

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	Integrated (Y/N)	Rationale for Y/N
ORA-1	Commercial	3	<p>Observations</p> <ul style="list-style-type: none"> Obviously the goals have not been quantified yet. However, it seems that in some cases, even broad brush goals have not been established. This seems like a necessary first step before any 'plan' can be developed to reach these goals. <p>Recommended Action</p> <ul style="list-style-type: none"> SDG&E needs to set clear goals for the Commercial sector. One way to do this is to think about what needs to be achieved, what has worked in the past and what hasn't. The goals would seem to be to overcome certain barriers using new program design, or utilization of specific tech, etc. <ul style="list-style-type: none"> **** This is the most basic step. Without it there is no plan. **** 		
ORA-2	Commercial		<ul style="list-style-type: none"> Following on our observation on goal-setting, the 'background' sections should help establish these goals by assessing: what has been accomplished; what has not; and what technological, economic, or policy changes are happening or likely to happen and how will these effect your ability to find EE savings within the Commercial sector. One exception to this is the discussion of TOU rates on P.11, but the implications of this is not fleshed out. 		
ORA-3	Commercial		<ul style="list-style-type: none"> Currently the background sections read in a disjointed manner. There is some material for market characterization, but it is relatively superficial. The section on Legislative impacts seems disconnected from early discussions. There is no discussion of the consumption within the sector or the EE potential from past evaluations or potential studies. These would seem essential for setting reasonable goals. With the exception of the split-incentive issue, the economic motivation of small commercial actors are not really discussed. What are their main concerns and when are they likely to engage in investments that could be influenced? How can SDG&E do a better job or engaging them? 		

<p>ORA – 4</p>	<p>Commercial</p>	<p>Observations</p> <ul style="list-style-type: none"> <i>The BP Draft Chapter does not provide a framework within which 3rd party implementers might understand the needs of the Commercial sector and provide innovative offering to address them. (Insetad, this chapter seems to have been written with specific ‘solutions’ /programs already in mind.</i> <p>Recommended Action</p> <ul style="list-style-type: none"> <i>Many of our recommendations are already imbedded in the Observations above. In order for this chapter to provide really value as a guiding and regulatory document, the analysis of the market needs to be much more comprehensive and nuanced. For a good example, we recommend that you see PG&E’s draft on agriculture. This is what some members of the Coordinating Committee called a “gap analysis” although it would be something more comprehensive. That would lead to concrete, ambitious (but achievable) goals being articulated and the justification of a few strategic directives. The actual implimentaion of these strategies (what the BPs are calling tactics) could be brought forward by market actors who will be bidding on at least 60 percent of SDG&E’s 3rd party portfolio by year 5 of this cycle.</i> 		
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