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SOUTHERN CALIFORNIA EDISON IMPLEMENTATION
PLAN CHANGE SUMMARY AND HISTORY

Filing List

Specification

Document history

Implementation Plan for SCE-13-SW-008F: National and International Standards

| Version no. | Start date | Files |
|-------------|-----------------|---|
| 2 | 3 October, 2018 | View main file View redline file View change summary file |
| 1 | 30 August, 2018 | View main file |

Southern California Edison



PROGRAM IMPLEMENTATION PLAN

Codes and Standards Program

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First Filing Date: April 2013

Current Version Filing Date:

Codes and Standards Program

Compliance Improvement and Reach Codes proposed evaluation methodologies are identified by the CADMUS Draft Impact Evaluation Plan dated February 17, 2012.

b) Program Design to Overcome Barriers

The statewide Codes and Standards Program has ~~six~~five subprograms including:

- 1) [State Building Energy Codes Advocacy](#)
- 2) [State Appliance Standards Advocacy](#)
- 3) Compliance Improvement
- 4) Reach Codes
- 5) Planning and Coordination
- 6) [National and International Standards Advocacy \(new for 2019\)](#)

State Building Code and Appliance Standards Advocacy Subprograms

Codes and standards advocacy comprises a portfolio level strategy that complements incentive and information offerings in several ways. Since IOU incentive and rebate programs typically capture only a small percentage of the market, a transition to regulatory intervention is essential to maximize portfolio energy savings. This transition to code causes a once high-margin product to become an industry standard; thereby reducing the overall cost to society for energy efficiency. This commoditization effect, in turn, spurs innovation for new high-margin products since most manufacturers and other industry practitioners seek to compete in part on high-margin differentiated products.

As involuntary interventions, codes and standards are effective at breaking down market barriers such as split incentives between building owners and tenants that are difficult to overcome through incentive and information programs. Minimum code requirements direct consumers', builder's and renovation contractor's choices of materials and appliances to higher efficiency products, thereby reducing monthly energy bills to tenants. Regulations also improve equity in benefits from IOU customer investments in energy efficiency through rates. Through codes and standards, positive changes initiated through voluntary programs targeting early adopters are extended to all customers. Hence, hard-to-reach groups that do not participate in voluntary offerings benefit through codes and standards.

Baselines for building and appliance advocacy activities are developed in two ways. If the objective of a code proposal is to update an existing standard, the baseline is simply the existing standard. If the objective is a new standard, which expands the

Codes and Standards Program

The ambitious goals set by the CPUC and CEC require the participation of many different entities. Without proactive coordination, it will be difficult if not impossible to fully realize the savings from the C&S program activities as well as other programs. The C&S program will facilitate coordination and develop and implement a strategic vision to promote and advance cost-effective technologies.

The Planning and Coordination subprogram will work with the CEC, CPUC, emerging technologies, as well as voluntary programs to create a strategic approach for key measures and technologies in support of the Zero Net Energy (ZNE) and other policy goals. For those key technologies, the C&S program will strive to work with other programs to commercialize them for adoption into a relevant code or standard.

The Planning and Coordination subprogram will also work with other programs and market actors to improve code compliance, conduct more outreach and solicit additional input on code enhancement proposals from impacted industries. As part of the expanded outreach and communications efforts, the C&S program will establish and maintain a codes and standards collaborative, and will continue to facilitate the Compliance Advisory Group. In addition, the C&S program will maintain regular contact with state and federal code-setting agencies to minimize duplication of efforts and coordinate activities.

c) Advancing Strategic Plan Goals and Objectives

Through the C&S program, SCG, SDG&E, SCE and PG&E will combine advocacy, compliance improvement and reach code development efforts to meet the codes and standards goals defined in the Strategic Plan. Please see Section 6 for the specific action strategies the IOUs will employ in order to meet the Strategic Plan's codes and standards goals.

Due to the long code upgrade cycle, the process of developing CASE and research studies may extend past the end of the program cycle; therefore, funding committed prior to the end of 2011 will be available for four years thereafter to fund these studies. This might entail moving the committed funds forward into subsequent program cycles until these studies are completed.

5. Program Goals, Objectives and Action Strategies

a) Subprogram Descriptions

The C&S program consists of ~~six~~^{five} subprograms: [State Building Codes Advocacy](#); [State Appliance Standards Advocacy](#); Compliance Improvement; Reach Codes; ~~and~~, Planning and Coordination; and, [National and International Standards Advocacy](#).

1. [State Building Codes Advocacy](#) Subprogram

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The Building Energy Codes Advocacy subprogram primarily targets improvements to Title 24 Building Efficiency Regulations that are periodically updated by the California Energy Commission (CEC). The subprogram also seeks changes to national building codes that impact CA building codes. Advocacy activities include, but are not limited to, development of code enhancement proposals and participation in public rulemaking processes. The subprogram will coordinate or engage with ratings organizations that are referenced in Title 24; for example, the National Fenestration Rating Council, and the Cool Roof Rating Council.

2. [State](#) Appliance Standards Advocacy Subprogram

The Appliance Standards Advocacy subprogram targets both state and federal standards and test methods: improvements to Title 20 Appliance Efficiency Regulations by the CEC, and improvements to Federal appliance regulations by the US Department of Energy. Advocacy activities include, but are not limited to, development of code enhancement proposals and participation in the public rulemaking process (Title 20), and comment letters based on IOU research and analysis (USDOE), participation in direct negotiations with industry, and development of quasi-mandatory appliance standards reach codes. Additionally, the subprogram monitors state and federal legislation and intervenes, as appropriate.

3. Compliance Improvement

The Compliance Improvement subprogram is a new subprogram that combines the previous Extension of Advocacy and Compliance Enhancement subprograms. It provides education, training, and other activities targeting building departments and other industry actors responsible for compliance with Building Energy Code and Appliance Standards requirements. Activities may include development of “best practices tools” and other infrastructure elements that serve multiple compliance improvement objectives.

4. Reach Codes

The Reach Codes subprogram provides technical support to local governments that wish to adopt ordinances that exceed statewide Title 24 minimum energy efficiency requirements for new buildings, additions, or alterations. Support for local governments includes research and analysis for establishing performance levels relative to Title 24 and cost effectiveness per Climate Zone, drafting of model ordinance templates for regional consistency, and assistance for completing and expediting the application process required for approval by the CEC. The subprogram also supports local governments that seek to establish residential or commercial energy conservation ordinances for existing buildings.

5. Planning and Coordination

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The Planning and Coordination Subprogram supports planning activities that improve alignment across the IOU energy efficiency portfolio with respect to future C&S program activities. This subprogram supports efforts to prepare the market for future code adoption (i.e., improve code readiness), to ensure higher code compliance rates and advance the CPUC Strategic Plan goals for achieving zero net energy.

[6. National and International Standards Advocacy](#)

[This new subprogram will focus on national and international regulations including voluntary codes, standards, and testing procedures that directly and indirectly affect IOU customers in California. The C&S program will increase engagement and coordination with interested California delegations to increase alignment between national and international standards and California goals.](#)

b) Program Goals and Activities

In general, the goals of the C&S program are the same as the two C&S goals defined in the C&S section of the Strategic Plan. Through the Advocacy subprograms, the IOUs will strive to continually strengthen and expand building and appliance codes and standards as IOU efforts reveals greater efficiency opportunities and compelling economic benefits. Through the Compliance Improvement subprogram, the IOUs will strive to improve code compliance through education, outreach, and other technical resources. IOUs will also develop local ordinances and facilitate their adoption and implementation in motivated communities.

- Strategic Plan Codes and Standards Goal #1: Continually strengthen and expand building and appliance codes and standards as market experience reveals greater efficiency opportunities and compelling economic benefits. (Subprograms 1 and 2: Building Codes and Appliance Standards Advocacy).
- Strategic Plan Codes and Standards Goal #2: Improve code compliance and enforcement. (Subprograms 3 and 4: Compliance Improvement and Reach Codes).

The following sections provide a description of the proposed C&S subprogram activities which will lead to achieving the program goals.

[State Building Codes Advocacy](#)

The [State Building Codes Advocacy](#) program will continue conducting many of the same activities as were conducted in the 2010 – 2012 program cycle, but will focus on the upcoming 2016 Title 24 Energy Building Code cycle. In addition, the

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- National Stakeholders Communication:
 - Conduct regular conference calls with national stakeholders regarding appliance standards.
- Compliance Advisory Group Communication:
 - Host quarterly meetings with Compliance Improvement Advisory Group regarding compliance improvement activities.
- Local Government Partnership Communication:
 - Provide quarterly updates to Local Government Partnership Program regarding reach code adoption progress and delivery of training to building departments.

Workforce Education and Training (WE&T)

- Sector Strategies for WE&T:

The C&S and WE&T teams will meet periodically to coordinate activities that will enhance support for the appropriate market actor roles responsible for new and emerging codes and standards implementation according to priorities established by needs assessments. The C&S program will collaborate with the WE&T Centergies subprogram to not only prepare contractors and technicians to implement current codes, but to also prepare them with technical training on advanced technologies that are projected to become part of reach codes and then the statewide code.

National and International Standards Advocacy

The National and International Standards Advocacy subprogram will continue conducting many of the same activities as were conducted in the 2013–2014 program cycle, but will focus on preparing new measures pursuant to the U.S. Department of Energy’s ongoing rulemaking for Federal Appliance Standards. Primary activities for 2019 include the following:

National and International Building Standards Development

- Intervene in and monitor ASHRAE and ICC Code Development
 - Monitor latest and anticipated ASHRAE Standard 90.1 updates to best ensure that nonresidential Title 24 remains in compliance with EPA Act 1992 that requires state building codes to be as stringent or more stringent than 90.1

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- o [Monitor latest and anticipated ICC IECC updates to best ensure that residential Title 24 remains in compliance with EPAct 1992 that requires state building codes to be as stringent as or more stringent than IECC.](#)
- o [Submit comments to public review drafts of ASHRAE and ICC code updates as appropriate.](#)

[Federal Appliance Standards Rulemaking](#)

- [Provide support to DOE rulemaking process:](#)
 - o [Advocate and provide public testimony in Federal public proceedings.](#)
 - o [Submit supporting market and technical data to the Department of Energy \(DOE\).](#)
 - o [Participate in consensus negotiations with industry and energy advocacy groups \(which typically develop standards levels which DOE eventually adopts\).](#)
 - o [Develop voluntary agreements or reach standards.](#)

c) Program objectives which are more specific milestones to be achieved in order to accomplish the goals

See Codes and Standards Alignment with Strategic Plan narrative and table below.

d) Program action strategies that will be used to implement the goals

See Codes and Standards Alignment with Strategic Plan narrative and table below.

e) Program outputs which are measurable results of the program linked to the action strategies

See Codes and Standards Alignment with Strategic Plan narrative and table below.

Codes and Standards Alignment with Strategic Plan

The following narrative and table details the specific actions the C&S program will use to carry out the C&S goals defined in the Strategic Plan and the program outputs linked to each action strategy.

In addition to striving to meet the two C&S goals defined in the Strategic Plan, the IOUs will work in concert with other programs within the energy efficiency portfolio to help meet associated goals such as those defined for HVAC, local governments and WE&T as described in Section 8 of this PIP.

Implementation Plan Change Summary

| | | | |
|---|--------------------------------------|--|----------------------------|
| Program Name | Codes and Standards Program | Date 10/3/2018 | |
| Subprogram Name | National and International Standards | PA Name | Southern California Edison |
| Program ID | SCE-13-SW-008F | PA Program Contact | Randall Higa |
| Current Program Budget¹ | \$557,037 (for 2019) | Past Program Budget (if applicable) | N/A |

This form is to be used to document any required changes to the Program Implementation Plans (PIPs) and should be uploaded as a pdf. Please remember to upload the accompanying cost effectiveness inputs and program definitions, as needed. The following are triggers that will require a PIP change:

1. Changes to eligibility rules
2. Changes affecting incentive levels
3. Fund shifts
4. Portfolio Budget and Other Commission-Directed Changes
5. Changes to Program Theory/Logic Models
6. Addition or elimination of programs and/or sub-programs
7. Changes in program targets
8. Change in sub-program approach - unless the IOUs submit logic models for the sub-programs (to be defined) with IOUs
9. Changes in incented measures
10. Changes in adopted PPMs/MTIs

Identify Specific Trigger (above) requiring the PIP change

6. Addition or elimination of programs and/or sub-programs ▼

Driver of Change:

Need for local utility management of federal, national, and international code advocacy

Description of Change:

Bifurcation of state advocacy and federal/national/international advocacy

Budget Change:

No overall net program change

PIP Section and/or Wording to be Changed or replaced:

Section 1: Projected program budget table
 Section 2: Projected program gross impacts table
 Section 4: Program rationale expected outcome, Subsection b: Program design to overcome barriers
 Section 5: Program goals, objectives and action strategies, Subsection a: Subprogram Descriptions, Subsection b: Program goals and activities
 Appendix 2

Replacement Language or Information

The prior advocacy subprograms were revised to limit the scope to state code advocacy and the new subprogram was added to reflect federal/national/international code advocacy

Revised Energy Savings (If Any):

None

¹ If the implementation plan belongs to a subprogram, then use the subprogram budget.

Other PIP Changes Required:

None