

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 #	PA	Page #	Comment	Integrated (Y/N)	Rationale for Y/N
ORA-1	LGSEC	18	<ul style="list-style-type: none"> • How does Program Administrator (PA) status solve data access issues encountered by Local Government Programs (LGPs)? <ul style="list-style-type: none"> ○ Improved data access systems are asserted in the Business Plan, but there is no clear argument or analysis that shows by a new PA would be effective in overcoming previous barriers to data access. 		
ORA-2	LGSEC	18	<ul style="list-style-type: none"> • Why is a new administrative entity a preferable and more cost-effective solution to LGP consistency issues than making LGPs a state-wide (SW) program under the new energy efficiency (EE) SW model? <ul style="list-style-type: none"> ○ It is unclear in the BP whether a SW program structure with an existing PA as the lead was considered and what the advantages are of establishing a new entity vs. the SW model. ○ Standing up a new PA is likely to be costly in early phases and could potentially create administrative redundancy and greater administrative cost. 		
ORA-3	LGSEC	2, 35-36	<ul style="list-style-type: none"> • How will a SW LGP PA ensure that ratepayer funds are used for projects that benefit ratepayer through avoided system costs when funds are pooled in a Climate Fund? <ul style="list-style-type: none"> ○ The CPUC approves EE program funding on the basis that it is more cost-effective for electric and gas ratepayers than alternative procurement resources such as renewables. ○ When funds are pooled in an integrated climate fund, there is a risk that electric and gas ratepayer funds will be used to support projects that do not lower the cost of providing reliable electric and gas service and therefore increase costs for ratepayers. ○ How will the SW LGP PA ensure that all ratepayer funds are used for projects that will actually lower electric and gas ratepayer costs and thereby benefit ratepayers? 		

<p><i>ORA-4</i></p>	<p><i>LGSEC</i></p>	<p>10, 20</p>	<ul style="list-style-type: none"> • How would a SW LGP PA ensure that this proposal does not undermine coordination of program offerings with the programs that continue to be offered by existing PAs? <ul style="list-style-type: none"> ○ Currently LGPs are coordinated with other program offerings through the utility PAs such that LGP customers also have access to audits, technical assistance, coordinated marketing efforts, and other program offerings. ○ If LGP programs are now administered by a separate entity, it will be more difficult to coordinate program offerings and some customers may experience fragmented offerings that limit the range and depth of assistance available to them. 		
<p><i>ORA-5</i></p>	<p><i>LGSEC</i></p>	<p>18, 30</p>	<ul style="list-style-type: none"> • Would a SW LGP PA be subject to CPUC portfolio cost-effectiveness requirements and other regulatory/compliance requirements? <ul style="list-style-type: none"> ○ The BP is unclear on what regulatory rules and compliance obligations LGSEC proposes the new PA would be subject to, including whether portfolio cost-effectiveness requirements would apply to the new PA’s portfolio. 		
<p><i>ORA-6</i></p>	<p><i>LGSEC</i></p>	<p>33</p>	<ul style="list-style-type: none"> • What responsibility would a new SW LGP PA have in meeting electric and gas reliability requirements and capacity constraints? <ul style="list-style-type: none"> ○ Investor-owned utilities use energy efficiency programs to help satisfy regulatory requirements for safe and reliable service at reasonable cost to ratepayers. ○ Since a SW LGP PA does not provide energy services, how would such an entity ensure that its programs are targeted to meet reliability needs and overcome local capacity constraints such that ratepayers do not lose these benefits when program funds are transferred to a new entity? 		

<p><i>ORA-7</i></p>	<p><i>LGSEC</i></p>		<ul style="list-style-type: none"> • What is the timeline for submittal of the information that all business plans are required to contain? <ul style="list-style-type: none"> ○ The current BP version lacks the basic information that is required of all PA BPs, including budget, intervention strategies, sample tactics, market analysis and targeting, performance metrics, and cost-effectiveness metrics. ○ Given the timeline for submittal, the absence of this information means that stakeholders will not have had a meaningful opportunity to vet and give substantive feedback on the BP proposal until it is filed with the CPUC in January. 		
<p><i>ORA-8</i></p>	<p><i>LGSEC</i></p>	<p>13</p>	<ul style="list-style-type: none"> • Why does LGSEC propose an alternative timeline for implementation of the CPUC’s third-party (3P) requirements in D.16-10-028? <ul style="list-style-type: none"> ○ The IOUs are required to implement a rebuttable presumption that all programs will be bid out to 3Ps in the BPs and to meet a minimum requirement of 60% 3P by 2020. ○ It is unclear whether LGSEC proposes that the new LGP PA would also be subject to the rebuttable presumption and on what timeline. ○ It is unclear why LGSEC proposes an alternate timeline (2024-2026) for compliance with the 3P implementation direction in D.16-10-028. 		