

## A. CAEECC Stakeholder Feedback

In D.15-10-028, the Commission adopted a stakeholder process associated with business plans. A statewide committee was established in January 2015 and was designated the California Energy Efficiency Coordinating Committee (CAEECC). Through the CAEECC forum, stakeholders provided ongoing input into the development of the Program Administrators' energy efficiency business plans as drafts were published on the CAEECC website. SoCalREN received input from 17 stakeholders and thoroughly reviewed each comment. Table 1 below captures the input applicable to the SoCalREN portfolio and provides notes to each comment. Comments were addressed individually and were applied as applicable to SoCalREN's approach to meeting its energy efficiency rolling portfolio objectives.

**Table 1. Stakeholder Feedback Submitted to SoCalREN Business Plan Draft**

Issue #	Sector	Topic	Issue	Reference Page #/Note
1	Residential	Business Plan Topic	Inclusion of consideration for AB 793 (energy management technology) in Business Plan	SoCalREN will educate ratepayers about energy management technology in its outreach to homeowners.
2	Residential	Business Plan Topic	Re MF programs--Does public housing belongs in the public or MF sectors?	If the public housing element is a multifamily building, it is served as part of the multifamily program sector.
3	Residential	Business Plan Topic	"Can we look at differential variations by climate zone in the Business Plan description of the challenges and solutions.	SoCalREN's Business Plan considers climate zone differences in reviewing proposed intervention strategies.
4	Residential	Market Barrier	A major market barrier to whole house upgrades is lack of consumer understanding of their benefits. Please quantify the monetary benefits for the average home owner for doing a whole house upgrade.	SoCalREN aims to quantify the monetary benefits of energy efficiency upgrades as part of the Business Plan intervention strategies.
5	Residential	Budgets	Proposed budgets need to align with program metrics	SoCalREN will align proposed budgets with program metrics in its Business Plan.

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6	Residential	Assertions of Fact	Assertions of fact or policy need to be fully supported by evidence and citation, not simply opinion	SoCalREN includes citations and evidence of claims in its Business Plan.
7	Residential	Market Barriers	Characterizations of market barriers and program attributes/accomplishments are vague, and asserted without documentation.	Where feasible and/or where quantified data exists, SoCalREN cites characterizations of market barriers in its Business Plan.
8	Residential	Metrics	Metrics are oriented to intermediate program outcomes but not to broader market effects	SoCalREN aims to address this in the business plan
9	Residential	Intervention Strategies	Intervention strategies are less specific. They either largely mirror ongoing activities and/or could be outside PAs ability to implement	SoCalREN aims to focus its intervention strategies on what can be accomplished over the 10-year Business Plan period.
10	Residential	Third Party Implementation	THE DRAFT BP'S DO NOT INCORPORATE THIRD PARTY PROCUREMENT REQUIREMENTS LAID OUT IN D.16-08-019.	Not applicable to Regional Energy Networks.
11	Residential	Metrics	In almost every draft chapter, the metrics (where they were addressed at all) lack clear definition, fail to focus on desired outcomes, lack targets and require data that may not be regularly available	SoCalREN has aimed to address this in the business plan.
12	Residential	Strategies	THE BUSINESS PLANS SHOULD PROVIDE A ROAD MAP FOR EACH PA'S STRATEGY DEVELOPING ENERGY EFFICIENCY PROGRAMS, AND PROVIDE CLEAR METRICS AND MILESTONES TO ALLOW FOR MEANINGFUL REVIEW.	The Business Plan is SoCalREN's roadmap to developing energy efficiency programs. Metrics and milestones for specific programs will be established in Program Implementation Plans.
13	Residential	Justification	Coherency, clear reasoning, and justification for activities, I am confused on how THIS BP works in relation to the IOU Service area BP – e.g. where some program activities are offered by the REN and perhaps other activities for the same market segment(s) are offered by IOUs. Further, how do these 2 relate to a “statewide” residential sector strategy?	SoCalREN has clarified areas where potential overlap may occur, and how the RENs and IOUs interact with the statewide residential sector activities.
14	Residential	Strategies	Not all the strategies are “key strategies” and in fact some sound like supporting activities. Nest or bundling as appropriate, and indicate where you have certain implementing tactics or supporting activities.	SoCalREN aims to distill intervention strategies to their core, listing specific tactics underneath those strategies, in the Business Plan.

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15	Residential	Multifamily	In Multifamily we need to know more about ownership profiles relative to the strategy for pursuing on-going relationships – would this be for a specific building, or with owners who have portfolios of buildings? I look forward to seeing more about how market demand will be driven via traction and success on green labels and MLS data.	SoCalREN believes this question is best addressed on a programmatic level as part of Program Implementation Plans. However, study of green labels and MLS data is included as part of the Business Plan intervention strategies.
16	Residential	LTSEEP	PA Business Plans should identify strategies to advance Strategic Plan / market transformation objectives (and other policy guidance), particularly as advanced in upstream/midstream interventions.	SoCalREN's Business Plan clearly identifies how our strategies advance the Strategic Plan.
17	Residential		Business Plans should clearly outline anticipated connections between SW up/mid-stream initiatives and long-term SW C&S initiatives, and how they will collaborate in support of the SP MT goals.	Not applicable to Regional Energy Networks.
18	Residential	LTSEEP	Clarify terminology in Plans to cite specific SP MT goals where these are discussed, rather than a general desire for market transformation.	SoCalREN's Business Plan clearly denotes when specific market transformation goals are discussed.
19	Residential	LTSEEP	For each SP MT goal that the PAs plan to promote, provide specific information on the investment level needed to achieve which SP MT goals via which specific strategies as outlined in the two Commission guidance documents cited above.	SoCalREN has aimed to address this in its business plan
20	Residential	Market Assessment & Gaps Analysis Issue	PAs residential business plans should explicitly address the idea of real estate engagement. There has been substantial investment in this area over the last 5 years, particularly through the RENs and it's highlighted in the Energy Commission's Existing Buildings Energy Efficiency Action Plan (strategy 4.1). Not clear in Market Assessments and Gaps that IOUs are considering this.	SoCalREN's Business Plan continues to identify opportunity in real estate engagement.
21	Residential	Intervention Strategies & Metrics	Suggestion of several "trigger points" to be considered in assessing residential market strategies	Although this will be covered in more detail in program Implementation Plans, SoCalREN does include a limited discussion of trigger points in its Business Plan.

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22	Residential	Intervention Strategies & Metrics	<p>The volume and pace of residential EE retrofits is low compared to California’s ambitious energy reduction goals as set forth in SB 350, AB 32, AB 802, AB 758, the California Long-Term Energy Efficiency Strategic Plan. If California is to realistically achieve its long term goals, the current approach to realizing energy efficiency in the residential sector will need significant overhaul.</p> <p>Increased commitment to workforce education and training whether as part of a Market Transformation program or a WE&amp;T program. Strategies might include improving access to technical training, job shadowing, mentoring, sales training, process improvement consulting, and other consultative activities. In addition, use program funding for Loan Loss Reserve (LLR) in order to buy down interest rate for homeowners and drive deeper market penetration. Similar programs have fixed interest rates starting at 2.75% APR. Appropriate Metrics: Penetration of market, participating contractors, savings per site on a segmented basis.</p>	SoCalREN includes a Loan Loss Reserve program in its Business Plan.
23	Residential	Market Assessment & Gaps Analysis Issue	PAs residential business plans should explicitly address the idea of real estate engagement. There has been substantial investment in this area over the last 5 years, particularly through the RENs and it's highlighted in the Energy Commission's Existing Buildings Energy Efficiency Action Plan (strategy 4.1). Not clear in Market Assessments and Gaps that IOUs are considering this.	SoCalREN’s Business Plan continues to identify opportunity in real estate engagement.
24	Residential	Market Assessment & Gaps Analysis Issue	PAs residential business plans should explicitly address the idea of real estate engagement. There has been substantial investment in this area over the last 5 years, particularly through the RENs and it's highlighted in the Energy Commission's Existing Buildings Energy Efficiency Action Plan (strategy 4.1). Not clear in Market Assessments and Gaps that IOUs are considering this.	SoCalREN’s Business Plan continues to identify opportunity in real estate engagement.

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25	Residential	Re: Residential/Multifamily	<p>While we understand many of the details for the other Program Administrators will be developed as part of the implementation plan, we want to draw attention to the BayREN multifamily recommendations as a model example for future efforts. We recommend that the PAs review the following sections:</p> <ul style="list-style-type: none"> <li>• Suggest reviewing BayREN entire multifamily section (pg. 2.21-2.30), as an example of a multifamily residential section that includes data, strategies, barriers and opportunities for the sector, and expand scope to include low income.</li> <li>• Suggest reviewing BayREN Figure 5 (Pg. 2.23) for example of characterizing multifamily.</li> <li>• Suggest reviewing BayREN Business Plan Figure 6 for example of program metrics (See p. 2.25, “BAMBE Completed Projects”).</li> <li>• Suggest reviewing SoCalREN p. 7 for characterization of different multifamily market segments</li> </ul>	E. Sector Overview, Target Audience
26	Residential	Residential/Multifamily	SoCalREN (p.8): Missing citations for footnote 14 and 15.	Citations added to E. Sector Overview

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27	Residential	Re: Residential/Multifamily	<p>We acknowledge that the BPs are for general efficiency programs, but given the ESAP direction on OBF and the requirement that general EE coordinate with ESAP multifamily efforts, it would be an informative and necessary strategy to include these characteristics.</p> <ul style="list-style-type: none"> <li>• Include market characteristics on multifamily residential sector, including low income multifamily. These characterizations could help inform a more descriptive approach to coordinating with the ESAP multifamily offerings (see CHPC-EEFA comment #8 for more information)</li> <li>• The general EE portfolio programs should serve those Low Income Multifamily buildings that are not eligible for new ESA program, and understanding the market is an important aspect of outreach to the sector. <ul style="list-style-type: none"> <li>• See ESA decision p.206, re: buildings that will be served under new ESA multifamily whole building programs: Eligible properties must meet the partial definition of deed-restricted in California Public Utilities Code Section 2852 (a)(A) further modified here. For this ESA Program multifamily effort, a property must be a multifamily residential complex financed with low-income housing tax credits, tax-exempt mortgage revenue bonds, general obligation bonds, or local, state, or federal loans or grants. The property must also house at least 65% of tenants with incomes at or below 200% Federal Poverty Guidelines, per ESA Program rules.</li> </ul> </li> </ul>	K. SoCalREN's Partners and Commitment to Coordination, Disadvantaged Communities
28	Residential	Re: Residential/Multifamily	<p>The annual program timelines for Energy Upgrade California Home Upgrade Multifamily Program and lack of secured long-term funding is a barrier to participation, and has the potential to impact the perception of the program's success. Further, whole building energy efficiency projects for large multi-family take considerable time to develop; for example, in affordable housing properties, a large scale EE retrofit would be developed and implemented over the course of 1.5 - 3 years. PG&amp;E and SDG&amp;E's EUC multifamily whole building programs currently have waiting lists, and uncertainty about the programs delays the pipeline, thus preventing households from being served.</p>	Statement

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			Business Plans should provide for guaranteed funding allocations for 3-5 years and work with CPUC and annual advice letter process to make this possible. This change will provide more market certainty for potential program participants. All Business Plans should include as a barrier: Multifamily projects take longer to cultivate and implement. See pp. 23-25 of the Cadmus Multifamily Study, <a href="http://www.energydataweb.com/cpucFiles/pdaDocs/1000/ESA%20MF%20Segment%20Study%20-%20Volume%201%20Final%20Report%2012-04-13.pdf">http://www.energydataweb.com/cpucFiles/pdaDocs/1000/ESA%20MF%20Segment%20Study%20-%20Volume%201%20Final%20Report%2012-04-13.pdf</a> , citing timing of upgrades and long-term planning as critical needs for owners and barriers presented by existing programs.	
29	Residential	Residential/ Multifamily	While recognizing the constraints posed by existing cost-effectiveness requirements, Business Plans should support the continuation and expansion of EUC multifamily whole building programs.	G. SoCalREN's Approach to Achieving Goals, Intervention 3 – Engage Public Agencies to Drive Energy Efficiency in Their Communities
30	Residential	Residential/ Multifamily	"All Business Plans should include strategies for coordinating with ESA multifamily programs. Given that some multifamily buildings will be excluded from the ESAP comprehensive MF offerings, we recommend PAs coordinate with the ESA program to leverage single end use offerings and	K. SoCalREN's Partners and Commitment to Coordination, Program Administrators
31	Residential	Re: Residential	Regions served by multiple PAs experience a profound lack of coordination and discordant messaging in regards to establishing priorities and implementing programs. Overlapping PA service territories creates additional administration costs and conflicting messaging to participating contractors and trade partners. Moreover, interpretation and implementation of state policy is often not aligned in overlapping territories causing confusion for implementers, contractors, and homeowners.	K. SoCalREN's Partners and Commitment to Coordination, Disadvantaged Communities, Table SoCalREN Coordination with Partners, Intervention Strategies 1-3 and Statewide
32	Residential	Missing issues and details	The REN Business Plans fail to address (or even identify) all the issues set forth in the applicable guidance decisions and raised by the CAEECC stakeholder process. (See e.g., D.15-10-028 at p. 47). In addition, numerous sections of the Business Plans are either cursory in nature, incomplete or entirely blank. As a result, the draft Business Plans are lacking in sufficient detail or content to allow for meaningful stakeholder input on a number of key issues. Examples of issues missing from the REN Business Plans include:	Comments noted and have been applied where applicable

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			<p>1. Business Plans fail to identify strategies to address the issue of poor workforce and installation quality resulting in underperforming energy efficiency measures and stranded savings opportunities. (See Guidance Decision D.16-08-019 at p. 63, fn. 24.)</p> <p>2. Business Plans fail to address the recommendations for increasing the demand for skilled workers set forth in the 2014 University of California, Berkeley, Donald Vial Center for Employment in the Green Economy (UCB-DVC) report, “Workforce Issues and Energy Efficiency Programs: A Plan for California’s Utilities.” (See D.1410-046 at p. 102.)</p> <p>3. Business Plans fail to identify goals, strategies or approaches to incorporate workforce diversity and inclusion goals into the contractor selection process. (D.12-11-015, Decision Approving 2013-2014 Energy Efficiency Programs and Budgets, at p. 84 (ordering IOUs to develop approaches to incorporate workforce diversity and inclusion goals into their third-party contractor selection process; see Guidance Decision D.16-08-019 at p. 63, fn. 24 (affirming continued applicability of prior workforce orders).)</p> <p>4. Business Plans ignore Decision’s recommendation to track measure installation quality over time as a metric. (D.15-10-028 at p. 52.)</p> <p>5. Business Plans fail to include transition plans to demonstrate the minimum level of third party delivery required by the Guidance decision. (Guidance Decision D.16-08019 at p. 74.)</p> <p>6. The Business Plans fail to identify which strategies will be coordinated statewide or regionally and who will be the lead administrators. (Guidance Decision D.16-08-019 at p. 102-103; D.15-10-028 at p. 47.)</p> <p>7. Business Plans fail to identify at least four downstream programs to be piloted on a statewide basis, including proposed lead administrator and other program details. (Guidance Decision D.16-08-019 at p. 111.)</p> <p>8. Business Plans fail to describe how collection strategies are embedded in the design of the program or intervention to ensure ease of reporting and near term feedback, and how performance will be analyzed during deployment. (D.15-10-028 at p. 47-48.)</p> <p>9. The Business Plans fail to identify or address inherent free ridership concerns with incentive programs. (See CEE-3).</p>	

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			<p>10. Business Plans fail to respond to prior comments and input provided by the CEE, including the CEE’s comments on the Draft Business Plan Chapters.</p> <p>11. Business Plans fail to describe the stakeholder process that will be associated with implementation plan preparation and fails to provide a proposal for oversight. (D.1510-0208, at p. 64; D.16-08-019 at p. 75.)</p>	
33	Residential	Statewide Administration	<p>The Coalition supports the Commission’s move towards statewide administration of upstream and midstream programs. This shift is a move in the right direction to improve customer participation and access, reduce transaction costs for customers and market actors, and increase in energy efficiency savings. The Coalition supports this effort and agrees that this transition will reduce portfolio overhead by eliminating redundant capacity and can potentially provide a bridge to more collaboration with the California Energy Commission (Energy Commission), California Air Resources Board (ARB), and public and municipal utilities. We further support the Commission’s decision to allow non-utility PAs to lead statewide programs.</p>	
34	Residential	SB 1414 Compliance	<p>Require HVAC equipment whose sale, purchase or installation has been subsidized by an incentive program to provide proof of code and permit compliance. Stakeholders have been recommending this for years, but it has taken the adoption of SB 1414 to get the PAs to agree to this requirement.</p>	J. SoCalREN and State Policy Goals, Table: SoCalREN State Policy Support
35	Residential	Re: pg. 17-18	<p>Residential PACE financing proposal Residential PACE financing leverage and integration with HUP offerings sounds like a smart approach. Would be even more valuable to CPUC if REN were able to provide some quantitative estimate tracking the magnitude of this "unregulated" financing sector.</p>	G. SoCalREN’s Approach to Achieving Goals, Intervention 1 – Integrate with Residential PACE to Drive Greater Energy Savings
36	Residential	Re: pg. 19-20	<p>"improvement data" proposal. What about persuading Zillow and others to offer a feature indicating EE improvement investment and estimated annual utility cost and comparing this with the average similar home in the area? What about taking the annual expected utility bill to the banks and federal mortgage regulators to have lower bills factored into formula for how large a mortgage a household can afford?</p>	G. SoCalREN’s Approach to Achieving Goals, Intervention 2 – Increase Access to Improvement Data that Demonstrates Benefits of Energy Efficiency and Table 7. Intervention 2 – Establish Benchmarking Data

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37	Residential	Re: pg. 30	<p>Strategy 4.1 Real Estate Value. Work collaboratively with real estate industry, underwriters, and financial agents to adopt property asset-related energy characteristics in building valuation and to integrate energy efficiency into all transactions.</p> <p>What about persuading Zillow and others to offer a feature indicating EE improvement investment and estimated annual utility cost and comparing this with the average similar home in the area? What about taking the annual expected utility bill to the banks and federal mortgage regulators to have lower bills factored into formula for how large a mortgage a household can afford?</p>	G. SoCalREN's Approach to Achieving Goals, Intervention 2 – Increase Access to Improvement Data that Demonstrates Benefits of Energy Efficiency
38	Residential	Re: pg. 23	<p>"PACE proposal. ""SoCalREN can also pilot midstream incentive programs that the IOUs are unable to administer by leveraging local government programs such as residential PACE. Contractors working in this high volume program can be incentivized to submit projects through a pilot designed to work seamlessly with the PACE financing option. By routing non-ratepayer funded projects through an approved pilot, SoCalREN can claim verifiable energy savings that have previously gone unverified."</p> <p>Proposal to track savings and receive credit sounds promising.</p>	Comment appreciated
39	Residential	Re: pg. 36	<p>P. 36 "Therefore, there must be a conscious effort by evaluators to adapt established evaluation methodology to the end of capturing the full impact of SoCalREN. "</p> <p>The CPUC has unlocked funding to allow the RENs to lead by example by conducting their own evaluation. One benefit of this would be to advance commonly accepted methodology for these niche PAs. What is SoCalREN doing to expedite its ability to embrace this opportunity. When will SoCalREN be ready to commit to undertaking evaluation activities?</p>	In 2018 SoCalREN will seek EM&V study opportunities
40	Residential	Residential	<p>"Please note that "REALTOR®" is a collective membership mark owned by the National Association of REALTORS® and is used by C.A.R. with permission. Guidelines for using "REALTOR®" can be found on the National Association of REALTORS®"</p>	E. Sector Overview, Target Audience
41	Residential		<p>Business Plans (BPs) should discuss all current and anticipated energy efficiency (EE) procurement activities, including those occurring outside of the EE programs funded through the BP application. The discussion should include potential overlapping</p>	SoCalREN has aimed to address this in its business plan as applicable

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			<p>activities; safeguards against arbitrage, double payment and double counting; whether additional EE procurements will count towards EE goals, cost-effectiveness requirements, and other metrics; and whether additional EE procurements will conform with Commission guidance in relevant proceedings including R.13- 11-005. o Potential procurement activities relevant to the BP include (but are not limited to) all-source solicitations, Integrated Distributed Energy Resources (IDER)proceeding procurements, and PG&amp;E’s Diablo Canyon application. o Methods for evaluating and measuring savings for any EE procured should be consistent regardless of whether it is funded through the BP applications or not. Any deviations must be justified.</p>	
42	Residential		<p>Solicitation strategies should be robust and sufficiently detailed to allow for meaningful review and oversight. o The solicitation strategies included in the introductory and sector chapters should include a discussion of not only the sectors that will be bid out and the schedule of the anticipated scope, size, structure, and phasing of solicitations and how the proposed solicitation strategy will meet Commission and program administrator (PA) objectives. o Solicitation strategies should provide analysis and rationale for the proposed bidding schedule and associated details.</p>	Is addressed in Section G of its Portfolio Summary
43	Residential		<p>BP applications should include detailed budget testimony that is sufficient to determine the reasonableness of the budget request. The budget testimony should include all elements PAs expect to record to the EE balancing account using a General Rate Case-type forecast and explain the basis for that forecasting sufficient detail to demonstrate the costs are reasonable. PAs should submit their testimony using a common format and common budget categories that are reasonable for EE program activities. Budget proposals should align with the objectives, vision, and strategies outlined in the BPs.</p>	Budgets are included in each Chapter of SoCalREN’s business plan
44	Residential	Re: Residential	<p>All Res BPs are insufficient in recognizing geography based barriers and barriers related to population density. Access to services in these regions is significant enough to warrant specific intervention strategies and alternative key performance indicators to more comprehensively measure program effectiveness.</p>	Statement

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45	Residential	Re: Solicitation Plans	<p>The PAs were directed by the California Public Utilities Commission (CPUC) to outsource a minimum of 60 percent of their portfolio by 2020. This will likely result in a major shift in how programs are developed and will have a significant impact on procurement approaches. Only two PAs, Southern California Edison and San Diego Gas and Electric (SDG&amp;E), provided draft language on this topic and then only with limited detail.</p> <p>The Efficiency Council respectfully requests all the PAs (investor-owned utilities (IOUs), regional energy networks, community choice aggregators, and local governments) add the material below to a solicitation-process section in the business plans. Inclusion of this information will allow market actors to effectively prepare to respond to solicitations and support a vibrant and competitive market that can offer viable and cost-effective solutions. We believe that it is in the interest of the PAs, ratepayers and third parties to facilitate a robust market for energy efficiency services. The information requested is critical for the market to prepare to deliver the resources where and when they are anticipated to be needed by the PAs. Only by planning ahead with clear roles, processes, and schedules, can we efficiently bid and process virtually the entire California energy efficiency portfolio in the next three years. A big cost to all parties would be to have the solicitation and contracting processes derail due to poor planning. California Energy Efficiency 1535 Farmers Lane, Suite 312 Telephone 503-810-1155 Industry Council Santa Rosa, California 95405 <a href="http://www.energycouncil.org">www.energycouncil.org</a>.</p> <p>Another big cost would be if current programs are disrupted because of lack of adherence to contracting and transition schedules. Consequently we urge the PAs to work with the procurement (or peer) review groups (PRGs) and the CAEECC to clearly delineate the “existing program to new activities” piece of the transition. In California, the acronym “PA” means “program administrator.” However, given the clear direction to move toward third-party design and implementation of programs, and the ever increasing importance of utilities (and others) as administrators, we urge PAs to think of themselves as “portfolio administrators.” No other entities are assigned with the responsibility and task of managing the portfolio of programs and research on behalf of ratepayers. As such, thinking deeply about when and how to acquire the desired</p>	Not applicable to Regional Energy Networks.

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			<p>resources is a crucial piece of a PA’s performance – yet less than three pages of the business plans address this subject in the thousands that were produced for the draft plans. Similarly, the IOUs have executed energy efficiency solicitation and contracting for years, but there is no mention in the business plans of how the new solicitations will be conducted over the next three years, what kind of peer or procurement review process will prevail, and an estimate or template of a schedule.</p> <p>We summarize below requests made by both the Efficiency Council and other stakeholders during prior CAEECC meetings with some supplemental recommendations for information that should be included in the solicitation section for each PA’s plan:</p> <p>Explanation of the overall strategy. For example, is the PA going for big volume/low cost first? How will it fill niches? Replacing oldest programs first or underperforming areas?</p> <p>A clear schedule of when procurement solicitations will be released in each area, and when the solicitation process is expected to be completed. SDG&amp;E’s schedule shown on page 12 is a good start but additional detail is requested to inform the market;</p> <p>A description of the types of solicitations planned over the schedule (e.g. open program requests for proposals (RFPs), targeted program RFPs, request for offers RFOs, master-service agreements or other vehicles). This would also include the types of requirements that a bid might contain, such as any guarantees;</p> <p>An estimate of the desired savings and budget (at an appropriate level) for each area over the next three years to achieve at least 60 percent third-party implementation;</p> <p>An estimate of the cumulative third party program percentage anticipated each year through 2020 as programs and services are contracted to reach more than 60%;</p> <p>An explanation of which activities will be held internally and why;</p> <p>A description of procurement for emerging technologies and new innovations over time (for example, will funds be reserved for this every year? If so, how much and when will the solicitations happen?); and</p> <ul style="list-style-type: none"> <li>• A commitment that all RFPs will be publicly posted on the “Proposal Evaluation &amp; Proposal Management Application” web</li> </ul>	

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			site, even if they are also posted elsewhere. There need to be one guaranteed location where all bidders can find the RFPs.	
46	Residential	Re: Moving bids to contracts	"The Efficiency Council is particularly concerned about ensuring a smooth and fair process to move from bids to contracts. While a CAEECC subcommittee is working on this issue, including the role of a peer or procurement review group and an "independent evaluator," the PA's business plans should outline how the PAs will move from bids to signed contracts on an expedient schedule with the right level of CPUC and stakeholder oversight. The "bid to contract" schedule as a template and the roles and responsibilities of invested parties is crucial to have settled as soon as possible ahead of business plan approval since it will likely take well over a year to execute the solicitation process after approval. Now is the time to describe the process at a "template" level in the business plans.	Not applicable to Regional Energy Networks.
47	Residential	Re: Reducing costs by combining and standardizing efforts	We would like to see each PA commit to working with the other PAs to standardize some aspects of the solicitation effort. For example the basic solicitations could have the same structure and request the same types of information at the general level, thus reducing the cost of market actors to respond.	Not applicable to Regional Energy Networks.
48	Residential	Re: Strategic energy mgmt.	The Efficiency Council greatly appreciates the PAs choice to remove Strategic Energy Management (SEM) from the list of statewide (SW) downstream programs. As we have previously commented we continue to urge the PAs to develop SEM as a tool or approach that can be used by any implementer to work with customers to deliver savings. We hope that the final business plans reflect this opportunity. We would also urge the PAs to include opportunities for implementers to participate in discussions on how to get SEM off the ground throughout the state, since they will have valuable input on the structure of the approach.	Comment noted
49		Re: clarification on purpose of statewide downstream pilot	The current draft plans do not include a description of the SW downstream pilots because the energy efficiency target area and lead PA were identified very late in the process. However, when the downstream pilots are included in the January filings, we encourage the PAs to facilitate a discussion with the CPUC and stakeholders on the purpose of the "pilot." Our interpretation of	Comment noted

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			D.16-08-019 is that that the intent is to ensure that SW programs are “uniform” and reduce costs, but we suspect there may be other attributes that the pilot is intended to test. It would be helpful to know the hypothesis being tested in piloting downstream programs before they start so that the success of the pilots can be properly evaluated.	
50	Public	Market Assessment & Gaps Analysis Issue	SCE owns over 80% of the streetlights in the WRCOG sub-region. My question is simply this “How will the business plan reflect an energy savings potential of an opportunity (retrofit of streetlight, for example) that local jurisdictions do not have any control over.	Question should be addressed to SCE because it refers to LS1 streetlights owned by them.
51	Public	Market Assessment & Gaps Analysis Issue	The Rural Hard to Reach working group (RHTR) drafted recommendations for the Public Sector Business Plan (PSBP) is to provide Program Administrators (PA) specific feedback on barriers and drivers observed while serving rural. The recommendations identify three key barriers in delivering energy efficiency services to the public sector in rural areas. The PSBP must capture program design elements that support improved program delivery that addresses the key attributes of the public sector while limiting the creation of new barriers. In the short term, RHTR agrees the proposed barriers and associated drivers are applicable to the represented territories. RHTR has identified three key barriers in delivering energy efficiency services to the public sector in rural areas. The PSBP must capture program design elements that support improved program delivery that addresses the key attributes of the public sector while limiting the creation of new barriers.	SoCalREN agrees that new barriers should not be created and as designed its program accordingly.
52	Public	Intervention Strategies & Metrics	K-12 Public Schools often lack the resources and expertise needed to execute efficiency projects. Schools are currently being “touched” and approached by many entities (utilities, third party programs, government partnerships, solar companies, ESCO’s, construction management companies, etc.) with overlapping or competing offerings creating confusion for school districts to know which path to take to improve facilities and spend Prop 39 funds. This leads to slower uptake of projects and slower disbursement of Prop 39 funds, and in some cases lost opportunities.	SoCalREN’s public sector Intervention Strategies 1 and 2 directly address this comment. SoCalREN’s one-stop, integrated solution addresses the unique needs of for K-12 schools to complete energy efficiency projects build the platform for ZNE.

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			<p>PA's should be considering a more streamlined approach with fewer overlapping and competing offerings and incentives to help schools navigate this complex landscape. Some of the offerings that schools will be approached with by outside entities (solar companies, ESCO's, construction management companies) will not be something the PA's can control, but streamlining PA offerings including partnership and third party programs will help.</p> <p>Even with streamlined programs the range of projects options available to schools will still be complex and varied. Supporting schools' energy project planning can accelerate program participation by prioritizing efforts and ensuring budget and resources are available. Strategic Energy Management (SEM) is one type of approach that can address this need, by offering consultant support to assess current operations and set goals, determine the full range of potential improvements, and support the development and implementation of a multi-year energy plan. The energy plan would be comprehensive (all measure types) enabling the school district to create a long-term plan with short-term milestones. The SEM umbrella might also help in addressing the differing energy savings estimation approaches between the various programs. This strategy would strongly benefit from longer program cycles to ensure long term program success and help support longer lead time projects with small installation windows. Finally, an SEM approach over a longer term would help ensure that the value and benefits that have accrued to schools through the Prop 39 mandate are sustained beyond the end of the funding provisions and life of the Prop 39 initiative.</p>	
53	Public	Intervention Strategies & Metrics	<p>With respect to retro commissioning programs targeting the public sector (including analytic software-enabled programs), project results have been very encouraging but overall market penetration is still very low and project throughput is often slow. In addition there is evidence that savings are being stranded by the current program/regulatory approach.</p> <p>1. Intervention strategy #1: Provide holistic support for public sector energy management &amp; project planning.</p>	SoCalREN incorporates retro-commissioning support for public agencies as part of its Public Sector Intervention Strategy 1.

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			<p>2. Intervention Strategy #2: Collaborate with public sector and other agencies such as the Energy Commission to establish funding (such as a revolving loan fund) to support public sector equipment repairs that are ineligible for utility program funding.</p> <p>3. Intervention Strategy #3: Workforce development initiative to train HVAC contractors to deliver operational savings to small public buildings in rural areas.</p> <p>4. Intervention Strategy #4: Provide incentives for meter installation on master-metered campuses and/or allow meter costs to be included in customers' project costs for comprehensive projects (such as RCx).</p>	
54	Public	Intervention Strategies & Metrics	<p>A) Moving Targets. Continuous rule, practice, and incentive revisions impairs the ability of Public Sector customers like UC and CSU to create strong financial proposals to successfully compete for limited funding to implement energy efficiency projects.</p> <p>B) Decreasing Incentive Levels. Eligible incentive dollars per project cost dollars spent have been decreasing over the last five years for higher education customers, which has decreased the volume of energy efficiency accomplishments at a time when statute requires a doubling of energy efficiency goals. These reductions have effectively forced the Universities to make their energy efficiency programs less comprehensive.</p> <p>C) Self-generation. Public Sector customers with significant self-generation (primarily cogeneration, an ARB recognized carbon reducing technology) have become ineligible for program resources due to administrative revisions to eligibility tests (annual vs. hourly). This exclusion has stranded UC and CSU campuses with large cogeneration systems from full program participation.</p>	SoCalREN does not serve the higher education market. This is a statewide program led by SCE.

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			<p>A) Moving Targets. UC and CSU recommend that during a program cycle, the base policy rules and incentive eligibility determinations remain stable for Public Sector customers once a project application is approved. In addition, to the extent any work papers are applicable, specific EUL, IMC and energy savings values should be established for Public Sector customers.</p> <p>B) Decreasing Incentive Levels. In compliance with AB 802 and SB 350, programs would transition to meter-based savings from existing conditions with incentives that are not impacted by uncertain administrative mid-stream adjustments. In addition, UC and CSU recommend that a public sector factor should be developed and applied to any remaining deemed energy savings measures implemented in the public sector to account for the higher costs of implementing construction projects in the Public Sector.</p> <p>C) Self-generation. In compliance with AB 802 and SB 350, programs would measure savings at the meter, which would provide real savings to the customer with a more straightforward accounting methodology, as opposed to limiting eligibility before a project begins based on a static baseline projection, and excluding carbon reducing and valuable preferred resources to the grid mix.</p>	
55	Public	Intervention Strategies & Metrics	To address the rural communities, could there be “rural adders” where companies get an added bump when they serve that community? Also need	SoCalREN does not provide incentives nor does it certify contractors.

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			contractors who are certified to do the work well. How can we address this?	
56	Public	Market Assessment & Gaps Analysis Issue	In response to statements by the Coalition that there are major unmet needs for EE in the MUSH market, the PAs asked for data to support the statements. There do not appear to be Commission-sanctioned potential studies that address the PAs' precise questions, because the recent potential studies have used the Title 24 and Industrial Standard Practice baselines, and so identify only a fraction of the available EE resource. Also please note that my goal in presenting this data is not to disparage or challenge the work of the PAs, whose program portfolios have been restricted within the confines imposed by Title 24. But I think we need to take a step back from those confines to see the true market potential that has been made available by AB 802.	SoCalREN agrees there is significant unmet potential.
57	Public	Market Assessment & Gaps Analysis Issue	There are major unmet needs for EE and EE funding in key MUSH market sub-sectors. See document PS0259 on CAEECC	SoCalREN agrees.

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			<p>website for details on large gaps between various MUSH sector EE funding requirements versus funding available from PA programs, historically.</p>	
58	Public	Business Plan Topic	<p>Comment confirming that it would be extremely helpful for PAs to identify specific market barriers in documents that get filed with BPs with respect to challenges with MUSH markets. It is recommended that PAs make persuasive arguments to CPUC supporting continuance of certain market transforming programs even if they are not non-costs effective programs. In addition to identifying barriers, PAs should provide alternative mechanisms to remove barriers.</p>	SoCalREN agrees.
59	Public	Business Plan Topic	<p>Public Sector: Business plans should articulate a vision to have this sector lead by example in every possible way. Data-driven ME&amp;O is needed to demonstrate the benefits of efficiency to institutional decision makers. There is great opportunity to use college students and community workforce</p>	<p>SoCalREN's business plan articulates a vision in which the public sector plays an active leadership role in shaping ZNE communities that are safe, secure, resilient, affordable and sustainable. SoCalREN's public sector Intervention Strategies 1 through 4 articulate how this is accomplished by public agencies leading by example and engaging their communities. Intervention 3</p>

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			<p>development participants in WE&amp;T activities such as customer recruitment, project implementation, and data analysis and data infrastructure development. Local and regional organizations could also play a new role as aggregators for community and institutional energy savings bid into IDSM/EE P4P auctions. Creative financing options could be piloted first with the public sector. The CEC is piloting an effort with Sonoma County to provide much better energy savings estimates for the built environment within Sonoma County's climate action planning efforts. The CEC would like to see other local governments leverage the open source data and energy reduction estimation techniques developed in this pilot. The PA business plans should include high level strategies that communicate this important connection to local government GHG reduction mandates.</p>	<p>specifically addresses the need to leverage open source data and shared database, along with regional energy master planning.</p>
60	Public	Business Plan Topic	<p>For all IOU PAs, (see Input Document [PS0295] for more information) Observations</p>	<p>This comment only refers to IOU PAs.</p>

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			<ul style="list-style-type: none"> <li>All IOU PAs were effective at identifying unique barriers in the Public Sector</li> <li>PG&amp;E provided detailed strategies at the sub-segment level (i.e. Higher Education), which is most effective based on the significantly different customer needs by sub-segment</li> <li>No mention of statewide consistency across IOU PA approaches for the same customer or sub-segment</li> </ul> <p>Recommended Action IOU PAs should coordinate strategies based on PG&amp;E's sub-segment approach to address varying customer needs and statewide consistency</p>	
61	Public	Intervention Strategies & Metrics	Give every local government or local government partnership an EE expert or pool together resources to get someone for each region.	SoCalREN's public sector Intervention Strategy 1 specifically addresses this by creating shared access to expertise, tools, project management and other resources that enable agencies to complete energy projects in half the time.
62	Public	Intervention Strategies & Metrics	There were many mentions of strategies to use data for improved and informed decision-making, but these strategies should be outlined in the business plans. BP should highlight the strategies that address or reduce the issues of program timing, uncertainty of funding and long approval processes.	SoCalREN's public sector Intervention Strategy #3 describes the proposed approach to develop regional strategies for improved data and informed decision-making
63	Public	CA Regulator or Policy barrier	Re SDG&E Public Sector & Statewide Public Sector. See SANDAG-1 [PS0302]	This applies only to the SDG&E Business Plan.

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			<p>Request for a Statewide Study on The Influence of Local Climate Action Plans on Energy Efficiency Program Participation. This should look at long- term influence – 5, 10, 20 years.</p> <ul style="list-style-type: none"> <li>• Within a service territory, the local CAP implementation measures related to energy should be considered during energy efficiency program design, marketing, implementation, and performance monitoring. Specifically, energy efficiency programs should clearly demonstrate how they reduce GHGs and thereby help local governments and others in meeting CAP targets.</li> </ul> <p>*Clear direction from the CPUC to the PAs on data-sharing at the jurisdiction/ town code level is needed.</p> <p>GHG reductions should receive equal weighting with energy savings. Energy programs now fall under implementation of state climate goals and laws but treatment of GHG reductions has not been integrated into the way energy programs are decided on at the utilities and CPUC.</p> <ul style="list-style-type: none"> <li>• Suggestion for both the State and Utility: Progress should be made on integrating distributed energy resources with energy efficiency. Energy efficiency could be further defined as the first measure of DER. Through energy efficiency, additional onsite measures could be sized more economically (e.g., needing fewer solar panels or inverters with reduced energy usage).</li> <li>• Programs should either be designed to include the suite of distributed energy options under one program, or have programs from energy efficiency and DER designed in tandem and become complimentary to each-other (e.g., an energy efficiency program and SGIP).</li> <li>• Suggested Statewide Study: Impacts and Benefits of Expanding the Energy Efficiency Component of the PPP to address a Customer-Side Preferred Loading Order: Integrating Energy Efficiency and Distributed Energy Resource Programs under the PPP.</li> </ul> <p>*Request for a Statewide Study: Energy Usage in</p>	

Issue #	Sector	Topic	Issue	Reference Page #/Note
			Older Buildings by Service Territory. See SANDAG-4 in [PS0302]	
64	Public	CA Regulator or Policy barrier	<p>This feedback relates more to Statewide suggestions for the Business Plans and Rolling Portfolio Cycle than to a specific piece of the SDG&amp;E Public Sector Chapter. See [PS0303]</p> <p>Suggest that the Commission should allow PPP funds to be used for the top 3 measures in the Preferred Loading Order. PPP could be applied to a “preferred loading order for the customer- side of the meter.” Measures could be prioritized or mandated in order of efficiency to DER. Here again the treatment of GHG reductions along with energy savings plays a role.</p> <ol style="list-style-type: none"> <li>1. Energy Efficiency (including performance controls),</li> <li>2. Demand Response (including performance controls),</li> <li>3. Distributed Energy Resources (including performance controls).</li> </ol> <p>Suggest that the Commission should consider integration of energy efficiency and DER funding in terms of Codes and Standards also. In 2020, the first ZNE code becomes effective. Traditionally the PPP energy efficiency dollars have been used for code compliance, code training, and code development.</p> <ul style="list-style-type: none"> <li>• When ZNE is code, will the PUC only allow PPP to fund the energy efficiency code component?</li> <li>• What will be the source of funding for the rest of the energy code?</li> </ul> <p>See [PS0303] page 3 for three possible solutions to cost effectiveness of Transformational Programs.</p> <ul style="list-style-type: none"> <li>• Would legislation need to be passed for the Commission to be able to direct PAs to use their PPP energy efficiency funds for energy efficiency, DR, and DER?</li> <li>• It seems that energy policy is coming up to a big merge rather than a fork in the road and</li> <li>• The Commission has the opportunity to break down some silos between proceedings and subsequent silos across PA departments.</li> </ul>	SoCalREN agrees that EE program activities need to be integrated with DER activities. Such integration is critical to achieve a ZNE future.

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			<ul style="list-style-type: none"> <li>The Public Sector is an essential tool for driving market transformation as PAs, Implementers and users of energy efficiency programs. For a greater uptake in program participation by the public sector, the value proposition introduced to public agencies must:               <ul style="list-style-type: none"> <li>1) Speak the language of that customer and</li> <li>2) Address or connect to that customer class' highest priorities.</li> </ul> </li> </ul> <p>SDG&amp;E and other PAs should look at the value proposition for public sector while they are designing programs, and structure the programs around that.</p>	
65	Public	Intervention Strategies & Metrics	<p>Re All PAs' Public Sector chapters. See RTHR-1 in [PS0305] PAs should work with stakeholders to develop a statewide framework that allows for program consistency and transparency throughout the state while allowing for localized autonomy for the PA and stakeholders.</p>	<p>The CPUC has not designated public sector programs as statewide.</p>
66	Public	CA Regulator or Policy barrier	<p>RHTR 2 in [PS0305]          Use the Societal Cost Test or the California Energy Commissions Savings to Investment (SIR) ratio as incremental steps in the right direction while exploring more robust cost-effectiveness tests that internalizes, for example, the following:</p> <ul style="list-style-type: none"> <li>GHG reductions</li> <li>Human health and safety gains o Reduced environmental impacts</li> </ul> <p>Localized economic multipliers</p>	<p>SoCalREN does not have any authority over cost-effectiveness methodology or tests.</p>

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67	Public	Intervention Strategies & Metrics	<p>RE SCE Public Sector Stage 2 doc, RHTR 3 of [PS03045]</p> <p>Observations</p> <ul style="list-style-type: none"> <li>PA states increased number of reach codes as a metric for Problem Statement One.</li> </ul> <p>Recommended Action</p> <ul style="list-style-type: none"> <li>PA should reconsider using increased number of reach codes as a metric.</li> </ul> <p>Consideration improvement over baseline AND number of reach codes adopted would be more equitable.</p>	Not relevant to SoCalREN.
68	Public	Intervention Strategies & Metrics	<p>Re SoCalREN page 4 and PG&amp;E pg. 13, RHTR 5 see [PS0305]</p> <p>Observations</p> <ul style="list-style-type: none"> <li>PA presents staff education and training for CEM and Strategic Energy Management (SEM) to address Lack of Capacity problem statement</li> <li>PA presents expanded training as a solution to lack of capacity.</li> </ul> <p>Recommended Action</p> <p>We recommend other PAs consider this localized approach to building capacity.</p>	SoCalREN agrees.
69	Public	Intervention Strategies & Metrics	<p>Re PG&amp;E Stage 2 Public Sector Document, RHTR6 in [PS0305]</p> <p>Observations</p> <ul style="list-style-type: none"> <li>PA recommends the integration of behavioral programs as a solution to Increase the Relevancy of PG&amp;E Portfolio</li> </ul> <p>Recommended Action</p> <p>We caution the PA in using behavior programs as a strategy under the current evaluation model.</p>	This comment pertains to PG&E.
70	Public	Chapter Drafts (Voluntary)	<p>Include \$1 million annual funding for a new partnership with</p>	SoCalREN does not service state agencies.

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			<p>Administrative Office of Courts (AOC). CA Department of General Services is not involved in ownership, operation or contracting for the AOC facilities. Include additional funding for in depth audits.</p>	
71	Public	Statewide Admin Discussion	<p>Create a long-term sustainable program to help the California Administrative Office of Courts (AOC) substantially reduce its energy use. The AOC Statewide Partnership Program (AOC Partnership) would fund a team of energy professionals through the energy efficiency public purpose program to assist the AOC to plan, evaluate, and implement projects to reduce facilities' energy use. The proposed budget for the program is approximately \$1 million per year (approximately five professionals at an average fully loaded cost of \$200,000 per person). The IOUs will select the team through a competitive process and contract with it to assist the AOC in the following services:</p>	SoCalREN does not service state agencies.

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72	Public	Chapter Drafts (Voluntary)	#1 - The state is interested in more creatively exploring other options for project execution and is strongly reaching out to IOUs and other program administrators to be a partner with us in finding creative solutions. Adapting OBF to include upfront construction costs would help to enable the state to leverage this financing approach. Most of the projects in large state buildings exceed the current \$1M limit for financing via OBF. Increasing this limit would address another barrier.	SoCalREN does not service state agencies.
73	Public	Chapter Drafts (Voluntary)	#2 - There is a need to more strategically identify the retrofit opportunities with the highest and most comprehensive savings potential long term. Implementing investment grade audits for all buildings would be cost prohibitive. The state is seeking support from IOUs and PAs to provide this strategic targeting support.	SoCalREN does not service state agencies.
74	Public	Chapter Drafts (Voluntary)	#3 - It is critical that the state utilizes a fair, appropriate, transparent, competitive process in soliciting work. Given those parameters, the state is seeking support in executing retrofit projects that comply with these requirements while offering more time saving and efficient approaches.	SoCalREN does not service state agencies.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<ul style="list-style-type: none"> <li>The state is exploring alternative models for engaging with ESCOS more effectively, at lower costs and more timely execution. The Federal Government has effectively modeled an energy services relationship with the IOUs that may be modified to work with State entities. We encourage the Partnership to work with us to develop alternative ways of delivering efficiency projects to state customers</li> <li>The state is open to piloting metered based savings approaches with incentives tied to measured savings</li> </ul> <p>Extending the current direct install program to small/medium state facilities statewide would help to save time and resources. Further expanding the direct install program to include HVAC measures and control measures would capture a larger portion of the current needs.</p>	
75	Public	Chapter Drafts (Voluntary)	NRDC-1 - (throughout) There seems to be a lot of extra prose. The definitions are extremely helpful, but seems that it could be an Appendix instead of as part of the actual BP.	SoCalREN agrees and has modified its business plan accordingly.
76	Public	Chapter Drafts (Voluntary)	NRDC-2 - (re beginning of document) Very little market characterization. It's unclear what the main end uses are, where the highest need is, etc. It is understandable that there isn't sufficient "public" data but there were examples in the Phase 1 presentations (e.g.,	SoCalREN's business plan will include market characterization data to the extent that is available from the IOUs.

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			SDG&E's is a good model). See data recommendations in "NRDC Feedback for All PAs" (Input Source Document).	
77	Public	Chapter Drafts (Voluntary)	NRDC-3 - (page 28-29 as an example of throughout) It's a bit challenging to clearly see the link between barrier/strategy/etc. With so many pages of text to be read by ED and stakeholders, the PAs should strive to make the information as easily digestible and succinct as possible. See "NRDC Feedback for All PAs" for helpful table formats	SoCalREN agrees and has modified its business plan accordingly.
78	Public	Chapter Drafts (Voluntary)	NRDC-4 - (re Throughout and p.34 as an example) It's unclear what exactly SCE proposes to do with the various intervention strategies. In table 6, there is a list of generic intervention strategies. However, this doesn't inform the reader of what approaches are being considered to solve the barrier or reach the desired sector outcome. NRDC urges SCE to look at the other chapters and comments to add appropriate level of detail.	This refers to SCE.
79	Public	Chapter Drafts (Voluntary)	NRDC-5 - P.34 – missing "baseline" as a column. The "metric source" seems to be what the baseline should be. P.36 – NRDC is "natural" not "national"	This refers to the SCE business plan.

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			P.45 – is EAP intended to be ESAP (Energy Savings Assistance Program) or a more general term?	
80	Public	Chapter Drafts (Voluntary)	#2 - (re page 3) Sector profile should be simplified and made more useful by relying less on mentions of recent legislation. Section should come after a useful disclosure that catalogues all actors, sub-sectors, and primary EE funding categories.	SoCalREN agrees and has modified its business plan accordingly.
81	Public	Chapter Drafts (Voluntary)	#3 (Re page 5-6) Section should be edited for brevity and should follow a new section that would include a useful disclosure that catalogues all actors, sub-sectors, and primary EE funding categories. Digressions such as a scale issue could go into an appendix. Table 2 would work better as a Venn Diagram since UC/CSU are state agencies and K-12 is a local govt animal.	This applies to the SCE business plan.
82	Public	Chapter Drafts (Voluntary)	#4 (re page 10) Sector should be edited to focus on Strategic Plan framework and renamed. Remainder could go into an appendix. Should follow a new section that would include a useful disclosure that catalogues all	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			actors, sub-sectors, and primary EE funding categories.	
83	Public	Chapter Drafts (Voluntary)	#5 (re page 14) Move LGP description to a new opening section that fully describes actors and agencies SCE is targeting in public sector. Change “promote three categories” to “advance six goals”. Add capacity building and constant improvement; peer to peer knowledge transfer; and informing the CPUC, CEC, and other state agencies of on-the-ground conditions.	This applies to the SCE business plan.
84	Public	Chapter Drafts (Voluntary)	#6 (re page 12) Market Trends. This section is useful but in places speaks to and generalizes LGPs rather than the public sector as a whole. (E.g. The statement “The main market drivers for public sector EE adoption are greenhouse gas (GHG) reduction and climate action plans.” Holds true for LGPs but not for K-12, etc.	This applies to the SCE business plan.
85	Public	Chapter Drafts (Voluntary)	#7 (re page 14) EM&V section should disclose that the IOUs have no plans and framework in place to evaluate state institutional partnerships (SIPs) or K-12. This includes no active PCG	This applies to the SCE business plan.

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			<p>to address these segments. EM&amp;V section should address long-term goals of IOUs LGP EM&amp;V, including a plan to assign IOU staff with LGP knowledge, PM capability, and ample bandwidth to oversee consultant studies. This section should concentrate on the way things are, deficiencies in EMV, and what SCE intends to do to address. Much of the narrative here could go to the beginning in a new Overview chapter that profiles the public sector.</p>	
86	Public	Chapter Drafts (Voluntary)	<p>#8 - (re page 16-20) Market Barriers. Good info but needs to be refocused. Please move the PACE info from Market Trends to fit with the financing narrative here. Bullets on pp. 17-20 are needlessly repeated. Convert into a table for simplicity and transparency.</p>	This applies to the SCE business plan.
87	Public	Chapter Drafts (Voluntary)	<p>#9 - (re page 21) Omit the definitions here to consolidate and add a table to the overall BP filing – many of these definitions will be applicable for various BP chapters.</p>	This applies to the SCE business plan.

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88	Public	Chapter Drafts (Voluntary)	#10 (re page 22) “For example, local government customers require community data for climate action plans and GHG inventories, but access to this data is limited by CPUC Decision D.14-05-016.” This statement is a pretty general disclaimer. Did SCE support this rule as proposed? Is it working out? Has there been any demonstrated benefit? Have parties complained? Does SCE support a second look at this rule? Please explain how SCE intends to navigate this rule or improve matters going forward.	This applies to the SCE business plan.
89	Public	Chapter Drafts (Voluntary)	#11 (re page 22) “While this business plan will not be able to overcome all of the data barriers facing this sector, SCE will continue to be mindful of these challenges when developing programs, policies, and procedures.” SCE should provide at least one proposed solution to the LG data sharing impasse.	This applies to the SCE business plan.
90	Public	Chapter Drafts (Voluntary)	# (NA) (re page 23) “Southern California Edison’s vision for the public sector is to increase customer adoption of EE improvements, enhance	This applies to the SCE business plan.

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			customers' abilities to self-serve, increase customer satisfaction, and make program participation easier for customers." SCE should specify who the customer is in this case. SCE statement is rather generic and seemingly could be substituted for other sectors.	
91	Public	Chapter Drafts (Voluntary)	#12 (re page 23) Savings goals should be broken down by LGP, SIP, and K-12.	This applies to the SCE business plan.
92	Public	Chapter Drafts (Voluntary)	#13 (re page 23) "The public sector is a newly defined sector, which will require conducting a number of M&V studies and performance analyses as outlined below." ED staff doesn't gauge why a newly defined sector would require a special study. In any case, if SCE believes that EMV is an urgent priority for the public sector, it's advised to heed ED direction for EM&V (p.27) and retain qualified IOU staff to oversee and monitor.	This applies to the SCE business plan.
93	Public	Chapter Drafts (Voluntary)	#14 (re page 23) Sector Vision. First two paragraphs add nothing new and should be deleted. SCE offers an interesting idea of weening LGs off of EE ratepayer funds but offers no plan to	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<p>get there and no argument that this is the correct course of action. "In 10 years, SCE would like the public sector to be leaders in energy efficiency adoption and promotion. With the exception of complex or novel projects, public sector customers should no longer be reliant on utility incentives to develop and implement energy efficiency projects, and should be able to finance their own EE projects and/or leverage utility finance programs."</p>	
94	Public	Chapter Drafts (Voluntary)	<p>#15 (re page 24) Revise for clarity "Public sector customers should continue to leverage their community respect and authority to continue to promote higher EE standards, "substituting "To further drive EE in their communities, public agencies should continue to apply their unique position as trusted and authoritative entities."</p>	This applies to the SCE business plan.
95	Public	Chapter Drafts (Voluntary)	<p>#16 (re page 25) This sentence is confusing and appears to pardon SCE of fully describing what is in the public sector. Please delete and add more detail about the public sector entities.</p>	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			“The flagship public sector offerings are local government and institutional EE partnerships”	
96	Public	Chapter Drafts (Voluntary)	#17 (re page 25) SCE refers to “four statewide Institutional Partnerships (IPs)” which is incorrect in that these are not statewide programs. Please reference throughout as State Institutional Partnerships (SIPs). Narrative that describes the LGPs and other programs should be moved to into Overview chapter.	This applies to the SCE business plan.
97	Public	Chapter Drafts (Voluntary)	#18 (re page 25) Screen entire chapter for repeated narrative. This sentence appears here for at least the third time “One of the major challenges for public sector customers is the ability to finance EE measures”	This applies to the SCE business plan.
98	Public	Chapter Drafts (Voluntary)	#19 (re page 25) 1. Existing Products and Services. This information should be moved to the front of the chapter.	This applies to the SCE business plan.
99	Public	Chapter Drafts (Voluntary)	#20 (re page 28, 48) Please add to the following statement to explain how the proposed SCE budget will allow for sufficient generation of new innovative project ideas by LGPs. Also please reconcile the SCE	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<p>budget line item LGP Strategic Plan pilots with the absence of a mention here. Is SCE pursuing new LGP Strategic Plan pilots? Why or why not and why is this justified? "In addition, LGPs have completed less complex Strategic Plan tasks through their partnership budgets. Lessons learned from the work accomplished to date have helped develop a new Strategic Plan process. In this new process, SCE has worked with Energy Division staff to develop a framework for innovative Strategic Plan activities to be proposed by local governments."</p>	
100	Public	Chapter Drafts (Voluntary)	#21 (re page 29) Everything presented here appears to be repeated elsewhere in chapter. Revise for brevity.	This applies to the SCE business plan.
101	Public	Chapter Drafts (Voluntary)	#22 (re page 32, 40, 48) Suggest changing decision makers to "gatekeepers". Decision makers are elected or appointed officials not city staff, typically. If decision makers is used, come up with a definition to and use appropriately.	This applies to the SCE business plan.
102	Public	Chapter Drafts (Voluntary)	#23 (re page 39) First mention of RENs should be much closer to beginning of	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			chapter. CCA coordination and response also needs to be addressed.	
103	Public	Chapter Drafts (Voluntary)	#24 (re page 38-47) These pages don't offer a whole lot of useful new substance should be shortened to fit in a single page.	This applies to the SCE business plan.
104	Public	Chapter Drafts (Voluntary)	#25 (page 47) Language is repeated verbatim from p. 27. Revise per request above and consolidate EMV discussion into one section within chapter. "The public sector is a newly defined sector, which will require conducting a number of M&V studies and performance analyses as outlined below." ED staff doesn't gauge why a newly defined sector would require a special study. In any case, if SCE believes that EMV is an urgent priority for the public sector, it's advised to heed ED direction for EM&V (p.27) and retain qualified IOU staff to oversee and monitor.	This applies to the SCE business plan.
105	Public	Chapter Drafts (Voluntary)	CPUC/CLN-1 - (re page 7) Please be clear about extent to which health care belongs in a profile of public buildings, vs. (private) commercial, or both.	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
106	Public	Chapter Drafts (Voluntary)	CPUC/CLN-2 - (re page 13, top) Refers to public sector climate action plans. Many of these target municipal buildings. Text does not discuss how these plans would impact public building sector, incl. e.g. meeting Energy Star or LEED building standards, applying benchmarking to help prioritize buildings for improvement.	This applies to the SCE business plan.
107	Public	Chapter Drafts (Voluntary)	CPUC/CLN-3 (re page 13) Some of the text here not relevant to public buildings, e.g. re: PACE and reach codes, streamlined permitting... Remove or improve applicability to public buildings.	This applies to the SCE business plan.
108	Public	Chapter Drafts (Voluntary)	CPUC/CLN-4 See 2004 attempt to characterize size of "public" buildings in California. Dated, but may be better than nothing if there is not more recent update.	This applies to the SCE business plan.
109	Public	Chapter Drafts (Voluntary)	CPUC/CLN-5 (re page 14) Profile data for Public Sector is lacking and text gives a weak excuse for not finding the data. Does not take a Navigant potential study to have data. Public sector buildings have LOTS of publicly-documented info on	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<p>the kinds of EE measures they identify, take, save, and spend. See for example CEC data on Prop 39 K-12 schools, Community colleges data for Prop 39, UC and CSU partnerships, DGS State facilities partnerships, Corrections, CEC's long-standing public building loan program and technical assistance. I also believe AB 758 attempted to characterize the public sector building stock. Moreover, LBNL for years has been tracking the ESCO industry (largely with public building clients) and the Federal Energy management Program (FEMP) that targets federal facilities, a good portion of which are in Calif. Also could query the CPUC EM&amp;V data base for program participants with NAICS codes for public buildings, or some equivalent codes.</p>	
110	Public	Chapter Drafts (Voluntary)	<p>CPUC/CLN-6 (re page 16-22) You need to set priorities for the current laundry lists of barriers; pretty surprising that a 1996 source is your reference, given how much progress the public sector has made with EE and climate goals.</p>	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
111	Public	Chapter Drafts (Voluntary)	CPUC/CLN-7 (re page 23, 32) Budgets shown do not seem to reflect the 50-65% increase in savings goals, at least in the near term until strategies for financing manage to offset the need for incentives. What is the trajectory to get to the point of not needing incentives?	This applies to the SCE business plan.
112	Public	Chapter Drafts (Voluntary)	CPUC/CLN-8 (re page 25) Missing any discussion of lessons learned from SoCalREN's local government facility technical assistance and turn-key implementation services.	SoCalREN agrees with this comment. SoCalREN's public sector Intervention Strategy 1 has successfully assisted public agencies to complete energy efficiency projects, complementing and supplementing IOU programs.
113	Public	Chapter Drafts (Voluntary)	CPUC/CLN-9 (re page 25-32) More laundry lists of current products and services and (newer?) intervention strategies in long lists. This is lacking in a clear sense of which strategies will be deployed to overcome which barriers in which market segments or overall sector. P. 29 continues to prominently feature variety of incentives. How does this mesh with our p. 23 vision to move away from incentives?	This applies to the SCE business plan.
114	Public	Chapter Drafts (Voluntary)	CPUC/CLN-10 (re page 25 , 32) In the "budget and Metrics" opening text, SCE punts at coming up with	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<p>budget estimates for its strategies, relative to savings goals it sets on p. 25. Seems SCE should be able to estimate market uptake given the strategies and incentives it imagines offering and their costs. In fact, the PA estimates may be INPUTS to the CEC's targeting efforts, rather than the other way around.</p>	
115	Public	Chapter Drafts (Voluntary)	<p>CPUC/CLN-11 (re page 34) Metric #1 for financing and procurement, where the desired outcome is to "encourage greater customer investment in EE", would be better to set the outcome metric as a \$ investment level.</p>	<p>This applies to the SCE business plan.</p>
116	Public	Chapter Drafts (Voluntary)	<p>CPUC/CLN-12 (page 36 under "Coordination with Partners) Lists current local government partnerships. Will all these continue? Will they all or partially include activities that targets public buildings?</p>	<p>This applies to the SCE business plan.</p>
117	Public	Chapter Drafts (Voluntary)	<p>CPUC/CLN-13 (re page 39) Codes &amp; Standards program discussion is very general. Hard to discern the value of intended strategies, expected outcomes, and relevant performance metrics.</p>	<p>This applies to the SCE business plan.</p>

Issue #	Sector	Topic	Issue	Reference Page #/Note
118	Public	Chapter Drafts (Voluntary)	CPUC? CLN-14 (re page 42) ETP discussion is general and not informative. Also seems backward in referring to a set of “traditional measures”, rather than viewing ET as the way to push the envelope on new(er) technologies, making the case for their application and performance, and learning how to disseminate and get uptake through appropriate market channels.	This applies to the SCE business plan.
119	Public	Chapter Drafts (Voluntary)	CPUC/CLN-15 (re page 42) Refers to the “education of decision makers” as WE&T? Is that a conventional definition? I would think that any persuasion targeting decision-makers would be more about marketing, not “WE&T”.	This applies to the SCE business plan.
120	Public	Chapter Drafts (Voluntary)	CPUC/CLN-16 (re page 49) Features ZNE Schools through Prop 39 funding. But I believe Prop 309 funding was only authorized for 5 years, likely to end around 2017 or 2018, is largely committed via plans filed with CEC, and applies primarily to retrofit situations. If retained, supply evidence of how ZNE schools will have 5-10-year future	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			traction – with what impetus, what funding, what target segments?	
121	Public	Chapter Drafts (Voluntary)	CPUC/CLN-17 (re page 49) Proposing picking ONE school district to “develop a roadmap to cost-effectively achieve ZNE”. I would doubt that a single road map, can be that useful given the huge variety of climates, economic situations, facility ages ... across the SCE territory. Refers to collaboration with Doe and NREL. This probably needs additional coordination with relevant school facility and business professionals in So. Calif.	This applies to the SCE business plan.
122	Public	Chapter Drafts (Voluntary)	<p>Highlights of Memorandum include:</p> <ul style="list-style-type: none"> <li>• ED suggests that SCE revise the document to reduce it by half the length (25 pp. max), with a new Overview chapter at the top that describes the LGPs, State Institutional Partnerships, K-12, and any other programs related programs such as SEEC. Budgets, savings goals, gaps, solutions, transition plans, etc. should be specified for each and then rolled up into an overall tally</li> <li>• SCE fails to demonstrate that SCE is complying with CPUC request to demonstrate that IOUs are moving the LGPs in the direction of greater statewide consistency.</li> <li>• SCE also fails to account for notable changes since 2012, notably the new PA actors operating in the local government space — RENs and CCAs.</li> <li>• For the ten years to come, SCE should explain how its LGPs will stay relevant alongside RENs and CCAs, and whether it supports market segmentation or competition.</li> </ul>	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<ul style="list-style-type: none"> <li>Similarly, SCE should define what constitutes a partner and a partnership, minimal LGP member expectations and rewards, and whether some higher minimal threshold for LGP performance is warranted.</li> <li>CE chapter should specify proposed strategies to link qualifying local agencies with an effective LGP implementer; how such an implementer would be allowed to make decisions on behalf of its members to motivate and reward them and carry out a coordinated regional vision; and how the implementer would (or would not) serve as conduit for IOU communication and directives.</li> </ul> <p>CEandtheotherthreeIOUshaveatoolofenormouspotentialforreleavingthecapacityofthe LGPs, but whose potential has not been captured fully due to constant staff turnover. The tool is SEEC and the best practices coordinator. SCE should provide a plan for stabilizing and growing SEEC so that, among other things, local agencies have an impartial source of expertise for matters that would include the CAEECC, responding to regulatory filings, questions about the service list, filing a protest, becoming a party, and so on.</p>	
123	Public	chapter Drafts (Voluntary)	CSE-1 In talking about the public sector and its sub-segments (i.e., local governments, schools, hospitals); CSE recommends grouping the	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<p>same sub-segment challenges and solutions into the same sections throughout the paper (as opposed to referring to the public sector at large throughout the chapter). CSE encourages SCE to reexamine some of its claims about the public sector (again, if broken out by sub-segment, certain characteristics may be easier to assign). CSE hypothesizes that in addition to reducing energy consumption, many public buildings choose to invest in energy efficiency because it saves money. CSE recommends that SCE use citations for the above claims (highlighted) in the final draft. While the chapter refers multiple times to the fact that no studies have been done for the public sector and energy efficiency market potential, CSE requests more specificity in the claim, i.e. no studies done for California? (Please see input source document for important additional details). CSE recommends moving the sections “SCE’s Approach to Achieving Sector Goals” and “Sector</p>	

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<p>Vision” to the beginning of the chapter; these sections provide a detailed and concise overview of SCE’s goals and vision for the public sector.</p>	
124	Public	chapter Drafts (Voluntary)	<p>CSE-2 The description of AB 802 on Pg. 11 fails to include the benchmarking and data access components of the bill (Pg.11). While the description of AB 758 calls out proposed EE Services, the draft chapter does not align its proposed activities to what is prioritized in the AB 758 roadmap (Pg. 11).</p> <p>CSE recommends that SCE use aspects of the AB 758 Action Plan to frame strategy and prioritize activities for the public sector. While the chapter briefly references whole- building data access on Pg. 32 (Building Energy Benchmarking Data Access), it cites the lack of adequate data on Pg. 21. With the roll-out of AB 802, building owners (of both public and private buildings) will be able to access whole-building data (in addition to Green Button DMD and CMD) for the first time (particularly significant for separately-metered buildings). In building a benchmarking portal and offering automatic upload to Portfolio Manager, SCE will be able to retrieve building-level data for all buildings using the portal.</p>	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<p>Access to this building-level information will allow for new, and previously unknown insights, into buildings. SCE could also propose how they could prioritize outreach to buildings based on their Energy Star score (lower scores as a proxy for buildings in need of more technical assistance and rebates).</p>	
125	Public	chapter Drafts (Voluntary)	<p>CSE-3 *While it's true that lenders have not historically known how to value high-performing buildings, this particular shortcoming is changing.</p> <ul style="list-style-type: none"> <li>Given the availability of OBF in the SCE territory, it would be helpful for the chapter to include insights on public sector participation and as to whether OBF is alleviating any of the aforementioned barriers to capital for EE improvements.</li> </ul> <p>CSE requests more detail on the proposed EE revolving funds (Pg. 28)</p>	This applies to the SCE business plan.
126	Public	chapter Drafts (Voluntary)	<p>TURN-1 (re page Incomplete pp. 9, 32, 16- 22, 25-32, 35- 49, Table 6 p. 34)</p> <p>Overall: SCE's public sector BP chapter lacks quantitative information on estimated efficiency potential (p. 9), which when available should be linked to the proposed savings goals (p. 25), and proposed budget (p. 32).</p> <p>The BP reads more as a regulatory compliance document, appearing long in somewhat generalized discussions on market barriers (pp. 16 – 22), existing products and services (pp. 25 – 32), and coordination with key partners and associated proceedings (p. 35-49). This is particularly evident in reviewing the one page matrix of "Public Sector Problem Statements, Desired Sector Outcome,</p>	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<p>Intervention Strategies, and Metrics”, in which the chapter is generally captured (Table 6, p. 34).</p> <p>TURN recommends that SCE streamline the sections cited.</p>	
127	Public	chapter Drafts (Voluntary)	<p>TURN-2 (re pages 35-49) The BP contains no discussion of gas usage in the public sector, or partnering with SoCalGas. This is particularly disconcerting given the lengthy Section D. “Coordination with Key Partners and Associated Proceedings”. Efficiency savings and cost- effectiveness are significantly compromised by this bifurcated approach. TURN was equally confused by the fact that SCE and SCG each proposed stand-alone public sector HOPPs instead of a coordinated effort.</p> <p>TURN recommends that SCE incorporate information and data on gas efficiency into all customer sector BPs, and develop seamless customer offerings.</p>	This applies to the SCE business plan.
128	Public	chapter Drafts (Voluntary)	<p>TURN-3 (re page 4 )</p> <p>SCE concludes that Industry Standard Practice (ISP) should rarely apply to the public sector: “Additionally, there is a scale issue. A public building's kitchen or computer server system is usually considerably smaller than it would be in a commercial building. SCE concluded that Industry Standard Practice (ISP) should rarely apply to the public sector because the community the public sector serves and the scale of public sector energy systems do not compare to those of the commercial sector. Public sector investments are based on public good and on providing essential services at a minimal cost. But minimizing costs often leaves more advanced EE work for the public sector unrealized because it is expensive, while the</p>	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<p>commercial sector is not bound by the same spending restrictions.” (Emphasis added). TURN believes that it is inappropriate for SCE to unilaterally decide that ISP should not apply to the public sector. Such a generalized statement claiming that alleged differences in the “scale” of public sector and commercial energy using equipment and systems is not a reasonable basis for exempting the public sector from ISP considerations.</p> <p>SCE should proceed with the identified M&amp;V market characterization study identified as needed “as soon as possible in order to: Document industry standard practices specific to the public sector, particularly in operations, maintenance, and early replacement or “indefinite repair” practices, which may differ in different segments within the sector.” (p. 41)</p>	
129	Public	chapter Drafts (Voluntary)	<p>TURN-4 (re page 13) SCE explains, “The declining cost and increased adoption of solar and battery storage is making a great impact on the EE marketplace.” This is a critically important matter, and TURN commends SCE for flagging it.</p> <p>SCE should address the impact of solar and battery storage in its discussion of overarching market trends for each BP chapter.</p>	This applies to the SCE business plan.
130	Public	chapter Drafts (Voluntary)	TURN-5 (re page 28) SCE summarizes the first of the public sector problem statements in Table 6 as “Financing and procurement hurdles challenge adoption”. With financing and public sector	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<p>procurement being such significant hurdles to efficiency adoption, TURN believes it would be very helpful to expand the discussion of some of the ways SCE is working to tailor financing programs to this sector and to create EE revolving funds.</p> <p>TURN recommends that SCE provide more detail on the ways SCE is working to tailor financing programs to this sector and to create EE revolving funds. TURN recommends that SCE consider PG&amp;E's proposed expansion of OBF and OBR and new financing partnerships to address problems around capital availability for first costs, with a specific focus on project co-pay over the \$100,000 ceiling for OBF. PG&amp;E states that it will explore extending OBF repayment periods beyond the current standard of five years—up to ten— to provide near-term relief for customers requiring greater flexibility for large capex investments. And, explore new, lower risk financing structures for the sector as they become available, beyond simply supplementing existing OBF (up to the current \$20,000 cap) with OBR (which carries variable risk depending on</p>	

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<p>how third-party loans are structured) for greater liquidity.</p>	
131	Public	chapter Drafts (Voluntary)	<p>TURN-6 (re page 48) SCE’s discussion of its Public Sector HOPPs is limited to a standalone paragraph in the next to the last page of the BP.</p> <p>It would be very helpful for SCE to incorporate the discussion of its Public Sector HOPPs into more of the core of the BP chapter, and address how NMEC could possibly assist in overcoming market barriers, including capital market investment.</p> <p>Beyond this, TURN recommends that SCE explore using AMI data and innovative meter-measured performance strategies for site-specific whole building programs to stimulate broader market interest in NMEC-based pay-for-performance programs. Such an approach could be used to attempt to spur private sector innovation and capital markets investment, thus building a market for efficiency, creating transparent and real time accounting for savings using smart meter data, increasing quality installations by making contractors accountable to measured performance, and ultimately reducing program administration and</p>	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<p>evaluation costs by making the industry (and not just the program) responsible for performance risk.</p>	
132	Public	chapter Drafts (Voluntary)	<p>TURN-7 (General Comment) Customer sector goals and program savings, budgets, and cost-effectiveness are forward looking. The BPs are intended to be integral to California moving the current generally flat or stagnant needle on energy efficiency. Some quantitative context to the current portfolios and programs would be very helpful.</p> <p>We recommend that all data on projected customer sector goals and program savings, budgets, and cost-effectiveness be given some context relative to ongoing customer sector activities and accomplishments. There needs to be some demonstration as to how the BP will advance savings and improve cost-effectiveness.</p>	SoCalREN agrees. Refer to SoCalREN Business Plan, Section N.
133	Public	chapter Drafts (Voluntary)	<p>TURN-8 (General Comment) It is not clear whether projected savings are gross annual. In D.16-08-019 (atp.21), the Commission directed a return to net goals and the development of cumulative goals for application in 2018 to support the State's SB 350 efforts.</p> <p>If not already included, we recommend that SCE provide projected customer sector goals and program savings in net annual and net cumulative form, with the basis for net provided, and cumulative specified by the</p>	This applies to the SCE business plan.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<p>estimated average EUL by customer sector and key programs. Indicate the basis (i.e. end use, measures) for the estimated average EUL(s).</p>	
134	Public	chapter Drafts (Voluntary)	<p>UC/CSU-1 (re page 38) At the top of page 38 under section b) Statewide Program Coordination, there are several key topics that have only been addressed with placeholders, including "How lead PA will operate", "IOU/PA lead coordination" and "Solicitation strategy for implementation". Based on the intent of the decision to create statewide consistency and efficiencies, these items must be addressed in a way that effectively supports these goals. There needs to be very clear language on how all IOUs will work together to provide consistent offerings (i.e. identical program processes and project eligibility) for customers in statewide partnerships. The lead PA can leverage the authority provided in the decision to standardize all program processes and project eligibility across all IOUs as needed</p>	<p>SoCalREN does not serve higher education which is a statewide program, led by SCE.</p>

Issue #	Sector	Topic	Issue	Reference Page #/Note
135	Public	chapter Drafts (Voluntary)	UC/CSU-2 (re page 38) SCE appears to suggest that the public sector will be transitioned to third party programs. The language in the decision does not specifically make this requirement, and UC would like to understand in more detail what this could mean for our statewide partnership, as currently we utilize almost no third party programs. From a high level, transitioning the UC/CSU partnership to a third party program would create new inefficiencies and cost by inserting a management layer between the customer and the utility that does not exist today, while creating no added value to the customer or cost savings. Provide justification and more detail on the requirement/plan to transition statewide institutional partnerships to third party programs.	SoCalREN does not serve higher education which is a statewide program, led by SCE.
136	Public	chapter Drafts (Voluntary)	UC/CSU-3 (re page 38) The timing of an [Public Sector] RFP being released prior to Business Plans being finalized could be problematic in that the solicitation would not incorporate input from public sector stakeholders. The role	SoCalREN does not serve higher education which is a statewide program, led by SCE.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<p>and requirements of Statewide Program Implementers is not defined, and depending on how this is developed in the Business Plans, it may make sense for a public sector customer to pursue this role. Provide clarification and more detail on what this RFP will include and how it will accommodate the potential for public sector customers to pursue the Statewide Program Implementer role.</p>	
137	Public	chapter Drafts (Voluntary)	<p>NAESCO - We suggest that the IOUs use the information described below to create a common template for all their business plans. A common template will greatly facilitate stakeholder review and the Commission's analysis which is necessary for approval of Business Plans. [see source input document PS0360 for several page description of the outline]</p>	N/A.
138	Public	chapter Drafts (Voluntary)	<p>NAESCO believes that the Commission's requirements for statewide administration and third party implementation are very clear. In their October 19 presentations, SCE and the other utilities should describe overall bidding plans, including programs not specifically identified in the decision, for 2017, 2018, 2019 and 2020. Those plans should include bidding timelines from issuance of RFPs to contract signing for every program to be bid out.</p>	This applies to IOU PAs.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<p>For each year, the utilities should list the programs implemented in their service territories, broken out by utility-implemented and third party implemented programs.</p> <p>In order to meet the Commission's requirement of filing a plan that demonstrates their achieving the Commission's minimum of 60% third-party program spending as a percent of the total portfolio spending, each utility's Business Plan filing should include annual budgets for the years 2017 through 2020 broken out by major category:                      administration;                      Implementation (further broken out into utility-implemented programs versus third party programs);                      marketing (also broken out by utility program-related versus third party program-related) and EM&amp;V.</p>	
139	Public	chapter Drafts (Voluntary)	<p>NAESCO</p> <p>Prior to any utility program implementation, the utilities, working with the CAEECC and other stakeholders, should (1) establish an objective framework with clear criteria that must be applied in determining that a utility must deliver a program, and (2) show how those criteria are met in the</p>	This applies to IOU PAs.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<p>case of utility implementation of a particular program. The utilities Business Plans should describe this process and how outcomes were achieved.</p>	
140	Public	chapter Drafts (Voluntary)	<p>NAESCO - The public sector and the residential sector are two markets that are served by a large, sophisticated community of implementers. The end use technologies used in these sectors have seen significant technological improvements in recent years (advanced lighting, energy management systems, smart thermostats, heat pumps, etc.). For both the MUSH and residential markets, SCE and the other utility administrators should establish meaningful budgets for truly open solicitations that allow third parties to propose new, innovative program designs.</p>	This applies to IOU PAs.
141	Public	chapter Drafts (Voluntary)	<p>ORA-1 (re page 23/32) Budgets do not align with 10-year vision for the sector</p> <ul style="list-style-type: none"> <li>• SCE states on p.23 that “with the exception of complex or novel projects, public sector customers should no longer be reliant on incentive to develop and implement EE projects.”</li> <li>• However, the budget table on p.32 shows stable budgets through 2027, which is inconsistent with incentives declining to near zero.</li> </ul> <p>The long-term goal is either</p>	This comment applies to SCE.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			not credible or the budget in out-years should decline substantially	
142	Public	chapter Drafts (Voluntary)	<p>ORA-2 (re page 34) Metrics do not align with the 10-year vision for the sector</p> <ul style="list-style-type: none"> <li>SCE’s success metrics are all based on participation levels; however, the 10-year vision is that customers will no longer be participating in incentive programs.</li> </ul> <p>Fundamental disconnect between a metric of “number of projects that receive on incentive” increasing through year 10 and a vision of declining incentives to zero by year 10.</p>	This comment applies to SCE.
143	Public	chapter Drafts (Voluntary)	<p>ORA-3 - Metrics do not align with the problem statement or intervention strategy</p> <ul style="list-style-type: none"> <li>Problem statement of lack of visibility for building performance data and intervention strategies around increasing customer access to data do not match a sector outcome metric of the number of projects receiving an incentive</li> </ul> <p>Metric must measure something meaningful that represents success/failure of the intervention strategy</p>	This comment applies to SCE.
144	Public	chapter Drafts (Voluntary)	<p>ORA-4 (re page 33) Metrics must be credible and stable in order for BPs to represent a plan whose success/failure can be accurately assessed</p> <ul style="list-style-type: none"> <li>BPs cannot be approved with caveats such as that on p.33 that “SCE plans to refine [the metrics] once more analyses are completed....if historical data on these sectors does not exist or is too sparse, then SCE will update these metrics targets after sector-specific evaluations have been completed.”</li> </ul> <p>If metrics are constantly moving targets, then the accountability mechanism is destroyed and there is no marker to judge whether or</p>	This comment applies to SCE.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			not progress is being made, whether strategies are producing results, and whether the administrator is succeeding.	
145	Public	chapter Drafts (Voluntary)	ORA-5 - Fails to address sector-specific market opportunities/advantages in addition to market barriers Many public buildings are have stable, long-term ownership and can have longer time horizons for capital investment	This comment applies to SCE.
146	Public	chapter Drafts (Voluntary)	ORA-6 (page 28-29) Intervention strategies should address specific market barriers and focus on the most important barriers first Example: SCE intervention strategies (on pp.28-29) are just a list of current programs. "Core program" is not an intervention strategy, it is an administrative category.	This comment applies to SCE.
147	Public	chapter Drafts (Voluntary)	ORA-7 (re page 16-22) Contains lengthy sections that do not 'push the narrative forward' ( <ul style="list-style-type: none"> <li>Items included in the early sections should set up the actual intervention strategies, rather than a catalogue that is largely unused in the actual planning sections</li> </ul> Example: MT discussion on pp.16-22 develops a laundry list of possible market barriers, but only three are included in the actual intervention plan discussion and these are vague/high level and do not actually use the insights in the preceding discussion	This comment applies to SCE.

Issue #	Sector	Topic	Issue	Reference Page #/Note
148	Public	chapter Drafts (Voluntary)	<p>ORA-8 (re page 4, 12) Assertions of fact or policy need to be fully supported by evidence and citation, not simply opinion</p> <ul style="list-style-type: none"> <li>• Example: assertion on p.4 that Industry Standard Practice should rarely apply to the public sector has no citation or evidence to support</li> <li>• Example: assertion on p.12 that the vast majority of low-hanging fruit has been captured “as seen in recent impact evaluations and CPUC dispositions” fails to cite a single study</li> <li>• Example: assertion on p.12 that spillover is not quantified ignores an ED evaluation study in progress that aims to quantify spillover</li> </ul> <p>Example: assertion on p.12 that public sector GHG or sustainability mandates reduce PA attribution for program influence fails to cite any evidence that this is current practice.</p>	This comment applies to SCE.
149	Public	chapter Drafts (Voluntary)	<p>ORA-9 (re page 15-22) Studies that are referenced should be cited accurately and use best available recent information</p> <ul style="list-style-type: none"> <li>• Example :reference to Navigant IP study on p.15 says the study had “very few recommendations for areas under SCE control” is factually inaccurate; the study had many recommendations that are pertinent to SCE territory</li> </ul> <p>Example: in discussion of market transformation on pp.16-22, SCE 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>	This comment applies to SCE.

Issue #	Sector	Topic	Issue	Reference Page #/Note
150	Public	Statewide Admin Discussion	Notes page 8 - Currently, we don't have a program implementer for our [UC] partnership. I see no value in introducing a program implementer. I'd like to know more about the process for introducing program implementer for our partnership.	This comment applies to SCE.
151	Public	Chapter Drafts (Voluntary)	Notes page 21 - Comment (from ED): Primary focuses on downstream strategies and tactics. The Decision identifies that Statewide programs should be designed to achieve market transformation. SDG&E is tentatively assigned Statewide administrators for non-residential and residential HVVAC. Where will Statewide strategies appear in this BP?	This comment applies to SCE.
152	Public	Chapter Drafts (Voluntary)	Notes page 22 - With regard to bundling, we want to make sure PAs make room for smaller implementers. Hopefully smaller contractors will also have a voice.	This comment applies to SCE.
153	Public	Chapter Drafts (Voluntary)	Notes page 22 - <ul style="list-style-type: none"> <li>The draft chapter can be made shorter. What is the pitch? Why should ratepayer dollars be used toward public sector?</li> <li>Regarding goals (p. 24): you need to have specific goals that are relatively concrete so we can see if you are achieving them.</li> </ul>	This comment applies to SCE.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			<ul style="list-style-type: none"> <li>Budgets don't appear to align with 10 year plan for sector (p. 23). Budgets are stable but should be declining. There is a disconnect between increasing programs and budgets.</li> </ul> <p>Assertions need to be fully supported – not just simply stated (example, p. 4).</p>	
154	Public	Chapter Drafts (Voluntary)	<p>Notes page 22 - I also agree there was some content in the draft chapter that was unnecessary. You could skim through definitions.</p> <ul style="list-style-type: none"> <li>Goals are not totally clear.</li> <li>Maybe forgot column on baseline on table (at p. 34?). I can't really tell what you are doing here.</li> </ul> <p>This raises the issue of what is the right level of information necessary to relay what PA is doing and where it is going?</p>	This comment applies to SCE.
155	Public	Chapter Drafts (Voluntary)	<p>Notes page 23 - One of ORA's expectations will be a bottom up budget including detailed description of continuing programs as they are, internal staff and administration and overhead. Program budgets need to get built from bottom up every once in a while. Annual advice letters will address incremental changes based on what has transpired from bottom up budget. Bottom up budgets will follow for BP sector chapters. It has been a really long time since utilities provided accounting for what makes \$1billion/year. Annual</p>	This comment applies to SCE.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			advice letters are not enough.	
156	Public	Chapter Drafts (Voluntary)	<p>Notes page 23 - I'd like to second comments of CPUC that BPs should start with market estimate from available data. First, always start with an estimate of what the market is. There are other evaluations besides Navigant studies. Second, PAs need to set up what the target market is. Third, PAs need to make an overarching statement about what kind of investment is required to capture the target market and what the benefits will be. If you go through this process, you will see that Southern California Edison public sector program is off by 1-2 orders of magnitude. We very much support comments of the Coalition for Energy Efficiency about draft chapter lacking mandates and specifics about what is required to be included.</p>	This comment applies to SCE.
157	Public	Chapter Drafts (Voluntary)	<p>Notes page 23 - I have three high level comments:</p> <ul style="list-style-type: none"> <li>• I didn't see comments about gas usage. There needs to be a partnership between the electric and gas company in the public sector.</li> <li>• Page 4: commercial sector is not bound – needs factual basis to support assertions</li> </ul> <p>p. 25: for all BPs, when you</p>	This comment applies to SCE.

Issue #	Sector	Topic	Issue	Reference Page #/Note
			make your projections of savings, need to clarify if gross or net, annual or cumulative.	
158	Public	Chapter Drafts (Voluntary)	Notes Page 24 - see extensive list of recommendations from the state of California on this page of the notes.	This comment applies to SCE.
159	Public	Chapter Drafts (Voluntary)	Notes page 24 - p. 37 includes a large list of to dos. IOU/PA coordination should be customer driven partnerships, not market driven programs. <ul style="list-style-type: none"> <li>• When you have institutional partnership, Statewide process is more difficult. I would like to know why institutional partnerships were included in Statewide. This doesn't work with institutional partnerships.</li> </ul>	This comment applies to SCE.
160	Public	Chapter Drafts (Voluntary)	Draft page 25 - ZNE energy goals for state buildings has not been acknowledged at all in this draft chapter. That should be added. There should be coordination with C&S in advancing that goal. It is problematic to leave this issue out of draft chapter.	This comment applies to SCE.
161	Public	Chapter Drafts (Voluntary)	Notes page 25 - Curiously missing from SCE's draft chapter is any reference to lessons learned from SoCalREN experience on buildings	This comment applies to SCE.

Issue #	Sector	Topic	Issue	Reference Page #/Note
162	Cross Cutting: C&S	Codes & Standards	<p>For all IOU PAs C&amp;S chapters: Recommended Action</p> <ul style="list-style-type: none"> <li>In view of the observations and comment above we recommend the IOUs integrate product reach standards as a strategy into their Business Plans</li> </ul> <p>We specifically recommend consideration of dynamic reach standards to drive innovation on an ongoing basis</p>	Not applicable to SoCalREN.
163	Cross Cutting: C&S	Reach Codes	Suggestion made to consider process of rolling out new programs before setting corresponding reach codes. It may be easier to set codes after people have participated in programs and learned about benefits of new technology.	Not applicable to SoCalREN.
164	Cross Cutting: C&S	Strategies	C&S discussions have debated that code savings are being stranded because the code is not strict enough and they urge that code standards be pushed forward. At the same time, PAs in other CC subcommittee meetings and other venues argue that standards are not being implemented by customers because they are too expensive. If codes aren't being met, why are PAs then pushing for more strict codes?	Standards are being pushed forward to achieve the 2020 and 2030 goals, regardless of implementation or cost-effectiveness. C&S programs help stakeholders better implement codes and achieve savings, and also push for advanced adoption of codes to prepare stakeholders for future mandates and to establish LGs as leaders.
165	Cross Cutting: C&S	C&S Compliance Metrics	<p>Achieving full compliance with Title 24 continues to be a significant challenge for the California building industry. This challenge will only increase as the standards evolve to meet State ZNE targets. PA developed compliance assistance tools are marginally helpful, but more effective solutions are available through development channels not directly managed by the PAs.</p> <p>Performance metrics for compliance improvement should use A/B testing of building intervention practices such that 1) as-built outcomes can be compared and modeled, and 2) longer-term,</p>	Further details can be found in Section F of SoCalREN's Cross-Cutting: Compliance Enhancement C&S chapter

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			metered energy use of the A/B groups can be compared. Due to the overall length of most design and construction timeframes, any RCT applied to compliance improvement should allow for multi-year implementation and analysis cycles.	
166	Cross Cutting: C&S	California Energy Commission Objectives	<p>The PA business plans should include the following objectives to support the California Energy Commission’s building and appliance standards:</p> <ul style="list-style-type: none"> <li>(1) Appliance standards advocacy to reduce plug load energy consumption in both residential and commercial buildings;</li> <li>(2) Building standards advocacy to meet the state goal of ZNE commercial buildings by 2030;</li> <li>(3) Building standards advocacy for existing building “reach codes” that can be published in the California Building Code, Part 11 and adopted by local jurisdictions.</li> </ul>	Addressed in Section A and throughout the SoCalREN Cross-Cutting: Compliance Enhancement C&S chapter