

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	Integrated (Y/N)	Rationale for Y/N
			ORA appreciates that the vision put forward in this BP chapter is more specific and potentially actionable than other PAs		
<i>ORA-1</i>	<i>Residential</i>		<ul style="list-style-type: none"> Absence of a budget makes it impossible to verify whether it aligns with strategy and plan <ul style="list-style-type: none"> Emphasis on a ten-year endpoint with little to no incentives should mean substantial budget reductions in outyears 		
<i>ORA-2</i>	<i>Residential</i>	34	<ul style="list-style-type: none"> Metrics are oriented to intermediate program outcomes but not to broader market effects <ul style="list-style-type: none"> Example: metrics on p. 34 count number of units touched by programs and energy savings per program building, but do not include metrics to judge whether the market is transformed and incentives can be withdrawn <ul style="list-style-type: none"> The metric measuring whether EE increases home value at resale is better, although the target is only whether there is a quantified value rather than if the treated homes have higher resale value. 		
<i>ORA – 3</i>	<i>Residential</i>	22,23	<ul style="list-style-type: none"> Intervention strategies are less specific. They either largely mirror ongoing activities and/or be outside BayREN’s ability to implement <ul style="list-style-type: none"> Example: Strategy on p. 22 “introduce policies” to address “multiple market drivers influence decision making” is hard to pin down. Example: Strategy on p. 23 “flatten the playing field by introducing local government policies in a regionally coordinated manner” ultimately rests with elected officials...ABAG/BayREN may not have the ability/capacity to actually do this. 		

<i>ORA – 4</i>	<i>Residential</i>	7	<ul style="list-style-type: none"> • The objectives are also underdefined and more vague than we would like and may be difficult to actually implement <ul style="list-style-type: none"> ○ Example: objective on p. 7 “standardize the inclusion of EE data in property listings” is both ambitious and vague (standardize to what, how would BayREN actually do this?) 		
<i>ORA-5</i>	<i>Residential</i>	20	<ul style="list-style-type: none"> • Assertions of fact or policy need to be fully supported by evidence and citation, not simply opinion <ul style="list-style-type: none"> ○ Example: Assertion on p. 20 that national and statewide studies show that existing MF housing has the potential to save 30% cost-effectively has no citation. ○ Even when citations are included, there is no reference to specific pages such that references are unverifiable. Example: CEC RASS reference on p. 20 		
<i>ORA-6</i>	<i>Residential</i>	21	<ul style="list-style-type: none"> • Characterizations of market barriers and program attributes/accomplishments are vague, and asserted without documentation. <ul style="list-style-type: none"> ○ Example: Assertion on p. 21 that the MF market is new to EE and has low tolerance for “complicated new procedures” ○ Example: Assertion on p. 21 that the distribution of ex ante claimed savings “are relatively reflective of the energy end uses in MF properties” cites no actual data on end use distribution for either BayREN projects or all MF properties 		