

Commenter: Please Fill In This Part Of The Form		For PA Use	
Comment #	Comment	Integrated (Y/N)	Rationale for Y/N
NRDC - 1	<ul style="list-style-type: none"> It would be helpful to better understand how the BP intersects with existing offerings (similar to Jeanne Clinton’s comment re: SDG&E’s sample chapter) and what rationale was used to continue existing offerings or cancel approaches. For example: <ul style="list-style-type: none"> SCG has a table on p.20-25 that highlights its plan for the industrial sector. What are new, modified, or existing? PG&E has a table (starting at p.21) that includes N/M/E, but uncertain how “successful” programs were determined. In addition, the reader could presume the PG&E p.21 table includes the full range of offerings, but it’s not explicit. To show the intersection, it would be useful to understand the following, akin to “telling the story” to the reader about the thought process behind the proposal: <ul style="list-style-type: none"> (1) what approaches are continuing (doesn’t have to be specific programs since this is BP level, could be labeling similar to PG&E’s table), (2) how the PA determined these were successful (e.g., could be a summary description of criteria used to continue “existing” approaches such as TRC, savings, participation rates, EM&V etc.) (3) if appropriate, why were some approaches removed or modified (could use similar criteria?). For NRDC, if there are no best practices or citations to support a proposed approach, the rationale could be internal discussion/brainstorming/CAEECC meetings/etc. 		
NRDC – 2	<ul style="list-style-type: none"> NRDC agrees with ORA’s comment to provide more complete citations with page #s to enable follow up if interested. 		
NRDC – 3	<ul style="list-style-type: none"> For partnerships, describe <i>what</i> it is the PA plans to do. For example: <ul style="list-style-type: none"> SCG at p.27 includes a helpful set of bullets under its partnership with PAs w/ specific action items it plans to pursue. BayREN, p.32 has a list of partners, but unclear what the strategy/plan is with each of them. 		
NRDC – 4	<ul style="list-style-type: none"> Whenever “leverage” or “integrate” is used, please provide a clear description of <i>what</i> would happen as a result. For example, SDG&E p.17 has “In addition to creating this new customer-centric tool, SDG&E will leverage existing offering to enhance the customization and scope of the data provided to customers by the tool.” This is followed by a list of offerings, but what is the idea? Is this connected to the concierge approach? What will SDG&E do differently to leverage the list of offerings that isn’t happening now? Would it be a requirement/incentive in 3P/SW/LG contracts to offer other programs than their own? Would it be to set up some sort of search function for account reps to use and relay to customers and/or implementers? 		
NRDC – 5	<ul style="list-style-type: none"> NRDC recommends that each PA include a short high level summary of the key learnings from EM&V, similar to SCE’s @ p.14. NRDC recommends PAs include something similar to SCG @ p.11: “SoCalGas response to each identified EM&V recommendations directed at the industrial sector from program year 2006 through 2015 as listed in Attachment C of this business plan.” Each PA should clearly indicate the linkage in a table, which could also remove prose and shorten the chapter. 		

<p>NRDC – 6</p>	<ul style="list-style-type: none"> • NRDC suggests the PAs consider workforce requirements prior to being able to contract with a PA. There are two programs that could serve as models. This approach does not have to be overbearing or unduly restrictive, but could raise the level of quality contractors able to participate: <ul style="list-style-type: none"> ○ NYSERDA puts out “Eligible Installer” RFPs where they require contractors to fill out an RFP to get onto their list of contractors who can work with them. You do not automatically get on the list and there are a number of requirements to prove you are able to perform to quality/customer services/etc. standards. There is currently a “qualified vendor” example here. ○ In 2013 (uncertain how the program looks today), MassSAVE had a behind the scenes program to assess qualified workers for quality, customer service, and paperwork. When contractors fell below required quality, they had to do additional training. If they continued to fall below accepted levels for quality, customer service, and paperwork, they would be removed for the eligible contractor list for the MassSAVE program. The process, review, etc. was conducted by a vendor. 		
<p>NRDC – 7</p>	<ul style="list-style-type: none"> • While each PA provided good information, NRDC is resubmitting it’s proposal for a comprehensive market characterization (same data compilation as before). Having all PAs provide the same data when available would provide the reader a consistent understanding of the various sectors in different territories as well as provide for a more complete picture of which areas need to be targeted when implementing the BP after Commission approval. • In particular, the following were not consistently applied across all PAs (although many did do a combo of the following): <ul style="list-style-type: none"> ○ Climate zone information (e.g., BayREN p.11) would be informative for targeting approaches and future implementation plans ○ End use consumption (many PAs included this already, but want to make sure a breakdown of the relevant end uses are in each chapter). For example, SDG&E Phase 1 presentation from February 22, 2016 p.11), which could be then used during the subsequent implementation planning process. Also SDG&E Figure 6 and 7. ○ Comparison of account #s, usage, and program uptake (also included by many, important to understand how to design the next stage of implementation approaches to reach the particularly high need areas). For example, PG&E Figure 3. • For the graphics, please include examples of what makes up “Misc.” or “other” (e.g., SDG&E Figure 5, other makes up the most of “other”) • In addition, an assessment of the “hard-to-reach” communities would be useful. For example: <ul style="list-style-type: none"> ○ how many schools or small/med/businesses are in disadvantaged communities? ○ What is the make up of middle income customers? ○ What is the uptake of programs in these particular communities or customers? • This would be useful in driving the development of forthcoming implementation plans, which are intended to be linked to the BPs. Without this information, it would be easy for the IPs to overlook such activities. • For example, in the BP PAs would commit to target underserved communities and customers that are ineligible for ESAP (whether it be schools in low income neighborhoods, SMB, or MIDI customers). In the implementation planning process, the PA would then link a solicitation to this strategy and could overlay BP data with (for example) existing information on Prop 39 funding to determine which schools continue to need support. The implementation plan would then provide for the specific program interventions that would be needed to reach these schools, which would tie back to the overarching targeting strategy in the BP. 		

NRDC – 8	<ul style="list-style-type: none"> • NRDC appreciates the detailed descriptions of what the PAs are thinking the types of approaches would achieve their intended goals. However, we understand ORA’s concern that these details could potentially be used to create restrictive RFPs. To address this, NRDC proposes to maintain the level of detail but include a caveat that these are descriptive for the BPs, but not necessarily prescriptive for the IPs. That said, it is also important to note that the PAs are responsible for complying with specific legislative mandates, such as benchmarking and energy management programs. The caveat should allow sufficient flexibility for the PAs to be able to include legislative needs in the RFPs, but without being prescriptive as to how such goals would specifically be achieved. These details can be worked out in the IPs. 		
NRDC – 9	<ul style="list-style-type: none"> • NRDC appreciates the tables provided by the various PAs. We recommend all PAs include similar tables. Specifically: <ul style="list-style-type: none"> ○ EM&V (see NRDC-5) ○ Legislation/CPUC directives – propose a combo of PG&E, SCG, SDG&E table with a column for: <ul style="list-style-type: none"> ▪ Legislative or CPUC directives citation ▪ BP approach ▪ In addition to the general BP strategy (e.g., SEM or customer incentives), may need to include a column for section or Table references to make the connection easy for the reader to go back to the place the PA thinks it was addressed. For example, SCG’s Appendix B (p.33) has great references to the legislation, etc. but for section 399.4 (c) of SB 350, the strategy column doesn’t tell me quite how this ensures LGs, CBOs, etc. would be used to implement programs. There should also be a reference to the section on partners and the forthcoming discussion of bidding. Alternatively, the table could include more prose. ○ Tactics/strategy table – propose a combo of PG&E, SCG, BayREN (SDG&E has a lot of the pertinent information in prose, which could benefit from a table format). NRDC proposes the following columns: <ul style="list-style-type: none"> ▪ Barrier ▪ Strategy ▪ Tactic ▪ New/Existing/Modified ▪ Short/Mid/Long ▪ Resource/NonResource ○ Stakeholder feedback – propose PAs use SCG’s Appendix D (many addressed feedback, but stakeholders and ED would benefit from a consistent table that links back to the tracker references for ease of comparison) <ul style="list-style-type: none"> ▪ Include reference # to tracker ▪ Recommendation ▪ Response (included or not and rationale) 		
NRDC – 10	<ul style="list-style-type: none"> • NRDC proposes inclusion of a definitions Appendix for all PAs with at least the following items: Tactic, Strategy, Objective, Intervention 		