

Energy Efficiency Portfolio Reform

Follow-up questions at the March CAEECC Meeting, 03/16/21



California Public
Utilities Commission

Overview of Questions

1. Timing for Business Plan Filing
2. Managing 2022 and 2023 ABALs During “Transition” Period
3. Program Closures

CPUC Background & Timeline

March 2020- CPUC issued a ruling asking stakeholders about the EE goals metrics and portfolio structure.

April 2020- NRDC filed motion on behalf of CAEECC regarding EE portfolio process.

July 2020- CPUC issued a ruling regarding the CAEECC proposal.

2021: Proposed Decision in progress

September 2021: EE Business Plans Due

Business Plan Filing

Background: The PAs are required to file new business plans in September of 2021. The proposed decision addressing the energy efficiency portfolios is in progress.

Questions:

1. Assuming changes to the EE portfolio structure and process, is there sufficient time for the PAs to file business plans incorporating those changes?
2. If the CPUC was to consider postponing the due date, what should the revised due date be?
3. Are there any other topics related to the business plans which have not yet been addressed?

ABALs in a Transition Period

Background: In the CAEECC proposal ruling and Potential and Goals ruling, the CPUC considered changes which would impact the energy efficiency portfolio structure and filing process. Even after a decision is released, we will still need to dispose of ABALs between now and the proposed effective date of 2024 or 2026.

Questions:

1. What challenges do you anticipate in disposing of ABALs after the release of the Decision but prior to the effective date?
2. Is it feasible to retain the current ABAL approval process and standards, given the challenges of the transition period and COVID-19?

ABALs in a Transition Period Cont.

3. If the CPUC were to consider adjusting the ABAL approval process for the transition years, what kind of adjustments would be recommended?
4. Would approving multiple budget years in a single ABAL reduce the administrative burden and allow more time for transition planning? Are there drawbacks to this approach?
5. Are there any other topics you'd like to address regarding ABALs in a transition period?

Program Changes/Closures process

Background: Comments received in response to Feb. 17th Ruling on R. 13-11-005 generally proposed advice letters for program closures.

The Ruling "invites parties to file comments, no later than March 3, 2021, and reply comments, no later than March 17, 2021, on whether and what criteria the Commission should adopt for delineating between (1) program changes that require staff approval via advice letter submission, and (2) program changes that only require an Implementation Plan (IP) addendum."

Questions:

1. What are the drivers for recommending advice letter approval for canceling or launching new programs?
2. What are the counter points for recommending only IP updates are required from canceling or launching new programs?
3. Are there any other factors to consider when setting the process option 1 or 2 for closing a program, or an alternative process option?