

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 #	PA	Page #	Comment	Integrated (Y/N)	Rationale for Y/N
ORA-1	SCE C&S	10	<ul style="list-style-type: none"> <li>• <b>Discussion of using Codes &amp; Standards (C&amp;S) to increase efficiency of existing buildings should include discussion of AB 802 and problems encountered in lighting retrofit codes.</b> <ul style="list-style-type: none"> <li>○ SoCalGas' focus on using building codes as an intervention strategy for existing buildings moves in the opposite direction of AB 802's directive to use incentives.</li> <li>○ C&amp;S chapter fails to acknowledge that customers are under no obligation to make alterations in existing buildings and code requirements for existing buildings may in fact discourage efficiency adoption through IOU incentive programs (example: lighting retrofit code requirements).</li> </ul> </li> </ul>		
ORA-2	SCE C&S	25	<ul style="list-style-type: none"> <li>• <b>C&amp;S chapter should include discussion of impact of statewide (SW )administration, timeline for SW transition, SW roles and responsibilities and how SW C&amp;S work will be bid out.</b> <ul style="list-style-type: none"> <li>○ C&amp;S chapter should have a robust discussion of the new SW structure and its impact on C&amp;S administration, activities, and structure.</li> <li>○ Failure to include C&amp;S SW issues in the business plan draft means that a crucial element of the C&amp;S business plan will not be adequately vetted with stakeholders prior to filing.</li> </ul> </li> </ul>		
ORA-3	SCE Financing		<ul style="list-style-type: none"> <li>• <b>SCE business plan should include a financing chapter.</b> <ul style="list-style-type: none"> <li>○ Failure to include a financing chapter in the business plan draft means that a crucial element of SCE's business plan will not be adequately vetted with stakeholders prior to filing.</li> </ul> </li> </ul>		
ORA-4	SCE WE&T	16	<ul style="list-style-type: none"> <li>• <b>Workforce Education &amp; Training (WE&amp;T) chapter should include discussion of impact of statewide administration, timeline for SW transition, SW roles and responsibilities, or how SW WE&amp;T work will be bid out.</b> <ul style="list-style-type: none"> <li>○ WE&amp;T chapter should have a robust discussion of the new SW structure and its impact on WE&amp;T Connections administration, activities, and structure.</li> <li>○ SCE's plan to restructure three WE&amp;T subprograms into a single consolidated WE&amp;T program may conflict with Commission direction regarding a SW WE&amp;T Connections program in D.16-08-019.</li> <li>○ Failure to substantively address SW WE&amp;T Connections issues in the business plan draft means</li> </ul> </li> </ul>		

Commenter Name: Dan Buch

Commenter Affiliation: ORA

Date 11/21/2016

Program Administrator to receive feedback:

SCE Cross-Cutting

			that a crucial element of the WE&T plan will not be adequately vetted with stakeholders prior to filing.		
<i>ORA-5</i>	<i>SCE ET</i>	27	<ul style="list-style-type: none"><li>• <b>Emerging Technologies (ET) program chapter should include a discussion of what role(s) if any the non-lead utilities will play in the administration and activities of the statewide ET program.</b><ul style="list-style-type: none"><li>○ The only mention of non-lead utilities in the ET chapter (p. 27) notes that PG&amp;E has a different stage-gate process than other utilities.</li><li>○ The new SW structure would appear to require harmonization across utilities and/or elimination of direct program administration and implementation at non-lead utilities, which is not evident in the ET chapter.</li><li>○ Failure to substantively address SW ET issues in the business plan draft means that a crucial element of the ET plan will not be adequately vetted with stakeholders prior to filing.</li></ul></li></ul>		