

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	SDG&E	Overall	<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 PG&E’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 PG&E’s public sector business plan will not be adequately vetted with stakeholders prior to filing. 		
ORA-2	SDG&E	Overall	<ul style="list-style-type: none"> SDG&E’s strategies should be targeted to address specific end uses and market segments. <ul style="list-style-type: none"> Strategies to address HVAC and Lighting should be addressed in the BP as these dominate commercial electrical use. Similarly, water heating and space heating dominate gas use. Alternatively, SDG&E should justify why strategies to address specific end uses are not discussed in the BP. SDG&E should consider segmenting the market by firm size and addressing the specific market barriers for different sectors. Section is overly reliant on “market innovations” that lack specificity. Strategies should be sufficiently defined to allow SDG&E to demonstrate that future activities were those included in the business plans. 		
ORA –3	SDG&E	Overall	<ul style="list-style-type: none"> No discussion of past programs. <ul style="list-style-type: none"> EM&V reports should be referenced as an important resource in overcoming past program shortcomings. Should add discussion of past efforts and/or self-evaluation of what works and what did not work (and evidence supporting those conclusions). The chapter lacks a discussion of how SDG&E will address the shortcomings of previous program cycles or even what these are. 		
ORA-4	SDG&E	48	<ul style="list-style-type: none"> The category “other” for gas consumption in the Unlabeled Table on page 48 requires explanation. 		

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Program Administrator/Chapter to receive feedback:

SDG&E Commercial Sector

Date 11/21/2016