

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Southern California Edison Company
(U338E) for Approval of Energy Efficiency Rolling
Portfolio Business Plan

Application 17-01-013
(filed January 17, 2017)

And Related Matters

Application 17-01-014
Application 17-01-015
Application 17-01-016
Application 17-01-017
(Consolidated)

**SECOND SET OF DATA REQUESTS TO
PACIFIC GAS AND ELECTRIC COMPANY
BY
THE COALITION FOR ENERGY EFFICIENCY
(Questions 38 – 54)**

This second set of data requests is submitted to Pacific Gas and Electric Company (“PG&E”) by the Coalition for Energy Efficiency (“CEE” or the “Coalition”). Please provide your responses, via email or disc if available, by June 2, 2017 to:

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INSTRUCTIONS

1. When available, provide documents in their original electronic format. Documents produced in response to the Data Requests should be Bates-numbered, and indexed if voluminous. Responses to Data Requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.
2. Restate the text of each request prior to providing the response.

3. Identify the person providing the answer to each Data Request and identify the individual who would be designated as a witness for cross-examination of the response if hearings are held in this proceeding. If witnesses have not yet been selected at the time a data response is provided, please supplement the response once witnesses have been selected.
4. For questions that seek a “yes” or “no” answer, please respond if possible with an unqualified yes or an unqualified no. If it is not possible to provide either an unqualified yes or no to a particular question as posed, please include in each response an explanation as to why an unqualified yes or no is not possible.
5. To the extent you object to a request or portion of a request, or assert privilege, please describe in detail the basis for the objection and/or assertion of privilege.
6. If a request is unclear, please contact CEE immediately to seek clarification. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the data request.
7. Responses to these data requests are requested as soon as possible, and no later than 10 business days of receipt of the requests. If you are unable to meet this schedule, please inform CEE as soon as possible.

CEE DATA REQUEST SET TWO (QUESTIONS 38 – 54)

38. Response to Data Request Question 1 was vague and did not provide the information requested.
 - a. In order to clarify your response, please respond with a “yes” or “no” to the following revised question: *Did PG&E develop pilot approaches collaboratively with stakeholders to incorporate workforce diversity and inclusion goals into their third-party contractor selection process in response to Conclusion of Law 70 of D.12-11-015?*

- b. If the answer is yes, please describe what pilot approaches were developed collaboratively with stakeholders and provide any notices, memoranda, reports, studies or other documents that support this claim.

- 39. Response to Data Request Question 1, PG&E states that “utilities are precluded from adopting a preference for contractors with diverse workforce.” Please clarify this response in the context of the question asked. Is PG&E taking the position that they are legally precluded from developing “pilot approaches collaboratively with stakeholders to incorporate workforce diversity and inclusion goals into their third-party contractor selection process”? Please respond yes or no before providing any explanation.

- 40. Response to Data Request Question 1 states that contractors and subcontractors are required to sign a Prime Supplier Contractor Plan based on a template provided as Attachment 1 to the response. Attachment 1 appears to be a voluntary information gathering document. Please explain how this document increases opportunities for low-income, minority and disadvantaged workers.

- 41. Response to Data Request Question 5 states that “future Implementation Plans will identify ways in which PG&E and other IOUs will support disadvantaged workers.”
 - a. Is this an enforceable commitment set forth in the Business Plan? If yes, where in the Business Plan is this commitment made?
 - b. Will all Implementation Plans be required to identify ways in which the program will support disadvantaged workers? If no, identify specifically which Implementation Plans will be required to identify ways in which the program will support disadvantaged workers.

- 42. The responses to Data Request Questions 9, 10 & 11 state that: “Energy savings calculations take a reduction to account for the risk of lost energy savings due to factors such as equipment not being installed, not functioning properly and operating in conditions that affect energy consumption.”
 - a. Please identify specifically each energy efficiency measure whose energy savings are discounted due to the risk of lost energy savings due to poorly installed

measures for energy efficiency measures. This question does not encompass reductions for incentives that were found to not actually have been installed.

- b. For each measure identified in response to part (a) of this question, state the specific discount attributable to the risk of lost energy savings due to poorly installed measures (e.g., 10%).
 - c. For each measure identified in response to part (a) of this question, identify the ex ante review dispositions, energy efficiency measure work papers or other specific documents that provide the basis for the discount attributable to the risk of lost energy savings due to poorly installed measures, and identify where in each document this information is contained (by page number and paragraph).
43. Response to Data Request Questions 9, 10 & 11 states that the “risk factors for degradation of the performance of energy efficiency (EE) measures are factored into the installation rates found in workpapers (see below) and subsequently updated in DEER as Gross Savings Installation Adjustments (GSIA). Energy savings (with deductions for installation rates) are one input into cost-effectiveness calculations, so these installation rate reductions are reflected in cost effectiveness calculations as well.” Your description of the GSIA adjustments suggests that the deductions for installation rates are related to deductions for equipment found not to have actually been installed, not for energy losses due to poor installation.
- a. Do Gross Savings Installation Adjustments include adjustments for energy losses due to poor installation?
 - b. If the answer to (a) is yes, do *all* Gross Savings Installation Adjustments include adjustments for energy losses due to poor installation?
 - c. If the answer to (b) is no, please identify which specific energy efficiency measures have Gross Savings Installation Adjustments that include adjustments for energy losses due to poor installation?
 - d. If the answer to (b) is no, please identify any HVAC or lighting control energy efficiency measures whose Gross Savings Installation Adjustments do *not* include adjustments for energy losses due to poor installation?

44. Response to Data Request Question 12(a) did not provide the information requested. Data Request Question 12(a) asked PG&E to define the terms “as applicable” and “appropriate” in the context of the Business Plan’s statements that “PG&E will consider the appropriate workforce standard requirements ... for specific programs in support of its energy efficiency portfolio” and that PG&E will detail workforce standard requirements in each Implementation Plan “as applicable.” (IPs).” The response to Question 12(a) defines “as applicable” as standards that are incorporated “when applicable and appropriate.” Your response simply repeats the undefined terms and fails to define or explain how a workforce standard will be determined to be applicable or appropriate.

- a. Please define and explain how a workforce standard will be determined to be applicable.
- b. Please define and explain how a workforce standard will be determined to be appropriate.
- c. Will the stakeholders have an opportunity to review, comment on or object to a determination that a workforce standard is, or is not, applicable or appropriate?
- d. Will the Independent Evaluator and PRG have an opportunity to review and comment on a determination that a workforce standard is, or is not, applicable or appropriate?

45. PG&E’s proposed Business Plan states that “PG&E will consider the appropriate workforce standard requirements... for specific programs in support of its energy efficiency portfolio.”

- a. Response to Data Request Question 12(a) indicates that, while third party program proposals may choose to include workforce standard requirements if they are applicable and appropriate, PG&E will not require proposals to include a determination of whether any applicable and appropriate workforce standards exist. Is that correct? Please respond yes or no.
- b. Response to Data Request Question 12(a) only addresses workforce standards proposed by third party programs. Will PG&E require its own, or other non-third party programs, to determine whether any applicable and appropriate workforce standards exist?

- c. Response to Data Request Question 12(a) indicates that the requirement of appropriate and applicable workforce standards will be at the discretion of the third party programs even where such standards are found to exist. Is that correct? Please respond yes or no.
 - d. Response to Data Request Question 12(a) only addresses workforce standards that may be proposed by third party programs. Will PG&E require its own, or other non-third party programs, to incorporate appropriate and applicable workforce standards when such standards are found to exist?
46. Response to Data Request Question 12(b) states that energy efficiency programs will not be required to identify the minimum KSAs necessary to ensure quality installation. How will PG&E determine if workforce standards are appropriate or applicable if they do not know the KSAs necessary to ensure quality installation?
47. Response to Data Request Question 12(c) did not provide all the information requested. The question did not ask *when* appropriateness and applicability of workforce standards will be determined. To clarify, we rephrase the questions as follows:
- a. *How* will the appropriateness and applicability of workforce standards be determined. A complete response will identify who will make this determination and what factors will be considered to determine appropriateness and applicability.
 - b. Which energy efficiency programs, if any, will be *required* to make this determination. On what basis will PG&E determine if an energy efficiency program must make this determination?
48. Response to Data Request Question 15 states that all participating technicians for commercial HVAC programs are required to be either a Journeyman with 5+ years of experience or apprentices currently enrolled in or having completed a federal or California state apprenticeship program. CEE has been unable to confirm the existence of this requirement in the documents provided. Please identify the document, page number and section where this requirement is contained.

49. Response to Data Request Question 19 states that the Business Plan presents the “IOU’s overall approach to the DVC recommendations.”

- a. Please explain in detail what this “approach” is and how it addresses the UC-Berkeley Don Vial Center Workforce Guidance Plan recommendations. Please identify by page number and paragraph where the Business Plan presents this approach.
- b. Your response states that the approach in the Business plan is consistent with the direction provided by the CAEECC process. Please describe the “direction” provided by the CAEECC process, who specifically provided this direction and when and how this direction was provided.

50. As Attachment 1 to your response to Data Request Question 21, you provide a redacted version of the October 1, 2015 document titled “EE Work Force Proceeding (WE&T Planning) Project Deliverable.” The redacted information deletes key information regarding this document’s findings that is responsive to Data Request Question 21. PG&E has not raised any claim of privilege or confidentiality for this document. Please provide a non-redacted version of this document. If you claim that the document contains privileged or confidential information, please contact me to resolve those concerns.

51. Data Request Question 24 did not provide the information requested. Data Request Question 24 asks why PG&E’s 2018-2025 Energy Efficiency Rolling Portfolio Business Plan does not disclose or address the “lack of economic incentives for contractors to invest in worker training” as a market barrier to achieving the Long-Term Energy Efficiency Strategic Plan’s goal of an adequately trained and engaged workforce to achieve California’s economic energy efficiency potential. The question asks why this barrier recommendation was not accepted, not whether PG&E was required to accept the recommendation. Please provide the substantive rationale for not including this as a barrier despite the recommendation of stakeholders.

52. Response to Data Request Question 25 did not provide the information requested. Data Request Question 25 asks why PG&E’s 2018-2025 Energy Efficiency Rolling Portfolio Business Plan does not disclose or address “lost energy savings from poorly installed

retrofits” as a market barrier to meeting each sector’s energy efficiency goals. The question asks why this barrier recommendation was not accepted, not whether PG&E was required to accept the recommendation. Please provide the substantive rationale for not including this as a barrier despite the recommendation of stakeholders.

53. Have any PG&E energy efficiency programs (not just the WE&T programs) established the minimum knowledge, skills and abilities (KSAs) necessary to ensure quality installation for any specific energy efficiency measures or energy efficiency occupations? If yes, please identify the programs and measures and the identified KSAs. Please provide copies of any studies or reports upon which the KSAs are based.

54. Have any PG&E energy efficiency programs (not just the WE&T programs) established a worker quality baseline for any specific energy efficiency measures or energy efficiency occupations (i.e. the percentage of workers installing specific energy efficiency measures determined to have the appropriate skills, training, and certifications)? If yes, please provide a copy of any studies, reports or data on which this baseline is estimated.

Dated: May 23, 2017

Respectfully submitted,

/s/
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on behalf of the Coalition for Energy Efficiency