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ADVICE LETTER 3429-E/2797-G
(U902 M)

Public Utilities Commission of the State of California

SUBJECT: SAN DIEGO GAS AND ELECTRIC COMPANY'S 2020 ANNUAL ENERGY EFFICIENCY PROGRAM AND PORTFOLIO BUDGET REQUEST

San Diego Gas & Electric (SDG&E) hereby submits its 2020 annual energy efficiency (EE) program and portfolio budget advice letter (ABAL) as directed by the California Public Utilities Commission (Commission) Decisions (D.)15-10-028¹ and D.18-05-041². All necessary supporting documentation to support the funding request, revenue requirements, and rate impacts, as prescribed by the Energy Division, is incorporated as Appendix A and has been uploaded to CEDARS.³

SDG&E makes available Attachment A to this ABAL at <https://www.sdge.com/rates-and-regulations/regulatory-filing/914/energy-efficiency-filings>.

BACKGROUND

D.15-10-028 established the Rolling Portfolio process for regularly reviewing and updating EE portfolios following the approval of the Business Plan application. Specifically, D.15.10-028 Ordering Paragraph (OP) 4 states:

Each energy efficiency program administrator must file a Tier 2 advice letter containing a budget for the next calendar year's energy efficiency portfolio by the first business day in September. The Tier 2 advice letter shall contain a portfolio cost effectiveness statement and application summary tables with forecast budgets and savings by sector and program/intervention filed in paper, with an electronic query output available in an online tool. Additionally, the Tier 2 advice letter shall provide a report on portfolio changes, annual spending, and fund shifting.

SDG&E filed its Business Plan on January 17, 2017 (A.17-01-014) which was approved by the Commission on May 31, 2018. D.18-05-041 provided further detailed guidance on the requirements for the ABAL. D.18-05-041 requires the following:

¹ OIR13-11-005.

² Application 17-01-014.

³ CEDARS is available at <https://cedars.sound-data.com/>

1. Cost Effectiveness: The forecasted TRC during the “ramp” or transition years (i.e., 2018 – 2022) should meet or exceed a TRC of 1.00.⁴ If the forecasted TRC does not meet or exceed 1.25, the Program Administrator (PA) must submit to an additional process.⁵
2. Savings Goals: The portfolio must meet or exceed Commission adopted net goals as adopted in D.17-09-025.
3. Proposed Budget: The forecasted annual funding levels must not exceed the overall funding amount in the PA’s 2018-2025 business plan.⁶

In addition to these requirements, D.18-05-041 requires the PA to provide information on the above criteria based on Commission staff developed templates. These templates are provided in Appendix B, as prescribed by Energy Division. Further, the ABAL should include certain program and portfolio descriptive information:⁷

1. Discussion of proposed program changes.
2. Discussion of proposed portfolio changes.
3. Any ABAL that includes a forecasted portfolio TRC between 1.0 and 1.25 during the 2019-2022 ramp years should include:
 - An explanation of why the PA is not proposing a portfolio that meets a 1.25 TRC;
 - Why the PA is confident that it will meet the evaluated 1.0 TRC for that year; and
 - How the PA intends to lower costs or increase savings going forward.
4. Any ABAL that includes forecasted energy savings that are lower than Commission established annual savings goals should include:
 - Discussion or explanation of how the PA will ensure achievement of the overall savings goals, within the overall budget, during the business plan period (i.e., through 2025).

Portfolio Program Budgets

SDG&E’s approved annual portfolio budget in D.18-05-041 reflected in Table 1 provides the authorized 2019 Rolling Portfolio budget as approved in D.15-01-023 and confirmed by D.18-05-041. Table 1 also includes the authorized Integrated Demand Side Management (IDSM) Demand Response (DR) budget.

Table 1: Approved Rolling Portfolio Annual EE and DR Program Budgets (\$000)

Category	Electric Demand Response Funds	Electric Energy Efficiency Funds	Natural Gas Public Purpose Funds	Total Energy Efficiency Funds
Programs Funds	\$4,504	\$100,618	\$11,180	\$111,798
EM&V	N/A	\$4,192	\$466	\$4,658
Total	\$4,504	\$104,810	\$11,646	\$116,456

⁴ D.18-05-041, p. 71.

⁵ *Id.*, pp. 135-137.

⁶ *Id.*, OP 45, p. 192.

⁷ *Id.*, pp. 128-129.

A. 2020 Energy Efficiency Program Budgets

Table 2 shows the 2020 SDG&E business sector budgets.

Table 2: SDG&E 2020 EE Program Budgets by Business Sector

Sector	Program Year (PY) 2020 Budget
Residential	\$14,466,811
Commercial	\$43,027,462
Industrial	\$3,756,904
Agriculture	\$996,512
Emerging Tech	\$1,430,625
Public	\$9,046,065
WE&T	\$4,852,009
Finance	\$516,454
OBF Loan Pool	\$0
Codes and Standards	\$2,632,336
Program Subtotal	\$80,725,177
IOU EM&V	\$3,599,465
IOU PY Spending Budget Request	\$84,324,643

Notes:

1. SDG&E notes that program funding related to the Financial Pilots originally approved in D.13-09-044 that has not been fully expensed due to implementation delays is considered “committed” funding and will be carried over into 2020. In addition, these funds are not included in the 2020 EE Portfolio as directed by D.17-03-026⁸.
2. SDG&E's On-Bill Financing (OBF) Loan Pool is not included in the EE Portfolio budget. It is collected and tracked separately through its electric and gas OBF Balancing Accounts. SDG&E's authorized budget for its OBF loan pool is of \$26,003,565.

B. 2020 Integrated Demand Side Management (IDSM) Programs and Budgets

Table 3 shows the specific programs and budgets associated with the 2020 Demand Response Program approved budget. These strategies are in response to directions provided by D.18-05-041.

⁸ OIR13-11-005.

Table 3: SDG&E 2020 IDSM Program Budgets

Funding Source	Market Sector	Program Code	Program	Total Budget
DR	Commercial	4052	IDSM -DR - Commercial ME&O	\$428,921
DR	Commercial	4056	IDSM -DR - Commercial	\$1,612,380
DR	Commercial	4058	IDSM -DR - Commercial Nonres Audits	\$850,000
DR	Residential	4051	IDSM -DR - Residential ME&O	\$428,921
DR	Residential	4054	IDSM -DR - Residential	\$392,000
DR	Residential	4057	IDSM -DR - Residential Behavior	\$1,000,000
Subtotal DR				\$4,712,221
EE	Commercial	3260	Local-IDSM-ME&O-Local Marketing (EE)	\$2,581,243
EE	Residential	3261	IDSM Local Residential Behavioral Program (EE)	\$5,547,189
EE	Commercial	4030	SW-IDSM-IDSM	\$188,525
Subtotal EE				\$8,316,958
Total IDSM (DR + EE)				\$13,029,179

C. Revenue Requirements

SDG&E provides its estimated 2020 electric and gas proposed average rate changes and revenue requirement changes in Tables 4 and 5, respectively.

Table 4: SDG&E Estimated Electric Rate Impacts

Customer Classes	2020 Proposed Electric Average Rate Change \$/kwh *	2020 Proposed Percentage Change In Electric Revenue and Rates *
<u>System</u>		
Residential	\$ (0.23900)	-0.87%
Commercial - Small	\$ (0.18100)	-0.72%
Commercial - Medium & Large	\$ (0.14600)	-0.63%
Streetlights	\$ (0.03600)	-0.16%
Agricultural	\$ (0.13200)	-0.75%

*Rates as of 6/1/2019.

Table 5: SDG&E Estimated Natural Gas Rate Impacts

Customer Classes	2020 Proposed Gas Average Rate Change \$/therm	2020 Proposed Percentage Change In Gas Revenue and Rates
Residential	\$ (0.00894)	-16.3%
Core Commercial/Industrial	\$ (0.03510)	-53.1%
Non-Core Commercial/Industrial	\$ (0.03540)	-56.0%

The final gas and electric EE revenue requirements will be incorporated in SDG&E's annual Electric and Public Purpose Programs Rates advice letter and the Public Purpose Program Gas Surcharge Rates advice letter, which will be filed in the last quarter of 2019.

SDG&E PROPOSED PORTFOLIO ENERGY SAVINGS GOALS AND COST EFFECTIVENESS

SDG&E provides in the following tables its forecasted energy savings goals/targets and portfolio cost effectiveness.

Table 6: 2020 EE Portfolio Energy Savings Goals & Targets

Sector	SDG&E forecast kWh	SDG&E forecast kW	SDG&E forecast therms (MM)
Residential	52,534,972	61,009	1,947,485
Commercial	81,252,683	10,756	4,672,220
Industrial	12,896,253	1,347	734,920
Agriculture	7,036,791	739	41,959
Emerging Tech	na	na	na
Public	-	-	-
WE&T	na	na	na
Finance			
OBF Loan Pool	na	na	na
IOU Subtotal	153,720,700	73,852	7,396,585
	79,000,000	15,000	2,000,000
	195%	492%	370%
Codes and Standards	226,391,856	46,041	2,770,086

Note: D.19-08-034 updated the "2020 and beyond" CPUC savings goals.

Note that with respect to SDG&E's share of the Statewide Codes & Standards savings. SDG&E's share is below the Commission's goal. However, D.19-08-034 states:

The overall statewide codes and standards goals values in the final potential study remain final, but for the ABALs due in September of this year, we allow each IOU's 2020 codes and standards savings forecast to be based on its share of funding toward the statewide codes and standards program, as long as the sum of the IOUs' forecasts meets the 2020 statewide goal. Energy Division is not required to reject an IOU's ABAL if its codes and standards savings forecast does not match its IOU-specific goal in the final potential study. This approach is consistent with the Commission's statewide administration policy.⁹

Table 7: 2020 EE Portfolio Cost Effectiveness

	TRC Ratio	PAC Ratio	RIM Ratio
Without Codes & Standards (C&S)	1.26	1.54	0.56
With Codes & Standards (C&S)	1.47	4.06	0.55

SDG&E's 2020 TRC and PAC results reflect the following inputs:

⁹ D.19-08-034, p. 26.

1. Updated 2020 avoided costs and greenhouse gas adder consistent with Resolution E-5014;
2. Excludes Emerging Technology, On-Bill Financing (OBF) revolving loan pool, and credit enhancements;
3. Excludes Market Effects (ME) based on D.19-08-034, which eliminated the 5% spillover for resource programs;
4. Uses workpapers that are approved by staff as of September 1, 2019.
5. D.19-08-034 provides direction for forecasting for solicitations:

The IOUs shall align these Third Party program forecasts pending from solicitations as much as possible with the forecasting methods used for custom projects (in terms of measures and measure mix being “unknown” prior to a program year), as they develop PY 2020 Third party program savings forecasts.¹⁰

- a. For local Third Party program forecasts pending from solicitations, SDG&E used the same forecasting methods used for custom projects (in terms of measures and measure mix being “unknown” prior to a program year). SDG&E provided its expected net benefits for proposed programs in the Request for Proposal (RFPs). To achieve the same RFP net benefits in its forecast, SDG&E selected “representative” custom end use measures whose savings would provide the same net benefits. In most cases, the Retrocommissioning (RCx) and “Whole Building” measure savings provide the expected result. It is important to note that these selections are not necessarily what bidders are expected to propose. Rather, SDG&E expects that after Third Party programs are selected with their own proposed measures, the resulting portfolio of programs for the market sector will result in the expected net benefits. SDG&E also expects that the selected programs will perform at least if not better than SDG&E’s current program implementations. This is consistent with the Commission’s expectation that Third Party programs can bring on more innovative and cost effective programs.
- b. For statewide Third party programs, forecasted savings are based on the funding share method approved in the Joint IOUs Supplemental Advice Letter of the Shared Funding Mechanism Proposal submitted on November 15, 2018.¹¹ SDG&E’s portfolio, consistent with the other IOUs, only include at this time Statewide Codes & Standards programs. The lead IOU, PG&E, provided SDG&E with its expected share of savings for the programs based on the agreed upon budget contribution.

6. Includes estimated Energy Savings Performance Incentive payments of \$3.5 million; and
7. Includes indirect labor loaders adopted in SDG&E’s 2016 GRC D.16-06-054.

SDG&E’s 2020 portfolio forecast meets the Commission’s threshold of a TRC greater than 1.25 and therefore does not include any discussion on the following:

¹⁰ D.19-08-034, p. 30.

¹¹ San Diego Gas and Electric Company (SDG&E) Advice 3268-E-A/2701-G-A; Southern California Gas Company (SoCal Gas) Advice 5346-G-A; Southern California Edison Company (SCE) Advice 3861-E-A; and Pacific Gas and Electric Company (PG&E) Advice 5373-E-A/4009-G-A).

- An explanation of why the PA is not proposing a portfolio that meets a 1.25 TRC;
- Why the PA is confident that it will meet the evaluated 1.0 TRC for that year; and
- How the PA intends to lower costs or increase savings going forward.

SDG&E Historical Cost Effectiveness Information

D.18-05-041 requires claimed and evaluated TRC and Program Administrator Cost (PAC) of each program and of each sector for the two most recent years for which data is available. As evaluation activity did not occur in 2016 and 2017 and evaluations commenced in late 2018, this information is not available to be included in this advice letter. Claimed TRC and PAC for 2016 and 2017 are available on CEDARS. D.18-05-041 also requires a showing of forecasted, claimed and evaluated TRC and PAC at the portfolio going back to the beginning of the Rolling Portfolio (2016). SDG&E provides this information in Table 8 below.

Table 8: SDG&E Historical Cost Effectiveness Data

SDG&E Energy Efficiency Portfolio						
Program Year	Portfolio-level Cost-Effectiveness (3)					
	Forecast PAC ratio	Reported PAC ratio	Evaluated PAC ratio (2)	Forecast TRC ratio	Reported TRC ratio	Evaluated TRC ratio (1)
2016	1.00	1.16	evaluation not available yet	0.73	0.92	evaluation not available yet
2017	1.34	2.32		1.16	1.42	
2018	1.33	2.28		1.05	1.40	
2019	1.98	NA	NA	1.30	NA	NA
2020	1.51	NA	NA	1.26	NA	NA

All cost-effectiveness ratios should be for the energy efficiency portfolio. For the purpose of the 2019 ABAL, the Total Resource Cost (TRC) and Program Administrator Cost (PAC) ratios of the energy efficiency (EE) portfolio are defined pursuant to Decision 12-11-015 (p. 99), D. 16-08-019 (pp. 30-31), and D.18-05-041 (Finding of Fact 19).

Notes:

1. Source: *Energy Efficiency Portfolio Report*, California Public Utility Commission, May 2018, figures exclude Codes and Standards, p.20.
2. Source: *Portfolio Report*, California Public Utility Commission, May 2018, figures exclude Codes and Standards.
3. SDG&E includes its GRC overheads that are required by D.12-11-015 OP 39 in its Forecast and Reported cost effectiveness results. The cost effectiveness results do not include market effects.

2020 Portfolio Budget Caps and Targets

Table 9 provides a summary of SDG&E's compliance with the caps and targets required by D.09-09-047.

Table 9: 2020 EE Portfolio Budget and Budget Caps/Targets

	Admin	ME&O	Direct Implementation	Incentives	EM&V	Total EE Budget
	\$ 6,255,993	\$ 1,927,591	\$ 38,145,408	\$ 34,396,186	\$ 3,599,465	\$ 84,324,643
	GRC Admin Loaders	GRC ME&O Loaders	GRC DI Loaders	Total (EE + GRC)	OBF Loan Pool	Total Funds
	\$ 2,458,650	\$ 72,834	\$ 832,617	\$ 87,688,744	\$ 26,003,565	\$ 113,692,309
	%Admin	%MEO	%DI	%Incentives	EM&V %	
2020 September ABAL (with Loan Pool)	7.7%	1.8%	34.3%	30.3%	26.0%	100.0%
2020 September ABAL (without Loan Pool)	9.9%	2.3%	44.5%	39.2%	4.1%	100.0%
Caps/Targets	10%	6%	20%	60%	4%	100.0%

Notes:

1. Total EE Budget for percentage basis calculation includes authorized EE budget, OBF Loan Pool and GRC loaders associated with EE FTEs.
2. FTE loaders were adopted in SDG&E 2016 GRC D.16-06-054.
3. ICP, Workman's Comp and PLPD Loaders follows labor, therefore are associated with the Admin, ME&O and DI Labor.
4. Administrative budget does not include EM&V.
5. EM&V is 4% of proposed EE Budget.
6. Total EE budget does not include Statewide ME&O.
7. The loan pool is part of the Incentives.

SDG&E 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.¹²

2020 PORTFOLIO ANDBUSINESS SECTOR CHANGES

SDG&E optimized its EE portfolio to the extent possible to meet the minimum cost effectiveness criteria and authorized budget level. The following are the general planning principles and portfolio changes:

1. SDG&E's Budget request for 2020 is less than the authorized annual budget and is less than the 2019 budget. This is primarily a result of program funding changes made to optimize the portfolio.
2. SDG&E will be transitioning portions of its portfolio from SDG&E implementation to Third Party implementation. This will be accomplished by consolidating some programs and

¹² See <http://eestats.cpuc.ca.gov/Views/Documents.aspx>.

reducing SDG&E-implemented program budgets with the anticipation of new Third Party programs coming on-line later in 2020.

3. Selected underperforming programs will be closed to improve cost-effectiveness after review of Commission requirements and consideration of impacts to the market. Impacted Third Party program implementers have been notified.
4. SDG&E updated the measure savings assumptions based on DEER 2020, and all applicable deemed measure workpaper dispositions.
5. SDG&E removed measures due to low cost effectiveness, changes in Codes & Standards, lighting dispositions, or lack of customer demand.
6. SDG&E updated incentive levels to address changes, e.g., changes in measure savings, measure costs, etc. SDG&E will incorporate Commission guidance regarding determination of incentive levels and Pay for Performance options into the solicitation process.¹³
7. SDG&E will continue to focus on improving reporting measure costs to improve the accuracy of the TRC.
8. SDG&E will continue to investigate transitioning “custom/calculated” measures to “deemed” measures.
9. SDG&E will increase focus on the application of the Normalized Metered Energy Consumption (NMEC) verification methodology to improve reported savings.
10. SDG&E will continue its solicitations that began in the last quarter of 2018¹⁴ to meet the Commission’s requirement that 40 percent of each IOU PA’s portfolio must be under contract to a Third Party by the definition in D.16-08-019 by December 31, 2020.¹⁵ An important consideration for SDG&E’s forecast of its upcoming Third Party programs is that SDG&E assumes that they will be cost effective and more than likely meet the net benefits thresholds identified in its solicitations that would contribute to the cost effectiveness of its portfolio. This is consistent with the Commission’s expectations as stated in D.19-08-034:

At the same time, and as noted in D.18-05-041, the IOUs are in a state of transitioning an increasing proportion of programs to Third Party implementers, among other changes to their portfolios. While it is yet to be seen whether new implementers or new programs will generate evaluated savings results that are comparable to their corresponding forecasts, we are more inclined at this time to assume that they will.¹⁶

11. SDG&E classifies Independent Evaluator costs as part of the implementation costs. These costs are part of the program design wherein Third Party proposals for new program design are evaluated. Under the Commission’s definition, program design costs are considered implementation costs. The EE Policy Manual categorizes the following under implementation costs:

¹³ D.18-05-041, p. 18.

¹⁴ Refer to most current solicitation schedule available at <https://www.sdge.com/documents/consolidated-iou-solicitation-timeline>.

¹⁵ D.18-05-041, pp. 92-93.

¹⁶ D.19-08-034, p. 14.

- Project management activities (i.e. Planning Scope of Work, working with contractors and customers, setting goals, reviewing goals, reacting to market conditions, and responding to customer inquiries (i.e. calls, emails, letters).
- Program planning, development and design.¹⁷

The following discussion provides the major program changes under each of the program sectors.

A. Residential Sector

1. Single Family Subsector

a. HVAC- Residential Programs

The HVAC programs have been non-cost-effective. Therefore, in anticipation of the upcoming Statewide HVAC Upstream/Midstream program, SDG&E will close these programs.

b. Upstream Lighting Programs

Due to the changes in lighting codes & standards and the significant reductions in savings assumptions, SDG&E will be closing its lighting programs. It is anticipated that with the solicitation for Statewide Lighting Third Party program(s), new lighting program(s) will be in place to continue to serve customers.

c. Plug Load and Appliances Programs

SDG&E will continue its Plug Load and Appliances (PLA) program through Point-of-Sale only. The downstream approach will be eliminated since it is no longer cost effective. SDG&E's Marketplace will continue under PLA as directed by the Commission in Resolution E-4820, OP 1b. SDG&E will be focusing on the more cost-effective measures in the program, including adding pool-pumps back into the measure offering list. Thermostats, water heaters, and clothes washers will continue to be offered for SDG&E's customers. Specifically, smart thermostats will play an integral part in achieving marketing, education, and demand reduction objectives as articulated by AB 793. SDG&E has begun its solicitation for the Statewide PLA program that will replace SDG&E's local PLA programs. This effort is expected to be completed by Q4 2020.

d. Middle Income Direct Install (MIDI) Program

Due to the lack of participation in the program over the past few years and reduced cost effectiveness, SDG&E will close this program at the end of 2019. SDG&E plans to look to its future residential Single Family Third Party Solicitation to address the market penetration issues in this segment and is optimistic that new program design and innovation will better serve this historically underserved customer segment.

¹⁷ Energy Efficiency Policy Manual Version 5, July 2013, p. 91.

2. Multi-Family Programs

SDG&E has analyzed the different measures offered in the Multi-Family Energy Efficiency Rebates (MFEER) program and the Comprehensive Manufactured and Mobile Home Program (CMHP) program. It was found that although these programs have limited cost-effective offerings currently available to them, the more cost-effective measures such as T8 LED fixture will still be available as reflected in the new updated statewide workpapers which should improve the cost effectiveness of the program. In addition, SDG&E is forecasting a percentage of the participants to be Hard-to-Reach (HTR), and therefore the HTR Net-to-Gross (NTG) ration will be applied. SDG&E will track actual participation to determine the appropriate NTG by participant. Program offerings for multi-family customers will continue as status quo for most of 2020. Per the solicitation schedule SDG&E anticipates a new third-party implementer contract(s) for this market by the end of Q4 2020.

SDG&E received approval to close its Multi-Family High Opportunity Program Projects (MF HOPPs) via AL 3397-E effective July 28, 2019.

B. Commercial Sector

1. Large Commercial Subsector

Program offerings for large commercial customers will continue as status quo for most of 2020. Per the solicitation schedule SDG&E anticipates a new Third Party implementer contract(s) for this market by the end Q4 2020.

2. Small Commercial Subsector

Program offerings for small commercial customers will continue as status quo with an increased focus on the most cost-effective measures for most of 2020. Per the solicitation schedule, SDG&E anticipates a new Third Party implementer contract(s) for this market by the end of Q4 2020.

SDG&E will address Commission direction to incorporate IDSM strategies by adding \$4 million that will be made available to Third Party Implementers who proposed these strategies.

3. Other Commercial Programs

SDG&E will close the following programs at the end of 2019: HVAC programs, Customer Services Pump Test Services program, Energy Advantage Program, Benchmarking.

C. Industrial Sector

Most program offerings for Industrial customers will continue as status quo for 2020. The following programs will end in 2019: Industrial Pump Test Program and Benchmarking. Per the solicitation schedule, SDG&E anticipates signing a contract for this market in the middle of 2021.

D. Agricultural Sector

Most program offerings for the customers will continue as status quo for 2020 and possibly through 2021 to ensure customers in this sector continue to be served during the ramp down period. The Agricultural Pump Test and Benchmarking programs will be closed at the end of

2019. Per the solicitation schedule, SDG&E anticipates signing a contract in the middle of 2021 with a Third Party implementer for this market.

E. Public Sector

Incentive program offerings originally classified as Commercial programs will continue to serve Public Sector customers as status quo for 2020. Local Government Partnerships will continue under their current partnership contracts. Per the solicitation schedule, SDG&E anticipates signing a contract(s) at the end of 2020 with implementer(s) for federal, K-12 and local government markets.

SDG&E will participate in the statewide procurement and deployment of the Energy Atlas as directed by D.18-05-041, OP 32. This solicitation is administered by Southern California Edison Company.

F. Workforce Education & Training (WE&T)

SDG&E will continue to manage the Integrated Energy Education & Training program components of WE&T, including Technical Upskill and the newly developed Core Energy Education program, through collaboration with local organizations that support different aspects of the program. In addition, staff will continue to support the statewide efforts of Career Connections and Career & Workforce Readiness programs.

G. Financing Programs

1. On-Bill Financing Program

OBF is a local program run by SDG&E. In 2020, SDG&E will continue to increase program awareness with Third Party implementers and make OBF available to qualified program participants.

2. Statewide Financing Pilots

These Financing Pilots remain within the 2013-2014 EE program cycle. These pilots are budgeted and tracked accordingly and therefore no 2019 budget allocation for these pilots is required at this time. These pilots will be promoted within SDG&E's portfolio and with new Third Party implementers as applicable.

H. Integrated Demand Side Management (IDSM) Programs

SDG&E's IDSM program is funded through the IDSM Demand Response and EE portfolio. SDG&E's approved IDSM DR budget is \$4.640 million. D.18-05-041 requires the following for IDSM EE+DR efforts:¹⁸

- For the residential sector, the energy efficiency and demand response integration efforts should be focused, initially, on HVAC technologies and facilitating automatic response to new time-varying rates, possibly involving customer education on the rates and thermostats. Each IOU shall budget a minimum of \$1,000,000 annually from its IDSM budget, to test and deploy such strategies in the residential sector.

¹⁸ D.18-05-041, pp. 36-37.

- For the non-residential sector, including small commercial customers, the energy efficiency and demand response integration efforts should be focused initially on HVAC and lighting controls. For non-residential customers, the programs must validate that, if IDSM funds are used to facilitate integration of demand response capabilities into energy efficiency efforts already occurring, the customer is enrolled in a demand response program (e.g., dispatchable capacity program or, for bundled customers, an event-based rate or real-time pricing), for at least one year after the installation of the technology at the customer site, and up to 36 months if a large, deemed, or calculated incentive is involved. At least \$20 million annually in IDSM funds shall be divided among the IOU PAs on the basis of load share to test and deploy solutions in non-residential HVAC and lighting controls.
- Ensure participating customers are enrolled in a DR program.

These IDSM requirements will be incorporated within the Residential and Commercial sectors and have been included in all active solicitations for these sectors in 2020.

Integrated energy efficiency and demand response outreach and education activities funded by IDSM and supported by SDG&E's local Outreach Teams will continue in 2020 through community events, presentations, workshops, and energy solutions partnerships with local community organizations. In addition to these activities, outreach and education will also be provided in support of the Commission requirements for IDSM.

SDG&E will also continue its IDSM residential behavior program and Nonresidential Audit programs that identify both EE and DR opportunities.

I. SDG&E Status of Statewide Programs

Statewide program solicitations began in 2019 most of which are not expected to be in implementation phase until 2020/2021.¹⁹ Until then SDG&E will continue to implement the current SW programs with no substantive program changes.

J. 2020 Program Closures

Table 10 summarizes the programs that will close at the end of 2019.

Table 10: 2020 Program Closures

Program Code	Program	Sector	Brief Description of Rationale
SDGE3211	Local-CALS - Middle Income Direct Install (MIDI)	Residential	Currently low customer participation and is currently non-cost effective. New residential multifamily and single family programs are expected to be available in 2020 and 2021 respectively and are expected to address this subsector.
SDGE3240	SW-Lighting-Lighting Market Transformation	Residential	Due to the changes in lighting codes & standards and the significantly

¹⁹ See footnote 11.

Program Code	Program	Sector	Brief Description of Rationale
			reductions in savings assumptions, this program will be eliminated in 2020. A new Statewide program is expected to replace this program in 2021.
SDGE3213	SW-CALS CAHP/ESMH-CA Advanced Homes	Residential	The Current program is not cost effective. A new Statewide residential new construction program is expected to be available in Q4 2020.
SDGE3241	SW-Lighting-Lighting Innovation-ETPC MD	Residential	Due to the changes in lighting codes & standards and the significantly reductions in savings assumptions, this program will be eliminated in 2020. A new Statewide program is expected to replace this program in 2021.
SDGE3245	SW-Lighting-Primary Lighting	Residential	Due to the changes in lighting codes & standards and the significantly reductions in savings assumptions, this program will be eliminated in 2020. A new Statewide program is expected to replace this program in 2021.
SDGE3225	SW-CALS – Residential HVAC- HVAC Core	Residential	The current program is not cost effective. A new upstream/midstream and downstream HVAC program is expected to be available in 2021.
SDGE3302	SW-CALS - RESIDENTIAL HVAC UPSTREAM	Residential	The current HVAC program is no longer cost effective and will be closed in 2020. A new Statewide upstream/midstream program is expected to be available in 2021.
SDGE3216	SW-COM-Customer Services- Benchmarking	Commercial	SDG&E has made available access to customer consumption data for benchmarking per AB 802 and is expected to be funded through its GRC.
SDGE3224	SW-COM-Deemed Incentives-HVAC Commercial	Commercial	The current HVAC program is no longer cost effective and will be closed in 2020. A new Statewide upstream/midstream program is expected to be available in 2021.
SDGE3293	SW-CALS RESIDENT HVAC CORE	Commercial	The current HVAC program is no longer cost effective and will be closed in 2020. A new Statewide

Program Code	Program	Sector	Brief Description of Rationale
			upstream/midstream program is expected to be available in 2021.
SDGE3292	SW-Com-Customer Services-Pump Test Services	Commercial	This program is currently non-cost effective. A new Third Party statewide program is expected to be available in 2021.
SDGE3311	3P - Energy Advantage Program EAP	Commercial	Current program is not cost effective. New commercial programs are expected to be available in 2020.
SDGE3228	SW-IND-Customer Services-Benchmarking	Industrial	This program is currently non-cost effective. A new Third Party program to address the industrial sector needs is expected to be available in 2021.
SDGE3291	SW-Ind-Customer Services-Pump Test Services	Industrial	This program is currently non-cost effective. A new Third Party program to address the industrial sector needs is expected to be available in 2021.
SDGE3234	SW-AG-Customer Services-Benchmarking	Agricultural	SDG&E has made available access to customer consumption data for benchmarking per AB 802 and is expected to be funded through its GRC.
SDGE3235	SW-AG-Customer Services-Pump Test Services	Agricultural	This program is currently non-cost effective. A new Third Party Statewide program is expected to be available in 2021.

SOLICITATIONS OUTLOOK FOR 2020 AND 2021

A. SDG&E Local Solicitations

SDG&E expects that the following sectors will have Third Party program implementers in 2020:

- Small Commercial Sector
- Large Commercial Sector
- Multi-Family Sector

SDG&E expects to execute the associated contracts to be completed by the end of Q1 2020 with Third Party Contract Advice Letter approval anticipated within 60-90 days of submittal. The development and uploading of program Implementation Plans will be within 60-90 days of Advice Letter approval. SDG&E will ramp down its corresponding programs as Third Party programs begin ramp up and implementation.

The most recent SDG&E solicitation schedule is available on SDG&E's Energy Efficiency Third Party Solicitation webpage.²⁰

B. Statewide Solicitations

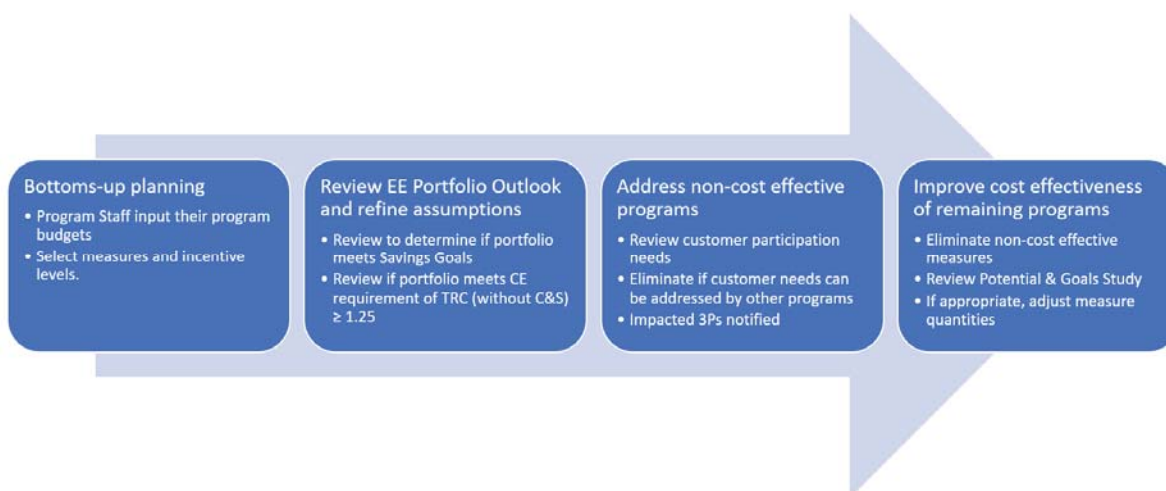
The statewide funding methodology was approved through AL 3268-E-A/2701-G-A. It allows for the utilities to update the statewide budgets for the statewide programs approved in D.18-05-041. The final statewide budgets and funding allocations by utilities are presented in Attachment A. The following statewide programs are expected to be in place for 2020 and SDG&E has included its share of the 2020 forecasted budget in its 2020 budget.

Table 11: Statewide Programs Launching in 2020

Statewide Program	Expected or Actual Launch Date
Codes & Standards	January 2020
Residential New Construction	December 2020
Nonresidential New Construction	December 2020

PORTFOLIO PLANNING PROCESS

SDG&E provided the various assumptions it used for its 2020 forecast in the section "2020 PORTFOLIO AND BUSINESS SECTOR CHANGES" above. The following illustration summarizes the various planning steps SDG&E undertook to develop its proposed 2020 portfolio.



A. Major Changes for the 2020 Portfolio

Table 12 below summarizes the major changes to SDG&E's EE portfolio compared to its 2019 EE portfolio and identifies the impacts of these changes to the portfolio.

²⁰ Available at <https://www.sdge.com/more-information/doing-business-with-us/energy-efficiency-Third-Party-solicitations>.

Table 12: Major Portfolio Changes

2020 Change	Portfolio Impact (+ or -)	Rationale
Removal of all screw-in lighting measures	Negative - - - -	Per CPUC memo June 14, 2019 - baseline for all screw-in lamps is considered 100% LED in upcoming DEER 2020 update. In 2019, the primary lighting program accounted for approximately 60 GWh of Net kWh at an approximate cost of \$ 8m.
Smart Thermostat Savings Reduction	Negative - -	Per 4/5/19 CPUC Memo - savings reduced for smart thermostats by approximately 75% across all CZ's and residential building types. Reducing measure TRC from approximately 1.0 to about 0.35 which significantly impacted the Plug Load & Appliance net benefits
Commercial LED T8 Lamps	Negative -	Due to the statewide workpaper updates, these savings decreased by approximately 25% (39 kWh/unit to 29 kWh/unit)
Commercial LED Fixtures	Negative -	Due to the 2019 workpaper updates, these savings decreased by approximately 60% (24kWh/unit to 9 kWh/unit)
Creation of Statewide Workpapers	Neutral	IOUs were ordered to create a single statewide workpaper for all 2020+ offerings instead of 4 individual IOU workpapers for the same measure. In their creation & measure update, some savings decreased while others increased.
Ramp Down of low TRC programs (<0.1)	Positive +	These programs (3212, 3302, etc.) historically had very low (< 0.1) TRC's. Although their overall net impact was minimal, their removal is a positive net benefit
Multifamily LED T8 Lamps	Positive ++	Resulting from updating the statewide T8 LED workpaper - the savings increased by 97% (45 kWh to 85 kWh) for multifamily measure install types which is the main positive measure for the multifamily program
Addition of new high TRC statewide measures	Positive + +	Statewide workpaper updates increased savings significantly (2-4x) for low flow showerheads & faucet aerators in the residential sector which are higher TRC measures. Additionally, statewide workpaper creation for Steam/HW pipe & tank insulation measures which are high TRC measures (2.0+) in the commercial sector

In developing the 2020 energy efficiency savings forecast, SDG&E is consistent with the Commission's expectations regarding forecasting to the adopted goals, in that SDG&E's forecasted energy targets exceed the adopted goals but, in general, the 2019 P&G Study supports the quantities in the forecast. D.19-08-034 states:

Finally, in response to comments regarding significant additional potential beyond the goals we adopt here, we remind parties that the goals we adopt in this decision establish a minimum amount of savings that the program administrators must achieve; nothing prevents program

administrators from going beyond the goals we adopt in this decision, or that we have set in past decisions dating back to 2004.²¹

B. 2019 Top Ten Portfolio End Uses or Measures

The following tables provides the list of top 10 electric measures and natural gas measures based on its savings contribution to the portfolio. SDG&E conducted an analysis of the SDG&E service territory data provided as part of the *2019 Energy Efficiency Potential and Goals Study (P&G Study)*,²² adopted by D.19-08-034. The focus of determining the viability of the SDG&E forecast is based on the P&G Study's SDG&E market and economic potential. This is a reasonable basis for determining the feasibility of the forecast since both the P&G Study's economic and market potential measures are selected based on a TRC of ≥ 1.00 .

Table 13: Top 10 Electric End Uses/Measures

ID	Program	MeasureName	Net GHW
SDGE3261	Local-IDSM-ME&O-Behavioral Programs (EE)	Behavioral Program	42.05
SDGE4003	Commercial Small Customer Services (<20KW) Program	RCx - Average Job	9.13
SDGE4004	Commercial Large Customer Services (>20KW) Program	RCx - Average Job	9.10
SDGE3223	SW-COM-Deemed Incentives-Commercial Rebates	Food Service - Steamer-Electric	6.97
SDGE3231	SW-IND-Calculated Incentives-Calculated	RCx - Average Job	5.94
SDGE3222	SW-COM-Calculated Incentives-Savings by Design	Whole Building	5.54
SDGE3226	SW-COM Direct Install	LED T8 Lamp_PreRebDown	5.23
SDGE3204	SW-CALS-Plug Load and Appliances-POS Rebates	Commissioned Variable Speed Drive on Pool Pump Controls (SWRE002A)	4.80
SDGE3239	SW-AG-Deemed Incentives	Ref Warehse, Floating Head Pressure, Fixed Setpoint (evap-cooled)	4.11
SDGE3226	SW-COM Direct Install	LED T8 Lamp_Direct Install	3.92
	Total		96.79

Table 14: Top 10 Natural Gas End Uses/Measures

ID	Program	MeasureName	Net Thm (MM)
SDGE3261	Local-IDSM-ME&O-Behavioral Programs (EE)	Behavioral Program	1.77
SDGE3220	SW-COM-Calculated Incentives-Calculated	Building Shell - High Performance Window Film - REA	0.80
SDGE3231	SW-IND-Calculated Incentives-Calculated	RCx - Average Job	0.52
SDGE3226	SW-COM Direct Install	Ricirculation Pump Timer, <=1/12 Hp (SWWH021A)	0.44
SDGE3220	SW-COM-Calculated Incentives-Calculated	Process Heat - NG Environmental Controls - ROB	0.33
SDGE4004	Commercial Large Customer Services (>20KW) Program	RCx - Average Job	0.33
SDGE3220	SW-COM-Calculated Incentives-Calculated	RCx - Average Job	0.28
SDGE4003	Commercial Small Customer Services (<20KW) Program	RCx - Average Job	0.28
SDGE3222	SW-COM-Calculated Incentives-Savings by Design	Whole Building	0.19
SDGE3226	SW-COM Direct Install	Food Service - Steamer-Gas	0.16
	Total		5.08

The following are the top 10 End Uses or Measures based on their net benefits contribution to the portfolio.

²¹ D.19-08-034, p. 15.

²² 2019 Energy Efficiency Potential and Goals Study, Navigant Consulting, Inc., July 1, 2019.

Table 15: Top 10 End Uses/Measures by Net Benefits

ID	Program	MeasureName	Net Benefits
SDGE3220	SW-COM-Calculated Incentives-Calculated	Building Shell - High Performance Window Film - REA	\$ 8,003,306
SDGE3226	SW-COM Direct Install	Ricirculation Pump Timer, <=1/12 Hp (SWWH021A)	\$ 4,662,713
SDGE4003	Commercial Small Customer Services (<20KW) Program	RCx - Average Job	\$ 4,189,514
SDGE3231	SW-IND-Calculated Incentives-Calculated	RCx - Average Job	\$ 3,847,815
SDGE3223	SW-COM-Deemed Incentives-Commercial Rebates	Food Service - Steamer-Electric	\$ 3,755,207
SDGE3220	SW-COM-Calculated Incentives-Calculated	Process Heat - NG Environmental Controls - ROB	\$ 3,295,479
SDGE4004	Commercial Large Customer Services (>20KW) Program	RCx - Average Job	\$ 2,947,843
SDGE3239	SW-AG-Deemed Incentives	Ref Warehse, Floating Head Pressure, Fixed Setpoint (evap-cooled)	\$ 2,553,992
SDGE3226	SW-COM Direct Install	LED T8 Lamp_PreRebDown	\$ 2,085,984
SDGE3222	SW-COM-Calculated Incentives-Savings by Design	Whole Building	\$ 2,083,401
	Total		\$ 37,425,255

A discussion of the analysis of the top 10 Measures/End Uses and comparison with the SDG&E EE potential for SDG&E's 2020 EE portfolio is provided in Attachment C.

2018 METRICS RESULTS

SDG&E submitted its 2018 metric results in its 2018 Energy Efficiency Annual Report.²³ SDG&E provides an updated report on its 2018 metric results in Attachment D.

As directed in D.18-10-008, SDG&E proposes a portfolio-level indicator for Third Party programs for disadvantaged worker training and participation as shown in the table below.²⁴ In addition, SDG&E has included the applicable modifiable and non-modifiable terms and conditions included in D.18-10-008 for its future Third Party contracts. Under these terms and conditions, Third Party implementers are required to report data on participation of disadvantaged workers in their EE programs and participation of disadvantaged workers in training or apprenticeship programs the Third Party may be partnering.

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

SDG&E anticipates that Third Party programs will start and ramp-up in 2020 and 2021, thus, reporting of these indicators will likely begin with the PY 2021 EE Annual Report (to be filed May 1, 2022), following the first full year of Third Party programs.

EFFECTIVE DATE

This filing is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B and D.15-10-028 OP4. SDG&E respectfully requests that this filing become effective on January 1, 2020, which is more than 30 days from the date filed.

In the event that this advice letter is not approved in time for January 1, 2020 implementation, D.15-10-028 OP 5 provides for 2019 program continuation until such time as the advice letter is approved.

²³ San Diego Gas & Electric Company's (U 902-M) Updated Set of Final Metrics, August 6, 2018.

²⁴ D.18-10-008 OP 34.

PROTEST

Anyone may protest this Advice Letter to the California Public Utilities 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 must be received no later than September 23, 2019 which is 20 days of the date this Advice Letter was filed with the Commission. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

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

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

Attn: Megan Caulson
Regulatory Tariff Manager
E-mail: mcaulson@semprautilities.com

NOTICE

A copy of this filing has been served on the utilities and interested parties shown on the attached list, including interested parties in A.17-01-014 and R.13-11-005, by providing them a copy hereof either electronically or via the U.S. mail, properly stamped and addressed. Address changes should be directed to the emails or facsimile numbers above.

CLAY FABER
Director – California & Federal Regulatory



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: San Diego Gas & Electric Company (U902)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Christina Sondrini

Phone #: 858-636-5736

E-mail: CSondrini@sdge.com

E-mail Disposition Notice to: CSondrini@sdge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 3429-E/2797-G

Tier Designation: 2

Subject of AL: San Diego Gas and Electric Company's 2020 Annual Energy Efficiency Program and Portfolio Budget Request

Keywords (choose from CPUC listing): Energy Efficiency

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.15-10-028 & D.18-05-041

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

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information: N/A

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: N/A

Resolution required? Yes No

Requested effective date: 1/1/20

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

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: Megan Caulson
Title: Regulatory Tariff Manager
Utility Name: San Diego Gas & Electric Company
Address: 8330 Century Park Court; CP 31D 92123
City: San Diego State: California
Telephone (xxx) xxx-xxxx: (858) 654-1748
Facsimile (xxx) xxx-xxxx:
Email: MCaulson@sdge.com

Name: SDG&E Tariff Department
Title:
Utility Name: San Diego Gas & Electric Company
Address: 8330 Century Park Court; CP 31D 92123
City: San Diego State: California
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: SDGETariffs@sdge.com

General Order No. 96-B
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

Public Utilities Commission

Office of Ratepayer Advocates (ORA)

R. Pocta

Energy Division

M. Ghadessi

M. Salinas

L. Tan

R. Ciupagea

Tariff Unit

CA Energy Commission

B. Penning

B. Helft

Advantage Energy

C. Farrell

Alcantar & Kahl LLP

M. Cade

K. Harteloo

AT&T

Regulatory

Barkovich & Yap, Inc.

B. Barkovich

Braun & Blasing, P.C.

S. Blasing

D. Griffiths

CA Dept. of General Services

H. Nanjo

California Energy Markets

General

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

City of Poway

Poway City Hall

City of San Diego

F. Ortlieb

B. Henry

L. Azar

Y. Lu

Clean Power Research

T. Schmid

G. Novotny

Davis Wright Tremaine LLP

J. Pau

Douglass & Liddell

D. Douglass

D. Liddell

Ellison Schneider Harris & Donlan LLP

E. Janssen

C. Kappel

Energy Policy Initiatives Center (USD)

S. Anders

Energy Regulatory Solutions Consultants

L. Medina

Energy Strategies, Inc.

K. Campbell

EQ Research

General

Goodin, MacBride, Squeri, & Day LLP

B. Cragg

J. Squeri

Green Charge

K. Lucas

Hanna and Morton LLP

N. Pedersen

JBS Energy

J. Nahigian

Keyes & Fox, LLP

B. Elder

Manatt, Phelps & Phillips LLP

D. Huard

R. Keen

McKenna, Long & Aldridge LLP

J. Leslie

Morrison & Foerster LLP

P. Hanschen

MRW & Associates LLC

General

NLine Energy

M. Swindle

NRG Energy

D. Fellman

Pacific Gas & Electric Co.

M. Lawson

M. Huffman

Tariff Unit

RTO Advisors

S. Mara

SCD Energy Solutions

P. Muller

Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

C. Frank

SPURR

M. Rochman

Southern California Edison Co.

K. Gansecki

TerraVerde Renewable Partners LLC

F. Lee

TURN

M. Hawiger

UCAN

D. Kelly

US Dept. of the Navy

K. Davoodi

US General Services Administration

D. Bogni

Valley Center Municipal Water Distr

G. Broomell

Western Manufactured Housing
Communities Association

S. Dey

Interested Parties

A.17-01-014

R.13-11-005

CEDARS FILING SUBMISSION RECEIPT

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

PA: San Diego Gas & Electric (SDGE)

Filing Year: 2020

Submitted: 15:20:40 on 03 Sep 2019

By: Athena Besa

Advice Letter Number: 3429-E/2797-G

* Portfolio Filing Summary *

- TRC: 1.4719
- PAC: 4.0624
- TRC (no admin): 1.9102
- PAC (no admin): 11.0796
- RIM: 0.5152
- Budget: \$84,324,642.90

* Programs Included in the Filing *

- SDGE3201: SW-CALS-Energy Advisor-HEES, UAT
- SDGE3203: SW-CALS-Plug Load and Appliances-HEER
- SDGE3204: SW-CALS-Plug Load and Appliances-POS Rebates
- SDGE3207: SW-CALS-MFEER
- SDGE3209: SW-CALS-EUC WHRP - Advanced
- SDGE3217: SW-COM-Customer Services- Audits NonRes
- SDGE3220: SW-COM-Calculated Incentives-Calculated
- SDGE3222: SW-COM-Calculated Incentives-Savings by Design
- SDGE3223: SW-COM-Deemed Incentives-Commercial Rebates
- SDGE3226: SW-COM Direct Install
- SDGE3227: SW-IND-Strategic Energy Management
- SDGE3229: SW-IND-Customer Services-Audits NonRes
- SDGE3231: SW-IND-Calculated Incentives-Calculated
- SDGE3233: SW-IND-Deemed Incentives
- SDGE3236: SW-AG-Customer Services-Audits
- SDGE3237: SW-AG-Calculated Incentives-Calculated

- SDGE3239: SW-AG-Deemed Incentives
- SDGE3246: SW-ET-Technology Introduction Support
- SDGE3247: SW-ET-Technology Assessment Support
- SDGE3248: SW-ET-Technology Deployment Support
- SDGE3251: SW C&S; - Compliance Enhancement
- SDGE3252: SW C&S; - Reach Codes
- SDGE3253: SW C&S; - Planning Coordination
- SDGE3254: SW-WE&T-Centergies;
- SDGE3255: SW-WE&T-Connections;
- SDGE3260: Local-IDSM-ME&O-Local; Marketing (EE)
- SDGE3261: Local-IDSM-ME&O-Behavioral; Programs (EE)
- SDGE3262: SW-FIN-On-Bill Finance
- SDGE3266: LInstP-CA Department of Corrections Partnership
- SDGE3267: LInstP-California Community College Partnership
- SDGE3268: LInstP-UC/CSU/IOU Partnership
- SDGE3269: LInstP-State of California /IOU
- SDGE3270: LInstP-University of San Diego Partnership
- SDGE3271: LInstP-San Diego County Water Authority Partnership
- SDGE3272: LGP- City of Chula Vista Partnership
- SDGE3273: LGP- City of San Diego Partnership
- SDGE3274: LGP- County of San Diego Partnership
- SDGE3275: LGP- Port of San Diego Partnership
- SDGE3276: LGP- SANDAG Partnership
- SDGE3277: LGP- SEEC Partnership
- SDGE3278: LGP- Emerging Cities Partnership
- SDGE3279: 3P-Res-Comprehensive Manufactured-Mobile Home
- SDGE3280: 3P-IDEA
- SDGE3281: EM&V-Evaluation; Measurement & Verification
- SDGE3282: SW-IDSM-IDSM
- SDGE3317: HOPPs - Building Retro-Commissioning
- SDGE3322: 3P - Streamlined Ag Efficiency (SAE)
- SDGE4002: Multi Family Program
- SDGE4003: Commercial Small Customer Services (<20KW) Program
- SDGE4004: Commercial Large Customer Services (>20KW) Program
- SDGE4061: Facility Assessment Services Program
- SDGE-ESPI: ESPI
- SDGE-GRCL: GRC Labor Loaders
- SDGE_SW_CSA_Appl: SW Codes & Standards Advocacy - State Appliance Standards
- SDGE_SW_CSA_Appl_PA: Codes & Standards Advocacy - State Appliance Standards (SDGE)
- SDGE_SW_CSA_Bldg: SW Codes & Standards Advocacy - State Building Codes
- SDGE_SW_CSA_Bldg_PA: SW Codes & Standards Advocacy State Building Codes (SDGE)
- SDGE_SW_CSA_Natl: SW Codes & Standards Advocacy - National Codes & Standards Advocacy

- SDGE_SW_CSA_Natl_PA: SW Codes & Standards Advocacy - National Codes & Standards Advocacy (SDGE)
- SDGE_SW_NC_NonRes: SW New Construction Non Residential
- SDGE_SW_NC_NonRes_PA: SW New Construction Non Residential (SDGE)
- SDGE_SW_NC_Res: SW New Construction Residential
- SDGE_SW_NC_Res_PA: SW New Construction Residential (SDGE)