

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	PG&E	2	<p>Data table contains incongruent data – the data source forsparklines should be checked to eliminate incongruities.</p> <ul style="list-style-type: none"> Example: sparkline for “gas use” decreases while the usage for large and small/medium customers is increasing. 		
ORA-2	PG&E	18	<p>PG&E’s discussion of market barriers is not well supported.</p> <ul style="list-style-type: none"> Table 3 lists several market barriers and then matches these with interventions. These asserted barriers lack substantiation. Analysis of barriers should be tied to discussion of EM&V learning (p.6) and the sectoral overview (page 9). Lacks description of how barriers are different for different market segments, for example, large versus small or medium sized firms. 		
ORA-3	PG&E	21-36	<p>The information in Tables 4 to 11 do not relate the strategy as a method for addressing a particular barrier. The tables should show the progression from the identified barriers down to strategies and tactics</p> <ul style="list-style-type: none"> Since strategies are developed to address market barriers the tables should be organized with Barriers leading to Strategies leading to tactics. The information about whether a specific tactic is new, modified, or existing is important so that reviewers can quickly understand the changes that BPs are proposing. Tables should be organized so that this information is readily interpreted. 		
ORA-4	PG&E	49-51	<p>The Category of Metrics seem appropriate butdetermining the reasonableness of the metrics requires specific targets.</p> <ul style="list-style-type: none"> The metrics are currently specified but all targets are not yet specified. It is difficult to judge the usefulness of targets and whether they are reasonable measures of success/failure in the absence of numbers that specify the baseline and whether the targets are ambitious but achievable. 		

			<ul style="list-style-type: none"> ○ Failure to specify the actual baseline and targets means that a crucial element of PG&E's commercial business plan will not be adequately vetted with stakeholders prior to filing. 		
<i>ORA-5</i>	<i>PG&E</i>		<ul style="list-style-type: none"> ● Solicitation strategy should be based on Commission directives and should be specific. <ul style="list-style-type: none"> ○ The chapter lacks any third-party solicitation strategy and does not conform to the Commission's direction in D.16-08-019. ○ The absence of a solicitation strategy and accompanying details means that a crucial element of PG&E's commercial business plan will not be adequately vetted with stakeholders prior to filing and misses an important opportunity to inform the market in advance of solicitation issuance. 		