

Commenter Name: Kay Hardy

Commenter Affiliation: CPUC

Date: 11/20/16

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

Comment #	PA(s)	Sector	Page #	Comment
CPUC-Hardy-1	PGE	Agriculture		<ul style="list-style-type: none">• General: This seems to be very similar to the draft chapter that was provided earlier. Note that placeholders have not been filled in.
CPUC-Hardy-1	PGE	Agriculture	4, fn. 5	<ul style="list-style-type: none">• The cited study seems quite old. Is there nothing more recent?

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CPUC-Hardy-2	PGE	Agriculture	6	<ul style="list-style-type: none">With respect to VFDs for new wells, inclusion in the business plan as an option does not mean that the measure is automatically eligible. Recent EMV studies show very low GRRs and thus indicate that there are not the energy savings expected. In addition, pump overhauls, also referenced on this page, are still subject to CPUC disposition.
CPUC-Hardy-3	PGE	Agriculture	7	<ul style="list-style-type: none">Annual net savings goals hold steady through 2024; understood that this is from Navigant study but does not indicate impact of any new strategies.
CPUC-Hardy-4	PGE	Agriculture	11	<ul style="list-style-type: none">Table 3: Why is the average usage for large customers less than the definitional 500 GW; also why does the unknown category have negative usage?

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CPUC-Hardy-5	PGE	Agriculture	23	<ul style="list-style-type: none">• “Offer retrocommissioning and O&M...” says N, guessing you mean S. Maybe M.
CPUC-Hardy-6	PGE	Agriculture	25	<ul style="list-style-type: none">• Update reference to cannabis legalization
CPUC-Hardy-7	PGE	Agriculture	p. 20 on	<ul style="list-style-type: none">• Customer intervention strategies seem focused on farms, not dairies or wineries or other segments. If inclusive, indicate as such; if not, expand.

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CPUC-Hardy-8	PGE	Agriculture	35	<ul style="list-style-type: none">• Section L – Metrics. Says 12 metrics for customer interventions; I see 8 or 10, depending, and none of them are really metrics.• “Customers will take more energy efficient actions, marketwide” need a baseline and projected increases over time• Energy efficiency ... will gain greater visibility ... PGE will work with other players... These are strategies• Energy savings will become more cost effective – what baseline and what metric for improvement? TRC and PAC or ... ?• PGE will effectively integrate ... is strategy
CPUC-Hardy-9	PGE	Agriculture	37	<ul style="list-style-type: none">• Sector Metric Table – how would “core energy-using equipment” be defined? How would energy efficiency criteria be established? How will this be measured?• How to determine customers have the information to allow systems to be optimized? Should there be a metric for systems that ARE optimized somewhere?
CPUC-Hardy-10	PGE	Agriculture	39	<ul style="list-style-type: none">• Benchmark: Average of approximately 60 GWh/ year in savings from PG&E programs (Table elsewhere shows around 40 GW)• Savings will be more cost effective over time – Strategic partnerships (how so? CPUC action?) – Agricultural sector cost effectiveness -- CPUC-approved ex ante TRC calculation in impact evaluations (including indirect savings) what does this refer to?

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CPUC-Hardy-11	PGE	Agriculture	42	<ul style="list-style-type: none">• “New or innovative program ideas” – How is this a metric? How would it be assessed?
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