

Commenter Name:

Commenter Affiliation:

Program Administrator to receive feedback:

Date:

Jeremy Battis and Jeanne Clinton, CPUC Staff

SCE

Sept. 29, 2016

Considerations for reviewing and providing comments on PA Business Plan Chapters

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					For PA Use	
Comment #	Sector	Page #	Comment	Rationale for Comment (include references to evaluations, studies, etc., if applicable)	Integrated (Y/N)	Rationale for Y/N
1	public		Attached are an ED staff memo offering feedback and guidance on requested revisions to the SCE document; and an attached study paper of the public sector.			
2	public	3	Sector profile should be simplified and made more useful by relying less on mentions of recent legislation. Section should come after a useful disclosure that catalogues all actors, sub-sectors, and primary EE funding categories.			
3	public	5-6	Section should be edited for brevity and should follow a new section that would include a a useful disclosure that catalogues all actors, sub-sectors, and primary EE funding categories. Digressions such as a scale issue could go into an appendix. Table 2 would work better as a Venn Diagram since UC/CSU are state agencies and K-12 is a local govt animal.			
4	public	10	Sector should be edited to focus on Strategic Plan framework and renamed. Remainder could go into an appendix. hould follow a new section that would include a a useful disclosure that catalogues all actors, sub-sectors, and primary EE funding categories.			
5	public	14	Move LGP description to a new opening section that fully describes actors and agencies SCE is targeting in public sector. Change “promote three categories” to “advance six goals”. Add capacity building and constant improvement; peer to peer knowledge transfer; and informing the CPUC, CEC, and other state agencies			

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			of on-the-ground conditions.			
6	public	12	Market Trends. This section is useful but in places speaks to and generalizes LGPs rather than the public sector as a whole. (e.g., the statement “The main market drivers for public sector EE adoption are greenhouse gas (GHG) reduction and climate action plans.” Holds true for LGPs but not for K-12, etc.			
7	public	14	EM&V section should disclose that the IOUs have no plans and framework in place to evaluate state institutional partnerships (SIPs) or K-12. This includes no active PCG to address these segments. EM&V section should address long-term goals of IOUs LGP EM&V, including a plan to assign IOU staff with LGP knowledge, PM capability, and ample bandwidth to oversee consultant studies. This section should concentrate on the way things are, deficiencies in EMV, and what SCE intends to do to address. Much of the narrative here could go to the beginning in a new Overview chapter that profiles the public sector.			
8	public	16-20	Market Barriers. Good info but needs to be refocused. Please move the PACE info from Market Trends to fit with the financing narrative here. Bulets on pp. 17-20 are needlessly repeated. Convert into a table for simplicity and transparency.			
9	public	21	Omit the definitions here to consolidate and add a table to the overall BP filing – many of these defns will be applicable for various BP chapters.			
10	public	22	“For example, local government customers require community data for climate action plans and GHG inventories, but access to this data is limited by CPUC Decision D.14-05-016.” This statement is a pretty general disclaimer. Did SCE support this rule as proposed? Is it working out? Has there been any demonstrated benefit? Have parties complained? Does SCE support a second look at this rule? Please explain how SCE intends to navigate this rule or improve matters going forward.			
11	public	22	“While this business plan will not be able to overcome all of the data barriers facing this sector, SCE will continue to be mindful of these challenges when developing programs, policies, and procedures.” SCE should provide at least one proposed solution to the LG data sharing impasse.			
	public	23	“Southern California Edison's vision for the public sector is to 12increase customer adoption of EE improvements, enhance customers' abilities to self-			

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			serve, increase customer satisfaction, and make program participation easier for customers.” SCE should specify who the customer is in this case.SCE statement is rather generic and seemingly could be substituted for other sectors.			
12	public	23	Savings goals should be broken down by LGP, SIP, and K-12.			
13	public	23	“The public sector is a newly defined sector, which will require conducting a number of M&V studies and performance analyses as outlined below.” ED staff doesn’t gauge why a newly defined sector would require a special study. In any case, if SCE believes that EMV is an urgent priority for the public sector, it’s advised to heed ED direction for EM&V (p.27) and retain qualified IOU staff to oversee and monitor.			
14	public	23	Sector Vision. First two paragraphs add nothing new and should be deleted. SCE offers an interesting idea of weening LGs off of EE ratepayer funds but offers no plan to get there and no argument that this is the correct course of action. “In 10 years, SCE would like the public sector to be leaders in energy efficiency adoption and promotion. With the exception of complex or novel projects, public sector customers should no longer be reliant on utility incentives to develop and implement energy efficiency projects, and should be able to finance their own EE projects and/or leverage utility finance programs.”			
15	public	24	Revise for clarity “Public sector customers should continue to leverage their community respect and authority to continue to promote higher EE standards,” substituting “To further drive EE in their communities, public agencies should continue to apply their unique position as trusted and authoritative entities.”			
16	public	25	This sentence is confusing and appears to pardon SCE of fully describing what is in the public sector. Please delete and add more detail about the public sector entities. “The flagship public sector offerings are local government and institutional EE partnerships”			
17	public	25	SCE refers to “four statewide Institutional Partnerships (IPs)” which is incorrect in that these are not statewide programs. Please reference throughout as State Institutional Partnerships (SIPs). Narrative that describes the LGPs and other programs should be moved to into Overview chapter.			

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18	public	25	Screen entire chapter for repeated narrative. This sentence appears here for at least the third time “One of the major challenges for public sector customers is the ability to finance EE measures”			
19	public	25	1. Existing Products and Services. This information should be moved to the front of the chapter.			
20	public	28,48	Please add to the following statement to explain how the proposed SCE budget will allow for sufficient generation of new innovative project ideas by LGPs. Also please reconcile the SCE budget line item LGP Strategic Plan pilots with the absence of a mention here. Is SCE pursuing new LGP Strategic Plan pilots? Why or why not and why is this justified? “In addition, LGPs have completed less complex Strategic Plan tasks through their partnership budgets. Lessons learned from the work accomplished to date have helped develop a new Strategic Plan process. In this new process, SCE has worked with Energy Division staff to develop a framework for innovative Strategic Plan activities to be proposed by local governments.”			
21	public	29	Everything presented here appears to be repeated elsewhere in chapter. Revise for brevity.			
22	public	32,40, 48	Suggest changing decision makers to “gatekeepers”. Decision makers are elected or appointed officials not city staff, typically. If decision makers is used, come up with a defn. to go into an appx and use consistently and appropriately.			
23	public	39	First mention of RENs should be much closer to beginning of chapter. CCA coordination and response also needs to be addressed.			
24	public	38-47	These pages don’t offer a whole lot of useful new substance should be shortened to fit in a single page.			
25	public	47	Language is repeated verbatim from p. 27. Revise per request above and consolidate EMV discussion into one section within chapter. “The public sector is a newly defined sector, which will require conducting a number of M&V studies and performance analyses as outlined below.” ED staff doesn’t gauge why a newly defined sector would require a special study. In any case, if SCE believes that EMV is an urgent priority for the public sector, it’s advised to heed ED direction for EM&V (p.27) and retain qualified IOU staff to oversee and monitor.			
CPUC/CLN-1	Public	7	Please be clear about extent to which health care belongs in a profile of public			

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			buildings, vs. (private) commercial, or both.			
CPUC/CLN-2	Public	13, top	Refers to public sector climate action plans. Many of these target municipal buildings. Text does not discuss how these plans would impact public building sector, incl. e.g. meeting Energy Star or LEED building standards, applying benchmarking to help prioritize buildings for improvement.			
CPUC/CLN-3	Public	13	Some of the text here not relevant to public buildings, e.g. re: PACE and reach codes, streamlined permitting, ... Remove or improve applicability to public buildings.			
CPUC/CLN-4	Public		See 2004 attempt to characterize size of “public” buildings in California. Dated, but may be better than nothing if there is not more recent update.	2004 report attached to these comments.		
CPUC/CLN-5	Public	14	Profile data for Public Sector is lacking and text gives a weak excuse for not finding the data. Does not take a Navigant potential study to have data. Public sector buildings have LOTS of publicly-documented info on the kinds of EE measures they identify, take, save, and spend. See for example CEC data on Prop 39 K-12 schools, Community colleges data for Prop 39, UC and CSU partnerships, DGS State facilities partnerships, Corrections, CEC’s long-standing public building loan program and technical assistance. I also believe AB 758 attempted to characterize the public sector building stock. Moreover, LBNL for years has been tracking the ESCO industry (largely with public building clients) and the Federal Energy management Program (FEMP) that targets federal facilities, a good portion of which are in Calif. Also could query the CPUC EM&V data base for program participants with NAICS codes for public buildings, or some equivalent codes.			
CPUC/CLN-6	Public	16-22	You need to set priorities for the current laundry lists of barriers; pretty surprising that a 1996 source is your reference, given how much progress the public sector has made with EE and climate goals.			
CPUC/CLN-7	Public	23, 32	Budgets shown do not seem to reflect the 50-65% increase in savings goals, at least in the near term until strategies for financing manage to offset the need for incentives. What is the trajectory to get to the point of not needing incentives?			
CPUC/CLN-8	Public	25	Missing any discussion of lessons learned from SoCalREN’s local government facility technical assistance and turn-key implementation services.			

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CPUC/CLN-9	Public	25-32	More laundry lists of current products and services and (newer?) intervention strategies in long lists. This is lacking in a clear sense of which strategies will be deployed to overcome which barriers in which market segments or overall sector. P. 29 continues to prominently feature variety of incentives. How does this mesh with our p. 23 vision to move away from incentives?			
CPUC/CLN-10	Public	25 and 32	In the “budget and Metrics” opening text, SCE punts at coming up with budget estimates for its strategies, relative to savings goals it sets on p. 25. Seems SCE should be able to estimate market uptake given the strategies and incentives it imagines offering and their costs. In fact, the PA estimates may be INPUTS to the CEC’s targeting efforts, rather than the other way around.			
CPUC/CLN-11	Public	34	Metric #1 for financing and procurement, where the desired outcome is to “encourage greater customer investment in EE”, would be better to set the outcome metric as a \$ investment level.			
CPUC/CLN-12	Public	36 under “Coordination with partners”	Lists current local government partnerships. Will all these continue? Will they all or partially include activities that targets public buildings?			
CPUC/CLN-13	Public	39	Codes & Standards program discussion is very general. Hard to discern the value of intended strategies, expected outcomes, and relevant performance metrics.			
CPUC/CLN-14	Public	42	ETP discussion is general and not informative. Also seems backward in referring to a set of “traditional measures”, rather than viewing ET as the way to push the envelope on new(er) technologies, making the case for their application and performance, and learning how to disseminate and get uptake through appropriate market channels.			
CPUC/CLN-15	Public	42	Refers to the “education of decision makers” as WE&T? Is that a conventional definition? I would think that any persuasion targeting decision-makers would be more about marketing, not “WE&T”.			
CPUC/CLN-16	Public	49	Features ZNE Schools through Prop 39 funding. But I believe Prop 309 funding was only authorized for 5 years, likely to end around 2017 or 2018, is largely committed via plans filed with CEC, and applies primarily to retrofit situations. If retained, supply evidence of how ZNE schools will have 5-10-year future traction – with what impetus, what funding, what target segments?			
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			achieve ZNE". I would doubt that a single road map, can be that useful given the huge variety of climates, economic situations, facility ages, ... across the SCE territory. Refers to collaboration with Doe and NREL. This probably needs additional coordination with relevant school facility and business professionals in So. Calif.			
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