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Comment #	PA	Page #	Comment	Integrated (Y/N)	Rationale for Y/N
ORA-1	SDG&E	105	<ul style="list-style-type: none"> • SDG&E should broaden its goals beyond participation. <ul style="list-style-type: none"> ○ Sector goals should include savings goals and potentially other grid management objectives such as Megawatt savings. 		
ORA-2	SDG&E	110	<ul style="list-style-type: none"> • The market analysis discussion focuses on the small size of the overall market but fails to identify which market segments have the most potential for energy efficiency savings. <ul style="list-style-type: none"> ○ Appropriate strategies would then target users based on their characteristics (such as size) with different strategies being targeted to smaller users. 		
ORA-3	SDG&E	General	<ul style="list-style-type: none"> • Strategies lack sufficient specificity and do not provide adequate information for the Commission to provide meaningful oversight <ul style="list-style-type: none"> ○ While diversity of customers suggests a more customized approach, there should be commonalities within customer classes around which some standard interventions can be designed. 		
ORA-4	SDG&E	113	<ul style="list-style-type: none"> • The background research needs to be more rigorous and properly documented. <ul style="list-style-type: none"> ○ Conclusion that OBF's low take-up among industrial customers is because industrial customers do not seek out energy savings projects requires citation and basis. ○ Citation to the Manufacturing Energy Consumption Survey has limited relevance to the type of industrial firms operating in San Diego County. If SDG&E intends to use this study, the limitations and applicability should be explicitly described. ○ Section should include clear discussion of past activities, including lessons learned that should be considered in developing future programs. 		
ORA-5	SDG&E	62	<ul style="list-style-type: none"> • Performance metrics should have concrete targets in order to judge the success of intervention strategies. <ul style="list-style-type: none"> ○ The metrics are currently specified but all targets are unspecified. ○ It is difficult to judge the usefulness of targets and whether they are reasonable measures of success/failure in the absence of (1) numbers that specify the baseline and (2) information showing that SDG&E's goals are ambitious and achievable. 		

			<ul style="list-style-type: none"> ○ Failure to specify the actual baseline and targets means that a crucial element of SDG&E's industrial sector business plan will not be adequately vetted with stakeholders prior to filing. 		
<i>ORA-6</i>	<i>SDG&E</i>	108	<ul style="list-style-type: none"> ● Budgets should be specified for the full ten-year business plan period and should align with market characterization and intervention strategies over the short-, medium- and long-term with sufficient specificity to evaluate proposed strategies. <ul style="list-style-type: none"> ○ The absence of budgets makes it difficult to assess whether SDG&E's request for resources aligns with its analysis of the needs in the industrial sector and its proposed intervention strategy. ○ Failure to specify the budget means that a crucial element of SDG&E's industrial sector business plan will not be adequately vetted with stakeholders prior to filing. 		