

**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 and Related Matters

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

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

**FIRST SET OF DATA REQUESTS TO  
SOUTHERN CALIFORNIA GAS COMPANY  
BY  
THE COALITION FOR ENERGY EFFICIENCY**

The following data requests are submitted to Southern California Gas Company (“SoCalGas”) by the Coalition for Energy Efficiency (“CEE” or the “Coalition”). Please provide your responses, via email or disc if available, by April 1, 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 ONE**

1. Decision 12-11-015 at p. 126 directed the utilities to “develop pilot approaches collaboratively with stakeholders to incorporate workforce diversity and inclusion goals into their third-party contractor selection process.”
  - (a) Please describe what actions were taken in response to this direction and provide copies of any studies or reports prepared as a result of this decision.
  - (b) Please provide a copy of any workforce diversity and/or inclusion requirements or goals that have been incorporated into energy efficiency programs (pilot or otherwise) and identify what programs have required compliance with these goals.

2. Does SoCalGas agree that it has the authority or discretion to incorporate workforce diversity and inclusion goals into their requirements for energy efficiency programs? If no, on what basis is this claim made?
3. Does SoCalGas agree with SDG&E’s assertion that connecting disadvantaged workers to job and career pathways is out of the scope of the energy efficiency programs.<sup>1</sup> If yes, please explain the basis for this assertion.
4. Does SoCalGas agree with SDG&E’s assertion that workforce development and job creation are not components of the workforce education and training (“WE&T”) program.<sup>2</sup> If yes, please explain the basis for this assertion.
5. In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), SoCalGas, Southern California Edison Company (“SCE”), San Diego Gas & Electric Company (“SDG&E”), and Pacific Gas and Electric Company (“PG&E”) (jointly, the “IOUs”) stated that they would address “EE skills building and fund training programs that connect disadvantaged workers to job and career pathways in EE,” including developing “an EE career pathway framework for disadvantaged workers that identify pathways for at least three occupations.”
  - (a) Are these activities being continued under the under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan? If yes, how does the Business Plan ensure that these activities will be continued?
  - (b) Did the IOUs develop “an EE career pathway framework for disadvantaged workers that identify pathways for at least three occupations”? If yes, please provide a copy.
  - (c) Please describe any other steps or activities that were taken to address “EE skills building and fund training programs that connect disadvantaged workers to job and career pathways in EE.”

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<sup>1</sup> See SDG&E 2018-2025 Energy Efficiency Rolling Portfolio Business Plan, Appendix F External Stakeholder Observations, ID #075.

<sup>2</sup> See SDG&E 2018-2025 Energy Efficiency Rolling Portfolio Business Plan, Appendix F External Stakeholder Observations, ID #075.

- (d) Please provide any studies, reports, memorandums, data or other documents describing WE&T activities that connected disadvantaged workers to job and career pathways in EE.
6. In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would hire an “inclusion consultant” to advise regarding the potential development of a workforce inclusion program to broaden access to living wage jobs and career pathways in EE for workers from disadvantaged communities.”
- (a) Was an inclusion consultant” hired?
  - (b) If yes, please provide a copy of the RFP and consultant contract, and a copy of any reports, memorandums or studies prepared by the inclusion consultant.
7. In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would add “workforce inclusion as a factor in ranking proposals by third-party contractors.”
- (a) Has “workforce inclusion” been added as a factor in ranking proposals by third-party contractors?
  - (b) If yes, to what proposals does this requirement apply, what workforce inclusion information is required to be included in proposals, and how is it assessed in ranking proposals?
  - (c) Will workforce inclusion be included as a factor in ranking proposals by third-party contractors under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan? If yes, how does the Business Plan ensure this will occur?
8. On page 267, the SoCalGas 2018-2025 Energy Efficiency Rolling Portfolio Business Plan asserts that prevailing wages create barriers to adopting energy efficiency solutions.
- (a) Identify and explain the basis for this claim.
  - (b) Please provide any studies, reports, data or other evidence relied upon to support this claim.

- (c) Has SoCalGas evaluated and identified the benefits that prevailing wage provides to achieving energy efficiency outcomes? If yes, please provide a copy of this evaluation.
9. Do energy savings and cost-effectiveness calculations for *upstream* energy efficiency programs take into account the risk of lost energy savings due to poorly installed energy efficiency measures? If yes, please describe and provide documentation showing: (a) how and where this is taken into account, (b) in what programs this is taken into account, (c) what adjustment factors (if any) were applied, and (d) the basis for the adjustment factor.
10. Do energy savings and cost-effectiveness calculations for *midstream* energy efficiency programs take into account the risk of lost energy savings due to poorly installed energy efficiency measures? If yes, please describe and provide documentation showing: (a) how and where this is taken into account, (b) in what programs this is taken into account, (c) what adjustment factors (if any) were applied, and (d) the basis for the adjustment factor.
11. Do energy savings and cost-effectiveness calculations for *downstream* energy efficiency programs take into account the risk of lost energy savings due to poorly installed energy efficiency measures? If yes, please describe and provide documentation showing: (a) how and where this is taken into account, (b) in what programs this is taken into account, (c) what adjustment factors (if any) were applied, and (d) the basis for the adjustment factor.
12. The 2018-2025 Energy Efficiency Rolling Portfolio Business Plan states that “qualified contractors” will be relied upon to ensure proper installation of energy efficiency measures.<sup>3</sup>
- (a) What is the definition of a qualified contractor?
- (b) Will a “qualified contractor” be required to demonstrate that it is utilizing an adequately skilled and trained workforce to perform the energy efficiency work?
- (c) On what basis does the Business Plan assume that a qualified contractor requirement will lead to properly installed energy efficiency measures?

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<sup>3</sup> See, e.g., SoCalGas 2018-2025 Energy Efficiency Rolling Portfolio Business Plan at 89, 91 (contractor incentives), 94 (Direct Install).

- (d) What energy efficiency measures or type of programs will require use of a qualified contractor?
13. On what basis does the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan assume that a strategy of educating customers and trade professionals on the “value of properly installed and maintained systems,” the value of hiring “qualified professionals”, or the “value of skilled workers”<sup>4</sup> will significantly improve installation quality outcomes?
- (a) Please provide any documents, studies, data, reports or other evidence on which this strategy is based.
- (b) What is the definition of a “qualified professional”?
- (c) What is the definition of a “skilled worker”?
- (d) How are customers supposed to know if the contractor they hire is using workers who have the knowledge, skills and training necessary to properly install or maintain the energy efficiency measure?
14. On what basis does the 2018-2025 Energy Efficiency Rolling Portfolio Business Plans assume that increasing awareness of training opportunities would significantly reduce the number of HVAC and lighting system measures being installed by inadequately trained technicians?<sup>5</sup> Please provide the documents, studies, data, reports or other evidence on which this assumption is based.
15. SoCalGas proposes a 2018-2025 Energy Efficiency Rolling Portfolio Business Plan metric of “increasing the number of properly installed and maintained HVAC systems by 15% over 2015 levels by 2025.”
- (a) Under this metric, how will SoCalGas determine the existing baseline and the future number of properly installed and maintained HVAC systems?
- (b) Why does this metric apply only to HVAC systems?
- (c) Does this metric apply to all HVAC systems in the SoCalGas service area or only HVAC systems installed pursuant to SoCalGas energy efficiency programs?
- (d) Does this metric apply to upstream and midstream HVAC programs?
- (e) Does this metric apply to all sectors or only residential?

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<sup>4</sup> See, SoCalGas 2018-2025 Energy Efficiency Rolling Portfolio Business Plan at pp. 111, 113-115, 127-129.

<sup>5</sup> SoCalGas 2018-2025 Energy Efficiency Rolling Portfolio Business Plan at p. 377.

- (f) Please provide any documents, studies, data, reports or other evidence on which this metric is based.
16. Will ratepayer money be allowed to subsidize energy efficiency measures that are installed by contractors that do not employ adequately trained and skilled workers?
17. Please list all SoCalGas upstream, midstream and downstream energy efficiency programs available over the past two years that impose training or skills standards, certification requirements, prevailing wage requirements, prequalification requirements, apprenticeship requirements, or other workforce quality requirements. For each program that contains such requirements, please provide a description of the program and the requirements.
18. In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would initiate the following activity as a priority issue: “[a]dopting skill certification requirements for advanced lighting controls and HVAC Quality Installation and Quality Maintenance and other available skill standards and certification guidance.”<sup>6</sup>
- (a) What skills standards or certification requirements have been adopted or initiated and to which programs do these requirements apply?
- (b) Please provide any studies, reports, memorandums, data or other documents describing the actions taken to initiate this activity.
- (c) Will the adoption of “skill certification requirements for advanced lighting controls and HVAC Quality Installation and Quality Maintenance and other available skill standards and certification guidance” remain a priority issue under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan? If yes, how does the Business Plan ensure that this will remain a priority?
19. In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E;

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<sup>6</sup> Advice Letter at p. 5.

SoCalGas Advice 4765-G), the IOUs stated that they would adopt a responsible contractor policy for contractors that work directly with the IOUs.<sup>7</sup>

- (a) Was a responsible contractor policy adopted for contractors that work directly with the IOUs?
- (b) If yes, please provide a copy of the policy and identify what programs are required to comply with this policy.
- (c) If no, please provide any studies, reports, memorandums, data or other documents describing the steps taken to comply with this commitment.

20. In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would meet with WE&T stakeholders in 2016 to present their plans for the remaining UC-Berkeley Don Vial Center Workforce Guidance Plan recommendations summarized in Appendix 1 of the Advice Letter.<sup>8</sup>

- (a) Was a plan for the remaining UC-Berkeley Don Vial Center Workforce Guidance Plan recommendations ever presented to stakeholders?
- (b) If yes, please provide a copy of this plan and identify the stakeholders who were invited to the presentation.

21. In Appendix 1 of the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would initiate establishing prevailing wage and targeted hire goals for contractors that are preselected by the IOUs or have a direct contracting relationship with the IOUs.<sup>9</sup>

- (a) Were prevailing wage and targeted hiring goals established for contractors that are preselected by the IOUs or have a direct contracting relationship with the IOUs?
- (b) If yes, please provide a copy of these goals and identify what programs are required to comply with these goals.
- (c) If no, please explain why this did not happen.

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<sup>7</sup> Advice Letter at p. 8.

<sup>8</sup> Advice Letter at p. 10.

<sup>9</sup> Advice Letter, Appendix 1 at p. 5.



22. In Appendix 2 (2015 WE&T PIP Addendum) of the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would “evaluate the impacts associated with implementing targeted hiring goals, prevailing wage and wage floors in the IOUs’ Resource Programs.”<sup>10</sup>
- (a) What is the status of this evaluation?
  - (b) Please provide copies of any reports, memorandum, contracts, studies, updates, data, emails, correspondence or other documents related to this evaluation.
23. In Appendix 2 (2015 WE&T PIP Addendum) of the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would prepare the following studies: (1) “WE&T Skill Standards for IOU Resource Program,” (2) “CALCTP Contractor Training Assessment,” and (3) the “SCE and SDG&E Lighting Control Pilot Program.”
- (a) What is the status of each of these studies? If a study has not been completed, please state when the study is expected to be complete.
  - (b) Please provide copies of any reports, memorandum, contracts, studies, updates, data, emails, correspondence or other documents related to these studies.
24. In Appendix 1 of the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs identify numerous actions that they will explore in 2016 and beyond.
- (a) Have any of these 2016 and beyond activities been initiated?
  - (b) If yes, please describe these activities.
  - (c) Which of the activities that the IOUs stated would be explored in 2016 and beyond will be initiated under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan?

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<sup>10</sup> Advice Letter, Appendix 2 at p. 5.

25. In its comments on the draft Business Plans submitted during the CAEECC review, CEE recommended expressly identifying the “lack of economic incentives for contractors to invest in worker training” as a market barrier to achieving Long-Term Energy Efficiency Strategic Plan’s goal of an adequately trained and engaged workforce to achieve California’s economic energy efficiency potential. Please explain why the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan does not disclose or address this barrier.
26. In its comments on the draft Business Plans submitted during the CAEECC review, CEE recommended expressly identifying lost energy savings from poorly installed retrofits as a barrier to meeting each sector’s energy efficiency goals. Please explain why the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan does not disclose this as a barrier to each sector’s energy efficiency goals.
27. Please explain why the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan does not require energy efficiency programs to ensure that ratepayer-subsidized energy efficiency measures are installed by an adequately trained and skilled workforce.
28. Have the IOU 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 KSAs and please provide copies of any studies or reports upon which the KSAs are based.
29. Have the IOU 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.
30. How will the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan ensure that midstream and upstream programs do not subsidize energy efficiency equipment or measures that are installed by contractors that violate permit or code requirements?

31. What is meant by the compliance strategy to “simplify” the codes?<sup>11</sup>
  - (a) What code requirements have been identified as too complex or amenable to simplification without reducing safety or energy efficiency?
  - (b) Please provide any data, reports, studies or other evidentiary basis to support the assumption that simplifying the codes will increase code compliance?
  
32. Does SoCalGas agree that it has the authority or discretion to support code enforcement efforts as part of its energy efficiency programs? If no, please explain.
  
33. Please describe how the proposed 2018-2025 Energy Efficiency Rolling Portfolio Business Plan Public Sector budget amounts were determined?
  
34. What is the definition of (a) downstream programs; (b) midstream programs; and (c) upstream programs?
  
35. Does SoCalGas intend to shift any incentive funds away from downstream programs to midstream and upstream programs during the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan? If yes, please respond to the following:
  - (a) Please describe the anticipated scope of this funding shift, including the amount of funds to be shifted, the sectors involved and the current downstream programs expected to be affected by this shift in funding.
  - (b) Please describe the purpose and justification for this funding shift, including the evidentiary basis for the justification.
  - (c) Provide any correspondence, notes, memos, emails, reports, studies, or other documents related to the decision to shift incentive funds away from downstream programs to midstream and upstream programs.
  - (d) For budget years 2014, 2015 and 2016, what was the percentage of energy efficiency funding allocated to (a) downstream programs; (b) midstream programs; and (c) upstream programs?

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<sup>11</sup> SoCalGas 2018-2025 Energy Efficiency Rolling Portfolio Business Plan at p. 318.

- (e) Under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan, what is the percentage of energy efficiency funding allocated to (a) downstream programs; (b) midstream programs; and (c) upstream programs?
36. In the Joint Investor Owned Utilities' November 23, 2016 Response to TURN's Data Request (DR-TURN-001), the IOUs state in Response to Question 14 (at p. 19) that the "IOUs do not intend to continue with Direct Install as a strategy for achieving energy efficiency."
- (a) Is this statement still correct?
  - (b) Is this statement limited to residential replace-on-burnout programs, or does it apply to other programs or sectors as well?
  - (c) Does SoCalGas expect the 2018-2025 Energy Efficiency Business Plans to result in the elimination or reduction of other Direct Install programs? Please list which Direct Install programs are anticipated to be eliminated or reduced.
  - (d) Please explain the justification for reducing or eliminating some or all Direct Install programs. Please provide any studies, reports, data or other evidence relied upon to support this justification.
37. Please provide the Curriculum Vitae of the supply-side Independent Evaluators.

Dated: March 22, 2017

Respectfully submitted,

/s/

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on behalf of the Coalition for Energy Efficiency