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ADVICE XXXX-E
(U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Southern California Edison Company's Energy Efficiency Program and Portfolio Annual Budget Advice Letter for Program Year 2020

In compliance with Decision (D.)18-05-041, Southern California Edison Company (SCE) hereby submits its Energy Efficiency (EE) Program and Portfolio Annual Budget Advice Letter (ABAL) for Program Year (PY) 2020. This ABAL contains the information required by the California Public Utilities Commission ("Commission" or "CPUC").¹ Specifically, this ABAL contains, among other things, SCE's budgets for PY 2020 for various EE and EE/demand response (DR) integration activities,² SCE's forecasts for the Total Resource Cost (TRC), Program Administrator Cost (PAC), and Ratepayer Impact Measure (RIM) tests,³ and its forecast of energy savings for PY 2020 for approval by the Commission.

In D.18-05-041, the Commission held that the "PAs' ABALs must provide sufficient detail, and basis in their implementation plans, to demonstrate their business plans will be cost-effective during each year of implementation."⁴ Among other reasons, if a PA is unable to file an ABAL reflecting an updated portfolio that meets savings goals, cost-effectively and within the authorized budget, the PA is required to file a revised business

¹ See e.g., in D.18-05-041, D.18-10-008, D.19-05-019, and CPUC Proposed Decision Adopting Energy Efficiency Goals for 2020-2030.

² In SCE's 2019 Annual Budget Advice Letter (Advice 3859-E), SCE referred to funding for EE/DR Integration activities as "Integrated Demand Side Management (IDSM)" activities and budgets. This should not be confused with the IDSM Program (Program ID: SCE-13-SW-006) funding that SCE received approval to close in Advice 3859-E and 3859-E-A. Therefore, what was previously referred to as IDSM activities and budgets will now be referred to as EE/DR Integration activities and budgets.

³ TRC test is performed for each program and sector and at the portfolio level. PAC and RIM tests are portfolio level only.

⁴ D.18-05-041, p. 72

plan (BP). The Commission identified several “triggers” which would require a PA to file a revised business plan.⁵

For the reasons explained in detail herein, SCE is unable to achieve the Commission’s most current adopted goals cost-effectively for PY 2020; therefore, consistent with the Commission’s direction, SCE will file a revised business plan after it holds a workshop with stakeholders so that SCE can consider stakeholder input prior to submitting its revised business plan.⁶

In SCE’s revised BP, SCE intends to demonstrate how it will meet California’s long-term goals for energy efficiency. Pending Commission approval of SCE’s revised BP, SCE will continue to implement its energy efficiency programs, including the third-party solicitation efforts, as effectively as possible, with the goal of meeting energy efficiency savings targets within budget and cost-effectively. As such, SCE requests that the Commission approve the portfolio modifications described herein.⁷ SCE’s proposed portfolio modifications for PY 2020 include discontinuing certain non-cost effective EE programs and sub-programs detailed in Attachment TBD, as well as adoption of recommended policy changes during this period of transition to a modernized energy efficiency portfolio. The proposed program closures and budgets are the most cost-effective options available given current market conditions and existing Commission guidance and should be approved by the Commission and implemented while the revised BP is pending.

SCE welcomes revising its BP as an opportunity to reconsider SCE’s strategy and the policies governing its EE portfolio in order to modernize EE to better align with current market conditions and customer expectations. The planning concepts that underpin the Rolling Portfolio policy framework date back almost ten years, and many factors in the market have since changed, most notably the success California has achieved in energy efficiency during that time.⁸ SCE will conduct significant internal planning as well as full and transparent engagement with Commission staff, ratepayer advocates, the California Energy Efficiency Coordinating Committee members, and other stakeholders before filing a revised BP.

⁵ *Id.*, p. 57

⁶ In D.18-05-041, the Commission required that “[i]f a PA’s ABAL submitted for program year 2019 (September 4, 2018) through program year 2022 (September 1, 2021) fails the ABAL review criteria, then staff will reject that PA’s ABAL and direct the PA to hold a workshop to explain why it failed to meet the approval criteria; the main purpose of this workshop would be to provide transparency of the challenges in meeting the criteria and potentially to aid the PA in revising its business plan.” D. 18-05-041, pp. 134-135.

⁷ SCE may also file a separate advice letter requesting program closures or other changes.

⁸ CPUC Proposed Decision Adopting Energy Efficiency Goals for 2020-2030, p.6

I. PURPOSE

The purpose of this advice letter filing is to propose detailed budgets for cost recovery, transfer, and contracting purposes for PY 2020, in compliance with D.18-05-041.⁹ SCE's EE annual budget and associated forecasted energy savings and cost-effectiveness for PY 2020, are summarized below. For a discussion on the impact of market effects, see Section V.

- SCE proposes a portfolio budget of \$154 million for 2020, which is a \$122 million reduction from SCE's Portfolio PY 2020 Budget Request amount of approximately \$276 million.¹⁰
- Without Codes & Standards, SCE's 2020 Portfolio results in a forecasted TRC of 0.76.
- Without Codes & Standards, SCE's portfolio yields forecasted energy savings of 342 GWh, which is 110 percent of goal; and 72 MW of forecasted demand reduction, which is 116 percent of goal.¹¹
- Including Codes & Standards, SCE's portfolio yields forecasted energy savings of 929 GWh, which is 95 percent of goal; and 189 MW demand reduction, which is 98 percent of goal.¹²

In this ABAL, SCE requests the Commission approve¹³:

- Program closures and modifications as described below in Section VIII and **Attachment TBD**, and
- Removal of budgets of workforce education, and training (WE&T) programs from SCE's cost-effectiveness calculations until such time as WE&T is funded through the Income Qualified Programs (IQPs). SCE plans to request the transfer of the WE&T budget to IQP, as discussed below.¹⁴

⁹ D.18-05-041, page 58.

¹⁰ Budget cap amounts were provided in the Annual Rolling Portfolio Budget Forecast - True-up Table (in SCE's 2019 ABAL Attachment D Commission Developed ABAL, Table 2a), see SCE Advice 3859-E-A submitted on October 29, 2018.

¹¹ Commission Proposed Decision Adopting Energy Efficiency Goals for 2020-2030 states SCE's goals (without Codes and Standards) for PY 2020 is 310 GWh and 62 MW.

¹² Commission Proposed Decision Adopting Energy Efficiency Goals for 2020-2030 states SCE's goals (including Codes and Standards) for PY 2020 is 997 GWh and 193 MW.

¹³ While D.18-05-041 requires that if a PA "fails the ABAL review criteria, then staff will reject that PA's ABAL" SCE urges the Commission to approve these changes requested in this ABAL to minimize unnecessary disruption during 2020 and facilitate the development of a revised BP. D.18-05-041, pp. 134-135.

¹⁴ SCE has included WE&T budgets in the tables of this Advice Letter. Removal of the current budgeted amounts would directly lower TRC Costs by \$5.9M.

II. BACKGROUND

In D.15-10-028, the Commission ordered each EE Program Administrator (PA) to file a Tier 2 advice letter in September of each year with the PA's annual EE budget for the following year.¹⁵ Each ABAL must contain the following:

- Portfolio cost effectiveness statement; and
- Application summary tables with forecast budgets and savings by sector and program/intervention.

Beginning with the ABAL due on September 4, 2018, D.18-05-041 directed the PAs to provide the following information:

- A forecasted TRC that meets or exceeds 1.25, except during program years 2019-2022, when the forecasted TRC must meet or exceed 1.0;
- Forecasted energy savings that meet or exceed Commission established savings goals for each PA;
- A forecasted budget that does not exceed the PA's annual budget in the approved business plans, or (if applicable) the revised annual budget in the current ABAL;
- Sector-level metrics¹⁶; and
- A description of program and portfolio information.¹⁷

Additionally, D.18-05-041 directed Commission staff to develop templates and further guidance as needed for ABAL submissions.¹⁸ On July 19, 2018, the Commission's Energy Division (Energy Division) issued its guidance for the PAs' ABAL submissions. The Energy Division instructed the PAs to also include the following in their ABALs:

- PA's Program Year Budget and Forecasted Savings;
- A Narrative of Program and Portfolio Information;
 - Proposed program changes;

¹⁵ See D.15-10-028, Ordering Paragraph (OP) 4.

¹⁶ Pursuant to D.18-05-041, OP 11, PAs reporting and assessments of metrics and targets are included in PA's EE Annual Reports. SCE's latest report on metrics and targets was included in its 2019 EE Annual Report for Program Year 2018. SCE's EE Annual Report is posted on EEStats.

¹⁷ See D.18-05-041, p. 124-129, &133.

¹⁸ See D.18-05-041, OP 40.

- Proposed portfolio changes;
- Additional explanations if the PA's TRC is between 1.0 and 1.25 or if the forecasted energy savings is below Commission established goals; and
- Investor Owned Utilities' (IOUs') allocation for EE/DR Integration activities, pursuant to Ordering Paragraph (OP) 10 of D.18-05-041

D.18-05-041 requires the ABAL to include historic portfolio, sector, and program-level budget requests and actual expenditures over the life of the business plan.¹⁹ This information is provided in **Attachment TBD**.

In support of the transition towards new statewide programs, Energy Division also requested that the PAs submit a table, based upon the Joint IOUs' Advice Letter of their Shared Funding Mechanism Proposal, to include 2020 and 2021 forecasted budgets for each statewide program and the proportional shares and budgets for each utility.²⁰ This table is contained in **Attachment TBD**.

In D.19-05-019, issued in the Integrated Distribution Energy Resources (IDER) proceeding, the Commission directed the PAs to provide the Ratepayer Impact Measure (RIM) and PAC cost-effectiveness estimates,²¹ and therefore SCE has included these estimates in the ABAL.

III. 2020 EE PORTFOLIO SUMMARY

A. Efforts to Meet CPUC Requirements

Through its ABAL planning and development process, SCE made every effort to develop a portfolio and budget to optimize for each of the CPUC metrics, including but not limited to meeting the Commission's required cost-effectiveness, savings goals, budgets, and Commission-mandated budget caps and targets. Developing a portfolio that could reasonably meet all metrics proved to be infeasible despite the portfolio adjustments proposed herein. SCE's revised BP will, in part, explain how SCE will

¹⁹ D.18-05-041, page 125.

²⁰ Energy Division (ED) Staff requested IOUs to update funding percentages and amounts. ED Staff provided IOUs a template, based upon Table 5 (page 9) from the Joint IOUs Supplemental Advice Letter of the Shared Funding Mechanism Proposal submitted on November 15, 2018 (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), to be included in their 2020 ABAL.

²¹ D.19-05-019, p. 24 ("[W]e require the review and consideration of the RIM and PAC tests results during deliberation of all distributed energy resources proceedings and advice letters where cost-effectiveness analyses are required.").

achieve the overall savings goals during the business plan period.²² While SCE was unable to meet the cost-effectiveness metric and energy savings goals (including codes and standards) for 2020, SCE does not view this result as a failure of the current portfolio of energy efficiency programs, but rather as a product of California's success in energy efficiency, as well as the timing to transition to a new EE structure implementing third-party designed and delivered programs. SCE remains committed to continue to fulfill "California's longstanding commitment to and actions to achieve energy savings."²³

SCE proposes significant modifications to its EE portfolio for 2020, as described herein, in order to come as close as possible to meeting EE goals and cost effectiveness requirements, even though the portfolio will fall short in 2020. These modifications focus on delivering a cost-effective portfolio while modernizing the portfolio components and continuing the transition to the new statewide and third-party model that the Commission has adopted to modernize California energy efficiency programs and energy efficiency markets.

At a high level, and detailed further below, the proposed adjustments to the portfolio include:

- Optimizing all measures and programs to maximize savings and cost-effectiveness;
- Eliminating or reducing non-cost-effective programs; and
- Reducing administrative costs.

The result of SCE's optimization efforts – the proposed portfolio budget, savings, and cost-effectiveness – are reflected in Sections IV, V and VI. SCE is proposing a portfolio cost-effectiveness and budget based upon currently approved energy savings and cost-effectiveness inputs to its measure and program mix.

While SCE forecasts a specific cost-effectiveness, savings, and measure mix in the ABAL, this mix and resulting cost-effectiveness may change as the Commission releases measure dispositions, Database for Energy Efficient Resources (DEER) updates, and other key inputs which could reduce or improve portfolio savings and cost-effectiveness. Dispositions which negatively impact measures in high-volume programs could have a significant impact on SCE's ability to achieve its cost-effectiveness and goals targets even further. Early notifications of such dispositions would assist SCE in responding to such changes.

²² D.18-05-041 p. 129 requires that any ABAL that forecasts lower than Commission established annual savings goals include "Discussion or explanation for how the PA will ensure achievement of the overall savings goals, within the overall budget, during the business plan period (i.e., through 2025)." SCE's forthcoming revised BP will include this discussion, which will be informed by other policy changes requested in the BP to enable SCE to meet its overall goals.

²³ CPUC Proposed Decision Adopting Energy Efficiency Goals for 2020-2030, p.6.

SCE is committed to working closely with the Commission and its staff to utilize the most recent measure and program forecasts while also providing the market with sufficient certainty in making energy efficiency investment decisions. As cost-effectiveness inputs change, SCE will continue to evaluate the available mix of measures and make portfolio adjustments as necessary to cost-effectively meet savings goals. SCE will also work with the Commission, its staff, and other stakeholders in the development of its revised BP to include changes to policies that may improve the ability of the program administrators, implementers, and customers to adjust to market and regulatory changes.

B. Reasonableness of Forecasts Given 2020 Uncertainty

While forecasting by definition requires using assumptions based on uncertain future outcomes, forecasting the 2020 portfolio contained more uncertainty than usual because of the transition of the EE programs to statewide and third-party implemented programs, as well as other factors as discussed in more detail in Section IX.

SCE views 2020 and 2021 as transition years for SCE's energy efficiency portfolio. SCE's 2020 portfolio budget includes forecasted costs associated with the implementation of statewide and third-party programs contracted pursuant to the third-party EE solicitations currently in progress. When statewide programs, new third-party programs, and other programs and policy changes are fully implemented, SCE anticipates that it will be able to meet the Commission-adopted goals cost-effectively and within the budget parameters of its revised approved business plan.

Specific examples of uncertainty which the 2020 ABAL considers are:

- Timing, costs, benefits, and energy savings associated with Statewide programs
- Timing, costs, benefits, and energy savings associated with the future selection of new third-party programs
- Timing, costs, benefits, and energy savings associated with fuel substitution programs
- Timing, costs, benefits, and energy savings associated with a pending pilot proposal filed with the Commission
- Timing and impact of workpaper and EM&V dispositions

Based on the available information as of this filing, SCE is forecasting no savings in 2020 for Statewide programs and minimal savings from new, local third-party programs.²⁴ These assumptions are reasonable because, along with other challenges discussed in Section IX below, 2020 and 2021 are transitional years with unique uncertainty.

²⁴ SCE is estimating 9 GWh and 2 MW in 2020 for new local third-party program savings.

C. WE&T Policy Requests

In SCE's post-2020 IQP application (due to be filed in November 2019), SCE intends to propose moving non-statewide WE&T funding to IQP in its application in 2021. This move will align the costs of these programs with those who can benefit the most from these programs. In addition, this move allows SCE to modernize the delivery of these programs to be increasingly delivered by third parties, which will be described in detail in the IQP application. SCE will continue funding WE&T through the energy efficiency budget until the Commission approves moving it to IQP.

Pursuant to current Commission requirements on portfolio cost-effectiveness, the WE&T programs provide no claimable resource value due to the inability to directly link the results of such programs to energy efficiency resource impacts. As such, SCE is proposing that WE&T programs be removed from cost-effectiveness calculations until WE&T is funded through IQP.

While WE&T programs currently do not provide benefits toward portfolio cost effectiveness, these programs are useful to customers and can transform the market over the longer term; therefore, WE&T programs should be treated similarly to Emerging Technology Program costs. The Commission approved removal of Emerging Technology Program costs from the cost-effectiveness evaluations in D.05-04-051.²⁵ In that Decision, in reference to Emerging Technology Program budgets, the Commission stated, "The usefulness of the TRC test as a primary indicator of cost-effectiveness is limited for certain programs which do not necessarily focus on the timing or type of resource needs of the utility."²⁶ Similarly, while WE&T programs do provide value to customers, it should not be considered in the TRC calculations.

IV. 2020 EE PORTFOLIO BUDGET

Table 1 below provides SCE's forecast for 2020 EE portfolio budget. Please see **Attachment TBD** for SCE's 2020 EE Portfolio Budget in the Commission-issued ABAL template.

Table 1: Forecasted 2020 EE Portfolio Budget²⁷

Sector	2020 Budget
Residential	\$ 39,840,537
Commercial	\$ 24,724,350
Industrial	\$ 24,028,046

²⁵ See D.05-04-051, Attachment 3, Rules IV.6. and IV.9.

²⁶ See D.05-04-051, Attachment 3, Rule IV.9.

²⁷ \$9 million dollars in anticipated third-party programs costs are included in Residential, Commercial and Industrial sectors. \$4.7 million in anticipated statewide program costs are included in Commercial, Residential, and Codes and Standards sectors.

Sector	2020 Budget
Agriculture	\$ 2,212,762
Emerging Technologies	\$ 7,105,103
Public	\$ 10,723,174
WE&T	\$ 5,889,739
Finance	\$ 147,687
OBF Loan Pool	\$ 17,000,000
Codes and Standards	\$ 14,987,041
IOU/CPUC EM&V	\$ 7,016,417
Total	\$153,674,856

Table 2 below provides SCE's 2020 EE portfolio budget and cost recovery by funding source.

Table 2: Budget and Cost Recovery by Funding Source

Budget and Cost Recovery by Funding Source	Amount
SCE's Forecasted 2020 EE Portfolio Budget	\$146,658,440
SCE's Unspent/Uncommitted Program Carryover Funds from 2019	Pending
Lancaster Choice Energy's (LCE) Funding Request for 2020 EE Portfolio	\$401,318
LCE's EM&V	\$4,598
Tri-County Regional Energy Network's (3CREN) Funding Request for 2020 EE Portfolio	\$2,154,342
3CREN's EM&V	\$24,685
Southern California Regional Energy Network's (SoCalREN) Funding Request for 2020 EE Portfolio	Pending
SoCalREN's EM&V	Pending
Total PA's Funding Request for 2020 EE Portfolio	\$153,674,856

In addition to the \$154 million requested for EE programs in 2020, SCE requests demand response (DR) funding in the amount of \$9.87 million for 2020 to continue EE/DR Integration activities directed in D.18-05-041.²⁸ In D.18-05-041, the Commission approved SCE's Business Plan Application which included demand response balancing account funding for EE/DR Integration activities. Further, the 3CREN and SoCalREN will be submitting their own Advice Letters for each PA's respective 2020 budget. Per Resolution E-4917, LCE's budget comes from SCE's budget; however, LCE will submit its own budget via CEDARS.

A. On-Bill Financing Loan Pool

SCE's will continue to offer its On Bill Financing (OBF) Program which provides zero-interest financing for the installation of qualifying energy-efficient measures. Loans are

²⁸ D.18-05-041, OP 10

available to qualifying nonresidential customers, including commercial, industrial, government, and institutional customers, and customers repay their loan as a line item on their electric bill. The Commission and its Energy Division, have previously granted SCE the authority to retain funds from prior EE and OBF program cycles to use in subsequent program cycles.²⁹ Consistent with this precedent and due to the continued success of the OBF program, SCE is requesting authority to retain funds from prior funding cycles to use for the 2020 funding cycle within the OBF program only.

SCE requests authority to retain \$17 million of program year 2010-2012 and 2013-2015 unspent, uncommitted, and repaid OBF loan pool funding, in order to fund EE On-Bill Finance program commitments for the 2020 program year. SCE proposes to retain approximately \$0.727 million from the 2010-2012 cycle and \$16.2 million from the 2013-2015 program cycle to make up the \$17 million needed for PY 2020. Table 3 includes the authorized budgets, loans issued, commitments, repayments and funds needed from each 2010-2015 program cycle.

Table 3: OBF Loan Pool Funding Needed for PY 2020

Program Cycle	Authorized Budgets (a)	Loans Issued ³⁰ (b)	Write Offs (c)	Repayments (d)	Commitments ³¹ (e)	Retained for 2018-2019 OBF Loan Pool ³² (f)	Available Balance (a)-(b)-(c)+(d)-(e)-(f)	Proposed to Retain for 2020
2010-2012	\$22,548,864	\$21,853,666	\$269,305	\$20,085,229	\$0	\$19,783,822	\$727,300	\$727,300
2013-2015	\$54,724,863	\$47,251,050	\$392,329	\$29,989,361	\$336,495	\$ 11,716,181	\$25,018,169	\$16,272,700
								\$17,000,000

V. 2020 EE PORTFOLIO SAVINGS

Table 4 and Table 5 below provide SCE’s forecast of energy savings and demand reduction for its 2020 EE portfolio. Energy savings from SCE’s Codes and Standards program are excluded from the figures below. Please see **Attachment TBD** for SCE’s 2020 EE Portfolio Savings in the Commission issued ABAL template.

All savings and cost-effectiveness figures used in this ABAL are direct outputs taken from the Commission-provided Cost Effectiveness Tool (CET) on the California Energy

²⁹ SCE was previously granted authority to retain funds from prior OBF program cycles to use in subsequent program cycles. See SCE Advice 3880-E.

³⁰ Cumulative amount of loans issued during the program cycle.

³¹ Commitments: Based on the total number of OBF projects which already have committed/reserved funds set aside.

³² Funds retained for the 2018/2019 Program Cycle.

Data and Reporting System (CEDARS),³³ which includes an embedded 5% adjustment for market effects. In response to the Potential and Goals Proposed Decision³⁴, SCE attempted to forecast and perform cost-effectiveness without market effects impacts by reducing net-to-gross (NTG) values by 0.05. Using this method, SCE estimates that its portfolio energy savings and demand reduction, excluding market effects, would be 323 GWh, 68 MW, with a TRC of 0.72.

Table 4: 2020 EE Portfolio Savings (IOU Programs Only)

	2020 Forecast		
	Total	CPUC Goal	% of 2020 Goal
Energy Savings (Net GWh)	342	310	110%
Demand Reduction (Net MW)	72	62	116%

	2020 Forecast without Market Effects		
	Total	CPUC Goal	% of 2020 Goal
Energy Savings (Net GWh)	323	310	104%
Demand Reduction (Net MW)	68	62	110%

**Table 5: 2020 EE Portfolio Savings
(IOU Programs Only including Codes & Standards)**

	2020 Forecast		
	Total	CPUC Goal	% of 2020 Goal
Energy Savings (Net GWh)	929	977	95%
Demand Reduction (Net MW)	189	193	98%

	2020 Forecast without Market Effects		
	Total	CPUC Goal	% of 2020 Goal
Energy Savings (Net GWh)	910	977	93%
Demand Reduction (Net MW)	193	193	96%

According to Table 5, SCE will not meet its 2020 GWh and MW goals when including Codes and Standards (C&S) savings. Since C&S is a statewide program, SCE receives 587 GWh and 117 MW using the statewide program savings allocation methodology directed in D.18-05-041, which is 80 GWh and 14 MW less than its 2020 C&S goals. These amounts reflect SCE's 40% funding share of electric savings for C&S.

³³ <https://cedars.sound-data.com/>

³⁴ CPUC Proposed Decision Adopting Energy Efficiency Goals for 2020-2030, p. 26

Details on current statewide C&S funding and savings allocations for PY 2020 are in Table 6 below and are based on a PY 2020 total statewide C&S budget of \$13.155 million:

Table 6: Codes and Standards Budget and Savings Allocations Based upon the Joint IOUs' Shared Funding Mechanism Proposal

IOU	Electric Proportional Share (80%)	Gas Proportional Share (20%)	Electric Proportional Share	Gas Proportional Share	Total Proportional Share	% Share of Total Proportional Share	C&S 2020 Goal (GWh)	C&S 2020 Goal (MW)	C&S 2020 Goal (MMTherms)
PG&E	44.4%	50.4%	\$4.673M	\$1.326M	\$5.999M	45.6%	650	130	18
SDG&E	15.5%	7.8%	\$1.631M	\$0.205M	\$1.836M	14.0%	227	45	3
SCE	40.1%	0.0%	\$4.220M	\$0.000M	\$4.220M	32.0%	587	117	0
SoCalGas	0.0%	41.8%	\$0.000M	\$1.100M	\$1.100M	8.4%	0	0	15
Total	100.0%	100.0%	\$10.524M	\$2.631M	\$13.155M	100.0%	1,464	293	36

VI. 2020 EE PORTFOLIO COST-EFFECTIVENESS

Table 7 below sets forth the results of the Total Resource Cost (TRC), Program Administrator Cost (PAC), and Ratepayer Impact Measure (RIM) tests for SCE's 2020 EE portfolio. These estimates exclude impacts from SCE's Codes and Standards programs, statewide marketing, education & outreach, and SCE's low-income EE program, the Energy Savings Assistance (ESA) program. Please see Attachment TBD for SCE's 2020 EE Portfolio TRC, PAC, and RIM in the Commission issued ABAL template.

Table 7: 2020 EE Portfolio TRC, PAC, and RIM (without Codes & Standards)

	2020 Forecast
TRC	0.76
PAC	0.86
RIM	Pending

	2020 Forecast without Market Effects
TRC	0.72
PAC	0.80
RIM	Pending

Note the above table includes budgets for WE&T, although this ABAL requests WE&T be removed from cost-effectiveness calculations. If WE&T amounts were to be removed from portfolio cost-effectiveness with market effects, TRC, PAC, and RIM would increase to 0.79, 0.90, and pending, respectively. TRC, PAC and RIM without market effects would be 0.74, 0.84 and pending, respectively.

VII. METRICS

D.18-05-041 Ordering Paragraph (OP) 11 directs each Program Administrator (PA) to include its metrics results and assessments in the PA's EE annual reports. To access

SCE's most recent metrics report, see SCE's 2019 EE Annual Report for metrics and assessments for Program Year 2018.

In compliance with D.18-10-008, OP 5, SCE, in collaboration with the other PAs, proposes a portfolio-level indicator to track disadvantaged worker participation similar to the disadvantaged worker participation metric for WE&T. SCE will include requirements in its third-party contracts to require third-party implementers to collect and report data (if provided or submitted voluntarily) on participation of disadvantaged workers in their programs.

VIII. PROPOSED PROGRAM AND PORTFOLIO CHANGES

SCE's ABAL is optimized to maximize cost-effective energy savings, taking into account uncertainties such as the timing of savings associated with statewide programs and new third-party programs, and other regulatory and market changes. D.18-05-041 requires IOUs to meet a minimum forecasted cost-benefit ratio of 1.0 through 2022 and 1.25 beginning no later than 2023.³⁵ While SCE's ABAL for 2020 forecasts a TRC below 1.0, SCE will use the revised BP as an opportunity to consider operational and policy changes intended to help meet Commission-required goals and cost-effectiveness and modernize energy efficiency overall.

SCE's proposed PY 2020 portfolio budget of \$154 million is lower than the IOU Portfolio PY Budget Request included in SCE's Annual Rolling Portfolio Budget True-Up for PY 2020 of \$276 million.³⁶ SCE's 2020 budget is forecasted to be lower resulting from delays in the third-party solicitations for new energy efficiency program concepts and corresponds with the reduced savings goals in the CPUC Proposed Decision Adopting Energy Efficiency Goals for 2020-2030.

To help meet the Commission's goals for energy efficiency, SCE is proposing to reduce its non-resource program portfolio, eliminate and reduce low-performing programs, and maximize savings from cost-effective programs and measures.

SCE is also working toward the implementation of third-party proposed, designed, and implemented programs as directed in D.15-10-028, D.16-08-019, D.18-01-004, and D.18-05-041, including third-party delivered statewide programs. SCE's Local Residential, Commercial and Industrial Solicitation activities and the Statewide Lighting Solicitation activities began in late 2018. To prepare for the implementation of the new third-party designed and delivered programs, SCE's 2020 budget accounts for approximately \$4.7 million in ramp-up funding for new third-party programs and approximately \$9 million in costs for funding for new statewide programs and activities.³⁷ In addition, SCE has budgeted funding to continue third-party energy

³⁵ See D.18-05-041, COL 36

³⁶ See Table 2a (IOU Budget True-Up) in Attachment D of SCE's 2019 ABAL Advice Letter 3859-E-A.

³⁷ SCE plans to request for an extension to comply with D.18-05-041, OP. 4.

efficiency programs and projects from previous years until the portfolio being transition to new third-party programs.

Other significant efforts taken by SCE to improve its portfolio's cost-effectiveness includes further actions to reduce its administrative costs by an additional 14 percent from its 2019 budgets, on top of the 35 percent reduction from 2018 budgets. This significant reduction was achieved through multiple actions, including a reduction in full-time labor headcount.

Table 8: Administrative Cost Comparison

Admin Budget	2018 ABAL (AL 3654-E) [A]	2019 ABAL (AL 3859-E) [B]	2020 ABAL [C]	Reduction [A - B]	Reduction [B - C]
G&A Labor	\$ 6,605,753	\$ 5,789,583	\$ 5,179,312	\$ 816,170	\$ 610,271
G&A Non-Labor and Consultant	\$ 3,284,223	\$ 1,904,412	\$ 1,798,119	\$ 1,379,811	\$ 106,293
IOU Program Labor	\$ 2,336,952	\$ 995,569	\$ 478,879	\$ 1,341,383	\$ 516,690
IOU Program Non-Labor	\$ 317,059	\$ 292,159	\$ 150,081	\$ 24,900	\$ 142,078
3TP/Partner	\$ 2,523,540	\$ 821,113	\$ 736,183	\$ 1,702,427	\$ 84,930
Total	\$ 15,067,527	\$ 9,802,836	\$ 8,342,573	\$ 5,264,691	\$ 1,460,263

In order to maximize cost-effectiveness, SCE is committed to managing its administrative and other non-resource-related costs while making sure there is appropriate oversight of its portfolio during and after the transition to the statewide and third-party program implementation model.

The following table provides a list of SCE's programs and identifies which ones are proposed to be new, closed, or continuing in 2020, programs with enhanced budgets (>40% increase from 2019 budgets) or reduced budgets (>40% decrease from 2019 budgets), and programs that are cost-effective (TRC >1.0) or not cost-effective (TRC <1.0). Detailed discussion of these programs are provided in subsections A-D and in **Attachment TBD**. Programs not listed below do not meet the enhanced/reduced criteria or new or closed criteria will be continued in 2020.

Program ID	Program Name	2019 vs. 2020 Budget
NON-COST-EFFECTIVE INCENTIVE PROGRAMS PROPOSED TO BE CLOSED IN 2020		
SCE-13-SW-005C	Primary Lighting Program	No budget requested for 2020
SCE-13-TP-018	School Energy Efficiency Program	
SCE-13-TP-021	Enhanced Retrocommissioning	
SCE-13-SW-002D	Commercial Direct Install Program	
NEW INCENTIVE PROGRAMS/PILOTS PROPOSED TO BE OPENED IN 2020		
N/A	Market Based Incentive Pilot (<i>pending CPUC approval</i>)	New budget request for 2020
SCE_SW_CSA	Statewide Codes and Standards Appliance Standards Advocacy	
NON-COST-EFFECTIVE INCENTIVE PROGRAMS TO CONTINUE IN 2020 TO CLOSE REMAINING PROJECTS		
SCE-13-SW-001F	Residential New Construction Program	Reduced (-93%)
SCE-13-TP-023	Midsized Industrial Customer Program	

Program ID	Program Name	2019 vs. 2020 Budget
SCE-13-TP-003	Healthcare EE Program	Minimal or no budget requested in 2020; any budget is to complete remaining projects
SCE-13-TP-004	Data Center Energy Efficiency	
SCE-13-TP-005	Lodging EE Program	
SCE-13-TP-011	Oil Production	
SCE-13-TP-022	Water Infrastructure Systems EE Program	
COST-EFFECTIVE INCENTIVE PROGRAMS, WITH REDUCED BUDGETS (>40% BUDGET DECREASE), TO CONTINUE IN 2020		
SCE-13-SW-001C	Multifamily Energy Efficiency Rebate Program	Reduced (-50%)
SCE-13-SW-001G	Residential Direct Install	Reduced (-42%)
COST-EFFECTIVE INCENTIVE PROGRAMS, WITH ENHANCED BUDGETS (>40% BUDGET INCREASE), TO CONTINUE IN 2020		
SCE-13-SW-001A	Energy Advisor Program	Enhanced (46%)
SCE-13-SW-003B	Industrial Calculated Energy Efficiency Program	Enhanced (101%)
SCE-13-SW-003D	Strategic Energy Management	Enhanced (92%)
NON-COST-EFFECTIVE INCENTIVE PROGRAMS, WITH REDUCED BUDGETS, TO CONTINUE IN 2020		
SCE-13-SW-001B	Plug Load and Appliances Program	Reduced (-82%)
SCE-13-SW-002C	Commercial Deemed Incentives Program	Reduced (-70%)
NON-COST-EFFECTIVE INCENTIVE PROGRAMS, WITH ENHANCED BUDGETS, TO CONTINUE IN 2020		
SCE-13-SW-004C	Agriculture Deemed Energy Efficiency Program	Enhanced (47%)
NON-COST-EFFECTIVE PARTNERSHIP PROGRAMS, WITH REDUCED BUDGETS, TO CONTINUE IN 2020		
SCE-13-L-002H	Eastern Sierra Energy Leader Partnership	Reduced (-65%)
SCE-13-L-002J	Desert Cities Energy Leader Partnership	Reduced (-82%)
SCE-13-L-002L	Orange County Cities Energy Leader Partnership	Reduced (-99%)
SCE-13-L-002N	San Joaquin Valley Energy Leader Partnership	Reduced (-93%)
SCE-13-L-002O	South Bay Energy Leader Partnership	Reduced (-90%)
SCE-13-L-002R	Western Riverside Energy Leader Partnership	Reduced (-99%)
SCE-13-L-002S	High Desert Regional Energy Leader Partnership	Reduced (-86%)
SCE-13-L-002T	West Side Energy Leader Partnership	Reduced (-99%)
SCE-13-L-002V	North Orange County Cities	Reduced (-85%)
SCE-13-L-002W	San Bernardino Association of Governments	Reduced (-98%)
NON-COST-EFFECTIVE PARTNERSHIP PROGRAMS, WITH ENHANCED BUDGETS, TO CONTINUE IN 2020		
SCE-13-L-003B	California Dept. of Corrections and Rehabilitation EE Partnership	Enhanced (125%)
SCE-13-L-003C	County of Los Angeles Energy Efficiency Partnership	Enhanced (271%)
SCE-13-L-003I	Public Sector Performance-Based Retrofit High Opportunity	Enhanced (261%)
NON-RESOURCE PROGRAMS, WITH REDUCED BUDGETS, TO CONTINUE IN 2020		
SCE-13-SW-003A	Industrial Energy Advisor Program	Reduced (-46%)
SCE-13-SW-007C	New Finance Offerings	Reduced (-92%)
CODES AND STANDARDS, WITH ENHANCED BUDGETS, TO CONTINUE IN 2020		
SCE-13-SW-008D	Reach Codes	Enhanced (76%)
SCE-13-SW-008E	Planning and Coordination	Enhanced (76%)
SCE-13-SW-008F	National and International Standards	Enhanced (286%)
NON-COST-EFFECTIVE INCENTIVE PROGRAMS, WITH REDUCED BUDGETS, TO CONTINUE IN 2020 FOR COMPLIANCE PURPOSES		
SCE-13-TP-025	Facility Assessment Service Program (AB793 compliance)	Reduced (-42%)
SCE-13-TP-024	AB793 Residential Pay for Performance (AB793 compliance)	Reduced (-99%)

A. Program and Sub-Program Cancellation

The Potential and Goals Proposed Decision acknowledges that updates to the baseline for lighting measures to LEDs has reduced the energy savings potential and will require the closure of programs with measures that heavily rely on lighting measures. Thus, SCE proposes to close the Primary Lighting Program, Commercial Direct Install, Enhanced Retrocommissioning, and School Energy Efficiency Programs. Further discussion and details of these four programs are in **Attachment TBD**.

B. New Programs and Sub-Programs

SCE is not proposing new programs or sub-programs for 2020. As discussed above, 2020 and 2021 are transition years as SCE is working toward the utilization of third-party proposed, designed, and implemented programs as directed in D.16-08-019, D.18-01-004, and D.18-05-041. Because third-party programs have not yet been proposed in detail or finalized, SCE has created placeholders for programs that SCE expects to award at the conclusion of the third-party solicitation process. SCE has allocated \$4.7 million in 2020 for ramp up costs for third-party programs that are anticipated to begin in late 2020. Because these third-party contracts are expected to begin in late-2020, SCE expects to incur start-up costs associated with these programs while claiming minimal savings in 2020.

SCE's PY 2020 ABAL includes the budget, energy savings, and cost-effectiveness impacts of the Market-Based Incentive (MBI) pilot, which is pending before the Commission.³⁸ The pilot will test: 1) a market-driven auction mechanism to determine the EE incentive level needed by customers to complete projects, and 2) an efficient, timely and predictable project eligibility review to re-engage large Commercial and Industrial (C&I) customers. The proposed pilot is intended to ensure SCE secures energy efficiency savings at the lowest cost with clearly defined project eligibility requirements and a streamlined process to encourage participation.

SCE is also exploring the measures, delivery channels, and other program considerations that will need to be finalized to help realize the potential for fuel substitution projects and measures, pending the outcome of the fuel substitution proposed decision.³⁹

C. Reduced and Expanded Programs

Pursuant to D.18-05-041, the following list of reduced and expanded programs below reflects those programs whose total budget increased or decreased by more than 40%. In SCE's PY 2020 planning efforts to achieve goals cost-effectively, SCE optimized its portfolio by expanding programs with high cost effectiveness, while reducing or eliminating measures with low cost effectiveness in order to achieve a higher TRC

³⁸ Advice Letter 3992-E

³⁹ Proposed Decision Modifying The Energy Efficiency Three-Prong Test Related To Fuel Substitution

value. Please see Attachment TBD for detailed program changes. The continuation of these programs may be impacted by the third-party EE solicitation process; for any third-party programs that start earlier than expected, SCE will ramp-down and close existing programs as needed.

The Local Government Partnerships (LGPs), through Southern California Edison's Energy Leadership Partnership Program (ELPP), has supported local governments in achieving their energy efficiency and sustainability goals. Through the ELPP, SCE has provided financial assistance, technical resources, and subject matter expertise to encourage Partners to lead the adoption of energy efficiency

As part of SCE's continued support in 2020, SCE will continue offering increased incentives which are above and beyond average incentive amounts to assist local government customers to develop and complete energy efficiency projects at their facilities. Along with this, SCE will continue to provide technical support through internal engineering resources to Cities and Counties that are interested in developing energy savings projects. Cities and Counties can also leverage technical support that is offered by the Southern California Regional Energy Network (SoCalREN) Public Agency Program as well as engage with the Statewide Energy Efficiency Collaborative (SEEC). Through SEEC, Cities and Counties can access the ClearPath climate planning tool, receive recognition through the Beacon Program, work with the Statewide Best Practices Coordinator, and engage in peer-to-peer connections, knowledge exchange and collaboration through the Annual SEEC Forum.

Because the landscape in energy efficiency is evolving and the focus to improve the cost-effectiveness of SCE's portfolio is paramount, SCE is proposing to discontinue funding for all non-resource related work that occurs through the LGP programs, partners, and implementers. As SCE transitions away from the ELPP program structure, SCE is committed to continue supporting local governments while being mindful of the impacts on SCE's portfolio cost-effectiveness.

D. Continuation of Non-Cost Effective Programs

SCE is proposing to continue multiple programs in 2020 that are not cost-effective in order to comply with various regulatory mandates, achieve 2020 savings goals, and support customers through the transition period. SCE will continue to evaluate its portfolio of programs in response to competitive solicitations, cost-effectiveness, ability to achieve goals and metrics, as well as other factors, and SCE may propose changing or eliminating these programs in the future.

Per D.16-08-019, the Commission requires that there should be no funding gaps for programs which have been identified as future statewide programs.⁴⁰ In addition, D.18-05-041 states that PAs cannot opt out of statewide programs and are required to fund

⁴⁰ See D.16-08-019, p.66.

all statewide programs.⁴¹ As such, SCE will continue multiple statewide programs, listed below, even though the programs are not forecasted to be cost-effective.

These programs will be part of the upcoming third-party solicitation, to be incorporated into statewide programs, which are anticipated to improve the cost-effectiveness of the programs. Until the statewide programs are operational, SCE will continue to offer these non-cost-effective programs.

SCE has included estimated budgets, savings, and benefits resulting from new third-party activities occurring in 2020. While SCE intends for such programs to eventually result in cost-effective savings, the program forecasts for these activities in 2020 are not expected to result in cost-effective savings. These forecasts are extremely preliminary, since the solicitation process is very early in the process.

IX. DISCUSSION OF SCE'S 2020 FORECASTED TRC RESULT

A. Why SCE Is Forecasting A TRC Below 1.25

SCE is updating its EE portfolio to improve customer participation and optimize portfolio cost-effectiveness while addressing long-term planning and near-term impacts. Forecasting a portfolio that can reasonably meet a TRC above 1.25 is uniquely challenging for 2020:

- As discussed above, SCE views 2020 and 2021 as transition years for energy efficiency. Statewide programs are not yet operating, and time is needed to fully review and implement new third-party proposed, designed, and delivered programs. When statewide programs, new third-party programs, and other programs and policy changes are in full effect, SCE anticipates that it will be able to meet the Commission-adopted goals cost-effectively within the budget parameters of its revised approved business plan.
- Cost-effective measures have been removed from the portfolio due to their successful market transformation and inclusion in building and appliance codes (i.e., CEC Title 24 and Title 20, respectively) and/or designation by Energy Division as standard practice baseline. While a transition to code or standard practice baseline marks a market transformation success, it also creates a challenge for the remaining portfolio to provide the energy savings at a level of cost-effectiveness necessary that the measure would have otherwise provided.
- Decrease in customer participation in downstream programs, particularly SCE's large industrial and commercial customers. SCE's primary EE program offerings for large business customers (Core

⁴¹ See D.18-05-041, OP 22

Calculated and targeted Commercial and Industrial Third Party programs) experienced a 90 percent decrease in net energy savings from 2014 to 2018, despite these large customers consisting of 85 percent and 46 percent of annual energy consumption of all industrial and commercial customers, respectively. While several factors contributed to this decline, two factors customers have cited are unclear eligibility requirements and uncertainty regarding if and when incentives will be awarded.⁴²

- The impact of non-resource and/or non-cost effective programs. Historically, SCE's portfolio could support non-cost effective programs and non-resource costs due to the high cost-effectiveness of the overall portfolio. While the net decrease to portfolio cost-effectiveness of such programs and costs is not unique to 2020, their impact to the portfolio is more significant as the magnitude of the benefits from the resource portfolio is reduced in 2020. As noted above, the reduced size of the resource portfolio can be attributed to both lower energy efficiency potential and a delay in new program launches from competitive solicitations. As such, these impacts have reduced the ability of the portfolio to support non-cost effective programs and other non-resource costs. For example, in 2019 non-cost-effective programs and other non-resource costs represented 35%⁴³ of the portfolio's TRC Costs. In 2020, this percent increased to 57%, after factoring in all the program closures and reductions proposed herein.

B. Ability to Achieve an Evaluated TRC of 1.0

Since SCE does not forecast a portfolio with a TRC ratio of 1.0, SCE does not anticipate having an evaluated portfolio with a TRC of at least 1.0. As discussed in this ABAL, SCE views 2020 and 2021 as transition years during which statewide and third-party programs are not yet operating at full capacity. When these programs are running, coupled with the policy changes SCE will seek in its revised BP, SCE expects its future portfolio to achieve an evaluated TRC of 1.0 or higher. In these transition years, however, it is critical to continue offering the energy efficiency programs as requested in this ABAL in order to avoid market disruption and customer confusion. SCE's revised BP will address how it expects to meet Commission requirements, including cost-effectiveness, and modernizing the EE portfolio and markets.

⁴² Advice Letter 3992-E

⁴³ See Advice 3859-E-A, Supplemental to Advice 3859-E, Southern California Edison Company's 2019 Energy Efficiency Program and Portfolio Annual Budget. Calculation is based on summing TRC Costs for 1) programs with TRC < 1.0, 2) non-resource programs, and 3) other non-resource costs that aren't allocated to any individual program, such as EM&V and ESPI. Final step was calculating the percent of this sum to portfolio TRC Cost.

SCE is also working to develop tools and resources to modernize the EE portfolio and markets. A key approach to modernizing EE is to enable and accelerate the use of normalized metered energy consumption (NMEC) to unlock to-code savings, as well as exploring opportunities for small, targeted pilots to test the market for further savings using NMEC.

Finally, in light of the recent fuel substitution proposed decision⁴⁴ SCE is exploring the measures, delivery channels, and other program considerations that will need to be finalized to help realize the potential for fuel substitution projects and measures.

C. Progress Towards Achieving A Forecasted TRC of 1.25

As noted above, SCE will continue to optimize its portfolio in response to competitive solicitations, cost-effectiveness challenges, changes in the marketplace, and other factors to maximize the TRC of its portfolio and strive to achieve a forecasted TRC of 1.25 no later than 2023 while also striving to achieve energy savings goals and other portfolio targets.

X. IOU EE/DR INTEGRATION BUDGET

Below is SCE’s EE/DR Integration Budget Allocation. SCE will utilize unspent EE/DR Integration funds from previous years to support SCE’s 2020 programs by pursuing EE/DR integration where appropriate. SCE will update Implementation Plans as needed to reflect any program changes.

Table 9: SCE’s 2020-2025 EE/DR Integration Budget Allocation (\$000)

Funding Source	Sector	2020	2021	2022	2023	2024	2025
DR	Non-Residential	\$8,871	\$8,678	\$8,961	\$9,253	\$9,554	\$9,864
DR	Residential	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000
Total		\$9,871	\$9,678	\$9,961	\$10,253	\$10,554	\$10,864

XI. FORECASTING THIRD-PARTY PROGRAMS

Under Development

PROPOSED TARIFF CHANGES

This advice filing will not cause the withdrawal of service nor conflict with any other schedule or rule.

⁴⁴ Proposed Decision Modifying The Energy Efficiency Three-Prong Test Related To Fuel Substitution

TIER DESIGNATION

Pursuant to General Order (GO) 96-B, Energy Industry Rule 5.2, this advice letter is submitted with a Tier 2 designation.

EFFECTIVE DATE

This advice filing will become effective on October 3, 2019, the 30th calendar day after the date submitted.

NOTICE

Anyone wishing to protest this advice filing may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice filing. Protests should be submitted to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone (626) 302-9645
Facsimile: (626) 302-6396
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Laura Genao
Managing Director, State Regulatory Affairs
c/o Karyn Ganseckis
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
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E-mail: Karyn.Gansecki@sce.com

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice filing to the interested parties shown on the attached GO 96-B, A.17-01-013 et al and R.13-11-005 service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-4039. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by filing and keeping the advice filing at SCE's corporate headquarters. To view other SCE advice letters filed with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Jesse Feinberg at (626) 302-302-4542 or by electronic mail at jesse.feinberg@sce.com.

Southern California Edison Company

/s/ Gary A. Stern, Ph.D.
Gary A. Stern, Ph.D.

RGW:lm:jm
Enclosures

Attachment A

Commission Developed ABAL Tables

DRAFT - Subject to Change

Attachment B

CEDARS Filing Confirmation

DRAFT - Subject to Change

Attachment C

Budget Tables and Information

DRAFT - Subject to Change

Attachment D

Description of Program Changes

DRAFT - Subject to Change