

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

Comment #	PA(s)	Sector	Page #	Comment
CPUC_JST_01	PGE	C&S	5 (top)	<p>For activities related to “primary research and data collection” to support code change proposals, there seems to be a greater need for a statewide roadmap of data collection activities so this valuable data is not collected in a vacuum and all sectors benefit from this information. How does the data collected from ET activity, code activity, EMV, EPIC studies and program activity all work together over the next 5 years to better inform the programs. This came up this year with a C&S led data collection home inventory that is very similar to a Commission staff led in home lighting inventory scoping project. Staff only found out about the C&S study after the study was already complete. A statewide plan for data collection would help prevent duplicative efforts and perhaps strengthen the overall quality of the data we have to inform our activities in California.</p> <p>(Also WET mentions a data gathering plan on p.14 of PGE’s WET chapter)</p>
CPUC_JST_02	PGE	WE&T	21 (Table)	<p>I understand these are separate sections from PA’s and that each PA may have their own specific goals and thus metrics to follow, but should enabling activities like WE&T have at least some consistent statewide metrics that help the CPUC and others with a statewide lens to see the collective value of WE&T activities in achieving the state’s goal to double efficiency? The SDGE WE&T metrics on p.204 do not seem to have the same metrics as PG&E and thus would make it hard to combine, say, 5 years down the road to see how this sector is progressing.</p>
CPUC_JST_03	PGE	WE&T	21 (Table)	<p>For success criteria that are below the “Low” level or 50%, how will that be used? For example, if a metric is below 50% after the first two years, does that mean you would course correct some strategy or some approach of perhaps some offering and then see if that metric increases afterwards? Also, is the WE&T team considering a metric that would include some sort of simple pre or post test to get at the indications of “moderate or high knowledge gain” (for instance, ask a handful of questions before a series of trainings and then ask those same questions after a year of courses to see if the score has increased).</p>
CPUC_JST_04	PGE (although this could apply to all)	ET	5 (#2)	<p>Since the ETP program has been around in the EE portfolio for a long time, have the IOUs looked at how many ETP projects/idea/demonstrations have made it through to a full scale production program offering between 2006 through 2015? This would seem like a good indicator of ET success. Even if there are ET projects that did not make it through, are there reasons why that would help inform other parts of the portfolio across the state, for example are some ET demonstrations not ready for full scale implementation because the technology</p>

Commenter: Please Fill In This Part Of The Form

Comment #	PA(s)	Sector	Page #	Comment
				requires additional skill that could be gained through increased WE&T in that area.
CPUC_JST_05	PGE (though could apply to all)	Comm	10	PGE states “high tech customers are responsible for 22% of commercial electricity consumption yet have the lowest participation rate in EE reveals the need to target this segment to capture savings potential “but does the definition of high tech include high tech companies with long term sustainability plans and possibly higher levels of free-ridership. And are these definitions for “high tech” and “bio-tech” similar across the other PA’s?
CPUC_JST_06	PGE	Comm	28	The tactic “launch programs that integrate EE and DR offerings” is labeled as new but this sounds similar to the 2013-2014 Commercial PIP on p.17 that stated “..to encourage greater use of IDSM, IOUs will offer customer solutions that integrate..comprehensive EE, DR, Solar, and CHP...”
CPUC_JST_07	PGE	Comm	33	The tactic states to “continue to partner with manufacturers and distributors to make purchasing energy equipment easy and affordable” via the upstream and midstream channels. Which existing programs are these? A quick search of the 2013-2015 data shows the upstream programs are either Commercial HVAC or Primary Lighting or Commercial Deemed. Since Primary lighting is mainly residential, is this tactic mainly saying to continue the Commercial HVAC activity or is there a desire to expand beyond HVAC.
CPUC_JST_08	PGE	Comm	49	Curious is an annual customer participation metric is a truly meaningful annual metric. Since customers do not take an EE action every year it seems hard to make sense of year to year comparisons? Is there some other metric like the % or number of small business Square Foot touched each year?
CPUC_JST_09	SDGE	Com	45-46	Should the business plans try to define small commercial the same? SDGE uses average monthly demand < 20 kW while PGE uses annual consumption < 40,000 kWh. I haven’t looked at SCE yet, but it seems since most business plans and the AB 758 plan have identified small businesses as an important area to target over the next 10 years, shouldn’t these plans have at least a consistent definition for comparing this segment of the commercial sector?
CPUC_JST_10	SDGE	Res/Public	p. 17, 31 (res) and 84 (public)	Both the residential strategies and the public sector strategies in SDGE’s territory see the need to “empower leaders by equipping them with the knowledge to make informed EE decision (p.84 public) which is similar to helping inform the multiple decisions makers (p.17) and educate building owners (p.31). There is a curriculum developed by the California Lighting Technology Center called Light Rite that tries to target these decision makers. California has a lot of training that makes sure things get installed correctly, but what about the people making the financial decision - not the facility managers, necessarily, but those

Commenter: Please Fill In This Part Of The Form

Comment #	PA(s)	Sector	Page #	Comment
				non-technical building managers and building owners – if they knew more about these EE opportunities they might make decisions that would increase the number of high quality EE projects that even get a start in California.
CPUC_JST_11	Statewide	Res	overall	Generally, the business plan seems to be silent on what 2018 will look like in terms of residential lighting. True, federal code kicks in on 1/1/2018 which some PA’s interpret as meaning there will be no residential upstream lighting program, as we currently know it. But is there no plan for what could happen in California for residential lighting? Just because code kicks in on 1/1/2018 does not mean that every home will now have high quality LEDs. It seems that marketing, education and outreach will become important in 2018 and 2019 to focus residential customers to make better decisions with residential lighting. And even though the savings may be small, does that mean there is no room at all for rebates in 2018 and 2019. Especially since D.16-08-019 still identified the primary lighting program as one of the program to be administered statewide (even if moved to a sector in the business plans) this indicates that there is still some work to do and the business plans should reflect at least a two year strategy for residential lighting. For example, for 2018 and 2019 the statewide administrator for lighting will purchase 30 million high quality LEDs to be distributed across all delivery channels across the portfolio the first year, and 25 million high quality LEDs the second year. In addition, the marketing plan will include messaging and labeling efforts to inform residential customers of the high quality LEDs and their benefits. This really isn’t getting into implementation as it is the high level strategy. These longer lasting products would also be a benefit to the PA’s for net lifecycle savings.

Commenter—please replace **red text** with the information you wish to provide. Please submit completed comments to facilitator@caeec.org