

Considerations for reviewing and providing comments on PA Business Plan Chapters

Please consider the following questions as you review the Business Plan chapters. The second page provides a template into which your feedback may be captured.

Prior to reviewing and commenting on the Business Plan drafts, a reviewer may wish to review the updated “NRDC Compilation of CPUC Business Plan Guidance and PA Consensus Outline” found on the CAEECC [Guidance webpage](#). That document merges a number of sources of guidance to PAs into a convenient outline format that the PAs have collectively agreed to leverage as they draft their documents. The following areas of review are intended to highlight those items that would be helpful in updating the business plans before the next draft. We do not expect stakeholders to answer all questions. Please choose those that are relevant to your interests. There is also an open row for additional comments that might not fit into the following format.

1. Structural Review

- a. Do the chapter layout and order of topics comply with NRDC compiled guidance document “outline”?
- b. Does the stylistic/visual presentation allow for easy navigation through the chapter (i.e., allowing easy comparison of the chapter against the NRDC compilation)?
- c. What examples from other PA chapters (whether same PA different sector or different PA all together) would you suggest be considered for this document

2. Content-Related Review

- a. Are all key pieces of information, tables, graphics, and supporting documents called for in the NRDC Compiled guidance document present in the Chapter?
- b. Are your previous comments and input addressed in the document?
- c. Is the overall sector plan coherent and clear?
- d. Are proposed activities (intervention strategies) sufficiently justified by the market assessment and other data analyses presented?
- e. Are substantive assertions and conclusions supported with clear reasoning and adequate citations?
- f. Are metrics relevant, representative, and associable with future IPs and PIPs?
- g. Is material presented at the right level of detail for a Business Plan?

On the next page, please find the comment template in which substantive comments can be recorded and then submitted to facilitator@caeccc.org. If you have any questions about using this form or the review process, please contact the facilitator by phone or email. Caution: this form is set up as an 8.5 X 14 inch document and will not properly print on 8.5 X 11 paper.

Instructions: Please make comments specific, reference pages where appropriate, and be focused on Business Plan level strategies.

Commenter: Please Fill In This Part Of The Form					For PA Use	
Comment #	Sector	Page #	Comment	Rationale for Comment (include references to evaluations, studies, etc., if applicable)	Integrated (Y/N)	Rationale for Y/N
CSE-1	Public	(See Comments for specific page numbers)	<p>Observations – Characterization of Public Sector</p> <ul style="list-style-type: none"> SCE’s draft chapter for the Public Sector is inconsistent when it comes to characterizing the sector itself: <ul style="list-style-type: none"> “The public sector has been considered a portion of the commercial sector. As a result, no comprehensive study has ever been conducted that specifically addresses public sector energy savings or market saturation in order to develop market potential by territory.” (Pg. 8) “Commercial buildings will inherently be farther along in their energy management practices than public buildings.” (Pg. 4) “The main market drivers for public sector EE adoptions are greenhouse gas (GHG) reduction and climate action plans.” (Pg.12) “The public sector lacks technical resource to identify, develop and implement projects.” (Pg. 19) “While not having specifically addressed it as a separate sector, Southern California Edison has been working with the public sector on energy efficiency and demand response for many years and has developed a robust portfolio of products and services that address this sector.” (Pg. 25) 	<ul style="list-style-type: none"> N/A 		

			<ul style="list-style-type: none"> ○ <i>“Public sector customers are often unable to pursue energy efficiency because of a lack of adequate technical knowledge about particular EE technologies or processes.” (Pg. 29).</i> <p>Recommended Action</p> <ul style="list-style-type: none"> • <i>In talking about the public sector and its sub-segments (i.e., local governments, schools, hospitals); CSE recommends grouping the 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).</i> • <i>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.</i> • <i>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?</i> • <i>CSE recommends moving the sections “SCE’s Approach to Achieving Sector Goals” and “Sector 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.</i> 		
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CSE – 2	Public	(See Comments for specific page numbers)	<p>Observations – Using AB 802 and AB 758 to meet SB 350 goals</p> <p><i>The description of AB 802 on Pg. 11 fails to include the benchmarking and data access components of the bill (Pg.11)</i></p> <ul style="list-style-type: none"><i>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)</i> <p>Recommended Action</p> <ul style="list-style-type: none"><i>CSE recommends that SCE use aspects of the AB 758 Action Plan to frame strategy and prioritize activities for the public sector.</i><i>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. 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</i>	<ul style="list-style-type: none">N/A		
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			technical assistance and rebates).			
CSE – 3	Public	(See Comments for specific page numbers)	<p>Observations – Availability of Financing</p> <ul style="list-style-type: none"> “Financing and procurement barriers challenge adoption of EE measures and create longer than usual project timelines.” (Pg. 16) “The difficulties associated with the lending industry’s historic inability to account for the unique features of loans for EE projects, reflecting lenders’ uncertainty about the reliability of future savings.” (Pg.17) “SCE provides on-bill financing, making loans available to customers so they can finance EE projects and make monthly repayments via their electricity bills.” (Pg.26) <p>Recommended Action</p> <ul style="list-style-type: none"> While it’s true that lenders have not historically known how to value high-performing buildings, this particular shortcoming is changing. 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. CSE requests more detail on the proposed EE revolving funds (Pg. 28) 	<ul style="list-style-type: none"> For Freddie Mac, Energy Data Matters Energy Efficiency Finance For Commercial Buildings: Insights From Lenders 		

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