

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 #	PA	Page #	Comment	Integrated (Y/N)	Rationale for Y/N
<i>ORA-1</i>	<i>SCE Public</i>	24, 26-27	<ul style="list-style-type: none"> • Stakeholder feedback from previous drafts has not been substantively addressed. <ul style="list-style-type: none"> ○ ORA noted in previous comments on SCE’s public sector plan that assertions of fact or policy need to be fully supported by evidence and citation. Revisions fail to address the comment. ○ Example: ORA noted that SCE’s assertions that public sector greenhouse gas mandates reduce Program Administrator attribution had no supporting citation. SCE subsequently revised the Public Sector section to include a citation to an evaluation study, but the citation refers to corporate standard practices, not public sector mandates. 		
<i>ORA-2</i>	<i>SCE Public</i>	23	<ul style="list-style-type: none"> • Market barriers should be prioritized and strategies should map to market barriers. <ul style="list-style-type: none"> ○ SCE identifies 19 generic market barriers across three broad categories; this is too many to effectively address and there is no prioritization to identify the most important barriers to target. ○ Intervention strategies are largely a list of current programs and practices and do not map onto key market barriers the strategies are targeted to overcome. 		
<i>ORA-3</i>	<i>SCE Public</i>	14	<ul style="list-style-type: none"> • Market characterization and intervention strategies should be relevant to the targeted market segment. <ul style="list-style-type: none"> ○ Example: Discussion of property assessed clean energy (PACE) financing is irrelevant to the public sector section as the target customer segment is the private consumer (local governments cannot finance their own energy efficiency upgrades via their property tax bills); this discussion belongs in the Residential or Commercial chapters market characterization sections. 		
<i>ORA-4</i>	<i>SCE Public</i>	30-31	<ul style="list-style-type: none"> • Solicitation strategy should be based on Commission directives and should be specific. <ul style="list-style-type: none"> ○ The chapter currently lacks a defined third-party solicitation strategy that outlines the types of public sector solicitations SCE will run and a strategy for balanced procurement. ○ The absence of a detailed solicitation strategy means that a crucial element of PG&E’s public sector business plan will not be adequately vetted with stakeholders prior to filing and misses an important opportunity to inform the market in advance of solicitation issuance. 		

<p><i>ORA-5</i></p>	<p><i>SCE Public</i></p>	<p>35</p>	<ul style="list-style-type: none"> • Participation metrics should only be used when appropriate and should be specifically tailored to relevant goals and intervention strategies. <ul style="list-style-type: none"> ○ Example: It is unclear how participation counts of public customers participating in SCE programs are a useful and specific metric to measure whether a variety of intervention strategies are overcoming the barrier of customers having access to limited resources. ○ More useful metrics would target the specific barrier (resource constraints) and identify whether specific intervention strategies are overcoming those barriers. 		
<p><i>ORA-6</i></p>	<p><i>SCE Public</i></p>	<p>34</p>	<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. <ul style="list-style-type: none"> ○ The absence of budgets makes it difficult to assess whether SCE’s request for resources aligns with its analysis of the needs in the public sector and its proposed intervention strategy. ○ Failure to specify the budget means that a crucial element of SCE’s public sector business plan will not be adequately vetted with stakeholders prior to filing. 		