816: PUB-Deemed Incentives
- SCG3817: PUB-Direct Install Program
- SCG3818: PUB-SW-Water/Wastewater Pumping Program

- SCG3819: WE&T-SW-Career & Workforce Readiness
- SCG3820: RES-Direct Install Program
- SCG3821: IND-Direct Install Program
- SCG3823: RES-HVAC QI/QM
- SCG3824: RES-Behavioral Program
- SCG3825: COM-HVAC QI/QM
- SCG3829: RES-Marketplace
- SCG3830: RES-Retail Partnering
- SCG3831: RES-EE Kits
- SCG3832: RES-Pasadena Home Upgrade
- SCG3833: RES-Burbank Home Upgrade
- SCG3834: COM-LADWP Direct Install
- SCG3835: COM-Pasadena Direct Install
- SCG3836: RES-LADWP HVAC
- SCG3837: PUB-SW-Energy Atlas
- SCG3843: RES-SF Solicitation
- SCG3844: RES-MF Solicitation
- SCG3845: COM-SMB Solicitation
- SCG3846: PUB-SM Solicitation
- SCG-ESAP: Energy Savings Assistance Program
- SCG-ESPI: ESPI Incentives
- SCG-GRCL: GRC Labor Loaders
- SCG_SW_CSA_Appl: C&S-SW-Appliance Standards Advocacy
- SCG_SW_CSA_Appl_PA: C&S-SW-Appliance Standards Advocacy-PA

- SCG_SW_CSA_Bldg: C&S-SW-Building Codes Advocacy
- SCG_SW_CSA_Bldg_PA: C&S-SW-Building Codes Advocacy-PA
- SCG_SW_CSA_Natl: C&S-SW-Federal Codes Advocacy
- SCG_SW_CSA_Natl_PA: C&S-SW-Federal Codes Advocacy-PA
- SCG_SW_NC_NonRes: COM-SW-New Construction
- SCG_SW_NC_NonRes_PA: COM-SW-New Construction-PA
- SCG_SW_NC_Res: RES-SW-New Construction
- SCG_SW_NC_Res_PA: RES-SW-New Construction-PA

ATTACHMENT C

Advice No. 5510

**Joint IOUs Shared Funding Allocations
for Statewide Programs**

ATTACHMENT D

Advice No. 5510

**Southern California Gas Company
Supplemental Budget Information Pursuant to D.18-05-041**

Appendix A - Supplemental 2020 Energy

Efficiency Budget Information

Appendix B - SoCalGas Management and

Organizational Supporting

Appendix C - Third-Party Program Solicitation

Schedule

I. DESCRIPTION OF IN-HOUSE EE ORGANIZATIONAL STRUCTURE & ASSOCIATED COSTS

1. Functions conducted by each department/organization.

Response:

The following is a list of functions conducted by SoCalGas departments supporting EE programs, as shown in the organizational chart in Appendix B.

- Customer Strategy and Engagement Department – Provides support for the marketing and outreach of EE programs.
- Market Development – Manages emerging technology projects.
- Commercial and Industrial Services – Provides account executive support for energy efficiency projects with large SoCalGas nonresidential customers.
- Customer Programs and Assistance (CP&A) – Provides overall EE program management, which includes program administration, the third-party solicitation process, design, implementation, contract management, and product and channel management for all sectors. CP&A also provides overall policy, finance and accounting, strategy, compliance, audits, regulatory support, data analytics, evaluation, measurement and verification (EM&V), product review, and management of evaluation studies.

2. Management structure and org chart.

Response:

Please see Appendix B.

3. Staffing needs by department/organization, including current and forecast for 2020, as well as a description of what changes are expected in the near term or why it's impossible to predict beyond 2020, if that's the PA's position.

Response:

SoCalGas provides the requested information regarding its staffing needs, both current (2018) and estimated (2020) by function at the aggregated category in Appendix A. SoCalGas' Business Plan outlines a solicitation strategy that is to be conducted in three phases between now and 2022 to obtain new program designs based on strategies proposed in the Business Plan. It is currently unknown to what extent programs and vendor contracts developed through this effort will impact SoCalGas' organization or staffing needs.

4. Non-program functions currently performed by contractors (e.g. advisory consultants), as well as a description of what changes are expected in the near term or why it's impossible to predict beyond 2020, if that's the PA's position.

Response:

SoCalGas currently utilizes consultants to provide portfolio support, including regulatory, program/process design, and solicitation management. As mentioned above, it is currently unknown to what extent SoCalGas' current organization, staffing, and reliance on consultants will continue until the solicitation strategy is fully implemented and new energy efficiency programs are designed and launched.

5. Anticipated drivers of in-house cost changes by department/organization.

Response:

As mentioned above, it is currently unknown to what extent SoCalGas' current organization, staffing, and reliance on consultants will continue until the solicitation strategy is fully implemented and new energy efficiency programs are designed and launched.

6. Explanation of method for forecasting costs.

Response:

SoCalGas' 2020 budget is based on the Commission-authorized budget set in D.18-05-041.² Method of forecasting cost for SoCalGas include evaluated historical portfolio, program, and cost category performance, as well as market sector forecasts to identify the potential goal to develop the proposed budget.

² See D. 18-05-041.

B. Table showing PA EE “Full Time Equivalent” headcount by department/organization

1. TURN and ORA like this example, taken from testimony PG&E’s 2017 GRC addressing its Energy Procurement department. We would be looking for 2018 or 2017 “recorded” positions, depending on what’s most appropriate for the PA, or both, if that provides the most clarity. For forecast years, we’d want at least 2020.
 - Note, if PA’s FTE needs change, these changes can be made without reporting or seeking CPUC approval.

**TABLE 6-3(a)
 EP HEADCOUNT
 NUMBER OF PLANNED POSITIONS**

Line No.	Description	2014 Positions	2015 Forecast	2016 Forecast	2017 Forecast
1	EP Administrative Office	4	4	4	4
2	Energy Supply Management (ESM)	126	131	131	134
3	Renewable Energy (RE)	38	40	40	41
4	Energy Policy, Planning and Analysis (EPPA)	46	46	46	46
5	Value Based Reliability (VBR)	10	12	12	12
6	Energy Contract Management and Settlements (ECMS)	79	80	80	80
7	Energy Compliance and Reporting (ECR)	18	18	18	18
8	Total	321	331	331	335

(a) See WP Table 6-7, Exhibit (PG&E-5).

Response:

SoCalGas does not track or forecast FTEs at this granular level for EE programs or in its Business Plan. Notwithstanding, SoCalGas has made a good-faith effort to provide an approximate FTE breakdown in the manner requested. Please see the information provided in Appendix A, Portfolio Headcount (FTE) table.

C. Table showing costs by functional area of management structure

1. Expenses broken out into labor, non-labor O&M (with contract labor identified).

Response:

Please see the information provided in Appendix A.

2. Identify any capital costs.

Response:

SoCalGas' capital costs are not part of the EE portfolio budget.

D. Table showing cost drivers across the EE organization

1. TURN and ORA like this example, taken from testimony PG&E's 2017 GRC addressing its Energy Procurement department. While this example pertains to departmental cost increases, in our case, cost increases or decreases would be attributed to major cost drivers.

TABLE 6-2(a)
EP COST INCREASE
2015-2017 EXPENSE BY COST DRIVER

Line No.	Description	Increase in Thousands of \$	Percent of Total Increase
1	Escalation	3,597	57
2	Portfolio Complexity	1,138	18
3	Regulatory Mandates	1,192	19
4	Process Improvements	400	6
5	Total	6,324	100

(a) See WP Table 6-6, Exhibit (PG&E-5).

Response:

SoCalGas does not forecast EE budgets in a manner similar or comparable to a forecast as prepared in a General Rate Case (GRC). Notwithstanding, SoCalGas makes a good faith effort to provide the information in the manner requested. The 2020 program year budget increase of \$2M against the 2019 is contributed to incentive or rebate structure changing from year-to-year, to achieve the portfolio's goal.

E. Explanation of allocation of labor and O&M costs between EE-functions and GRC-functions or other non-EE functions

1. When an employee spends less than 100% of her/his time on EE, how are costs tracked and recovered (e.g., on a pro rata basis between EE rates and GRC rates; when time exceeds a certain threshold, all to EE; etc.).

Response:

SoCalGas uses its accounting tracking system, including designated internal order numbers for each program cost category, to track the costs associated with EE programs. Using SoCalGas' time keeping system (MyTime), an employee records the actual hours of work performed on EE programs. MyTime is used to record, review, and approve the actual time spent on EE programs bi-weekly, which is reviewed for accuracy monthly.

2. Describe the method used to determine the proportion charged to EE balancing accounts for all employees who also do non-EE work.

Response:

As mentioned above, MyTime uses EE-designated program cost category internal order numbers to track actual hours worked on EE. The designated EE internal order numbers are then used to capture EE costs to the EE DSMBA balancing account.

3. Identify the EE functions that are most likely to be performed by employees who also do non-EE work (e.g. Customer Account Representatives?)

Response:

The EE functions that are most likely to be performed by employees who also do non-EE work are Information Technology, Account Management, and Marketing.

4. Are labor costs charged to EE fully loaded?

Response:

Only labor loaders for Vacation & Sick and Payroll Taxes are charged to EE.

5. How are burden benefit-related A&G expenses for employees who work on EE programs recovered (EE rates or GRC rates)? **PG&E allocates these costs to EE pursuant to a settlement agreement with MCE and TURN, which was adopted in D.14-08-032.

Response:

SoCalGas does not forecast EE budgets in a manner similar or comparable to a forecast as prepared in a GRC. Any benefit-related A&G items outside of Vacation & Sick and Payroll Taxes are recovered through the GRC.

6. When EE and non-EE activities are supported by the same non-labor resources, how are the costs of those resources or systems allocated to EE and non-EE activities?

Response:

For non-labor resources supporting both EE and non-EE, the costs charged to EE program are based on the actual cost incurred associated with the approved scope of work related to the EE program.

7. Identify the EE O&M costs that are most likely to be spread to non-EE functions as well as EE, if any.

Response:

EE allowable O&M costs are identified in Energy Efficiency Policy Manual Version 5 and D.09-09-047. These identified costs are specific to EE program cost category in nature and therefore, they do not spread to non-EE functions.

II. BUDGET TABLES INCLUDING INFORMATION IDENTIFIED IN THE SCOPING MEMO

A. Attachment-A, Question C.8

“Present a single table summarizing energy savings targets, and expenditures by sector (for the six specified sectors). This table should enable / facilitate assessment of relative contributions of the sectors to savings targets, and relative cost-effectiveness.”

Response:

Please see Appendix A, Portfolio Summary table.

B. Attachment-A, Question C.9

“Using a common budget template developed in consultation with interested stakeholders (hopefully agreed upon at a “meet and confer” session), display how much of each year’s budget each PA anticipates spending “in-house” (e.g., for administration, non-outsourced direct implementation, other non-incentive costs, marketing), by sector and by cross-cutting program.”

Response:

Please see Appendix A, Residential table and similar tables for all other sectors: Commercial, Industrial, Agricultural, Public Sector and Cross-cutting.

C. Attachment-A, Question C.10

“Present a table akin to PG&E’s Figure 1.9 (Portfolio Overview, p 37) or SDG&E’s Figure 1.10 (p. 23) that not only shows anticipated solicitation schedule of “statewide programs” by calendar year and quarter, but also expected solicitation schedule of local third-party solicitations, by sector, and program area (latter to extent known, and/or by intervention strategy if that is more applicable). For both tables, and for each program entry on the calendar, give an approximate size of budget likely to be available for each solicitation (can be a range).”

Response:

Please see Appendix C. As described in SoCalGas' Business Plan, SoCalGas has planned for three phases of open solicitation. This schedule includes budget ranges for solicitations in each phase, based on current budgets for programs in these sectors. Solicitation budgets will be dependent on program designs, and thus, the budget ranges are intended to be illustrative.

III. CONCLUSION

This completes SoCalGas' Supplemental Energy Efficiency Business Plan Budget information in response to D.18-05-041.

**Appendix A - SUPPLEMENTAL 2020 EE BUDGET INFORMATION
PORTFOLIO SUMMARY TABLE**

Sector	2018 EE Portfolio Expenditures (\$Million)				2020 EE Portfolio Budget (\$Million)				2018 EE Portfolio Savings			2020 EE Portfolio Forecasted Savings		
	Labor	Non-Labor (excl. Incentives)	Incentives	Total	Labor	Non-Labor (excl. Incentives)	Incentives	Total	KWH	KW	THERMS	KWH	KW	THERMS
Residential	6,967,867	22,561,785	21,245,119	50,774,771	5,885,117	14,714,236	19,545,422	40,144,775	11,418,345	1,484	13,408,645	7,247,402	1,638	9,024,846
Commercial	6,805,029	1,633,318	8,415,055	16,853,401	5,742,113	4,732,912	14,196,667	24,671,692	31,682	3	4,191,336	106,227	13	6,757,518
Agricultural	998,106	157,925	804,284	1,960,315	1,152,895	280,312	1,041,738	2,474,945	276,673	-	1,087,033	168,096	-	970,561
Industrial	3,334,233	570,169	256,915	4,161,317	4,255,919	1,017,533	9,490,976	14,764,428	-	-	530,172	-	-	5,890,612
Public (GP)	1,840,978	815,960	-	2,656,938	2,656,930	4,514,438	2,788,660	9,960,028	(175)	1	114,192	-	-	1,219,774
Cross Cutting*	4,539,074	1,842,922	-	6,381,996	3,072,220	4,639,872	-	7,712,092	-	-	32,453,419	-	-	14,851,867
Total Sector Budget	24,485,285	27,582,078	30,721,373	82,788,737	22,765,194	29,899,304	47,063,462	99,727,960	11,726,524	1,488	51,784,797	7,521,726	1,651	38,715,178
EM&V-PA	229,707	127,447	-	357,155	-	1,192,411	-	1,192,411	-	-	-	-	-	-
EM&V-ED	-	107,989	-	107,989	-	3,143,629	-	3,143,629	-	-	-	-	-	-
OBF - Loan Pool**	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EE Total				83,253,880				104,064,000	11,726,524	1,488	51,784,797	7,521,726	1,651	38,715,178

* Cross Cutting Sector includes Codes & Standards, Emerging Technologies, Workforce Education & Training, Financing.

** For SCG, the loan pool is not part of the authorized EE portfolio budget and is collected and tracked through a separate balancing account.

A. → Attachment-A, Question C.8¶

“Present a single table summarizing energy savings targets, and expenditures by sector (for the six specified sectors). This table should enable/facilitate assessment of relative contributions of the sectors to savings targets, and relative cost-effectiveness.”¶

¶

- → TURN and ORA invite the PAs to propose a common table format for this information. We don't have anything specific in mind.¶
- → Additionally, include a brief description of the method used by the PA to estimate the costs presented in the C.8 Table. ¶

¶

Appendix A - SUPPLEMENTAL 2020 EE BUDGET INFORMATION
FUNCTION DEFINITIONS TABLE

Aggregated Category	Definition	Functional Category	Detailed Definition
Policy, Strategy, and Regulatory Reporting Compliance	Includes policy, strategy, compliance, audits and regulatory support	Planning & Compliance	DSM Goal Planning; lead legislative review/positioning; policy support on reg proceedings; portfolio optimization; end use-market strategy; DSM lead for PRP, DRP, ES; locational targeting; audit support; SOX certifications; developing control plans; developing action plans; continuous monitoring; inspections; program/product QA/QC; decision compliance oversight/tracking; data requests; policies & procedures
		Company Regulatory Support	Case management for EE proceedings
Program management	Includes labor, contracts, admin costs for program design, program implementation, product and channel management for all sectors	Program Management & Delivery	Market Segment & Locational Resource programs; Business Core & Finance Programs; Large Power DR Programs; Non-Res HVAC & Technical Services; Program Integration & Optimization; Residential EE & DR Programs (incl. Res HVAC QI); IQP & Economic Assistance Programs; Mass Market DR Programs; Education & Information Products & Services; Energy Leader Partnerships; Institutional & Federal Partnerships; REN Coordination; Strategic Plan Support; Energy/Water Program Mgt; Service Level Agreement Tracking
		Product Management	Manage end-to-end new products and services (P&S) intake, evaluation, and launch process; develop and facilitate P&S governance teams, coordination of all sub-process owners, stakeholders, and technical resources required to evaluate and launch new products; evaluate and launch new services and OOR opportunities; develop external partnerships & strategic alliances; work with various companies and associations to help advance standards, products, and tech.; work with external experts to help reduce SCE costs to deliver new prog. and products; develop and launch new customer technologies, products, services for residential and business customers; conduct customer pilots of new technologies and programs; lead customer field demonstrations of new technologies and products; align new P&S to savings programs/incentives; develop new programs/incentives in support of savings goals
		Channel Management	
		Contract Management	Budget forecasting, spend tracking, invoice processing, and contract management with vendors and suppliers; Regulatory support for ME&O activities
Engineering Services	Includes engineering, project management, and contracts associated with workpaper development and pre/post sales project technical reviews and design assistance	Custom project support	Management of Emerging Products projects; Customized reviews; LCR/RFO support; Ex-ante review management; Technical policy support; Technical assessments; Workpapers; Tool development; End use subject matter expertise
		Deemed workpapers	
		Project management	
Customer Application/Rebate and Incentive Processing	Costs associated with application management and rebate and incentive processing (deemed and custom)	Rebate & Application Processing	
Inspections	Costs associated with project inspections	Inspections	
Portfolio Analytics	Includes analytics support, including internal performance reporting and external reporting	Data analytics	Data development for programs, products and services; Standard and ad hoc data extracts for internal and external clients ; Database management; CPUC, CAISO reporting; Data reconciliation; E3 support ; Compliance filing support; Funding Oversight; ESPI support; Program Results Data & Performance
EM&V	EM&V expenditures	EM&V Studies	Program and product review; manage evaluation studies
		EM&V Forecasting	EE lead for LTPP and IEPR; market potential study; integration w/ procurement planning; CPUC Demand Analysis Working Group
ME&O	Costs associated with utility EE marketing; no statewide; focus on outsourced portion	Marketing	Customer Programs, Products, and Services Marketing; Digital Product Development; Digital Content & Optimization
		Customer insights	Voice of the Customer; Customer satisfaction study measurement and analysis (JD Power, SDS); Customer testing/research
Account Management / Sales	Costs associated with account rep energy efficiency sales functions	Account Management	
IT	IT project specific costs and regular O&M	IT - project specific	Projects and minor enhancements. Includes project management/business integration ("PMO/BID"). Excluded: maintenance (which SCE defines as when something goes down, normal batch processing, verifying interfaces, etc.).
		IT - regular O&M	
Call Center	Costs associated with call center staff fielding EE program questions	Call Center	
Incentives	Costs of rebate and incentive payments to customers	Incentives	

**Appendix A - SUPPLEMENTAL 2020 EE BUDGET INFORMATION
PORTFOLIO HEADCOUNT (FTE) TABLE**

Functional Group	2018 EE Portfolio FTE	2020 EE Portfolio FTE
Policy, Strategy, and Regulatory Reporting Compliance	11	10
Program Management	78	79
Engineering Services	21	24
Customer Application/Rebate/Incentive Processing	8	8
Customer Project Inspections	2	3
Portfolio Analytics		1
EM&V	1	1
ME&O	16	13
Account Management / Sales	37	29
IT	5	6
Call Center	3	2
Total	182	177

||
A. → **Narrative description of in-house departments/organizations supporting the PA's EE portfolio**

- ¶
- → Functions conducted by each department/organization¶
 - → Management structure and org chart¶
 - → Staffing needs by department/organization, including current and forecast for 2018, as well as a description of what changes are expected in the near term (2019-2020) or why it's impossible to predict beyond 2018, if that's the PA's position.¶
 - → Non-program functions currently performed by contractors (e.g. advisory consultants), as well as a description of what changes are expected in the near term (2019-2020) or why it's impossible to predict beyond 2018, if that's the PA's position.¶
 - → Anticipated drivers of in-house cost changes by department/organization¶
 - → Explanation of method for forecasting costs¶

¶
¶
B. → **Table showing PA EE headcount by department/organization**

- ¶
- → TURN and ORA like this example, taken from testimony PG&E's 2017 GRC addressing its Energy Procurement department. We would be looking for 2016 or 2017 "recorded" positions, depending on what's most appropriate for the PA, or both, if that provides the most clarity. For forecast years, we'd want at least 2018.¶

Appendix A - SUPPLEMENTAL 2020 EE BUDGET INFORMATION
RESIDENTIAL BUDGET DETAIL TABLE

Sector	Cost Element	Functional Group	2018 EE Portfolio Expenditures (\$Million)	2020 EE Portfolio Budget (\$) (2)
Residential	Labor(1)	Policy, Strategy, and Regulatory Reporting Compliance	1,715,420	1,448,857.34
		Program Management	2,198,302	1,856,703.90
		Engineering services	114,210	96,462.37
		Customer Application/Rebate/Incentive Processing	1,241,750	1,048,792.32
		Customer Project Inspections		-
		Portfolio Analytics		-
		ME&O (Local)	1,496,418	1,263,886.91
		Account Management / Sales		-
		IT	3,922	3,312.49
		Call Center	197,845	167,101.86
	Labor Total		6,967,867	5,885,117
	Non-Labor	Third-Party Implementer (as defined per D.16-08-019, OP 10)		11,590,736
		Local/Government Partnerships Contracts (3)		
		Other Contracts		
		Program Implementation	582,581	1,777,526
		Policy, Strategy, and Regulatory Reporting Compliance		
		Program Management	21,784,721	1,234,065
		Engineering services	58,676	3,593
		Customer Application/Rebate/Incentive Processing	87,929	105,385
		Customer Project Inspections		
		Portfolio Analytics		
		ME&O (Local)	47,878	2,932
		Account Management / Sales		
		IT		
		Call Center		
		Facilities		
		Incentives--(PA-implemented and Other Contracts Program Implementation) Programs	21,245,119	11,088,157
		Incentives--Third Party Program (as defined per D.16-08-019, OP 10)		8,457,265
	Non-Labor Total		43,806,904	34,259,658
Residential Total			50,774,771	40,144,775
	Other (collected through GRC) (3)	Labor Overheads	1,321,295	1,550,571

Notes:

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- (2) Estimated 2020 budget may change based on the implementation of the solicitation strategy.
- (3) The labor P&B costs are collected through GRC.

C. → Table showing costs by functional area of management structure

- → Expenses broken out into labor, non-labor O&M (with contract labor identified)
- → Identify any capital costs

B. → Attachment A, Question C.9

“Using a common budget template developed in consultation with interested stakeholders (hopefully agreed upon at a “meet and confer” session), display how much of each year’s budget each PA anticipates spending “in-house” (e.g., for administration, non-outsourced direct implementation, other non-incentive costs, marketing), by sector and by cross-cutting program.”

- → TURN and ORA invite the PAs to propose a common table format for this information. We don’t have anything specific in mind.
- → Additionally, include a brief description of the method used by the PA to estimate the costs presented in the C.9 Table.

Appendix A - SUPPLEMENTAL 2020 EE BUDGET INFORMATION
COMMERCIAL BUDGET DETAIL TABLE

Sector	Cost Element	Functional Group	2018 EE Portfolio Expenditures (\$Million)	2020 EE Portfolio Budget (\$) (2)
Commercial	Labor(1)	Policy, Strategy, and Regulatory Reporting Compliance	597,103	503,839
		Program Management	2,977,184	2,512,161
		Engineering services	1,077,701	909,369
		Customer Application/Rebate/Incentive Processing	123,176	103,936
		Customer Project Inspections		-
		Portfolio Analytics		-
		ME&O (Local)	873,618	737,163
		Account Management / Sales	1,118,199	943,541
		IT	11,897	10,039
		Call Center	26,150	22,066
	Labor Total		6,805,029	5,742,113
	Non-Labor	Third-Party Implementers Contracts (as defined per D.16-08-019, OP 10)		2,142,398
		Local/Government Partnerships Contracts (3)		
		Other Contracts		
		Program Implementation	177,386	191,553
		Policy, Strategy, and Regulatory Reporting Compliance		
		Program Management	1,147,160	1,890,193
		Engineering services	120,545	198,625
		Customer Application/Rebate/Incentive Processing	188,226	310,143
		Customer Project Inspections		
		Portfolio Analytics		
		ME&O (Local)		
		Account Management / Sales		
		IT		
		Call Center		
		Facilities		
		Incentives--(PA-implemented and Other Contracts Program Implementation) Programs	8,415,055	11,202,137
		Incentives--Third Party Program (as defined per D.16-08-019, OP 10)		2,994,530
	Non-Labor Total		10,048,372	18,929,579
Commercial Total			16,853,401	24,671,692
	Other (collected through GRC) (3)	Labor Overheads	1,405,808	1,649,748

Notes:

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- (3) The labor P&B costs are collected through GRC.

C. → Table showing costs by functional area of management structure

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- → Expenses broken out into labor, non-labor O&M (with contract labor identified)
- → Identify any capital costs

B. → Attachment A, Question C.9

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**Appendix A - SUPPLEMENTAL 2020 EE BUDGET INFORMATION
INDUSTRIAL BUDGET DETAIL TABLE**

Sector	Cost Element	Functional Group	2018 EE Portfolio Expenditures (\$Million)	2020 EE Portfolio Budget (\$) (2)
Industrial	Labor(1)	Policy, Strategy, and Regulatory Reporting Compliance	175,657	224,214
		Program Management	683,056	871,874
		Engineering services	736,812	940,489
		Customer Application/Rebate/Incentive Processing	40,703	51,955
		Customer Project Inspections		-
		Portfolio Analytics		-
		ME&O (Local)	500,801	639,238
		Account Management / Sales	1,172,801	1,497,000
		IT	518	661
		Call Center	23,884	30,487
	Labor Total		3,334,233	4,255,919
	Non-Labor	Third-Party Implementers Contracts (as defined per D.16-08-019, OP 10)		288,876
		Local/Government Partnerships Contracts (3)		
		Other Contracts		
		Program Implementation	26,839	34,299
		Policy, Strategy, and Regulatory Reporting Compliance		
		Program Management	493,652	630,871
		Engineering services	34,815	44,492
		Customer Application/Rebate/Incentive Processing	14,863	18,995
		Customer Project Inspections		
		Portfolio Analytics		
		ME&O (Local)		
		Account Management / Sales		
		IT		
		Call Center		
		Facilities		
		Incentives--(PA-implemented and Other Contracts Program Implementation) Programs	256,915	9,055,976
		Incentives--Third Party Program (as defined per D.16-08-019, OP 10)		435,000
	Non-Labor Total		827,084	10,508,509
Industrial Total			4,161,317	14,764,428
	Other (collected through GRC) (3)	Labor Overheads	1,065,414	1,250,288

Notes:

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(3) The labor P&B costs are collected through GRC.

C. → Table showing costs by functional area of management structure

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- → Expenses broken out into labor, non-labor O&M (with contract labor identified)
- → Identify any capital costs

B. → Attachment A, Question C.9

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“Using a common budget template developed in consultation with interested stakeholders (hopefully agreed upon at a “meet and confer” session), display how much of each year’s budget each PA anticipates spending “in-house” (e.g., for administration, non-outsourced direct implementation, other non-incentive costs, marketing), by sector and by cross-cutting program.”

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Appendix A - SUPPLEMENTAL 2020 EE BUDGET INFORMATION
 AGRICULTURAL BUDGET DETAIL TABLE

Sector	Cost Element	Functional Group	2018 EE Portfolio Expenditures (\$Million)	2020 EE Portfolio Budget (\$) (2)
Agricultural	Labor(1)	Policy, Strategy, and Regulatory Reporting Compliance	84,606	97,727
		Program Management	282,798	326,655
		Engineering services	198,773	229,600
		Customer Application/Rebate/Incentive Processing	18,106	20,914
		Customer Project Inspections		-
		Portfolio Analytics		-
		ME&O (Local)	164,612	190,141
		Account Management / Sales	239,133	276,218
		IT		-
		Call Center	10,077	11,639
	Labor Total		998,106	1,152,895
	Non-Labor	Third-Party Implementers Contracts (as defined per D.16-08-019, OP 10)		
		Local/Government Partnerships Contracts (3)		
		Other Contracts		
		Program Implementation		
		Policy, Strategy, and Regulatory Reporting Compliance		
		Program Management	121,944	216,447
		Engineering services	26,070	46,273
		Customer Application/Rebate/Incentive Processing	9,911	17,591
		Customer Project Inspections		
		Portfolio Analytics		
		ME&O (Local)		
		Account Management / Sales		
		IT		
		Call Center		
		Facilities		
		Incentives--(PA-implemented and Other Contracts Program Implementation) Programs	804,284	1,041,738
		Incentives--Third Party Program (as defined per D.16-08-019, OP 10)		
	Non-Labor Total		962,209	1,322,049
Agricultural Total			1,960,315	2,474,945
	Other (collected through GRC) (3)	Labor Overheads	341,795	401,105

Notes:

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C. → Table showing costs by functional area of management structure

- → Expenses broken out into labor, non-labor O&M (with contract labor identified)
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Appendix A - SUPPLEMENTAL 2020 EE BUDGET INFORMATION
PUBLIC SECTOR BUDGET DETAIL TABLE

Sector	Cost Element	Functional Group	2018 EE Portfolio Expenditures (\$Million)	2020 EE Portfolio Budget (\$) (2)
Public Sector	Labor(1)	Policy, Strategy, and Regulatory Reporting Compliance	114,672	165,497
		Program Management	1,565,503	2,259,359
		Engineering services	54,461	78,599
		Customer Application/Rebate/Incentive Processing	703	1,015
		Customer Project Inspections		-
		Portfolio Analytics		-
		ME&O (Local)	22,787	32,887
		Account Management / Sales	62,381	90,030
		IT	20,469	29,542
		Call Center		-
	Labor Total		1,840,978	2,656,930
	Non-Labor	Third-Party Implementers Contracts (as defined per D.16-08-019, OP 10)		
		Local/Government Partnerships Contracts (3)	815,960	3,030,601
		Other Contracts		
		Program Implementation		
		Policy, Strategy, and Regulatory Reporting Compliance		
		Program Management		1,483,838
		Engineering services		
		Customer Application/Rebate/Incentive Processing		
		Customer Project Inspections		
		Portfolio Analytics		
		ME&O (Local)		
		Account Management / Sales		
		IT		
		Call Center		
		Facilities		
		Incentives--(PA-implemented and Other Contracts Program Implementation) Programs		1,588,660
		Incentives--Third Party Program (as defined per D.16-08-019, OP 10)		1,200,000
	Non-Labor Total		815,960	7,303,098
Public Sector Total			2,656,938	9,960,028
	Other (collected through GRC) (3)	Labor Overheads	592,969	695,864

Notes:

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C. → Table showing costs by functional area of management structure

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Appendix A - SUPPLEMENTAL 2020 EE BUDGET INFORMATION
CROSS-CUTTING BUDGET DETAIL TABLE

Sector	Cost Element	Functional Group	2018 EE Portfolio Expenditures (\$Million)	2020 EE Portfolio Budget (\$ (2))
Cross Cutting	Labor(1)	Policy, Strategy, and Regulatory Reporting Compliance	201,312	136,256
		Program Management	3,995,773	2,704,493
		Engineering services	27,765	18,792
		Customer Application/Rebate/Incentive Processing		-
		Customer Project Inspections		-
		Portfolio Analytics		-
		ME&O (Local)	302,744	204,909
		Account Management / Sales	2,893	1,958
		IT	8,587	5,812
		Call Center		
	Labor Total		4,539,074	3,072,220
	Non-Labor	Third-Party Implementers Contracts (as defined per D.16-08-019, OP 10)		1,099,758
		Local/Government Partnerships Contracts (3)		
		Other Contracts		
		Program Implementation	383,527	736,726
		Policy, Strategy, and Regulatory Reporting Compliance		
		Program Management	1,459,395	2,803,388
		Engineering services		
		Customer Application/Rebate/Incentive Processing		
		Customer Project Inspections		
		Portfolio Analytics		
		ME&O (Local)		
		Account Management / Sales		
		IT		
		Call Center		
		Facilities		
		Incentives--(PA-implemented and Other Contracts Program Implementation) Programs		
		Incentives--Third Party Program (as defined per D.16-08-019, OP 10)		
	Non-Labor Total		1,842,922	4,639,872
Cross Cutting Total			6,381,996	7,712,092
	Other (collected through GRC) (3)	Labor Overheads	1,401,308	1,644,468

Notes:

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Appendix B - SoCalGas Management Structure and Organizational Supporting

