

Commenter Name: Kay Hardy

Commenter Affiliation: CPUC

Date: 11/20/16

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-Hardy-1	PGE	Industrial	2	<ul style="list-style-type: none">• “Customers by the numbers table” shows decline in energy savings and participation. Suggestion: reasons for this should be addressed and strategies tied to reversing the trend.
CPUC-Hardy -2	PGE	Industrial	4-5	<ul style="list-style-type: none">• Suggest including a breakdown of the 2015 savings by fuel from core, 3P and statewide programs. Also, a further breakdown of each of these categories at the sector level - manufacturing, petroleum, food processing and chemicals and minerals.

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CPUC-Hardy-3	PGE	Industrial	7	<ul style="list-style-type: none"> Near term appears to be business as usual while PGE does some research; “standing up solutions” to create a framework for SEM does not happen until years 4-7; SEM is integrated into program design during years 8-10. This seems a little leisurely and makes me wonder what the timeline is for other programs/interventions, as there surely must be some.
CPUC-Hardy-4	PGE	Industrial	23-24	<ul style="list-style-type: none"> Intervention 4 – Financial solutions: The text does not address financing options but alludes to them by stating “PG&E plans to expand the use of financing products to further improve energy efficiency project economics.” The section then goes on to address project documentation, freeridership and spillover, and permit closure (for industrial?), which seem marginally relevant. Recommend: address potential use of loans and other finance products, use of tiered incentives, and so on – actual finance options that are listed in Table 10.
CPUC-Hardy-5	PGE	Industrial	29	<ul style="list-style-type: none"> Energy Champion Outreach – can this be tied to SEM in some way or is it a separate plan? Please clarify how they complement each other and indicate how this activity will promote goals set out in SB350.
CPUC-Hardy-6	PGE	Industrial	Section H	<p>This section points to the intervention strategy discussions for description of cross-cutting activities, but those strategies do not provide any detail about, for example, WET.</p>
CPUC-Hardy-7	PGE	<p>General comments on Section G -- Strategy descriptions are very general such that anything can be justified in the implementation plan. The sections are wordy, digressive and do not give a clear idea of why these strategies are selected or how they will increase savings in the industrial sector. On p. 17 PGE states “Before proceeding with implementation, PG&E will expose each tactic described to a rigorous internal development process to assess its relative viability and cost effectiveness” which makes all the strategies pretty uncertain. The emphasis on midstream programs is concerning in a sector that sees much of its savings coming from custom projects. The plan does not provide any rationale on how a midstream program can help achieve doubling of EE goals by 2030. In the tables for each intervention strategy it is often hard to see how the “barrier” being addressed relates to the “example” tactics. Overall, section G does not provide adequate support for implementation plans to follow.</p>		