

Commenter: Please Fill In This Part Of The Form				For PA Use	
Comment #	PA	Page #	Comment	Integrated (Y/N)	Rationale for Y/N
ORA-1	PG&E	39-40	<ul style="list-style-type: none"> • Midstream training intervention is not clearly tied to any goal, also duplicative of WE&T. <ul style="list-style-type: none"> ○ Contractor interface with customers may not increase interest in EE homes. Interventions aimed at contractors and builders should be differentiated from those targeting real estate professionals. ○ ORA recommends separating midstream training into two aspects: technical and marketing. 		
ORA-2	PG&E	39-40	<ul style="list-style-type: none"> • EM&V research needs should be supported by defined program directives. <ul style="list-style-type: none"> ○ For example: AB793 research needs should include more detail specific to the directives of the legislation. 		
ORA-3	PG&E	7	<ul style="list-style-type: none"> • PG&E should define challenges identified with the whole building approach and clarify its plan to address those challenges where whole building treatment is optimal. <ul style="list-style-type: none"> ○ PG&E plans to transition from a whole building approach to a meter based approach and pay for performance models. Include the lessons learned from implementing a whole building approach that will inform the process when that is the optimal approach for highest savings. 		
ORA-4	PG&E	13	<ul style="list-style-type: none"> • PG&E's AB1109 goal does not represent savings potential. <ul style="list-style-type: none"> ○ PG&E states that lightings savings potential is represented by the need to reduce residential lighting use 19 percent by 2018. This does not represent a potential, but rather informs the goal. If the potential in lighting savings exceeds or does not meet this standard, then alternatives should be considered. 		
ORA-5	PG&E	17-18	<ul style="list-style-type: none"> • Research cited does not reconcile residential sector challenges defined as to plug load appliances. <ul style="list-style-type: none"> ○ The IEPR report cited does not support the proposition that overall energy usage is projected to increase based on increased plug load. Rather, the IEPR report cites the energy savings <u>potential</u> in plug load appliance usage. ○ PG&E should clarify its goals relative to harnessing the potential for savings related to plug load appliances. Research does not directly link the challenges identified to the increase in plug load appliances. The connection between the challenges identified and the research cited is unclear. 		
ORA-6	PG&E	24	<ul style="list-style-type: none"> • PG&E Should consider privacy protections when sharing data platforms among third parties. <ul style="list-style-type: none"> ○ The current data sharing strategy does not reference how customer privacy will be protected. 		
ORA -7	PG&E	32-33	<ul style="list-style-type: none"> • Clearly define a plan for ZNE financing. <ul style="list-style-type: none"> ○ How financing will support ZNE demonstrations is not clearly defined. BP should provide specific methods describing how financing will interact with the market to support ZNE. 		
ORA -8	PG&E	38-40	<ul style="list-style-type: none"> • Outreach plan does not have any long-term goals. 		

			<ul style="list-style-type: none"> ○ PG&E only defines short term goals to continue current campaigns. 		
<i>ORA -9</i>	<i>PG&E</i>	50	<ul style="list-style-type: none"> ● No solicitation strategies are mentioned as part of plan. 		
<i>ORA -10</i>	<i>PG&E</i>	51-57	<ul style="list-style-type: none"> ● The DER and EE metrics are unclear. <ul style="list-style-type: none"> ○ Counting the number of customers using one Demand product and EE measure will not show whether success has been attained in helping them use this technology to lower usage during peak periods. PG&E should verify that energy usage is lowered. 		
<i>ORA -11</i>	<i>PG&E</i>	57	<ul style="list-style-type: none"> ● Clearly define plug load efficiency market goal. <ul style="list-style-type: none"> ○ Define strategy for slowing growth of plug load, including indicators and midstream activities. 		