

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
ORA-1	All		<ul style="list-style-type: none"> • 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. <ul style="list-style-type: none"> ○ The discussion should include potential overlapping 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. ○ Potential procurement activities relevant to the BP include (but are not limited to) all-source solicitations, Intergrated Distributed Energy Resources (IDER)proceeding procurements, and PG&E’s Diablo Canyon application. ○ 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. 		
ORA-2	All		<ul style="list-style-type: none"> • Solicitation strategies should be robust and sufficiently detailed to allow for meaningful review and oversight. <ul style="list-style-type: none"> ○ 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. ○ Solicitation strategies should provide analysis and rationale for the proposed bidding schedule and associated details. 		
ORA-3	All		<ul style="list-style-type: none"> • BP applications should include detailed budget testimony that is sufficient to determine the reasonableness of the budget request. <ul style="list-style-type: none"> ○ 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 forecastin sufficient detail to demonstrate the costs are reasonable. 		

Commenter Name: Dan Buch

Commenter Affiliation: ORA Program Administrator/Chapter to receive feedback: All PAs Overarching

Date 11/21/2016

			<ul style="list-style-type: none">○ 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.		
--	--	--	--	--	--