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Cc: Carol Yin < cyin@yinsight.net > Date: July 26, 2016 at 7:56 PM

Subject: Metrics: background documents and comments

Hi, everyone, my apologies for coming to the discussion a little bit late, but I just learned comments had closed on the PG&E/Grounded Research whitepaper on metrics for the business plan. I hope you'll allow me to submit this late comment and contribution on behalf of SCE: I was the statewide utility co-lead on the PPM development in 2010, and was the on the statewide IOU/ED team (that included Carmen) for MTI development in 2011. I noticed that the Decision had asked the PAs to leverage lessons-learned in the past processes:

"The past experience in developing the PPM and MTIs should not be lost. The principles and frameworks for considering and developing the metrics and discussed in Workshops and meetings are still relevant today, even if the metrics themselves may need to be updated. In addition, experts in EM&V should contribute their expertise on process and impact evaluations to development of metrics." p. 54, D.15-10-028

and

"However, we encourage the PAs to utilize experience and possibly some actual metrics from the PPMs and MTIs, where warranted and logical." p. 54, D.15-10-028

I suggest that the CAEECC includes discussion of the Framework of Indicators developed by ED in 2011 be used to inform the development of metrics for the business plans, as that framework was supported by the IOU/ED team and vetted through a public workshop that was well received by both the public and intervenors. Attached are ED's Framework of Indicators, and a whitepaper by Ralph Prahl and Ken Keating, that includes a discussion of how metrics should and should not be used. (Both these attached documents were the versions sent out on the service list announcing the MTI workshop that was held in November of 2011.)

I hope that it's not too late to revisit the metric development process for the business plans. If it is not too late, please feel free to share these documents on the CAEECC website if you feel it is appropriate.

Thank you.

Best, Carol

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