

Comment #	PA(s)	Sector	Page #	Comment
<i>CPUC-Clinton-1</i>	SDG&E	Commercial	All	<p>Observations</p> <ul style="list-style-type: none"> • Of the four IOU PAs, this commercial sector BP best exemplifies my expectations for a business plan. The approach seems well conceived and carefully connects market segmentation, EE opportunities, barriers, challenges, desired outcomes, and strategies to accomplish. • Since BPs are inherently not at the implementation level, the key challenge for SDG&E, its ratepayers, and California will be to see SDG&E's upcoming ability to translate and deliver via the Implementation Plans.
<i>CPUC-Clinton-2</i>	SCE	Commercial	All	<ul style="list-style-type: none"> • The BP is at a very high level, but seems to articulate have the important issues and suggest a right-sounding approach. • Appendix B is good – it shows the lessons learned from relevant EM&V studies, and these lessons appear to have been applied to the BP strategies. • Appendix H is the overall table that well conveys the strategies and tactics in an easy-to-understand format.
<i>CPUC-Clinton-3</i>	SCE	Commercial	19	<ul style="list-style-type: none"> • Table 3 does not show the nexus I would expect to see on strategies to get at EE progress with property managers and leased space. The strategy listed re: the “top 50 property management firms” shows that it will use enhanced incentive delivery channels to allow OWNERS to directly apply for incentives. It is unclear how this will address the target audience of MANAGEMENT FIRMS. • Similarly, for the retail segment, the strategy emphasizes partnering with purchasing decisions – of what, equipment and appliances? Will this work in leased space? Is the idea to use EQUIPMENT LEASING mechanisms?
<i>CPUC-Clinton-4</i>	SCG	Commercial	All	<ul style="list-style-type: none"> • This business plan presents strategies at a very high level, and it is impossible to connect the front-end discussion of market segments, opportunities, and barriers to the desired outcomes, strategies, or expected results.

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<i>CPUC-Clinton-5</i>	SCG	Commercial	15-23 and 28	<p>By way of example:</p> <ul style="list-style-type: none"> • Page 15, Table D.2 for the desired outcome of “increased EE levels in EE in commercial leased properties”, indicates 8 program strategies in a bulleted list, of which one is “customer Incentives”. These names tell me nothing about the substance, nor how likely each is to support the desired outcome. THEN • Page 18, Figure 2 of barriers and intervention strategies, for the “Split Incentive” barrier (clearly related to the leased property situation), shows 3 intervention strategies – Direct Install, Small business Outreach, and Partnering. It is not at all clear to me how such intervention strategies will indeed tackle the leased property participation desired outcome and the problem of split incentives. FINALLY, • Page 23, Table D.4 descriptions of program intervention strategies, for the “Partnering” strategy, shows 3 aspects – utility, industry, and customer partnering. The descriptions refer to both “industry associations” generically, and “partnering with large property owners” to create actions plans for property management. • With regard to “customer incentives”, on p. 28 the table indicates Pay for Performance via ESCOs, and other options such as customize4d, deemed, bundled, and whole-building. I do not see how any of the described customer incentive strategies on pp. 28-29 would apply to the challenge of commercial leased properties per page 15. • I cannot connect the dots in a linear way across these tables and concepts to convince myself exactly how appropriate strategies will produce savings participation in leased properties.
<i>CPUC-Clinton-6</i>	PG&E	Commercial	All	<ul style="list-style-type: none"> • This BP is very general and conceptual. It is the least developed and least specific of the 4 IOUs. In its current state it presents a seriously under-developed understanding of the opportunities, barriers, and promising actin strategies to undertake.
<i>CPUC-Clinton-7</i>	PG&E	Commercial	6	<ul style="list-style-type: none"> • The staged evolution of strategies over a 10-year period seem rather slow to incorporate innovation and deploy given the rather large and active commercial sector.
<i>CPUC-Clinton-8</i>	PG&E	Commercial	18	<ul style="list-style-type: none"> • In Table 3 the interventions shown to overcome the barriers list seems overly simplistic and undifferentiated
<i>CPUC-Clinton-9</i>	PG&E	Commercial	20	<ul style="list-style-type: none"> • I cannot discern how PG&E is applying its data analytics to better understand the SMB customer base. See SDG&E for a better example of how to do this.
<i>CPUC-Clinton-10</i>	PG&E	Commercial	28	<ul style="list-style-type: none"> • Table 8 that is labeled as “Financial Solutions” for the most part do not sound at all like financial tactics or tools. Perhaps the table is mis-labeled.

Please submit completed comments to facilitator@caeec.org