

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. 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	BayREN	Introduction	1.2	<p>Observations</p> <ul style="list-style-type: none"> BayREN states that its programs target low- to moderate-income customers, a “hard to reach” demographic that is historically underserved by utility programs. However, it’s unclear, due to a lack of substantiating evidence, that its programs are indeed reaching this targeted group. Specifically, the Home Upgrade program, which requires an investment by the participant in the project, would seem to be out of reach of many of these customers, who would better suited for the ESA/CARE program. Without substantiating evidence that provides details about program participant demographics, BayREN’s assertion cannot be supported/validated. <p>Recommended Action</p> <ul style="list-style-type: none"> In its final Business Plan, to be submitted January 2017, BayREN should include program participant data that reveals if this targeted group is in fact being reached.
CPUC – 2	BayREN	Residential	2.1	<p>Observations</p> <ul style="list-style-type: none"> BayREN states that it will focus on the moderate income sector. However, in the introduction, BayREN states that it will target low- and moderate-income customers. Similarly in its initial draft, BayREN states that there are 1.5 million eligible homes, with moderate income homes making up 30-40% of these homes. This compares to current estimate of 16% of BayArea housing market <p>Recommended Action</p> <p>It would be helpful to clarify the specific number and type of homes that BayREN’s program is going after. The target market really isn’t all SF homes in the BayArea, as presented in Figure 2; it’s a subset of those homes by vintage and income.</p>
CPUC – 3	BayREN	Residential	2.2	<p>Observations</p> <ul style="list-style-type: none"> Does GreenLabeling for the SF market really apply to the MF market, as implied in this section? <p>Recommended Action</p> <p>Clarify how lessons learned from the SF market for this tool can be applied (or not) to the MF market</p>

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CPUC-4	BayREN	Residential	2.3	<p>Observations</p> <ul style="list-style-type: none"> BayREN states that it has trained “over 300 contractors and enrolled 130 participating contractors, thereby increasing overall knowledge and interest in EE and supporting an expanding market”. How is this proven? 300 trained contractors is a good start, but as BayREN states, there are over 25,000 contractors in the BayArea, so what effect is this really having and how many contractors actually need to be trained to create a changed market? <p>Recommended Action</p> <ul style="list-style-type: none"> Provide information that substantiates the claim that these trainings have indeed led to better program delivery, etc.
CPUC – 5	BayREN	Residential	2.5	<p>Observations</p> <ul style="list-style-type: none"> The sector vision is that residential propert owners adopt EE upgrades as standard practice. What information is there that a family of 4 earning at least \$48,000/year is able and willing to spend a portion of their limited income on home upgrade projects that range from \$14,000 to \$16,000? Is there a cap on the moderate income segment? Certainly it ranges from a minimum of \$48,000 to a just –below middle income cap? Increasing the number of trained contractors, but how many? And which ones? If a small percentage of contractors are currently completing a majority of the jobs, does it make sense to train a larger number of smaller contractors BayREN’s program efforts will “ultimately...result in residential ee upgrades becoming a norm”. At what point? How many jobs need to be completed? How many contractors need to be trained? <p>Recommended Action</p> <p>It would be helpful to clarify the specific number and type of homes that BayREN’s program is going after. The target market really isn’t all SF homes in the BayArea, as presented in Figure 2; it’s a subset of those homes by vintage and income. This is also refined further by homes that are moderate income. BayREN shouldn’t be pulling in homes that are beyond this income range (which would be duplicating IOU efforts).</p> <p>Also clarify which contractors need to be trained. Certainly BayREN cannot train 25,000</p>

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CPUC – 5	BayREN	Residential	2.7	<p><i>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></p> <p>Observations</p> <ul style="list-style-type: none"> <i>There has been significant revision to the participation counts. Are these numbers now a percentage of just the moderate-income range of homes or still within the larger total of SF homes in the Bay Area?</i> <i>The number of treated homes has decreased and yet the budget remains the same. Unclear how both the original numbers presented in the voluntary chapter and the numbers presented in the 10/18 full draft are still happening within the same budget.</i> <p>Recommended Action</p> <p><i>It would be helpful to clarify the specific number and type of homes that BayREN’s program is going after. The target market really isn’t all SF homes in the BayArea, as presented in Figure 2; it’s a subset of those homes by vintage and income. This is also refined further by homes that are moderate income. BayREN shouldn’t be pulling in homes that are beyond this income range (which would be duplicating IOU efforts).</i></p>
CPUC-6	BayREN	Residential	2.10	<p>Observations</p> <ul style="list-style-type: none"> <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> <i>The total number of homes by vintage adds up to 2.809 million</i> <i>The total number of homes by income adds up to 2.058 million</i> <p>Recommended Action</p> <ul style="list-style-type: none"> <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>
CPUC – 7	BayREN	Residential	2.11	<p>Observations</p> <ul style="list-style-type: none"> <i>BayREN states that its programs will better target the SF market and result in better energy savings and cost-effectiveness;</i>

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				<ul style="list-style-type: none"> • 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 • 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? • BayREN also highlights specific climate zones as offering greater savings potential. This further complicates what the actual market is for BayREN program. <p>Recommended Action</p> <p><i>BayREN should clarify what its target market is.</i></p> <p><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></p>
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CPUC-8	BayREN	Residential	2.11, 2.17	<p>Observations</p> <ul style="list-style-type: none"> • BayREN highlights the # of participating contractors to date and the fact that <10% of participating contractors are responsible for 51% of completed jobs. • 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? <p>Recommended Action</p> <ul style="list-style-type: none"> • Provide a general idea of what mix of contractors require training over a specific period of time.

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