

Commenter: Please Fill In This Part Of The Form				For PA Use	
ORA-1	SoCal Gas	12-13	<ul style="list-style-type: none"> • There is no discussion of past programs and evaluation of past experiences. <ul style="list-style-type: none"> ○ The discussion of past programs should act as a benchmark for understanding current barriers and justifying and informing new strategies for addressing these barriers. ○ Lessons from EM&V need to be discussed or incorporated. 		
ORA-2	SoCalGas	13	<ul style="list-style-type: none"> • The large industrial customer segment requires additional discussion and articulation of goals and strategies for achieving savings. <ul style="list-style-type: none"> ○ The goal of increased adoption by small/micro industrial customers does not provide appropriate specificity. The goal should identify the amount of savings that could be achieved from this group, based on evidence, and describe past strategies and lessons learned to help educate potential bidders. This segment is only 8% of market share but the majority of the discussion and goals relate to this relatively small portion of the industrial class. Plan needs to address the 92% of gas usage by large industrial customers. 		
ORA-3	SoCal Gas	17-19	<ul style="list-style-type: none"> • Market Barriers are not documented -- each barrier is met using the same program strategies. <ul style="list-style-type: none"> ○ BP lacks specificity about how and why strategies will work and where and when they will be used. ○ Tables d.1-d.3 use the same set of overly broad strategies for each of the identified market barriers. 		
ORA-4	SoCal Gas	General	<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 SoCal Gas'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 SoCal Gas' industrial sector business plan will not be adequately vetted with stakeholders prior to filing. 		
ORA-5	SoCal Gas	37	<ul style="list-style-type: none"> • Performance metrics should have concrete targets in order to judge the success or failure of intervention strategies. <ul style="list-style-type: none"> ○ Metrics should also measure the quality of participation and progress towards goals such as energy savings rather than solely based on participation. ○ Targets should be specified. 		

Commenter Name: Sasha Cole

Commenter Affiliation: ORA

Program Administrator to receive feedback: SoCal Gas Industrial

Date 11/21/2016

			<ul style="list-style-type: none">○ 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 PG&E's goals are ambitious and achievable.○ Failure to specify the actual baseline and targets means that a crucial element of PG&E's public sector business plan will not be adequately vetted with stakeholders prior to filing.		
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