

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. 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
CPUC -- 1 – Kay Hardy	PG&E Agriculture	#1 p. 3-4 #2 p. 5 #3 p. 6 #4 p. 6 #5 p. 6 #6 p. 11 #7 p. 29-30	<ul style="list-style-type: none">• #1 Note 7-year savings goal vs. 5 or 10 year goals referenced in placeholder• #2 “existing pump-focused programs” Note that current issues regarding “pump-focused” programs must be resolved by the CPUC and IOUs before these services can be offered to customers. Inclusion of a program or measure in a business plan chapter does not obviate the necessity to complete workpapers or address other live issues between the CPUC and PAs• #3. HOPPs type programs in Ag. This program offering should be subject to similar review as the HOPPs programs.• #4 Irrigation system optimization. Noting that a pilot was proposed but not conducted by PGE, why not?; also concerned about justifying increased load from irrigation• #5 expanded pump overhauls/VFD offerings. Ex post	#3. Commercial HOPPs programs have been submitted via advice letter and subject to CPUC review. A similar program in the agricultural sector should have similar review to ensure that it meets the AB 802 objectives and that NMEC is a reasonable method for savings calculations for agriculture projects. In addition, what constitutes “retrocommissioning” for these purposes is under discussion.		

			<p>evaluation results show lack of savings due to inappropriate use of VFDs in ag (and other sectors). Expanded pump offerings: again note that including this in program offerings is contingent on resolution of ex ante issues.</p> <ul style="list-style-type: none">• #6 table: why is average KWh usage for small customers less than average savings? Also negative average for unknowns looks a little odd. <p>#7: Why no strategic partnerships for dairy/wine?</p>			
CPUC 2 – Peter Franzese	PGE Agriculture	Pp 35-40	<p>Metrics (pp. 35-40)</p> <p>PG&E has been working with Grounded Research to develop Business Plan metrics. The metrics discussion included on pp. 35-40 could be improved to better align with that development work.</p> <ul style="list-style-type: none">• The ten-year vision. While CPUC staff has asked that business plans contain a 10-year vision for each sector, this would logically come at the end of the metrics table. As with other sectors, the vision should be replaced by the problem statement(s), from which the intervention			

			<p>strategies, market effects, baseline, and short-, mid- and long-term metrics would follow.</p> <ul style="list-style-type: none">• Sector priorities on page 35 are somewhat vague, aside from energy savings:• Which customer will take what EE actions? Are there priorities?• Visibility is one thing; acting on that visibility would seem to be more important• Which of the four Ag segments are priorities? Does PG&E intend to reach all four in equal measure? In addition to sector prioritization, among large and small firms, which are a priority?• PG&E will effectively integrate EE with other DSM offerings – for whom, how, in which combinations, over what timeframe, and by when?• Decline in average energy use (between participating and non-participating large customers) is tricky, as PG&E will have to account for a host of exogenous factors unless the program			
--	--	--	---	--	--	--

			<div>is set up as some sort of experiment that allows for reliable comparisons between the two groups.</div> <div></div>			
General Comments – Kay Hardy CPUC	<div><div></div><div>In general, this draft is well done, although several areas remain to be completed and the metrics need to be revised. I assume the discussion, maps ets for the crops segment will also be provided for the other major segments? Appreciate the actual thought put into opportunities and strategies going forward. Please note that the inclusion of the pump-related activities is contingent on the resolution of current issues by the CPUC and PAs, and requirements concerning the implementation of HOPPs programs should be discussed with the CPUC.</div></div>					

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