

SOUTHERN CALIFORNIA GAS COMPANY
ADOPTION OF ITS ENERGY EFFICIENCY ROLLING PORTFOLIO
BUSINESS PLAN AND RELATED RELIEF
(A.17-01-016)
(1st DATA REQUEST FROM COALITION FOR ENERGY EFFICIENCY)

Date Received: March 22, 2017
Date Submitted: April 7, 2017

QUESTION 1:

Decision 12-11-015 at p. 126 directed the utilities to “develop pilot approaches collaboratively with stakeholders to incorporate workforce diversity and inclusion goals into their third-party contractor selection process.”

- (a) Please describe what actions were taken in response to this direction and provide copies of any studies or reports prepared as a result of this decision.
- (b) Please provide a copy of any workforce diversity and/or inclusion requirements or goals that have been incorporated into energy efficiency programs (pilot or otherwise) and identify what programs have required compliance with these goals.

RESPONSE 1:

D.12-11-015’s Conclusion of Law 70 states: “The utilities should develop pilot approaches collaboratively with stakeholders to incorporate workforce diversity and inclusion goals into their third-party contractor selection process.” To clarify, the Commission did not direct the utilities pursuant to an ordering paragraph. Notwithstanding, SoCalGas actively supports workforce diversity and inclusion. Consistent with the Commission’s suggestion, SoCalGas incorporated language for voluntarily reporting of First Source data as part of its third-party energy efficiency program contracts. SoCalGas has not prepared any studies or reports for workforce inclusion.

In addition, as a federal contractor, SoCalGas maintains affirmative action plans in compliance with Executive Order 11246. As part of its normal course of business, SoCalGas also incorporates its affirmative action language into contracts with suppliers, prime contractors, and subcontractors. The Company is also compliant with Commission General Order (GO) 156 and its obligation to establish and annually report on its Supplier Diversity Program. As part of the Supplier Diversity Program, and in accordance with GO 156, SoCalGas establishes goals for the use of Diverse Business Enterprises (DBEs) and encourages prime contractors to do the same. SoCalGas is also engaged in extensive outreach to locate qualified DBEs and assist them with DBE certification with the Commission.

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QUESTION 2:

Does SoCalGas agree that it has the authority or discretion to incorporate workforce diversity and inclusion goals into their requirements for energy efficiency programs? If no, on what basis is this claim made?

RESPONSE 2:

Please see response to Question 1.

It is SoCalGas' position that its authority and discretion to implement requirements for energy efficiency programs stems from state and federal mandates. As a federal contractor, SoCalGas maintains affirmative action plans in compliance with Executive Order 11246. As part of its normal course of business, SoCalGas also incorporates its affirmative action language into contracts with suppliers, prime contractors, and subcontractors. The Company is also compliant with GO 156 and its obligation to establish, and annually report to the Commission on its Supplier Diversity Program. As part of the Program and in accordance with GO 156, SoCalGas establishes goals for the use of DBEs and encourages prime contractors to do the same. SoCalGas is also engaged in extensive outreach to locate qualified DBEs and assist them with DBE certification with the Commission.

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QUESTION 3:

Does SoCalGas agree with SDG&E’s assertion that connecting disadvantaged workers to job and career pathways is out of the scope of the energy efficiency programs.¹ If yes, please explain the basis for this assertion.

RESPONSE 3:

SoCalGas agrees with the SDG&E Business Plan that states: “WE&T is not a workforce development, nor job creation program. Please see the Career and Workforce Readiness program for details on supporting disadvantaged workers.”¹

The WE&T program is not designed to provide job placement. Currently, WE&T provides training to help increase skills, abilities, and knowledge that can favorably affect energy efficiency outcomes. WE&T provides a pathway to green jobs through professional development, training, mentoring, integrated academic curricula, internships, project based learning, and broad-based professional networks.² Efforts to develop contiguous courses and curriculum are intended to help guide workers through career-based pathways, not provide job placement.

To expand upon the current WE&T offering, SoCalGas includes the proposed Statewide Career & Workforce Readiness (CWR) offering as part of the Business Plan. The new CWR program will have a primary focus on helping to reduce barriers to worker participation in the energy efficiency sector. CWR will provide its primary target audience with energy education and workforce development resources through collaborations with organizations that serve disadvantaged workers and communities, such as workforce investment boards, community-based organizations, and workforce development agencies.³

¹ See SDG&E 2018-2025 Energy Efficiency Rolling Portfolio Business Plan, Appendix F External Stakeholder Observations, ID #075.

² Southern California Gas Company Statewide Workforce, Education and Training Program - Program Implementation Plan at 721.

³ Business Plan at 392.

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QUESTION 4:

Does SoCalGas agree with SDG&E's assertion that workforce development and job creation are not components of the workforce education and training ("WE&T") program.² If yes, please explain the basis for this assertion.

RESPONSE 4:

SoCalGas agrees with the SDG&E Business Plan that states: "WE&T is not a workforce development, nor job creation program. Please see the Career and Workforce Readiness program for details on supporting disadvantaged workers."⁴

WE&T program is not designed to create jobs. Instead, WE&T provides a pathway to green jobs through professional development, training, mentoring, integrated academic curricula, internships, project based learning, and broad-based professional networks.⁵

To expand upon the current WE&T offering, SoCalGas includes the proposed Statewide Career & Workforce Readiness (CWR) offering in the Business Plan. The new CWR program will have a primary focus on helping to reduce barriers to worker participation in the energy efficiency sector. CWR will provide its primary target audience with energy education and workforce development resources through collaborations with organizations that serve disadvantaged workers and communities, such as workforce investment boards, community-based organizations, and workforce development agencies.⁶

⁴ Id.

⁵ Southern California Gas Company Statewide Workforce, Education and Training Program - Program Implementation Plan at 721.

⁶ Business Plan at 392.

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QUESTION 5:

In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), SoCalGas, Southern California Edison Company ("SCE"), San Diego Gas & Electric Company ("SDG&E"), and Pacific Gas and Electric Company ("PG&E") (jointly, the "IOUs") stated that they would address "EE skills building and fund training programs that connect disadvantaged workers to job and career pathways in EE," including developing "an EE career pathway framework for disadvantaged workers that identify pathways for at least three occupations."

- (a) Are these activities being continued under the under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan? If yes, how does the Business Plan ensure that these activities will be continued?
- (b) Did the IOUs develop "an EE career pathway framework for disadvantaged workers that identify pathways for at least three occupations"? If yes, please provide a copy.
- (c) Please describe any other steps or activities that were taken to address "EE skills building and fund training programs that connect disadvantaged workers to job and career pathways in EE."
- (d) Please provide any studies, reports, memorandums, data or other documents describing WE&T activities that connected disadvantaged workers to job and career pathways in EE.

RESPONSE 5:

- (a) The four IOUs hired a consultant to conduct research to provide data on appropriate job and career pathways into energy efficiency. Those studies were completed in 2016 and are available at www.energydataweb.com/cpuc/search.aspx . They are also attached to the PG&E response to this question. While the studies were completed in 2016, supporting disadvantaged workers will continue into 2018-2025 in ways identified in the Business Plan. Further, future Implementation Plans will identify ways in which the IOUs will support disadvantaged workers.
- (b) Yes. The report entitled "Survey of Inclusion Workforce Landscape" focused on four occupations (electricians, carpenters, plumber/pipefitter/steamfitter, and HVACR

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mechanic/installer), is posted at www.energydataweb.com/cpuc/search.aspx, and included in this response.

- (c) SoCalGas continues to offer EE training programs to various professions, including some of those identified in the study referenced in part (a). In doing so, SoCalGas collaborated with other training providers (union training organizations, community-based organizations) whose primary audience was one or more of the four identified professions. The SoCalGas Business Plan also speaks at a high level to how SoCalGas will continue to serve those audiences. The implementation plans, once developed, will provide more information about how SoCalGas and its implementers will support specific industries, occupations, and disadvantaged workers. Where possible, SoCalGas has and will modify program offerings to make them more accessible to disadvantaged/displaced workers.
- (d) The four IOUs hired two consultants to develop three reports related to disadvantaged workers. Those studies were completed in 2016 and are available at www.energydataweb.com/cpuc/search.aspx. They are also attached to the PG&E response to this question.

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QUESTION 6:

In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would hire an “inclusion consultant” to advise regarding the potential development of a workforce inclusion program to broaden access to living wage jobs and career pathways in EE for workers from disadvantaged communities.”

- (a) Was an inclusion consultant” hired?
- (b) If yes, please provide a copy of the RFP and consultant contract, and a copy of any reports, memorandums or studies prepared by the inclusion consultant.

RESPONSE 6:

- (a) Yes.
- (b) Original RFP documents (bid package) were made available to all interested vendors and final report documents prepared by consultant are attached to PG&E’s response to this question. Final reports were also posted to the Commission's Public Documents Area at www.energydataweb.com/cpuc/home.aspx

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QUESTION 7:

In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would add “workforce inclusion as a factor in ranking proposals by third-party contractors.”

- (a) Has “workforce inclusion” been added as a factor in ranking proposals by third-party contractors?
- (b) If yes, to what proposals does this requirement apply, what workforce inclusion information is required to be included in proposals, and how is it assessed in ranking proposals?
- (c) Will workforce inclusion be included as a factor in ranking proposals by third-party contractors under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan? If yes, how does the Business Plan ensure this will occur?

RESPONSE 7:

The question incorrectly interprets the joint advice letter if it is asserting that the IOUs affirmatively stated that they would add workforce inclusion. To clarify the IOUs’ joint advice letter, the IOUs instead stated:

“In 2015 in conjunction with the Resource Programs, the IOUs will assess the feasibility of adding “workforce inclusion” as a factor in ranking proposals for implementation work by third party contractors for selected Resource Programs. Prior to broader program adoption, it will be necessary to test this methodology to better understand the implications of such an initiative. Some of the necessary criteria that need to be explored include legal and regulatory requirements in introducing such standards into awarding contracts to third party contractors.”⁷

No, workforce inclusion has not been added as a factor in ranking proposals from third party energy efficiency program bidders. However, as indicated in the response to Question 1,

⁷ Statewide WE&T PIP addendum at 4.

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SoCalGas actively outreaches to potential bidders to encourage DBE participation in third-party program solicitations. DBE is also considered as part of the evaluation of third-party energy efficiency program proposals.

b) Not applicable.

c) No, workforce inclusion will not be included as a factor in ranking proposals by third-party contractors under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan. However, DBE is currently a consideration in ranking of program proposals and SoCalGas proposes to continue these considerations in future program solicitations.

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QUESTION 8:

On page 267, the SoCalGas 2018-2025 Energy Efficiency Rolling Portfolio Business Plan asserts that prevailing wages create barriers to adopting energy efficiency solutions.

- (a) Identify and explain the basis for this claim.
- (b) Please provide any studies, reports, data or other evidence relied upon to support this claim.
- (c) Has SoCalGas evaluated and identified the benefits that prevailing wage provides to achieving energy efficiency outcomes? If yes, please provide a copy of this evaluation.

RESPONSE 8:

- a) In the public sector, some local governments have procurement policies that require contractors to be paid prevailing wages for work performed on behalf of the local government. These organizational requirements can prohibit the local government from participating in a utility-procured energy efficiency direct install program as the program labor is contracted directly by the utility, which does not have such procurement requirements. To overcome this barrier, utility contracts with its vendors for direct install programs are typically modified to include a requirement to pay prevailing wages when required by the local government customer.
- b) SoCalGas has experienced the prevailing wage requirements within several local government partnerships (e.g., County of Riverside) when attempting to provide a direct install offering.
- c) No.

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QUESTION 9:

Do energy savings and cost-effectiveness calculations for upstream energy efficiency programs take into account the risk of lost energy savings due to poorly installed energy efficiency measures? If yes, please describe and provide documentation showing: (a) how and where this is taken into account, (b) in what programs this is taken into account, (c) what adjustment factors (if any) were applied, and (d) the basis for the adjustment factor.

RESPONSE 9:

SoCalGas does not currently offer upstream programs in its energy efficiency portfolio and therefore does not take into account the risk of lost energy savings due to poorly installed energy efficiency measures in its current energy savings and cost-effectiveness calculations for upstream energy efficiency programs. SoCalGas intends to utilize upstream program intervention strategies in the future energy efficiency portfolio as described in the Business Plan; respective energy savings and cost-effectiveness calculations would account for this risk as described in the response to Question 11.

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QUESTION 10:

Do energy savings and cost-effectiveness calculations for midstream energy efficiency programs take into account the risk of lost energy savings due to poorly installed energy efficiency measures? If yes, please describe and provide documentation showing: (a) how and where this is taken into account, (b) in what programs this is taken into account, (c) what adjustment factors (if any) were applied, and (d) the basis for the adjustment factor.

RESPONSE 10:

Yes. See the response to Question 11.

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QUESTION 11:

Do energy savings and cost-effectiveness calculations for downstream energy efficiency programs take into account the risk of lost energy savings due to poorly installed energy efficiency measures? If yes, please describe and provide documentation showing: (a) how and where this is taken into account, (b) in what programs this is taken into account, (c) what adjustment factors (if any) were applied, and (d) the basis for the adjustment factor.

RESPONSE 11:

Yes. SoCalGas accounts for multiple factors at the measure level which impact energy savings and cost-effectiveness calculations. Discounts applied to prescribed energy savings include, but are not limited to, the risk of lost energy savings due to poorly installed measures for energy efficiency measures and are accounted for in the revision of energy efficiency measure workpapers and measure implementation. Discounts are typically derived from Energy Division *ex ante* review dispositions as well as from direct measure impact evaluations which integrates in the evaluation installation rate examining, as applicable, measure existence, installation quality, and correct operation and potential to generate savings.

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QUESTION 12:

The 2018-2025 Energy Efficiency Rolling Portfolio Business Plan states that “qualified contractors” will be relied upon to ensure proper installation of energy efficiency measures.

- (a) What is the definition of a qualified contractor?
- (b) Will a “qualified contractor” be required to demonstrate that it is utilizing an adequately skilled and trained workforce to perform the energy efficiency work?
- (c) On what basis does the Business Plan assume that a qualified contractor requirement will lead to properly installed energy efficiency measures?
- (d) What energy efficiency measures or type of programs will require use of a qualified contractor?

RESPONSE 12:

- (a) In the context of its filed EE Business Plan, SoCalGas considers a qualified contractor as a contractor who is licensed to perform the work and who follows all applicable codes in performing such work.
- (b) In the context of its filed EE Business Plan, SoCalGas believes it is the responsibility of the State Licensing Board to properly test and confirm that these contractors are qualified to perform the work. It is the responsibility of the licensed contractor to pull the necessary permits and to use a workforce that is properly trained and skilled to perform such work.
- (c) In the context of its filed EE Business Plan, all work performed by the contractor shall be subject to the inspection and approval of SoCalGas to confirm work was performed consistent with program requirements. However, this does not relieve the contractor of any responsibility for the proper performance of the work.
- (d) Energy efficiency programs that encourage the installation of energy efficient equipment will require the use of a qualified contractor.

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QUESTION 13:

On what basis does the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan assume that a strategy of educating customers and trade professionals on the “value of properly installed and maintained systems,” the value of hiring “qualified professionals”, or the “value of skilled workers”⁴ will significantly improve installation quality outcomes?

- (a) Please provide any documents, studies, data, reports or other evidence on which this strategy is based.
- (b) What is the definition of a “qualified professional”?
- (c) What is the definition of a “skilled worker”?
- (d) How are customers supposed to know if the contractor they hire is using workers who have the knowledge, skills and training necessary to properly install or maintain the energy efficiency measure?

RESPONSE 13:

As referenced in SoCalGas’ filed EE Business Plan, proper replacement and maintenance of equipment holds the potential for significant energy savings.⁸ According to a study conducted by the University of California, Davis, a common problem in achieving energy-efficient retrofits with HVAC equipment is that contractors do not obtain the required permits (which mandate certain energy-efficient practices). Without consistency in permit acquisition, there is no standardized method for verifying that contractors perform quality installations. A typical HVAC installation loses almost 25% of its energy to duct leakage, improper sizing, refrigerant level and air flow.⁹ Encouraging customers to hire licensed contractors and, in turn, having the licensed contractor pull the necessary permits will help facilitate proper HVAC installation thereby reducing energy losses.

- (a) See the response above.

⁸ Business Plan at 113.

⁹ Harvey, C. (2013, March). Best practices in small commercial HVAC programs at California utilities. University of California, Davis, Retrieved from <https://eec.ucdavis.edu/files/03-25-2013-Best-Practices-in-Small-Commercial-HVAC-Programs-1.pdf>

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- (b) The term “qualified professional” was not referenced in the Business Plan.
- (c) In the context of SoCalGas’ filed EE Business Plan, the term “skilled workforce” was applied in the Workforce, Education & Training (WE&T) sector of the Business Plan to assist targeted professions with energy efficiency training. A goal of the WE&T cross-cutting sector is to facilitate skills training aligned with workforce standards needed to perform the type, level, and quality of work that will deliver energy savings.
- (d) See the response to (c) above. SoCalGas encourages customers to find licensed contractors that comply with all applicable codes including acquiring all necessary permits.

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QUESTION 14:

On what basis does the 2018-2025 Energy Efficiency Rolling Portfolio Business Plans assume that increasing awareness of training opportunities would significantly reduce the number of HVAC and lighting system measures being installed by inadequately trained technicians? Please provide the documents, studies, data, reports or other evidence on which this assumption is based.

RESPONSE 14:

SoCalGas did not conclude that increasing awareness of EE training opportunities will significantly reduce the number of HVAC and lighting system measures being installed by inadequately trained technicians. However, the Business Plan did identify that there exists low awareness of energy efficiency training opportunities among the contractor community. This is based on recent contractor training market characterization EM&V study that identified relatively minimal awareness which creates a significant barrier to participation in WE&T offerings. The studies are referenced below:

- Opinion Dynamics Corp. (2016, June 25). *PY2013-2014 California Statewide Workforce Education and Training Program Contractor Training Market Characterization, CALMAC Study ID CPU0134.01*, p. 9. Retrieved from [http://www.calmac.org/publications/CPUC WET Contractor Training Market Characterization FINAL.docx](http://www.calmac.org/publications/CPUC_WET_Contractor_Training_Market_Characterization_FINAL.docx)
- Opinion Dynamics Corp. (2016, June 25). *PY2013-2014 California Statewide Workforce Education and Training Program Contractor Training Market Characterization, CALMAC Study ID CPU0134.01*, p. 8. Retrieved from [http://www.calmac.org/publications/CPUC WET Contractor Training Market Characterization FINAL.docx](http://www.calmac.org/publications/CPUC_WET_Contractor_Training_Market_Characterization_FINAL.docx)

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QUESTION 15:

SoCalGas proposes a 2018-2025 Energy Efficiency Rolling Portfolio Business Plan metric of “increasing the number of properly installed and maintained HVAC systems by 15% over 2015 levels by 2025.”

(a) Under this metric, how will SoCalGas determine the existing baseline and the future number of properly installed and maintained HVAC systems?

(b) Why does this metric apply only to HVAC systems?

(c) Does this metric apply to all HVAC systems in the SoCalGas service area or only HVAC systems installed pursuant to SoCalGas energy efficiency programs?

(d) Does this metric apply to upstream and midstream HVAC programs?

(e) Does this metric apply to all sectors or only residential?

(f) Please provide any documents, studies, data, reports or other evidence on which this metric is based.

RESPONSE 15:

(a) As presented in the Business Plan, the existing baseline for the referenced metric is the number of properly installed and maintained HVAC units (p. 144) in SoCalGas’ 2015 energy efficiency programs supporting this sector. The 2018-2025 program results will be used to calculate metric progress, relative to this baseline, towards achieving targets over the short, mid, and long-term, as presented in the Business Plan (p. 144).

(b) A study conducted by the University of California, Davis,¹⁰ identified that properly installed and maintained HVAC systems can reduce energy losses. SoCalGas did not find other such barriers for other gas-related energy efficiency measures.

(c) The metric applies to all customer HVAC systems that participate in SoCalGas’ energy

¹⁰ Harvey, C. (2013, March). Best practices in small commercial HVAC programs at California utilities. University of California, Davis, Retrieved from <https://eec.ucdavis.edu/files/03-25-2013-Best-Practices-in-Small-Commercial-HVAC-Programs-1.pdf>

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efficiency programs from 2018-2015.

(d) Yes, the metric will apply to all program types including downstream, midstream, and upstream, if offered.

(e) The metric applies to the commercial sector.

(f) See the response to Question 15b.

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QUESTION 16:

Will ratepayer money be allowed to subsidize energy efficiency measures that are installed by contractors that do not employ adequately trained and skilled workers?

RESPONSE 16:

It is the intent of SoCalGas to require that selected implementers, whom install direct install and comprehensive direct install measures, to be licensed and qualified contractors and abide by all local, state and federal laws/ codes as listed above in response to question 12.

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QUESTION 17:

Please list all SoCalGas upstream, midstream and downstream energy efficiency programs available over the past two years that impose training or skills standards, certification requirements, prevailing wage requirements, prequalification requirements, apprenticeship requirements, or other workforce quality requirements. For each program that contains such requirements, please provide a description of the program and the requirements.

RESPONSE 17:

Although SoCalGas does not dictate specific contractor employee standards, contractors are expected to meet the certification and competency standards necessary to successfully deliver program performance results. Nevertheless, within the Residential sector, SoCalGas verifies contractors/installers meet certain certification requirements for the Energy Upgrade California[®] Home Upgrade Program (HUP), Residential HVAC Quality Installation Program (HVAC QI), and the Residential HVAC Code Compliance Rebate Program as described below.

Energy Upgrade California[®] HUP is designed to build customer and contractor awareness of the house-as-a-system approach to residential retrofits and the many benefits of improving the comfort, safety, and energy savings potential of the home. Contractors employ building science principles and use diagnostic equipment to detect the cause of home performance related problems, and quickly and accurately address them.

The HUP promotes both a Basic and Advanced path to retrofitting, allowing the customer to choose from a variety of measures that best suit their home and personal needs.

SoCalGas' HUP contractors must be certified and licensed according to applicable federal, state and local laws. Participating contractors shall meet, and provide sufficient evidence and supporting documentation for the following minimum requirements:

1. Contractor State Licensing Board (CSLB) license in the appropriate specialty;
2. Bonding and in good standing.
3. Insurance to IOU minimum insurance standard;
4. Execution of a contractor participation agreement;
5. Completion of all utility training course requirements, including Participation Workshop and a 3-Day Basic and/or Energy Upgrade Training, Workshop, if not Building Performance Institute (BPI)-certified Basic or Advanced Training, as appropriate;

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6. BPI-certified Building Analyst (BA) to complete Combustion Safety and Carbon Monoxide Protection and all other minimum Health and Safety Requirements specified in the BPI Technical Standards for Building Analyst Professional;
 7. Ensure HVAC permits will be pulled on all work that is appropriate per local jurisdiction requirements;
 8. Participating Contractors who participate in *Advanced Path* projects, must employ at least one staff person who holds an active BPI Building Analyst certification. BPI accreditation is strongly encouraged and may be required of all participating contractors at some point during the program cycle;
 9. Additional IOU requirements, as appropriate.

The *Residential HVAC Quality Installation Program (HVAC QI)* provides incentives to participating SoCalGas customers for the installation of high efficiency gas furnaces when installed according to the programs pre-determined installation guidelines by a participating contractor. By offering incentives based on the quality of installation, the program intends to achieve a greater efficiency potential.

HVAC QI contractors must be licensed as a C-20 contractor and must have no less than the minimum statutory and regulatory licenses as determined by the jurisdiction in which they are performing work. Contractors must hold either North American Technician Excellence (NATE) certification or HVAC Excellence certification. Additionally, contractors must attend program specific training and be proficient in HVAC load and sizing software.

The *Residential HVAC Code Compliance Rebate Program* provides incentives to HVAC distributors for working with their installation contractors to initiate the HERS process, and with SoCalGas customers for working with their local building departments to finalize their HVAC permits. Incentives are paid at the upstream and downstream channels to fairly and efficiently encourage both the start and finish of the compliance process and the discussion of the value of compliance at high-leverage key decision points of the market process.

Installers performing work for SoCalGas' Residential HVAC Code Compliance Pilot must be licensed as a C-20 contractor.

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QUESTION 18:

In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would initiate the following activity as a priority issue: “[a]dopting skill certification requirements for advanced lighting controls and HVAC Quality Installation and Quality Maintenance and other available skill standards and certification guidance.”⁶

- (a) What skills standards or certification requirements have been adopted or initiated and to which programs do these requirements apply?
- (b) Please provide any studies, reports, memorandums, data or other documents describing the actions taken to initiate this activity.
- (c) Will the adoption of “skill certification requirements for advanced lighting controls and HVAC Quality Installation and Quality Maintenance and other available skill standards and certification guidance” remain a priority issue under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan? If yes, how does the Business Plan ensure that this will remain a priority?

RESPONSE 18:

For contractors who participate in HVAC Commercial Quality Maintenance (QM) programs, applicable IOUs require skills standards and certification requirements in alignment with the recommendation, fulfilling the commitment outlined in the February 23, 2015 Advice Letter and PIP Addendum. The IOUs will continue to evaluate and consider the adoption of skills certification requirements, where applicable and feasible, and will seek guidance from the CPUC, CEC, and other relevant stakeholders as legislation and market needs evolve.

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QUESTION 19:

In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would adopt a responsible contractor policy for contractors that work directly with the IOUs.

- (a) Was a responsible contractor policy adopted for contractors that work directly with the IOUs?
- (b) If yes, please provide a copy of the policy and identify what programs are required to comply with this policy.
- (c) If no, please provide any studies, reports, memorandums, data or other documents describing the steps taken to comply with this commitment.

RESPONSE 19:

To clarify, the actual referred statement in the February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), please see the actual advice letter statement below which was approved.

Revised Recommendation 1.1 - Adopt a responsible contractor policy for use across all resource programs where contractors work directly with the IOU.

1.1.1 Require that all ratepayer-subsidized projects meet pre-established, clearly defined minimum standards relating to contractor responsibility, including: all applicable licenses, bonding and insurance (including workers' compensation), wage and labor law compliance, OSHA compliance, and permitting that includes passing code inspections.

- (a) The following is the response to the question which is consistent with the Statewide IOU discussion in the advice letter beginning at page 8.

Under California Public Utilities Code Section 399.4, the IOUs require that recipients of IOU program rebates (contractors or customers) certify that installations comply with any

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applicable permitting requirements and, if a contractor performed the installation or improvement, that the contractor holds the appropriate license for the work performed.

In addition, Senate Bill 1414 (approved September 26, 2016) would require the California Energy Commission (CEC), by January 1, 2019, to approve a plan that will promote compliance with specified regulations in the installation of central air conditioning and heat pumps. The bill would authorize the CEC to adopt regulations to increase compliance with permitting and inspection requirements for central air conditioning and heat pumps, and associated sales and installations, consistent with that plan. The IOUs will participate in the CEC's process as they develop and approve the regulations to implement the requirements of SB 1414.

- (b) See response to (a).
- (c) Not applicable.

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QUESTION 20:

In the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would meet with WE&T stakeholders in 2016 to present their plans for the remaining UC-Berkeley Don Vial Center Workforce Guidance Plan recommendations summarized in Appendix 1 of the Advice Letter.⁸

- (a) Was a plan for the remaining UC-Berkeley Don Vial Center Workforce Guidance Plan recommendations ever presented to stakeholders?
- (b) If yes, please provide a copy of this plan and identify the stakeholders who were invited to the presentation.

RESPONSE 20:

- (a) Guidance Plan (GP) recommendations are integrated into the SoCalGas Business Plan. At the May 3, 2016 Stage 1 WE&T CAEECC Sub-committee meeting, in response to a stakeholder's question regarding the DVC Guidance Plan recommendations, the IOUs responded that the stakeholder's question about implementing the recommendations was too detailed for the Business Plans. The Business Plan does not identify the GP recommendations one by one, but rather in a broader and more overarching manner.

Please refer to Attachment 1 of the joint Advice Letter and the column "IOU Proposal" which indicates the disposition of the DVC recommendations:

- (1) Partial Adoption
- (2) Current Activity/Initiate 2015
- (3) Explore in 2016+
- (4) Require Regulatory Guidance

The IOUs' response is focused on items (3) and (4). With respect to recommendations in (3), the Statewide WE&T team hosted a Stakeholder Engagement Forum in September 2015 and additional SEF/Subcommittee meetings in March and May of 2016. Additionally, to the extent that discussions/comments were raised at the various California Energy Efficiency Coordinating Committee (CAEECC) meetings, the WE&T Subcommittee Co-Chair, Brandi Turner, responded to WE&T DVC topics. Specifically,

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Ms. Turner addressed the issues/discussions with the perspective of their relevance to the planning and preparation of the Program Business Plans.

For item (4) the CPUC disposition letter that approved the joint Advice Letter recognized that some of the comments to the joint Advice Letter would “require higher level policy consideration that are not within the purview of the Energy Division. . . . Specifically, these issues may be raised in Phase 3 of the current energy efficiency proceeding which will deal directly with program implementation policies.”

The IOUs also note that since the publication of the DVC report, new laws have been passed that impact the workforce with respect to working in energy efficiency programs. For example, as stated in the response to Q18, SB1414 provides for the California Energy Commission to develop regulations regarding the installation of central air conditioning and heat pumps. SB 350, Sec. 25943(a)(3), directs the CEC to “adopt, implement, and enforce a responsible contractor policy for use across all ratepayer-funded energy efficiency programs that involve installation or maintenance, or both installation and maintenance, by building contractors to ensure that retrofits meet high-quality performance standards and reduce energy savings lost or foregone due to poor-quality workmanship.” Other examples from SB 350 are Sec. 25943(c)(7) regarding the use of not-for-profit and community-based organizations in disadvantaged communities; and Sec. 25943(c)(8) workforce development and job training in residential disadvantaged communities. This is not an exhaustive list of legislation that impacts workforce requirements as they pertain to EE program implementation. The IOUs will be participating at the CEC, and at the PUC as applicable, in the development of these regulations.

Lastly, throughout the Business Plans, the IOUs have discussed how they will continue to engage in stakeholder discussions (CAEECC, PRGs, CEC/PUC workshops) in development of workforce requirements in program solicitations as necessary.

- (b) Copies of the presentation material shared with stakeholders, along with meeting notes, for the above referenced WE&T sub-committee meetings are available at <https://www.caeccc.org>.

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QUESTION 21:

In Appendix 1 of the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would initiate establishing prevailing wage and targeted hire goals for contractors that are preselected by the IOUs or have a direct contracting relationship with the IOUs.⁹

- (a) Were prevailing wage and targeted hiring goals established for contractors that are preselected by the IOUs or have a direct contracting relationship with the IOUs?
- (b) If yes, please provide a copy of these goals and identify what programs are required to comply with these goals.
- (c) If no, please explain why this did not happen

RESPONSE 21:

- (a) No, prevailing wage and targeted hiring goals were not established for contractors that are preselected by the IOUs or have a direct contracting relationship with the IOUs. However, in the context of the question, SoCalGas pays prevailing wage in accordance with applicable federal, state and local requirements. SoCalGas also requires contractors and subcontractors to pay in accordance with those requirements.
- (b) Not applicable.
- (c) The IOUs did not specifically commit to establishing “prevailing wage and targeted hiring goals.” The specific action that the IOUs committed to doing with respect to this issue is as follows:

7) Prevailing Wage:

The IOUs will evaluate the impacts associated with implementing targeted hiring goals, prevailing wage and wage floors in the IOUs’ Resource Programs. The analysis will include documentation and data illustrating how worker circumstances and program operations are impacted by targeted hiring goals and by prevailing wage, a living wage, or wage floor agreement. Perspectives from impacted stakeholders (e.g. program implementers, contracting agencies and other internal and external stakeholders) will

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be taken into account.

The report addressing this issue is attached.



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QUESTION 22:

In Appendix 2 (2015 WE&T PIP Addendum) of the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would “evaluate the impacts associated with implementing targeted hiring goals, prevailing wage and wage floors in the IOUs’ Resource Programs.”¹⁰

- (a) What is the status of this evaluation?
- (b) Please provide copies of any reports, memorandum, contracts, studies, updates, data, emails, correspondence or other documents related to this evaluation.

RESPONSE 22:

- (a) See the response to Question 21(c).
- (b) SoCalGas objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to admissible evidence. Subject to, and without waiving this objection, SoCalGas provides the following response: please see response to Question 21(c) and the corresponding attachment provided therein.

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QUESTION 23:

In Appendix 2 (2015 WE&T PIP Addendum) of the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs stated that they would prepare the following studies: (1) "WE&T Skill Standards for IOU Resource Program," (2) "CALCTP Contractor Training Assessment," and (3) the "SCE and SDG&E Lighting Control Pilot Program."

- (a) What is the status of each of these studies? If a study has not been completed, please state when the study is expected to be complete.
- (b) Please provide copies of any reports, memorandum, contracts, studies, updates, data, emails, correspondence or other documents related to these studies.

RESPONSE 23:

(a) To clarify the call of the question, the IOUs did not commit to prepare the referenced studies. In the February 23, 2015 Advice Letter and PIP Addendum, the IOUs stated they would be "engaged and supportive" of these Commission-led studies. The status the first study is as follows (SoCalGas, as a gas utility, did not participate in the lighting-related studies):

(1) Energy Division's research plan for the "PY2013-14 California Statewide Workforce Education and Training Program Skill Standards for IOU Resource Program Study" included multiple phases of work. The first phase "Workforce Conditions Data Collection" is completed and available on the Commission's public documents site at www.energydataweb.com/cpuc/search.aspx. Likewise, the second phase "Contractor Training Market Characterization" is completed and also available on the CPUC's public documents site. Phase three "Responsible Contractor Policy Market Intelligence Study" is currently in progress and expected to be completed in August, 2017.

- (b) SoCalGas objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to admissible evidence. Subject to, and without waiving this objection, SoCalGas provides the following response: please see response to (a).

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QUESTION 24:

In Appendix 1 of the joint February 23, 2015 Advice Letter on the WE&T Program Implementation Plan Addendum (PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G), the IOUs identify numerous actions that they will explore in 2016 and beyond.

- (a) Have any of these 2016 and beyond activities been initiated?
- (b) If yes, please describe these activities.
- (c) Which of the activities that the IOUs stated would be explored in 2016 and beyond will be initiated under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan?

RESPONSE 24:

Yes, the IOUs explored these activities as part of the Business Planning process. At the September 23, 2015 Statewide WE&T Stakeholder Engagement Forum (SEF) the IOUs presented an update on how Decision 14-10-046 ordering a rolling portfolio would affect long term planning within WE&T. During the "Rolling Portfolio & Long Term Planning" section of the SEF, the IOUs presented changes in the approach to long term planning based on the Rolling Portfolio and where the WE&T team priorities would lie going forward. At that time, the IOUs requested feedback from stakeholders to direct priorities going forward

During the 2016 WE&T Rolling Portfolio Business Plan Subcommittee meetings, the IOUs presented their plans to stakeholders, stating that the Barriers, Problem Statements and Gap Analyses took into account the various evaluations, studies and reports the IOUs have received, including the Don Vial Center (DVC) studies. In response to a specific stakeholder question about the DVC Report (at the May 3, 2016 meetings) the IOUs stated that those recommendations in whole were being taken into consideration as part of the Rolling Portfolio Business Plan process

These meetings were noticed respectively to the service lists for the Energy Efficiency rulemaking, Demand Response rulemaking, and the Distributed Generation rulemaking and to the California Energy Efficiency Coordinating Committee (CAEECC).

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The IOUs believe that the CAEECC Business Plan process and the resultant proposed Business Plans presented the IOUs' overall approach to the DVC recommendations as holistic approach to feedback. This approach is not only consistent with the direction provided by the CAEECC process, it also provides a more comprehensive and strategic direction for WE&T than does addressing each recommendation one by one.

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QUESTION 25:

In its comments on the draft Business Plans submitted during the CAEECC review, CEE recommended expressly identifying the “lack of economic incentives for contractors to invest in worker training” as a market barrier to achieving Long-Term Energy Efficiency Strategic Plan’s goal of an adequately trained and engaged workforce to achieve California’s economic energy efficiency potential. Please explain why the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan does not disclose or address this barrier.

RESPONSE 25:

SoCalGas disagrees with CEE's assessment that the lack of contractor incentives to invest in worker training is a market barrier. The lack of incentives by itself does not constitute a market barrier. Instead, SoCalGas' Business Plan recognizes that "competing priorities among education and training providers" as the applicable market barrier. (see, p.376) This barrier can be removed through improved energy efficiency training and curriculum offered by Southern California's education and workforce training institutions. In this way, contractors will have available to them a workforce adequately trained in energy efficiency.

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QUESTION 26:

In its comments on the draft Business Plans submitted during the CAEECC review, CEE recommended expressly identifying lost energy savings from poorly installed retrofits as a barrier to meeting each sector's energy efficiency goals. Please explain why the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan does not disclose this as a barrier to each sector's energy efficiency goals.

RESPONSE 26:

See response to Question 15. The Business Plan identified major barriers to increased energy efficiency levels for each sector. However, only the commercial sector identified improper HVAC equipment installations as a market barrier to capturing lost energy efficiency. Specifically, a study conducted by the University of California, Davis, identified that properly installed and maintained commercial HVAC systems can reduce energy losses. SoCalGas did not uncover similar market barriers in other sectors that would capture significant energy efficiency levels.

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QUESTION 27:

Please explain why the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan does not require energy efficiency programs to ensure that ratepayer-subsidized energy efficiency measures are installed by an adequately trained and skilled workforce.

RESPONSE 27:

The SoCalGas Business Plan was designed to be a high level overview of the portfolio. It does not speak on specific program design, which will be further discussed and established in the Implementation Strategy. It is the intent of SoCalGas to require that selected implementers, whom install direct install and comprehensive direct install measures, to be licensed and qualified contractors and abide by all local, state and federal laws/ codes as listed above in response to question 12.

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QUESTION 28:

Have the IOU WE&T programs established the minimum knowledge, skills and abilities (KSAs) necessary to ensure quality installation for any specific energy efficiency measures or energy efficiency occupations? If yes, please identify the KSAs and please provide copies of any studies or reports upon which the KSAs are based.

RESPONSE 28:

The WE&T program does not establish minimum knowledge, skills and abilities (KSAs) rather SoCalGas and the other IOUs intend¹¹ to integrate US Department of Energy (DOE) skills standards. Currently, the backbone of the DOE accreditation guidelines includes a set of eight role-based Job Task Analyses (JTAs) aimed at cataloging the KSAs that a “Home Energy Professional” for single and multi-family homes needs to successfully perform his/her job safely and effectively. The IOUs will assemble a cross-functional team of WE&T and IOU resource program representatives to review and evaluate these JTAs for relevance in meeting California and utility energy efficiency program needs, and for integration into any program skills standards and/or certifications.

¹¹ PG&E Advice 3567-G/4592-E; SDG&E Advice 3179-E; SCE Advice 3179-E; SoCalGas Advice 4765-G, dated February 23, 2015.

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QUESTION 29:

Have the IOU WE&T programs established a worker quality baseline for any specific energy efficiency measures or energy efficiency occupations (i.e. the percentage of workers installing specific energy efficiency measures determined to have the appropriate skills, training, and certifications)? If yes, please provide a copy of any studies, reports or data on which this baseline is estimated.

RESPONSE 29:

The SoCalGas WE&T programs do not establish worker quality baselines for energy efficiency measures or energy efficiency occupations.

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QUESTION 30:

How will the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan ensure that midstream and upstream programs do not subsidize energy efficiency equipment or measures that are installed by contractors that violate permit or code requirements?

RESPONSE 30:

SoCalGas' Business Plan provides a high-level overview of the SoCalGas Energy Efficiency Portfolio. Furthermore, in regards to permit and code requirements, licensed contractors who obtain the required building permits and have knowledge of, and comply with, local codes and ordinances shall receive permit closures upon final inspection, rendering the measure/appliance properly installed. It is the responsibility of the governing agency performing the inspection and the qualified contractor to ensure that the measure is installed properly. In accordance with SB 1414, Section 1, item (2), the public utilities are "not responsible for verifying the proof of permit closure documentation provided by the customer or contractor." As previously stated in the response to Question 12, it is the responsibility of the licensed contractor to comply and observe all applicable federal, state, regional, municipal and local laws, ordinances, rules, regulations, executive orders, applicable employment, safety and environmental orders and any applicable orders or decrees of administrative agencies, courts or other applicable authorities.

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QUESTION 31:

What is meant by the compliance strategy to “simplify” the codes?11

- (a) What code requirements have been identified as too complex or amenable to simplification without reducing safety or energy efficiency?
- (b) Please provide any data, reports, studies or other evidentiary basis to support the assumption that simplifying the codes will increase code compliance?

RESPONSE 31:

Compliance Improvement subprogram staff are in constant contact with builders and code enforcement officials. SoCalGas understands that these groups have expressed interest in simplifying California codes to allow for more cost efficient building construction and alterations, as well as more straightforward review by local building officials. For example, input on the non-residential HVAC and lighting alterations sections of Title 24, Part 6 was collected through focus groups. Multiple white papers published by a stakeholder insight group, the Compliance Improvement Advisory Group, advocate for simplification and a reduction in process-related burdens in the compliance process. Revisions to the standards that reduce complexity as well as streamline the compliance process are expected to increase compliance thereby increasing statewide energy savings. Commission managed Codes & Standards program impact evaluation efforts are expected to determine if any implemented code simplification efforts increase energy savings.

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QUESTION 32:

Does SoCalGas agree that it has the authority or discretion to support code enforcement efforts as part of its energy efficiency programs? If no, please explain.

RESPONSE 32:

Codes and Standards (C&S) helps to define and support code activities by providing tools and resources to help stakeholders comply, however C&S is not an enforcer of the code. SoCalGas works collaboratively with code enforcement officials by providing training assistance on code awareness related to energy efficiency.

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QUESTION 33:

Please describe how the proposed 2018-2025 Energy Efficiency Rolling Portfolio Business Plan Public Sector budget amounts were determined?

RESPONSE 33:

SoCalGas relied on historical portfolio, program, and cost category performance as well as market sector forecasts including the Energy Efficiency Potential and Goals Study for 2015 and Beyond and AB802 Technical Analysis to proposed the budget at the market sector level, as presented on page 16-17 of SoCalGas' EE Business Plan.

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(A.17-01-016)
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Date Received: March 22, 2017
Date Submitted: April 7, 2017

QUESTION 34:

What is the definition of (a) downstream programs; (b) midstream programs; and (c) upstream programs?

RESPONSE 34:

In Decision 16-08-019, the Commission set forth definitions for downstream, midstream and upstream programs¹² as follows:

- Upstream - manufacturer level;
- Midstream - distributor or retailer level, but not contractor or installer; and
- Downstream - customer level, or via contractors or installers, including point-of-sale rebates.

¹² See D.16-08-019, pp.61-62 and p.58.

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QUESTION 35:

Does SoCalGas intend to shift any incentive funds away from downstream programs to midstream and upstream programs during the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan? If yes, please respond to the following:

- (a) Please describe the anticipated scope of this funding shift, including the amount of funds to be shifted, the sectors involved and the current downstream programs expected to be affected by this shift in funding.
- (b) Please describe the purpose and justification for this funding shift, including the evidentiary basis for the justification.
- (c) Provide any correspondence, notes, memos, emails, reports, studies, or other documents related to the decision to shift incentive funds away from downstream programs to midstream and upstream programs.
- (d) For budget years 2014, 2015 and 2016, what was the percentage of energy efficiency funding allocated to (a) downstream programs; (b) midstream programs; and (c) upstream programs?
- (e) Under the 2018-2025 Energy Efficiency Rolling Portfolio Business Plan, what is the percentage of energy efficiency funding allocated to (a) downstream programs; (b) midstream programs; and (c) upstream programs?

RESPONSE 35:

(a) – (b) Consistent with a basic tenant of the Rolling Portfolio, the energy efficiency program portfolio will adapt to changes over the 2018-2025 program cycle such as the introduction of new technologies/strategies, revision to program assumptions resulting from EM&V studies, and changes in the market. Such portfolio adaptations may require a shift in funds among the portfolio of programs. Significant program fund shifts, including those among downstream, midstream and upstream programs, will typically be part of the Commission-required annual program advice filing.¹³

¹³ Decision 15-10-028, OPN 4 at 123.

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(c) SoCalGas objects to this request as overbroad, unduly burdensome, and not reasonably calculated to lead to admissible evidence. Subject to, and without waiving this objection, SoCalGas provides the following response: please see response to (a)-(b).

(d) For budget years 2014, 2015 and 2016, the percentage of energy efficiency funding allocated to downstream, midstream, and upstream programs are shown below:

Budget (as of percentage)

	2014	2015	2016
Downstream	88%	85%	85%
Midstream	12%	15%	15%
Upstream	0%	0%	0%

Note: These percentages are approximate, as budgets for two midstream programs (Savings by Design and Midstream Water Heating) are sub-programs of two downstream programs (Commercial Calculated and Commercial Deemed, respectively). Budgets in this table are at the program-level only.

(e) For the 2018-2025 Energy Efficiency Rolling Portfolio, the percentage of energy efficiency funding allocated to downstream, midstream, and upstream programs will be identified after the completion of the upcoming energy efficiency program solicitations. The Business plan allocation, among these program types, is based on SoCalGas' 2017 energy efficiency budget at the program level as shown below:

Budget (as of percentage)

	2017
Downstream	85%
Midstream	15%
Upstream	0%

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QUESTION 36:

In the Joint Investor Owned Utilities' November 23, 2016 Response to TURN's Data Request (DR-TURN-001), the IOUs state in Response to Question 14 (at p. 19) that the "IOUs do not intend to continue with Direct Install as a strategy for achieving energy efficiency."

- (a) Is this statement still correct?
- (b) Is this statement limited to residential replace-on-burnout programs, or does it apply to other programs or sectors as well?
- (c) Does SoCalGas expect the 2018-2025 Energy Efficiency Business Plans to result in the elimination or reduction of other Direct Install programs? Please list which Direct Install programs are anticipated to be eliminated or reduced.
- (d) Please explain the justification for reducing or eliminating some or all Direct Install programs. Please provide any studies, reports, data or other evidence relied upon to support this justification.

RESPONSE 36:

In the Joint Investor Owned Utilities' November 23, 2016 Response to TURN's Data Request (DR-TURN-001), the IOUs did state their intention to continue to direct install as a program strategy. The Response to the referenced TURN data request is shown below for convenience.

"The IOUs do intend to continue with DI as a strategy for achieving energy efficiency. The IOUs cannot predict whether DI will be expanded to promote replace-on-burnout measure interventions through 2020. Whether it is or not will be addressed in the selected Implementation Plans as implementers are expected to propose program designs. TURN's continued participation in Phase II of CAEECC is welcomed, as we address these program designs." (Joint Investor Owned Utilities' November 23, 2016 Response to TURN's Data Request (DR-TURN-001), Response to Question 14, p. 19)

As part of the Business Plan, SoCalGas proposes to retain and expand the direct install program intervention strategy for various customer segments to overcome specific market barriers to increased program participation. To improve DI's cost-efficiency and effectiveness, customers will provide a co-payment to offset the cost of comprehensive DI

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programs offerings. The co-payment may be potentially funded through on-bill financing/repayment, PACE, etc. to help reduce the customer's cost burden and to increase energy efficiency adoption.

QUESTION 37:

Please provide the Curriculum Vitae of the supply-side Independent Evaluators.

RESPONSE 37:

SoCalGas does not have supply-side independent evaluators.