

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				For PA Use	
Comment #	PA	Page #	Comment	Integrated (Y/N)	Rationale for Y/N
<i>ORA-1</i>	<i>SDG&E Public</i>	73	<ul style="list-style-type: none"> • Budgets should be specified for the full ten-year business plan period and should align with market characterization and intervention strategies over the short-, medium-, and long-term. <ul style="list-style-type: none"> ○ The absence of budgets makes it difficult to assess whether SDG&E’s request for resources aligns with its analysis of the needs in the public sector and its proposed intervention strategy. ○ Failure to specify the budget means that a crucial element of SDG&E’s public sector business plan will not be adequately vetted with stakeholders prior to filing. 		
<i>ORA-2</i>	<i>SDG&E</i>	82	<ul style="list-style-type: none"> • Assertions of fact must be supported by factual sources. <ul style="list-style-type: none"> ○ Example: SDG&E asserts that “the whole building approach will be the best way to maximize energy savings” in the public sector. It cites to a 2015 University of California (UC) pilot proposal featuring a whole building approach. The point of the UCpilot is to test whether the whole building approach can be effective. To support the assertion, SDG&E would instead need to cite a completed pilot report that shows that the approach was successful and is superior to other alternatives. 		
<i>ORA-3</i>	<i>SDG&E Public</i>	85, 88, 93	<ul style="list-style-type: none"> • Market characterization and intervention strategies should be relevant to the targeted market segment. <ul style="list-style-type: none"> ○ SDG&E’s public sector chapter identifies four distinct segments and relevant sub-segments with unique challenges, but the interventions strategies are largely generic across segments and do not appear to substantively target distinct market barriers by segment. 		
<i>ORA-4</i>	<i>SDG&E Public</i>	85, 88, 93	<ul style="list-style-type: none"> • Intervention strategies are generic and too vague for evaluating their usefulness. <ul style="list-style-type: none"> ○ Example: tailoring offerings to meet the unique needs of public sector customers (p. 88) is an overly vague strategyandSDG&E should instead target strategies that match specific market and target market barriers.. 		

<p><i>ORA-5</i></p>	<p><i>SDG&E Public</i></p>	<p>88</p>	<ul style="list-style-type: none"> • Public Sector Action Plan is poorly specified and may not be an efficient or effective use of ratepayer resources. <ul style="list-style-type: none"> ○ ORA supports the initiative to integrate all relevant tactics and services in a way that serves public customers more effectively. However, the public sector action plan is poorly-specified and it is not clear whether it will support the goal of streamlining and integrating program offerings; no evidence is offered to show that such an intervention strategy is likely to increase public sector savings cost-effectively. Therefore, this strategy either requires substantially more specification, development, and justification or should be eliminated in the final business plan. 		
<p><i>ORA-6</i></p>	<p><i>SDG&E Public</i></p>	<p>63</p>	<ul style="list-style-type: none"> • Solicitation strategy should be based on Commission directives and should be specific. <ul style="list-style-type: none"> ○ The chapter currently lacks a defined third-party solicitation strategy that outlines the types of public sector solicitations SDG&E will run and a strategy for balanced procurement. ○ The absence of a developed solicitation strategy and details means that a crucial element of SDG&E's public sector business plan will not be adequately vetted with stakeholders prior to filing and misses an important opportunity to inform the market in advance of solicitation issuance. 		
<p><i>ORA-7</i></p>	<p><i>SDG&E Public</i></p>	<p>98</p>	<ul style="list-style-type: none"> • Performance metrics should have concrete targets in order to judge success/failure of intervention strategies. <ul style="list-style-type: none"> ○ The metrics are currently specified but all targets are unspecified. ○ It is difficult to judge the usefulness of targets and whether they are reasonable measures of success or failure in the absence of 1) numbers that specify the current baseline and 2) information showing that SDG&E's goals are both ambitious and achievable. ○ Failure to specify the actual baseline and targets means that a crucial element of SDG&E's public sector business plan will not be adequately vetted with stakeholders prior to filing. 		