Commenter Name: Commenter Affiliation: Program Administrator to receive feedback: Date:

Considerations for reviewing and providing comments on PA Business Plan Chapters

Please consider the following questions as you review the Business Plan chapters. The second page provides a template into which your feedback may be captured.

Prior to reviewing and commenting on the Business Plan drafts, a reviewer may wish to review the updated "NRDC Compilation of CPUC Business Plan Guidance and PA Consensus Outline" found on the CAEECC Guidance webpage. That document merges a number of sources of guidance to PAs into a convenient outline format that the PAs have collectively agreed to leverage as they draft their documents. The following areas of review are intended to highlight those items that would be helpful in updating the business plans before the next draft. We do not expect stakeholders to answer all questions. Please choose those that are relevant to your interests. There is also an open row for additional comments that might not fit into the following format.

1. **Structural Review**
    a. Do the chapter layout and order of topics comply with NRDC compiled guidance document "outline"?
    b. Does the stylistic/visual presentation allow for easy navigation through the chapter (i.e., allowing easy comparison of the chapter against the NRDC compilation)?
    c. What examples from other PA chapters (whether same PA different sector or different PA all together) would you suggest be considered for this document

2. **Content-Related Review**
    a. Are all key pieces of information, tables, graphics, and supporting documents called for in the NRDC Compiled guidance document present in the Chapter?
    b. Are your previous comments and input addressed in the document?
    c. Is the overall sector plan coherent and clear?
    d. Are proposed activities (intervention strategies) sufficiently justified by the market assessment and other data analyses presented?
    e. Are substantive assertions and conclusions supported with clear reasoning and adequate citations?
    f. Are metrics relevant, representative, and associable with future IPs and PIPs?
    g. Is material presented at the right level of detail for a Business Plan?

On the next page, please find the comment template in which substantive comments can be recorded and then submitted to facilitator@caeecc.org. If you have any questions about using this form or the review process, please contact the facilitator by phone or email. Caution: this form is set up as an 8.5 X 14 inch document and will not properly print on 8.5 X 11 paper.

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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 #	**Sector**	**Page #**	**Comment**	**Rationale for Comment (include references to evaluations, studies, etc., if applicable)**	**Integrated (Y/N)**	**Rationale for Y/N**
CPUC #1	*BayREN Residential*	1	Observations • *In BayREN's AL budget filing, the cost-effectiveness appears to decrease for 2017, which runs counter to the statement on page one about improving cost-effectiveness* • *BayREN uses the term "hard to reach", which has a specific meaning regarding income and location. It is not apparent how BayREN's target properties actually meet this HTR definition. Is there evidence that this program is actually gaining traction with these targeted customrs?* Recommended Action • ***Clarify the HTR definition and whether the BayREN programmatic effort is in fact bringing in the "right" participants.*** • ***Clarify statement regarding cost-effectiveness in order to make the document less promotional and more representative of***	• *The statement in the business plan regarding cost-effectiveness does not match the TRC numbers reported in the BayREN Budget Advice Letter filing.* • *It's unclear, as there is no evidence provided, that program uptake is occurring among HTR customers. Low income families would presumably be participating in either ESA or CARE, rather than what could be a costly home retrofit program such as that offered by BayREN.*		

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			actual forecast C/E.			
CPUC 2	BayREN residential	4	Observations • *BayREN states that it has "trained a new group of contractors, increasing their knowledge and interest in EE."* • *How is this supported? Is there research to back up this statement? What's working and what is not working?* • Recommended Action ***If there is not any supporting evidence for this promotional claim, it should be removed.***	• *PA's need evidence to support such assertions. BayREN should be able to cite this purported increase in knowledge and interest, from a contractor knowledge baseline, and what can be achieved in the next 6 years.*		
CPUC 3	BayREN residential	5	Observations • BayREN asserts that low TRC can be attributed to early efforts to ramp up a program. • However, 2017 will be the 5th year of a program that is	*PA's need to cite evidence, such as goals and milestones, to back up claims that a program is still "ramping up".*		

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			expected to cease incentives by 2023. In light of decreased TRC for 2017, as filed in the 2017 Budget AL request, Isn't 50% of a program's expected life "ramped up"? When does BayREN expect ramp up to occur? • Recommended Action Provide additional information on when the ramp up period ends (or ended), including milestones for the remainder of the program.			
CPUC 3.1	BayREN residential	6	Observations • Reposition Home Upgrade Advisoras a stand alone program, expanding services to educate and assist contractors and homeowners. • Objective: "Homeowners and contractors increase participation in the Home UpgradeProgram" Recommended Action • PA's BP statement need to be supported (and not contradicted) by their AL submissions.	*PA requests to increase HUA budget with the objective of increasing participation in the Hpgrade Program. However their PIP table 3. shows a proposed increase in the Home Upgrade Advisor Program by 50% but a %20 reduced goal for completing an actual EE project! This contradicts their claim in the BP.*		

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CPUC 3.2	BayREN residential	6	**Observations** • R6. Continue Bay Area MultifamilyBuilding Enhancements (BAMBE) streamlined technical assistance and rebate program model. • Objective: Expand program uptake until substantial market share demonstrates viability of whole-building upgrades. **Recommended Action** PA's BP statement need to be supported (and not contradicted) by their AL submissions.	*BayREN is requesting a %24 increase in their Multi Family Residential Budget (from 2015), while planning to achieve less savings at a higher cost/unit!!!* *{60% less kWh @ %24 higher cost, *70% less MW @ %6 higher cost, *60% less Therms @ %12 higher cost}* *BayREN is increasing their "Administrative" and "Marketing" budget, while at the same time cutting "Rebates" by more than %50!* *So essentially BayREN is asking for more money (to do marketing) to acheive less savings more expensively!!!*		
CPUC 4	BayREN residential	8-10	**Observations** • Short-, mid- and long-term targets are aggressive. • BayREN describes its market as "1.5 million eligible homes". • Short-term goal of 5% of market would be 75,000 homes; mid-term goal of 7% would be 105,000 homes, and long-term goal of 10% of market would be 150,000 homes.	*PA's need reliable evidence as to expected program performance.*		

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			• Program growth has doubled, but over various timeframes. The first 500 homes required 11 months; the next 500 just 5 months; the next 1000 took 10 months. (it's not clear that 4000 homes will be reached by end of 2016) • based on market size, and aggressive expectations of doubling the number of completed home every year, the short-, mid-, and long-term goals do not comport with a doubling of completed homes ever year. • Assuming 2000 homes are treated in 2016, that would mean 4000 homes in 2017, 8000 homes in 2018, and 16,000 homes in 2019, resulting in a short-term achievement of 28,000 homes, far short of 75,000. Even if you start with 4,000 homes treated by end of 2016, that's 8000, 16,000, and 32,000 for 2017-2019, resulting in 56,000 by end of the short-term period, still ~20,000 homes shy of the stated 5% of market. • Recommended			

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			Action While aggressive goals are appreciated, the math has to add up. BayREN needs to establish whether a doubling of homes year on year is realistic, and at what cost, and how 5% of market is in any way achievable.			
CPUC 5	BayREN residential	13	Observations • BayREN describes how, by the end of year 8 of program implementation (2020), it will reduce incentives as the program becomes more "affordable" and is supported by a 'robust industry". • What evidence is there to support that assertion? • How and over what timeframe will program costs decrease to "affordability". • What is "affordable"? Presumably there is a difference for the low- and middle-income customers? • What's the tipping point in terms of homes treated? Contractors trained? •	*PA's need reliable evidence to support each of these claims as they relate to projected future program performance.*		

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CPUC 6	BayREN residential	17	Observations • Increased contractor training is deemed essential to BayREN's efforts. • It's unclear how many contractors, and of what size, will require training and over what timeframe that training will occur. • If just 7% of contractors have completed 51% of the jobs to date (pg. 11), how will training smaller contractors improve program delivery. • Will there be higher costs to train a larger number of smaller contractors? • Recommended Action Provide analysis that supports these claims.	*PA's need reliable evidence as to expected program performance.*		

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Comment #	**Sector**	**Page #**	**Comment**	**Rationale for Comment (include references**	**Integrated (Y/N)**	**Rationale for Y/N**

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				to evaluations, studies, etc., if applicable)		
CPUC/CLN-1	Residential	9, 12	RE: coherency, clear reasoning, and justification for activities, I am confused on how THIS BP works in relation to the PG&E Service area BP – e.g. where some program activities are offered by the REN and perhaps other activities for the same market segment(s) are offered by PG&E. Further, how do these 2 relate to a "statewide" residential sector strategy?			
CPUC/CLN-2	Residential	5	I was pleased to see the energy savings and cost-effectiveness data presented for SF and MF. But that said, I am astounded to see that BayREN thinks ANY expenditures on their part are warranted if the strategies will produce only a 0.25 cost-effectiveness outcome. It would seem BAYEEN may have a "winning strategy" for pursuing multi-family buildings. If so, Perhaps should stick with that.	*Repeat as above*		
CPUC/CLN-3	Residential	6	Not all the strategies are "key strategies" and in fact some sound like supporting activities. I recommend your nesting or bundling as appropriate, and indicate where you have certain implementing tactics or supporting activities. E.G. For single family, R1 and R3 seems to be key on the "supply side (streamlining program and increasing numbers of trained contractors), while R2, R4, R5 seem to be supporting activities to somehow drive demand. But unclear how this will actually do so. The MF strategies seem more coherent. But we need to know more about ownership profiles relative to the strategy for pursuing on-going relationships – would this be for a specific building, or with owners who have portfolios of buildings? I look forward to seeing more about how market demand will be driven via traction and success on green labels and MLS data. I had time to read only to p. 12.			
CPUC/CLN-4	Residential	1 and 20	Text mislead on degree of "central systems". These are mostly for water heating only, and unlikely to bring about a "whole building upgrade". P. 20 suggests only 20% of the MF markets has both central water AND space heating, and thus a circumstances that might support a landlord's investment. I assume that in this case there is a central GAS meter, but unclear if individual units are metered for and pay for electricity. (lighting, appliances, plug loads?)			

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Commenter—please replace red text with the information you wish to provide. Please submit completed comments to **facilitator@caeecc.org**

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