

Considerations for reviewing and providing comments on Full PA Business Plans

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 Business Plan Checklist found on the CAEECC [Guidance webpage](#). In addition to comparing the Business Plan contents against the Updated Business Plan Checklist, the following questions are intended to highlight those items that would be helpful in updating the business plans. These questions are food for thought; we do not expect stakeholders to specifically address these questions in their form. Please choose those that are relevant to your interests.

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 Updated Business Plan checklist 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@caeec.org. If you have any questions about using this form or the review process, please contact the facilitator by phone or email.

Commenter Name:

Commenter Affiliation: PG&E

Date: 11/18/2016

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

Comment #	Proposed PA(s)	Sector	Page #	Comment
<i>CA Central Coast -1</i>	CA Central Coast REN	<i>All</i>		<p>Observations</p> <ul style="list-style-type: none"> PG&E appreciates the CA Central Coast REN (3-C REN) Business Plan proposal brought forth by the Counties of San Luis Obispo, Santa Barbara and Ventura to serve residential customers, support workforce development, offer financing options and remove barriers to building permitting and code compliance. However, per Commission Decision 12-05-015, and recently reaffirmed in D. 16-08-019, REN activities must not be duplicative to existing utility programs or activities that utilities intend to undertake.(D.12-11-015 COL 13, recently reaffirmed in D.16-10-019) PG&E points out that the emPower Central Coast Program is currently undergoing an evaluation by Opinion Dynamics and that the proposal of a duplicative or similar effort is premature and that future finance offerings in this region should benefit from the findings of this evaluation. <p>Recommended Action</p> <ul style="list-style-type: none"> PG&E asks that the proposed 3-C REN explicitly demonstrate how their proposal does not duplicate efforts existing or outlined in the draft business plan chapters posted to the CAEECC forum on October 18, 2016. Given the pending evaluation, please explain why the proposed approach is preferred to the existing and demonstrates an improvement both in participation and cost-effectiveness?
<i>CA Central Coast -2</i>	CA Central Coast REN	<i>All</i>		<p>Observations</p> <ul style="list-style-type: none"> PG&E points out that the emPower Central Coast Program is currently undergoing an evaluation by Opinion Dynamics and that the proposal of a duplicative or similar effort is premature and that future finance offerings in this region should benefit from the findings of this evaluation. <p>Recommended Action</p> <ul style="list-style-type: none"> Given the pending evaluation, please explain why the proposed approach is preferred to the existing and demonstrates an improvement both in participation and cost-effectiveness?

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<p>LGSEC – 1</p>	<p>LGSEC</p>	<p>All</p>		<p>Observations PG&E supports the Commission decision (D.16-08-019) that “LGPs would appear to be the essence of a local program, not appropriate for statewide application.” (D.16-08-019, p 60). PG&E would like to note that a 2013 Local Government Partnership Programs Evaluation found that, “The LGP model does not lend itself easily to evaluation metrics of most kinds, including best practices. Paradoxically, it is precisely the attributes that create complex Recommended Action</p> <ul style="list-style-type: none"> ity in measurement that also give LGPs their unique and irreplaceable value.”(<i>Evergreen Economics and Navigant Consulting, Program Assessment Study: Local Government Partnership Programs – Final Report, for Itron, the California Public Utilities Commission and the California Investor-Owned Utilities, July 26, 2013, p. 2</i>) Given this evaluation, how would the proposed statewide approach supersede D.16-08-019’s assessment of local government partnership needs?
<p>LGSEC – 2</p>	<p>LGSEC</p>	<p>All</p>		<p>Recommended Action</p> <ul style="list-style-type: none"> PG&E asks that LGSEC cite their data sources and provide justification for their many assertions of past and present LGP performance, too numerous to enumerate in this forum.
<p>LGSEC – 3</p>	<p>LGSEC</p>	<p>All</p>		<p>Observations</p> <ul style="list-style-type: none"> PG&E has concerns with LGSEC’s high-level commitment to energy efficiency program administration compliance and, at this point, remains unconvinced that LGSEC has the experience or depth-of-knowledge to deliver energy savings in a cost-effective and evaluable manner. <p>Recommended Action</p> <ul style="list-style-type: none"> Please explain the knowledge and experience in program administration that LGSEC will bring?
<p>LGSEC – 4</p>	<p>LGSEC</p>	<p>All</p>		<p>Observations</p> <ul style="list-style-type: none"> PG&E notes the ramp-up costs associated with building out this expertise. <p>Recommended Action</p> <ul style="list-style-type: none"> Please explain what steps LGSEC will take to eliminate ramp up costs? Please explain whether LGSEC would need to build out infrastructure to support program administration.

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Commenter—please replace **red text** with the information you wish to provide. Please submit completed comments to **facilitator@caeec.org**