

Commenter Name: Kay Hardy

Commenter Affiliation: CPUC

Date: 11/21/16

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	SCG	Agriculture	General	<ul style="list-style-type: none">• A kitchen sink approach to programmatic approaches that appears to set the course for submission of any type of implementation plan; no explanations of why certain approaches, such as direct install or comprehensive direct install are appropriate. This should be a red flag for CPUC staff.• For some reason includes comments that were submitted on the PGE draft ag chapter that was submitted early for review.• Does not address direction in D. 16-08-019 regarding Ag programs, AB802 type approaches, and custom projects (see p. 43).• Bibliography includes no CPUC sponsored studies whatsoever. This is troubling as both ex ante and ex post review have identified issues with measure eligibility in the Ag sector.• Overall, this is a general chapter that does an OK job at describing the sector, proposes a wide variety of program approaches with no justification, does not address issues with standard practice or other measure-related eligibility, does not really lay out what measures are realistic for the gas company, does not go in depth into dual-fuel type programs or partnerships with water agencies that are critical points of program development.

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CPUC-Hardy -2	SCG	Industrial	general	<ul style="list-style-type: none">• Program intervention strategies include a “simplified suite of financial incentive strategies” that is not clearly described unless it refers to everything that follows – that is unclear.• The chapter notes that a simplified approach to program delivery in the industrial sector but does not provide specifics. In a response to an earlier comment regarding CAEECC proceedings, SCG says “The business plan proposes a simplified, low hassle customer engagement for all EE programs. This requires a collaborative examination by administrators, implementers and regulators of current program requirements to significantly reduce the customer hassle factor” (p. 47, highlight added). This is absolutely correct. In light of issues such as low realization rates and high freeridership noted in the industrial sector, approval of the business plan cannot be assumed to be approval of any program delivery approach that bypasses known issues through “simplification.”• Generally, the strategies do not acknowledge the direction provided in D. 16-08-019 respecting industrial projects although the decision is included in the list of Legislative/Commission directives and SEM is properly called out.• As with the Ag chapter, this is a kitchen sink of strategies that is perhaps setting up a situation where SCG can submit any type of IP for the industrial sector. There is no explanation in the chapter as to why these strategies are appropriate and whether they are appropriate for different customer sizes.• Note that the bibliography lists CPUC Studies but all but one are IOU studies (there is also a joint study). Also, the bibliography does not list the most recent impact evaluation (2014) and there is no indication in the chapter that any of the recommendations have had any effect on program development.• Thank you for your responses to my comments. I continue to be concerned about the proposal for top down, P4P projects in the industrial sector and reiterate that such projects would be available for building-envelope type projects and not as an overall approach including what are currently custom projects. Generally, the intervention strategies are so numerous and broad that it raises concerns about the contents of the implementation plans.
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