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Comment #	PA	Page #	Comment	Integrated (Y/N)	Rationale for Y/N
ORA-1	SoCalGas	1-10	<ul style="list-style-type: none"> • 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"> ○ 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. ○ 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&V reports and evidence from SoCalGas' experiences in prior cycles. 		
ORA-2	SoCalGas	15	<ul style="list-style-type: none"> • 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"> ○ 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. 		
ORA-3	SoCalGas	41 -42	<ul style="list-style-type: none"> • Performance Metrics need to be much clearer and baselines need to make sense for metrics <ul style="list-style-type: none"> ○ 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. ○ In general, there will be participation metrics and energy savings metrics -- and then proportions of savings from different market segments. ○ 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. ○ 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. 		

			<ul style="list-style-type: none"> ○ Savings targets need to be established or there is no meaningful baseline. 		
<i>ORA-4</i>	<i>SoCalGas</i>		<ul style="list-style-type: none"> ● 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. <ul style="list-style-type: none"> ○ 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. ○ 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. 		