

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	Industrial	9,10	<ul style="list-style-type: none"> • Assertions of fact or policy need to be fully supported by evidence and citation, not simply opinion <ul style="list-style-type: none"> ○ Example: assertion on p. 9 that recent market assessments studies provide specific technologies with EE potential has no citation and no discussion of what those specific technologies are or their EE potential ○ Example: description on p. 10 of industrial market trends needs to include specific citations with page numbers for each assertion that is made. The current list of general studies may or may not be relevant. 		
ORA-2	Industrial	11, Appendix B	<ul style="list-style-type: none"> • Discussion of applicable legislation and regulatory directives lacks discussion of the impact on the strategy and tactics in the plan <ul style="list-style-type: none"> ○ Example: list of applicable legislation on p. 11 and in Appendix B appears to have little or no relationship to the rest of the plan; not clear why any of this matters in this chapter 		
ORA-3	Industrial		<ul style="list-style-type: none"> • Doesn't take advantage of insights from past evaluations and other EM&V work <ul style="list-style-type: none"> ○ List of responses to recommendations and their influence on the BP in Appendix C is too vague; it needs to be clear how EM&V work has influenced the strategies and tactics in the plan. 		
ORA-4	Industrial		<ul style="list-style-type: none"> • The Goals, objectives, should be distinct from the programs <ul style="list-style-type: none"> ○ Plan appears to begin from current programs as self-evidently justifiable, rather than identify distinct goals and objectives that the existing and new programs address (or do not address and should be eliminated) 		
ORA-5	Industrial	14	<ul style="list-style-type: none"> • Studies that are referenced should be cited accurately and use best available recent information <ul style="list-style-type: none"> ○ Example: in discussion of market transformation on pp. 14, SoCalGas cites a 1996 paper on market transformation produced under an entirely different regulatory structure but fails to cite and discuss the 2013 ED MT white paper written by some of the same authors 		

<p><i>ORA-6</i></p>	<p><i>Industrial</i></p>	<p>17</p>	<ul style="list-style-type: none"> • Metrics do not align with the problem statement or intervention strategy <ul style="list-style-type: none"> ○ Example: Problem statement on p. 17 of EE process being complex and time consuming is not meaningfully measured by an increase in sector participation ○ Example: Problem statement on p. 17 of industrial organizational practices not realizing the benefits of EE is not meaningfully measured by increase in EE savings from process-related projects 		
<p><i>ORA-7</i></p>	<p><i>Industrial</i></p>	<p>25,</p>	<ul style="list-style-type: none"> • Solicitation philosophy is poorly developed and appears to be too prescriptive, leaving little design control in the hands of 3Ps <ul style="list-style-type: none"> ○ Example: program delivery description on p. 25 limits 3P design and delivery to the intervention strategies in the plan, which are too prescriptive: midstream EE equipment, comprehensive direct install, small industrial bundled measure, etc. These set up narrowly defined solicitations for very specific program activities which is not how we understand the Commission's intent for 3P programs. ○ The plan should development a solicitation strategy, schedule, etc 		
<p><i>ORA-8</i></p>	<p><i>Industrial</i></p>		<ul style="list-style-type: none"> • Absence of a budget makes it impossible to verify whether the budget aligns with strategy and plan <ul style="list-style-type: none"> ○ The absence of any budget information makes it difficult to understand what resources SoCalGas intends to commit to the sector and whether they are sufficient/reasonable given the plan 		