

Commenter: Please Fill In This Part Of The Form					For PA Use	
Comment #	PA	Page #	Comment	Integrated (Y/N)	Rationale for Y/N	
ORA-1	SoCalGas	1-10	<ul style="list-style-type: none"> <li>• The Business Plan should address barriers and shortcomings of current utility practices. This should begin with a clear discussion of the sector characteristics and what SoCalGas has done in the past as a baseline against which new strategies can be judged.           <ul style="list-style-type: none"> <li>○ Table A.2, for example, which list new program intervention strategies, should match Section 2 and compare the proposed programs with prior cycles. The information about prior cycles provides a baseline for understanding the proposed changes in the new cycle.</li> <li>○ Section 3, which describes market barriers, needs to be much more detailed and better documented; documentation of market barriers should include discussions of past EM&amp;V reports and evidence from SoCalGas' experiences in prior cycles.</li> </ul> </li> </ul>			
ORA-2	SoCalGas	15	<ul style="list-style-type: none"> <li>• The link between Problems (Barriers) and strategies is not clear because SoCalGas applies the same strategies regardless of the problem.           <ul style="list-style-type: none"> <li>○ Table D.2 lists three different problem statements but the same program strategies for each. If the strategies are designed to address barriers, this is unlikely to be the case.</li> </ul> </li> </ul>			
ORA-3	SoCalGas	41 -42	<ul style="list-style-type: none"> <li>• Performance Metrics need to be much clearer and baselines need to make sense for metrics           <ul style="list-style-type: none"> <li>○ For example: The first line of the table in Appendix A: Sector Metrics uses participation levels as a baseline for a metric that is measuring savings. This is inappropriate since participation levels cannot tell us whether greater levels of savings are achieved.</li> <li>○ In general, there will be participation metrics and energy savings metrics -- and then proportions of savings from different market segments.</li> <li>○ It is difficult to judge the usefulness of targets and whether they are reasonable measures of success/failure in the absence of (1) numbers that specify the baseline and (2) information showing that SoCalGas's goals are ambitious and achievable.</li> <li>○ Failure to specify the actual baseline and targets means that a crucial element of SoCalGas's commercial sector business plan will not be adequately vetted with stakeholders prior to filing.</li> </ul> </li> </ul>			

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Program Administrator to receive feedback: SoCalGas Commercial Date 11/21/2016

			<ul style="list-style-type: none"><li>○ Savings targets need to be established or there is no meaningful baseline.</li></ul>		
ORA-4	<i>SoCalGas</i>		<ul style="list-style-type: none"><li>● <b>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.</b><ul style="list-style-type: none"><li>○ The absence of budgets makes it difficult to assess whether SoCalGas's request for resources aligns with its analysis of the needs in the public sector and its proposed intervention strategy.</li><li>○ Failure to specify the budget means that a crucial element of SoCalGas's commercial sector business plan will not be adequately vetted with stakeholders prior to filing.</li></ul></li></ul>		