CPUC Directives on DEER, Non-DEER Workpapers, and the Ex Ante Review Process





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Objective





Is Cal TF design/proposed implementation consistent with CPUC directives on ex ante value and non-DEER workpaper development?

Approach





- Reviewed CPUC Orders, Assigned Commissioner and ALJ Rulings (over 20)
- Reviewed DEER History
 - DEER Administration, Stakeholder Involvement, funding

History of DEER





- In 1990, CEC organized the California Conservation Inventory Group to identify types of data to be collected and methodologies to be used
 - Participation by CEC, CPUC, ORA, IOUs, NRDC, LBNL, California Institute for Energy Efficiency
- CADMAC took over DEER maintenance and updates, later CBEE and CPUC handed it off to Calmac
 - DEER needs to be supported by a collaborative of experts because "decisions on DEER values were often extremely challenging due to significant technical complexities and empirical uncertainties"
 - Report by Itron, Hirsh & Associates, 2005
- D.05-01-011 began transition of DEER management to Energy Division

Consistent CPUC Policy Directives on Ex Ante Values and Non-DEER WP





- Collaborative
- Transparent
- Well-Documented, Easily Available
- Best Available Data
- Strikes Reasonable Balance Between Accuracy, Precision, and Timeliness; Cost and Certainty
- Minimizes Ex Post Risk

CPUC Ex Ante Policy Directives Alignment: Cal TF



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- Collaborative
 - By Design
- Transparent
 - By Design: public TF meetings; all information on website.
- Well-Documented, Easily Available
 - All values will be documented in consistent templates; values to be linked to underlying data on web and in WP templates.
- Best Available Data
 - Broader range of experts will weigh in; increases likelihood of "Best Available Data"
- Strikes Reasonable Balance Between Accuracy, Precision and Timeliness;
 Cost and Certainty
 - TBD
- Minimizes Ex Post Risk
 - TBD

Cal TF Can Also Help Restore the CPUC's Separation of Functions



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"The Public Utilities Commission is a regulatory agency, not an administrative agency. As such, the Commission's regulatory functions, and the Commission's responsibility for providing independent oversight of all ratepayer-funded programs, are incompatible with administration of any of those programs or contracts on a long-term basis."

D.05-01-055