

Commenter Name:

Commenter Affiliation:

Date:

## 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](mailto:facilitator@caeec.org). If you have any questions about using this form or the review process, please contact the facilitator by phone or email.

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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 #	PA(s)	Sector	Page #	Comment
CPUC-1	SDG&E	Residential	16	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li>SDG&amp;E cites a 2008 study to highlight the confusing nature of programs and entry points as a possible factor regarding low participation rates. Certainly this still isn't the case 8 years after the conclusion of the 2006-2008 program cycle? Or at least SDG&amp;E has made strides over the last 8 years to change course and facilitate increased participation rates?</li> <li>What have participation rates been (outside of lighting) in the residential sector since 2008?</li> </ul> <p><b>Recommended Action</b></p> <ul style="list-style-type: none"> <li>SDG&amp;E should provide substantive evidence that program participation has been limited due to the myriad programs and entry points. It may well be the case that participation rates have fluctuated overtime, with multiple factors contributing to these participation rates.</li> </ul>
CPUC – 2	SDG&E	Residential	19	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li>SDG&amp;E includes home energy report/behavior program recipients in its larger total of residential program participants. It would be helpful to separate these opt-out programs from the opt-in programs so a clearer picture is evident.</li> <li>SDG&amp;E presents general SF and MF owner/renter and savings information. It may be more useful to break these properties out by vintage and climate zone to get a better understanding of where potentially larger savings opportunities are available. While programs are open to all, if SDG&amp;E is indeed targeting customers, homes in Escondido and Santee may have greater potential than those in Mission and Pacific Beach.</li> </ul>
CPUC – 3	SDG&E	Residential	21	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li>Energy Efficiency potential – SDG&amp;E seems to suggest that savings opportunities are diminished for new homes, which is clearly the case as these will be built to the most recent code. However, these homes are a small portion of SDG&amp;E's overall residential market.</li> <li>Figure Res-9 appears to be misinterpreted. The potential decline after 2017 is attributable</li> </ul>

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*to code changes for lighting, which will overwhelmingly affect existing homes with a limited effect on new homes (which will likely fluctuate with the economy).*

**Recommended Action**

*Clarify residential potential as it affects SDG&E's residential program efforts for existing buildings, which constitute the majority of target customers in the territory.*

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<i>CPUC-4</i>	<i>SDG&amp;E</i>	<i>Residential</i>	17	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li>Figure Res-2 is unclear and gives the impression that SDG&amp;E will go after all customers with all program options, which really shouldn't be the case. Certainly a refined understanding of the SF and MF customer segments, including climate zone, building vintage, customer usage, etc., would help shape which approaches work best for each segment. The table as currently configured does not present this subtlety.</li> </ul>
<i>CPUC-4</i>	<i>SDG&amp;E</i>	<i>Residential</i>	24-32	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li><i>SDG&amp;E lists "sample tactics". Are these a sample from a broader set? Are they under consideration but may not make the final cut to be presented in January 2017?</i></li> </ul> <p><b>Recommended Action</b></p>
<i>CPUC - 5</i>	<i>SDG&amp;E</i>	<i>Residential</i>	33	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li><i>Residential sector metrics – the metrics as presented in the chart may not be helpful in terms of measuring program performance and determining if the right customers are being reached.</i></li> <li><i>The intervention strategies need baselines. How accessible are EE products and services at this time? How empowered are customers today? What level of understanding do Property owners currently have of EE and ZNE?</i></li> <li><i>Sector metrics such as "track unique program app downloads" become more useful if you can tie these customers to their usage patterns and measure change</i></li> <li><i>Number of customers enrolled isn't entirely meaningful if the right customers are not</i></li> </ul>

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				<p><i>being enrolled.</i></p> <ul style="list-style-type: none"> <li><i>Useful metrics would be based on a strategy such as “we are targeting x customers, and intend to enroll y over z period of time with !! savings”</i></li> <li><i>Current online survey tools, which appear to be a key part of the residential effort, see just an average completion rate of 13 percent. Since July 2012, SDG&amp;E has managed to achieve just 21,000 completed surveys via its online tool. At that rate (approximately 5000 completes/year) it would take 200 years for all SDG&amp;E customers to have used the tool.</i></li> <li><i>.</i></li> <li><i>.</i></li> </ul> <p><b>Recommended Action</b></p> <ul style="list-style-type: none"> <li><i>It would be helpful to clarify the specific number and type of homes that SDG&amp;E’s Residential program is going after.</i></li> <li><i>SDG&amp;E needs to develop meaningful metrics, including baselines, that can be measured over time and provide valuable feedback on program performance in between evaluations.</i></li> <li><i>SDG&amp;E needs to set bold engagement goals for its proposed suite of energy management tools. While its response to AB793 is primarily smart thermostats for the foreseeable future, these additional EMT’s that maximize customer smartphones appear to provide an excellent platform for driving much-improved customer engagement and savings</i></li> </ul>
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<p>CPUC-6</p>	<p>BayREN</p>	<p>Residential</p>	<p>2.10</p>	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li><i>The numbers of SF units presented in Figure 2 doesn't match. There are 2.038 million SF units total. However, under Housing Tenure, that number is 2.62 million.</i></li> <li><i>The total number of homes by vintage adds up to 2.809 million</i></li> <li><i>The total number of homes by income adds up to 2.058 million</i></li> </ul> <p><b>Recommended Action</b></p> <ul style="list-style-type: none"> <li><b><i>Remove all reference to the total number of homes in the Bay Area market. If indeed BayREN is targeting only a moderate-income subset of the Bay Area market, then that subset is your market.</i></b></li> </ul>
<p>CPUC – 7</p>	<p>BayREN</p>	<p>Residential</p>	<p>2.11</p>	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li><i>BayREN states that its programs will better target the SF market and result in better energy savings and cost-effectiveness;</i></li> <li><i>However, in its Budget AL filing, C/E for SF program will decrease for 2017. In year 5 of the program, certainly the ramp-up period is over and we should see a stable and mature program</i></li> <li><i>BayREN highlights the potential for higher savings from homes of a specific vintage. These are not always owned by moderate income families, so it raises the question of whether BayREN will or should be targeting customers by income or housing vintage?</i></li> <li><i>BayREN also highlights specific climate zones as offering greater savings potential. This further complicates what the actual market is for BayREN program.</i></li> </ul> <p><b>Recommended Action</b></p> <p><b><i>BayREN should clarify what its target market is.</i></b></p> <p><b><i>Also clarify which contractors need to be trained. Certainly BayREN cannot train 25,000 contractors, but there is likely a correct mixture of large and small firms to be trained over time that will ultimately result in a “changed” market.</i></b></p>
<p><b>Comment #</b></p>	<p><b>PA(s)</b></p>	<p><b>Sector</b></p>	<p><b>Page #</b></p>	<p><b>Comment</b></p>

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<i>CPUC-8</i>	BayREN	<i>Residential</i>	2.11, 2.17	<b>Observations</b> <ul style="list-style-type: none"><li>• <i>BayREN highlights the # of participating contractors to date and the fact that &lt;10% of participating contractors are responsible for 51% of completed jobs.</i></li><li>• <i>With 23,000 contractors in the BayArea, is there a subset of contractors who should be targeted to reach the specific BayREN market? Is offering come one/come-all training the best approach? Should contractor training be targeted?</i></li></ul> <b>Recommended Action</b> <ul style="list-style-type: none"><li>• <i>Provide a general idea of what mix of contractors require training over a specific period of time.</i></li></ul>

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