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Commenter Affiliation: CPUC

Program Administrator to receive feedback: SDG&E

Date: September 28, 2016

Considerations for reviewing and providing comments on PA Business Plan Chapters

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 #	Sector	Page #	Comment	Rationale for Comment (include references to evaluations, studies, etc., if applicable)	Integrated (Y/N)	Rationale for Y/N
CPUC/CLN-1	Commercial	3,14,15	Observations <ul style="list-style-type: none">Seem to be three different foci or targets on 3 pages, less so, then landlords, then property managers. Justify your targets with relevant profile info. Recommended Action <p>Be clear about your targets</p>			
CPUC/CLN-2	Commercial	7	There is extensive info profiling by NUMBER of customers, but this does not necessarily comport with ENERGY CONSUMPTION profile – e.g. a small number of customers may account for much larger portion of consumption. THAT profile is equally if not more important.	Repeat as above		
CPUC/CLN-3	Commercial	10	Navigant uses the end use “Whole Building”, but I assume that is comprised of lighting & HVAC & plug loads in some general proportions by building type. Navigant is misleading, as is anyone who copies their categories to show “Whole Building” in addition to specific end-uses.			
CPUC/CLN-4	Commercial	13	Text says Biz Plan complements and does not replace current ... program level interventions. Please clarify what previous programs and services are retained, and what COMBINATIONS you anticipate going forward. Will these combinations be cost-effective?			
CPUC/CLN-5	Commercial	16	This discussion seems to expect that CUSTOMERS will solve the problem of the failure of provider business models to serve across end uses. Will the “customer hub” (aka “concierge” be able to overcome that? Thorough what means? Has it been done successfully elsewhere – especially for small businesses who are busy and may			

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			prefer “one stop” solutions?			
<i>CPUC/CLN-6</i>	Commercial	20	Seems to view OBF as the SOLE finance tool – which makes sense only if you expect to use traditional loans, below the \$100K cap. OBF draws upon 100% ratepayer funded capital. Have you estimated how much capital this market was likely to absorb? There has been a gap on finance for equipment leasing with the CHEEF pilots, with credit-supported leasing, about to launch. Is this not a consideration? Will any customers need finance above the \$100K OBF limit?			
<i>CPUC/CLN-7</i>	Commercial	20	Text discusses contractors and vendors’ need for construction loans or working capital while waiting to get paid via incentives and OBF proceeds upon completion of project. What solution(s) do you expect to work on the providers’ needs for working capital?			
<i>CPUC/CLN-8</i>	Commercial	26	Metric #2 states desired outcome to penetrate the untapped property management market. @nd strategy sounds more like an outcome – “transform tenant savings into asset value for property owners”. What strategy will you employ? And how will you navigate the interests and actions of property managers vs owners to achieve this?			
<i>CPUC/CLN-9</i>	Commercial	26	Metric #4 seeks to improve the customer experience. How does an online platform to cross-promote (multiple?) programs reduce complication and help to enroll participants?			
CPUC10	Commercial	3	How will SDGE determine the commercial sector goals (XX%)?			
CPUC11	Commercial	7	If the small commercial customer is 85% (under 20kW) – where is the profile on the spending on this sector?			
CPUC/ 12	Commercial	14	SDGE recognizes that they need a new approach to reach very small business. One major approach is reaching out to property managers. A three-pronged approach should be developed because the problem with non-motivated owners is challenging.			
CPUC13	Commercial	14	Shifting away from focusing on energy savings is great but how will SDGE transform the focus?			
CPUC14	Commercial	15	Working with third-party implementers has to be in compliance with Energy Efficiency Business Plan Guidance decision (recent EE decision) .			
CPUC15	Commercial	18	Barriers and a new approach to encourage innovation is an ongoing challenge- SDGE has identified many barriers- how can a barrier be used to open the door to a			

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			new approach? A gap analysis of the products available to the small business sector may help guide the type of innovation that is needed to expand the market			
CPUC16	Commercial	20	It might be helpful to gather financing resources and add funding for education customers on finance options			
CPUC17	Commercial	26	SDGE may be able to expand on number of metrics and another metric source			
CPUC18	Commercial	p.5, 21 (EMV) (but generally throughout the document)	<p>Observations</p> <ul style="list-style-type: none"> The chapter references the CEC forecast, CEUS, the potential study and multiple PA led studies, but it is not clear if SDG&E referred to any of the other CPUC led evaluation studies that target the commercial sector? <p>Recommended Action</p> <ul style="list-style-type: none"> Perhaps review the CMST study or other studies on www.energydataweb.com/search that are grouped under "commercial". 	<ul style="list-style-type: none"> The Business Plan checklist has "Analysis of PA and CPUC evaluation reports for this sector" as an item to include in the business plans. The studies may have recommendations or insights that may be useful for this chapter. 		
CPUC19	Commercial	p.12, 13	<p>Observations</p> <ul style="list-style-type: none"> The chapter references AB 758 (aka EBEE action plan) a few times, and specifically identifies Goal 1 as directly related to EBEE action plan; however, there are 28 strategies in the EBEE action plan, and I could not really tell how much the commercial chapter looked at those strategies that related to the commercial sector. <p>Recommended Action</p> <p>Review and include relevant EBEE commercial related strategies (maybe in Appendix A, along with the CA LTSP strategies).</p>	<ul style="list-style-type: none"> The EBEE action plan has a statewide vision for transforming the existing buildings market. There are many strategies that may be useful for this chapter. 		
CPUC20	Commercial	p.26	<p>Observations</p> <ul style="list-style-type: none"> Looking at the metrics table for SDGE's commercial chapter and PG&E's agricultural chapter, they are different. 	<ul style="list-style-type: none"> If one were to read the commercial sector for each PA, it seems like it would be helpful if 		

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			<p>Recommended Action</p> <p><i>Should the PA’s try to have consistent tables, maybe at least within the same sector and perhaps work together on statewide metrics for this sector?</i></p>	<p><i>certain tables have the same information and structure to allow the reader to better compare.</i></p> <ul style="list-style-type: none">• <i>It might make sense to at least think about statewide metrics considering the move towards truly statewide programs</i>		
<p><i>CPUC21</i></p>	<p><i>Commercial</i></p>	<p><i>p.11ish</i></p>	<p>Observation: CEUS (2006) is cited as a source of information on measures and market status.</p> <p>Recommended Action: Include consideration of the more recent Commercial Saturation and Commercial Market Share Tracking Studies conducted in 2014. The full reports (titles listed below) are available on http://calmac.org/search.asp</p> <ul style="list-style-type: none">• Commercial saturation and Commercial Market Share Tracking Study Telephone Survey Findings (2014)• California Commercial saturation Survey (2014)• California Commercial Market Share Tracking Study (2014)	<p><i>These studies should provide useful and actionable information for understanding potential in the Commercial sector; and offer more current data.</i></p>		