

**PACIFIC GAS AND ELECTRIC COMPANY**  
**Energy Efficiency 2018-2025 Rolling Portfolio Business Plan**  
**Application 17-01-015**  
**Data Response**

PG&E Data Request No.:	TURN_001-Q16		
PG&E File Name:	EnergyEfficiency2018-2025-RollingPortfolioBusinessPlan_DR_TURN_001-Q16		
Request Date:	February 17, 2017	Requester DR No.:	001
Date Sent:	March 6, 2017	Requesting Party:	The Utility Reform Network
PG&E Witness:	Chris Kato	Requester:	Hayley Goodson

**SUBJECT: PG&E 2018-2025 EE ROLLING PORTFOLIO BUSINESS PLAN & BUDGET. TURN DATA REQUEST TURN-PG&E-01.**

**PORTFOLIO MEASURE COMPOSITION AND INTERVENTION STRATEGIES**

**QUESTION 16**

Following up on the IOUs' joint response to Questions 13 and 14 of TURN's Nov. 9, 2016 Data Request in R.13-11-005 (addressing the draft business plans of all four IOU PAs), as it pertains to PG&E:

- a. Please specify all instances in your 2016 and 2017 portfolios in which direct install has been/will be used to promote early retirement, and indicate whether programs using this strategy permit "to code" installation, require above-code installation, or use tiered incentives to distinguish among to-code and above-code levels of efficiency. If "to code" installation is allowed, please include in your response an explanation of why you believe this is reasonable given the possibility of stranding achievable, above-code, savings over the life of the new measure.
- b. Please update your response to Question 13, if appropriate in light of your Business Plan, to indicate whether you intend to expand the use direct install to promote early retirement in 2018-2020, relative to your 2016-2017 portfolio. Include the measures, customer sectors, and building types for which you believe DI may be a reasonable strategy to surmount market barriers to EE, given cost-effectiveness considerations.
- c. Please specify all instances in your 2016 and 2017 portfolios in which direct install has been/will be used to promote replace-on-burnout measure interventions, and indicate whether programs using this strategy permit "to code" installation, require above-code installation, or use tiered incentives to distinguish among to-code and above-code levels of efficiency. If "to code" installation is allowed, please include in your response an explanation of why you believe this is reasonable given the possibility of stranding achievable, above-code, savings over the life of the new measure.
- d. Please update your response to Question 14, if appropriate in light of your Business Plan, to indicate whether you intend to expand the use direct install to promote replace-on-burnout measure interventions in 2018-2020, relative to your 2016-2017 portfolio. Include the measures, customer sectors, and building types for which you

believe DI may be a reasonable strategy to surmount market barriers to EE at burnout, given cost-effectiveness considerations.

## **ANSWER 16**

**a.** Early retirement is promoted in all of PG&E Government Partnership Regional Direct Install programs and the Commercial Hospitality Program, however several Regional DI programs do not report ER savings claims. Table 1 below shows Each of PG&E's direct install programs for 2016 and whether or not Early Retirements claims were documented in each for 2016. PG&E expects a similar distribution in 2017.

As a general rule, early retirement "to-code" is not allowed in Direct Install programs. However, it was discovered that in limited cases some implementers provided incentives for linear fluorescent lamps that were determined to be "to-code" measure in 2016. Those implementers were promptly instructed to stop offering those "to-code" lamp retrofits, and early retirement policies were clarified for all regional DI implementers according to CPUC policy.

**b.** PG&E intends to continue with DI as a strategy for achieving energy efficiency – particularly for small and medium businesses. Per D.16-08-019 and Resolution E-4818, PG&E anticipates greater utilization of the early retirement measures for residential and small business customers as streamlined standards for preponderance of evidence (required for all ER claims) become available, which would be applicable for most of projects in current DI programs. However, PG&E cannot predict whether DI specifically will be expanded to promote early retirement through 2020. Whether it is or not will be determined by 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.

**c.** All of PG&E's Direct Install Programs promote exceeding code on for replace-on-burnout measures. Table 1 below shows each of PG&E's direct install programs for 2016 and whether or not Early Retirements claims were documented in each for 2016. PG&E expects a similar distribution in 2017.

"To-code" replace on burnout measures are not allowed in Direct Install programs. Many direct install programs use customized calculations for lighting measures which provide incentives relative to energy savings. In those cases, greater incentives are provided for higher degrees of efficiency.

**d.** PG&E intends to continue with DI as a strategy for achieving energy efficiency. The PG&E 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.

**Table 1**

<b>Sector</b>	<b>Program</b>	<b>ROB</b>	<b>ER</b>	<b>Other MAT*</b>
<b>COM</b>	PGE210118 - FURNITURE STORE ENERGY EFFICIENCY	Yes		Yes
<b>COM</b>	PGE210143 - HOSPITALITY PROGRAM	Yes	Yes	Yes
<b>COM</b>	PGE21015 - COMMERCIAL HVAC	Yes		Yes
<b>GP</b>	PGE210126 - K-12 PRIVATE SCHOOLS AND COLLEGES AUDIT RETRO	Yes		Yes
<b>GP</b>	PGE2110051 - LOCAL GOVERNMENT ENERGY ACTION RESOURCES (LGEAR)	Yes	Yes	Yes
<b>GP</b>	PGE211007 - ASSOCIATION OF MONTEREY BAY AREA GOVERNMENTS (AMBAG)	Yes	Yes	Yes
<b>GP</b>	PGE211009 - EAST BAY	Yes	Yes	Yes
<b>GP</b>	PGE211010 - FRESNO	Yes	Yes	Yes
<b>GP</b>	PGE211011 - KERN	Yes	Yes	Yes
<b>GP</b>	PGE211012 - MADERA	Yes	Yes	Yes
<b>GP</b>	PGE211013 - MARIN COUNTY	Yes	Yes	Yes
<b>GP</b>	PGE211014 - MENDOCINO COUNTY	Yes	Yes	
<b>GP</b>	PGE211015 - NAPA COUNTY	Yes	Yes	Yes
<b>GP</b>	PGE211016 - REDWOOD COAST	Yes		
<b>GP</b>	PGE211018 - SAN LUIS OBISPO COUNTY	Yes	Yes	Yes
<b>GP</b>	PGE211019 - SAN MATEO COUNTY	Yes	Yes	Yes
<b>GP</b>	PGE211020 - SANTA BARBARA	Yes	Yes	Yes
<b>GP</b>	PGE211021 - SIERRA NEVADA	Yes		
<b>GP</b>	PGE211022 - SONOMA COUNTY	Yes	Yes	Yes
<b>GP</b>	PGE211023 - SILICON VALLEY	Yes	Yes	Yes
<b>GP</b>	PGE211024 - SAN FRANCISCO	Yes	Yes	Yes
<b>RES</b>	PGE210011 - RESIDENTIAL ENERGY FITNESS PROGRAM	Yes		Yes
<b>RES</b>	PGE21008 - ENHANCE TIME DELAY RELAY	Yes		Yes
<b>RES</b>	PGE21009 - DIRECT INSTALL FOR MANUFACTURED AND MOBILE HOMES	Yes		Yes

\*In DI, other MATs may include Retrofit Add-on, Retrocommissioning, or unknown.