

**Before the Public Utilities Commission of the State of California**

Application of Southern California Edison Company (U 338-E) for Approval of Energy Efficiency Rolling Portfolio Business Plan.	Application 17-01-013 (Filed January 17, 2017)
Application of San Diego Gas & Electric Company (U 902-M) to adopt Energy Efficiency Rolling Portfolio Business Plan Pursuant to Decision 16-08-012.	Application 17-01-014 (Filed January 17, 2017)
Application of Pacific Gas and Electric Company for Approval of 2018-2025 Rolling Portfolio Energy Efficiency Business Plan and Budget (U 39-M).	Application 17-01-015 (Filed January 17, 2017)
Application of Southern California Gas Company (U 904-G) for adoption of its Energy Efficiency Rolling Portfolio Business Plan and related relief.	Application 17-01-016 (Filed January 17, 2017)
In the matter of the Application of Marin Clean Energy for Approval of its Energy Efficiency Business Plan.	Application 17-01-017 (Filed January 17, 2017)

**NAESCO MOTION FOR EXTENSION OF TIME TO FILE COMMENTS ON  
PROGRAM ADMINISTRATORS' SUPPLEMENTAL INFORMATION**

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May 30, 2017

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### **NAESCO MOTION FOR EXTENSION OF TIME TO FILE COMMENTS ON PROGRAM ADMINISTRATORS' SUPPLEMENTAL INFORMATION**

The National Association of Energy Service Companies (NAESCO) submits this motion, pursuant to the email ruling of May 26, 2017 by ALJ Valerie Kao. Please note that the text of the motion below is identical to the text of NAESCO's May 19 email to ALJ Kao.

The April 14, 2017 Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judges ruled that the Program Administrators (PAs) were to provide certain supplemental information by May 15th, and that other parties to the proceeding could respond to that supplemental information no later than June 5th.

On May 15th, the assigned ALJs granted the Moving Parties' request to provide responses to questions I.C.9, II.C.14, II.C.15, VII.C, 101.d, 102 and 103 no later than June 12, after the June 5 due date for responses to the supplemental information.

Stakeholders must be able to review the information which the PAs will now provide on June 12 in order to respond to a number of the questions in the Scoping Memo, including the

Reasonableness of Business Plans – Questions I.A.3, I.A.5, I.A.6, I.A.7, I.C.10, I.B.9, I.B.10 -- as well as more general issues the Commission expects stakeholders to address, including:

- Should the Commission adopt, modify, or deny the Business Plan applications?
- Should the Commission adopt or modify the proposed budgets?
- Are the costs and benefits of the proposed business plans reasonable and justifiable?
- Reasonableness of costs
- Utility retention of selected portfolio functions, including the justification for not bidding out to third parties and potential cost implications.

We believe that stakeholders need the information because it is not possible to judge the reasonableness of the PA proposals until we know how the PAs intend to staff their programs. If the administrative staffing is inadequate, the PAs will not be able to timely execute their plans. If the administrative staffing is excessive, program administration will be unnecessarily complex and expensive, and accountability for program performance will be so dispersed that it will be difficult for the Commission to identify problem functions or individuals and order corrective action.

NAESCO requests a revised response schedule in light of the extended date for the provision of all the supplemental information. Instead of a June 5th date to respond to the PAs' supplemental information, NAESCO proposes a June 26th deadline. The June 19th date for reply comments should be moved to July 10th. July 10th should also be the deadline for parties to file motions requesting evidentiary hearings and/or an opportunity to submit testimony.

Respectfully submitted by,

A handwritten signature in black ink, appearing to read 'Donald Gilligan', with a long horizontal flourish extending to the right.

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