

## Considerations for reviewing and providing comments on PA Business Plan Chapters

Please consider the following questions as you review the Business Plan chapters. The second page provides a template into which your feedback may be captured.

Prior to reviewing and commenting on the Business Plan drafts, a reviewer may wish to review the updated “NRDC Compilation of CPUC Business Plan Guidance and PA Consensus Outline” found on the CAEECC [Guidance webpage](#). That document merges a number of sources of guidance to PAs into a convenient outline format that the PAs have collectively agreed to leverage as they draft their documents. The following areas of review are intended to highlight those items that would be helpful in updating the business plans before the next draft. We do not expect stakeholders to answer all questions. Please choose those that are relevant to your interests. There is also an open row for additional comments that might not fit into the following format.

### 1. Structural Review

- a. Do the chapter layout and order of topics comply with NRDC compiled guidance document “outline”?
- b. Does the stylistic/visual presentation allow for easy navigation through the chapter (i.e., allowing easy comparison of the chapter against the NRDC compilation)?
- c. What examples from other PA chapters (whether same PA different sector or different PA all together) would you suggest be considered for this document?

### 2. Content-Related Review

- a. Are all key pieces of information, tables, graphics, and supporting documents called for in the NRDC Compiled guidance document present in the Chapter?
- b. Are your previous comments and input addressed in the document?
- c. Is the overall sector plan coherent and clear?
- d. Are proposed activities (intervention strategies) sufficiently justified by the market assessment and other data analyses presented?
- e. Are substantive assertions and conclusions supported with clear reasoning and adequate citations?
- f. Are metrics relevant, representative, and associable with future IPs and PIPs?
- g. Is material presented at the right level of detail for a Business Plan?

On the next page, please find the comment template in which substantive comments can be recorded and then submitted to [facilitator@caeccc.org](mailto:facilitator@caeccc.org). If you have any questions about using this form or the review process, please contact the facilitator by phone or email. Caution: this form is set up as an 8.5 X 14 inch document and will not properly print on 8.5 X 11 paper.

Instructions: Please make comments specific, reference pages where appropriate, and be focused on Business Plan level strategies.

Commenter: Please Fill In This Part Of The Form					For PA Use	
Comment #	Sector	Page #	Comment	Rationale for Comment (include references to evaluations, studies, etc., if applicable)	Integrated (Y/N)	Rationale for Y/N
Silent Running-1	Commercial	(General)	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li>The SDG&amp;E Commercial Business Plan contains a number of new and innovative approaches for the Commercial Sector, inclusive of new proposed outreach and program platforms. It is unclear from the present draft which of these new elements will be developed internally or outsourced</li> </ul> <p><b>Recommended Action</b></p> <ul style="list-style-type: none"> <li>Include in the narrative some indication of which BP elements may be considered for outsourcing vs those that are likely to be in-sourced based upon current thinking</li> </ul>	<ul style="list-style-type: none"> <li>Helps potential implementers orient themselves to target opportunities</li> <li>Stakeholder response may provide indication of the degree to which these innovative approaches can be addressed by current and/or planned 3<sup>rd</sup> Party services</li> </ul>		
Silent Running-2	Commercial	(General)	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li>The SDG&amp;E Commercial Business Plan contains minimal mention of low-income or disadvantaged communities, yet the market characteristics suggest a very high proportion of small (and presumably locally owned) businesses. The go-to market approach for businesses in low income communities or where English is a 2<sup>nd</sup> language may well require very unique approaches.</li> </ul> <p><b>Recommended Action</b></p> <ul style="list-style-type: none"> <li>Provide Breakdowns of businesses by major demographic categories (e.g. low income and disadvantaged communities, English as Second Language, etc.) to better frame the market</li> <li>Include in the narrative whether there are currently unique approaches to businesses in these communities or whether</li> </ul>	<ul style="list-style-type: none"> <li>Providing greater granularity around market demographics—inclusive of the demographics which small businesses serves--- informs the strategies and tactics required to directly address unique challenges related to these communities.</li> <li>This will assist potential implementers in providing innovative solutions to PA's.</li> </ul>		

			<i>this is considered to be an important future need.</i>			
<i>Silent Running-3</i>	<i>Commercial</i>	P.3 Goals 1 and 2	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li>Goals #1 and #2 reference increasing energy efficiency penetration without providing a specific definition of penetration</li> </ul> <p><b>Recommended Action</b></p> <ul style="list-style-type: none"> <li>It is suggested that energy efficiency penetration be measured along two parameters: 1) Total # of program participants/Total # of eligible participants; and 2) Total Energy Savings/Total Energy Consumption. Stratification along vertical segment and other market segment parameters may also be relevant.</li> </ul>	<ul style="list-style-type: none"> <li>Normalizes program results against overall growth or shrinkage of potential participants and overall energy consumption</li> <li>A better and more effective measure of program success</li> <li>Better informs Integrated Resource Planning</li> </ul>		
<i>Silent Running-4</i>	<i>Commercial</i>	Commercial Market Segment Characterization- PP 5-9	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li>While the BP provides ample market segment data and characterization, it does not provide sufficient breakout or parameters that would be useful for planning purposes.</li> </ul> <p><b>Recommended Action</b></p> <ul style="list-style-type: none"> <li>Where possible, it is suggested that both number of locations or premises and energy consumption be provided for a given market segment. This can also better inform market penetration analysis.</li> <li>Providing indication of trends in average project size and</li> </ul>	<ul style="list-style-type: none"> <li>Helps potential future implementer more effectively target go-forward approach</li> <li>Provides visibility to where program has had greatest and least amount of success and where future opportunities are greatest</li> <li>Accounts for the unique community characteristics within SDGE territory.</li> </ul>		

			<p><i>annual project uptake by market vertical would provide more meaningful market characterization</i></p> <ul style="list-style-type: none"> <li><i>A geographic distribution of businesses by geographic unit (e.g. zip code) would be helpful</i></li> <li><i>A breakdown of businesses to the 2 digit NAICS code level is recommended. The current BP rolls up segments which may have similar load curves but which have significantly different occupant needs (e.g. combining wholesale and retail).</i></li> <li><i>As previously mentioned, it is suggested that a distribution of businesses across key demographic parameters be provided (e.g. in low income communities, in rural vs urban communities, in communities where English is a 2<sup>nd</sup> language, etc.)</i></li> </ul>			
<i>Silent Running-5</i>	Commercial	P.11	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li><i>No mention is made of “mixed use” facilities that combine both commercial space and residential space.</i></li> </ul> <p><b>Recommended Action</b></p> <ul style="list-style-type: none"> <li><i>Provide high level discussion of growth trends for Mixed Use Facilities in SDGE Territory to validate that they are growing at a high rate and note plans for customized approach and/or a planning need to be addressed.</i></li> </ul>	<ul style="list-style-type: none"> <li><i>The growth of mixed use facilities in urban areas has been pronounced in many parts of California---particularly over the past five years. It is important to plan for and address this potentially important segment in Business Plans to assure that tailored solutions can be developed.</i></li> </ul>		
<i>Silent Running-6</i>	Commercial	P.12 Figure X: Sources Used to Identify Problems and Goals	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li><i>“Collaborate with trades” is listed as a source for identifying problems and goals</i></li> </ul> <p><b>Recommended Action</b></p> <ul style="list-style-type: none"> <li><i>Suggest incorporating into the market characterization section some indication of the participation levels that contractors and trade ally’s play in delivering energy efficiency savings based upon market penetration measures</i></li> </ul>	<ul style="list-style-type: none"> <li><i>Provides insights into project origination patterns and future opportunities</i></li> <li><i>Provides insights into gaps in the marketplace that can be addressed through future planning efforts</i></li> <li><i>Provides insights into needs around contractor management and workplace development</i></li> <li><i>Provides useful information for potential</i></li> </ul>		

			<i>suggested above. To what degree are contractors and trade ally's originating projects vs self-applications vs SDGE Account Execs? To what degree are contractors and trade ally's delivering single end use projects vs comprehensive projects?</i>	<i>future implementers regarding current market dynamics</i>		
<i>Silent Running-7</i>	Commercial	P.18	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li>Tactic reference targeting under-performing/high potential end-uses such as refrigeration and food service</li> </ul> <p><b>Recommended Action</b></p> <p>Also consider tactic targeting under-performing/high potential market vertical segments (i.e. segments at the 2 digit NAICS code level)</p>	<ul style="list-style-type: none"> <li>In many cases, it is more effective to target a group of "like customers" for a greater level of participation and energy savings</li> <li>Targeting based upon end use can be challenging as it requires mapping of end uses into unique customers/customer segments which may be difficult</li> <li>Targeting by end-use alone may not fully address customer engagement and customer comfort issues</li> </ul>		
<i>Silent Running-7</i>	Commercial	P.19	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li>A reference is made to "District Level EE and ZNE."</li> </ul> <p><b>Recommended Action</b></p> <ul style="list-style-type: none"> <li>Provide greater detail around what is meant by "District Level"</li> </ul>	<ul style="list-style-type: none"> <li>Provides clarification to potential implementer</li> </ul>		
<i>Silent Running-8</i>	Commercial	P.20-Financing	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li>SDGE references providing more financing opportunities and making financing programs easier to use, but only specifically mentions On Bill Financing.</li> </ul> <p><b>Recommended Action</b></p> <ul style="list-style-type: none"> <li>Provide support narrative from New Financing BP (under development) and some indication of current market need/market barriers for the use of finance, as experienced by SDGE customers (e.g. Capital Access, interest rates too high, lack of available lenders, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>The CHEEF Pilot Programs are ratepayer funded, have been under development for a number of years, are applicable to the planning period, and are specifically intended to fill gaps in the energy efficiency debt marketplace and overcome first cost barriers.</li> <li>Coordination with these efforts has the potential to optimize the Commercial Business Plan along multiple parameters including participation, project uptake, cost</li> </ul>		

			<ul style="list-style-type: none"><li><i>It is suggested that other finance programs be explicitly mentioned and considered inclusive of Commercial PACE programs, and Pilots currently being developed by the California Alternative Energy and Advanced Transportation Financing Authority (CAEATFA) (e.g. Commercial Financing Program; Commercial On Bill Repayment Program Parameters, etc.).</i> <i><a href="http://www.treasurer.ca.gov/caeatfa/cheef/">http://www.treasurer.ca.gov/caeatfa/cheef/</a></i></li></ul>	<i>effectiveness, and market transformation.</i>		
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Commenter—please replace red text with the information you wish to provide. Please submit completed comments to **facilitator@caeec.org**