

August 15, 2016

Energy Division
Attention: Tariff Unit
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

**Re: Comments of Southern California Edison Company on Draft
Resolution E-4795 Approval of the Database for Energy-Efficient Resources
updates for 2017 and 2018, in Compliance with Decision15-10-028**

Dear Energy Division Tariff Unit:

The National Association of Energy Service Companies (NAESCO) respectfully submits these comments in support of Southern California Edison's (SCE) letter of August 1, 2016 on Draft Resolution E-4795 (Draft Resolution) issued on July 12, 2016, which approves updates to the Database for Energy-Efficient Resources (DEER) for 2017 and 2018.

SCE is correct in stating that the Draft Resolution is not consistent with D.15-10-028 because it would establish DEER updates long after the "bus stop" close date of 16 months prior to an update being effective for the energy efficiency portfolio. SCE is also correct in noting that the types of updates outside the normal "bus stop" process allowed by D.15-10-028 do not include the wholesale changes proposed in the Draft Resolution.

NAESCO has urged the Commission for years to ensure that DEER values be set with adequate time for Program Administrators (PAs) to plan their portfolios. The Draft Resolution does not allow for that practice. The PAs are required to file annual budget advice letters on September 1, 2016 for their proposed 2017 budgets. If the Draft Resolution were adopted mid-August, it would give the PAs only two weeks to complete the complex task of updating large, complex portfolios.

Therefore, NAESCO strongly agrees with SCE's recommendation that the Commission keep to the process it defined in D.15-10-028 and update DEER

values in January 2018. This would also allow for an update of DEER measures based on baselines that are consistent with AB 802, as SCE correctly notes.

Respectfully submitted by,

A handwritten signature in black ink, appearing to read "Donald Gilligan". The signature is stylized with a large, sweeping flourish that extends to the right.

Donald Gilligan
President

cc: Katie Wu, CPUC Energy Division
Maryam Mozafari, CPUC Energy Division
Edward Randolph, Director, CPUC
James Loewen, CPUC Energy Division
Service List R.13-11-005