

Greenlining’s Comments on BP Drafts’ Statewide Programs Sections					
Greenlining provided comments on workforce inclusion and multifamily issues in coalition with other stakeholders that are also providing input on the BPs.					
Comment #	PA(s)	Sector	Page #	Comment	Rationale for Comment (include references to evaluations, studies, etc., if applicable)
GLI-1	PG&E SoCalGas SDG&E SCE	Statewide Programs See pg. 62-63 of D.16-08-011 for a list of the statewide programs.	N/A	<p>Observations:</p> <ul style="list-style-type: none"> • There is an overall lack of clarity regarding which PA is the lead administrator for different statewide programs. For example, SCE stated that “As the WE&T program administrator, SCE will work in conjunction with all stakeholders including government...” (SCE Cross-cutting Sector: WE&T pg. 13). However, In the PA’s October 19th CAEECC presentation of proposed Statewide Leads, slide #2 shows that PG&E was the lead PA for WE&T and slide#4 shows that PG&E is still the proposed lead PA for WE&T. According to the same slide, PG&E is also the proposed PA lead for statewide marketing, education, and outreach program (ME&O). However, PG&E stated that it plans on collaborating with other actors in the matter of statewide ME&O in its role as a “stakeholder.” • The BPs did not present the statewide programs as directed by the Commission. Currently, the BPs’ discussions of the statewide programs approach are very inconsistent. In fact, the PAs simply left many statewide sections/sub-sections blank. As an 	<p>The Commission directed the PAs to include the proposed lead administrator for each statewide program. D.16-08-011 pg. 64</p> <p>D.16-08-011 pg.64</p>

				<p>advocate, Greenlining cannot provide meaningful input (as envisioned by the Commission when it created CAEECC) if the PAs give us incomplete drafts. Greenlining has often heard PA representatives say “members can’t just tell us that something is missing, they have to give specific examples of what they want to see.” In this the case of the statewide programs and cross-cutting sectors, giving examples of what we would like to see would entail Greenlining writing parts of the BPs, which is not its role.</p> <p><u>Recommended Action</u></p> <ul style="list-style-type: none">• Revise the BPs and propose a lead administrator. For example, the word “stakeholder” is too broad for this purpose and a PA should identify itself as the lead for a program rather than simply stating that it is a stakeholder.• Revise the BPs consistent with the Commission’s Guidance. 1) the lead program administrator could present a business plan for the statewide programs and/or subprograms in which it will be the lead administrator, on behalf of all of the administrators, or 2) all program administrators could present identical business plans developed collaboratively for each statewide program or subprogram.	
--	--	--	--	---	--

<p>GLI-2</p>	<p>PG&E SoCalGas SDG&E SCE</p>	<p>Statewide Programs</p>	<p><u>Observations: Adopted Definitions</u></p> <ul style="list-style-type: none"> • Key issues are not consistently defined throughout the statewide programs. For example, the definition of “Workforce, Education, and Training” (WE&T) is unclear. Most of the PAs included language that similarly states that WE&T has a role in training EE workforce in order to achieve the state’s EE goals. The description on what this role entails differs among PAs. If the PAs do not have the same definition or understanding of WE&T’s role or if their understanding is not communicated in the BPs, then we cannot determine whether the broad intervention goals, strategies, objectives, etc. are designed to meet Commission requirements. • Another example is the lack of consistent understanding of what type of programs are considered part of the Statewide Financing Pilots. In the EE PA’s October 19th presentation of Statewide Lead Administrators, SoCalGas is the current lead for “New Financing Offerings,” while slide #4 shows that PG&E is the proposed new lead. Is the term “New Financing Offerings” referring to the Statewide Financing Pilots? If so, we should avoid calling using inconsistent terms unless a change has been directed by the Commission. <p>PG&E states that one of its interventions is to implement new financing structures. (PG&E</p>	<p><i>See Updated Business Plan Checklist II.D.2</i></p>
--------------	---	---------------------------	---	--

				<p>Cross-cutting Segment: Financing at pg. 10). It said that through the Financing Pilots, “the IOUs will test on-bill repayment’s (OBR) ability to overcome barriers to energy efficiency. However, as far as Greenlining knows, the only OBR program approved through the Financing Pilots is the EFLIC program, which is the sole responsibility of PG&E. EFLIC is a sub-program of REEL, and is the only sub-program that is structured as OBR. Thus, Greenlining does not understand which OBR financing pilots the other IOUs are planning to test. Looking at the other three IOUs’ BPs, Greenlining did not find any specific reference to an OBR program that another IOU is proposing to test through the statewide Financing Pilots. SCG correctly identifies EFLIC as a subprogram of REEL and added that only PG&E administers this program. Looking back at PG&E’s BP draft, it makes no mention of EFLIC or the fact that PG&E has started the implementation process of the program. SCE completely left out any discussion on the statewide Financing Pilots and provided no reason.</p> <p><u>Recommended Action</u></p> <ul style="list-style-type: none"> • Greenlining is at a loss as to what to how it can provide a more meaningful recommendation in this matter, other than to suggest that the IOUs/BP drafters should read through the cross-cutting sections or any 	
--	--	--	--	---	--

				sections that discuss the statewide programs to ensure that the IOUs have the same understanding and are defining programs or important terms in a consistent manner.	
GLI-3	PG&E SoCalGas SDG&E SCE	Statewide Programs		<p><u>Observations: Coordination with existing legislation</u></p> <ul style="list-style-type: none"> The BPs’ identification of the PAs’ approach on coordinating the statewide programs to existing legislation is inconsistent. For example, while SCE recognized it plans on working with stakeholders on how to implement WE&T policies with the recognition that various legislations such as AB 793 and SB 350 have an impact on this issue (SCE provided a short description of each applicable legislation in a way that connects it to the issue of WE&T. Cross-cutting: WE&T, pg. 6-7), other PAs have only addressed some legislation or have left the discussion out altogether. <p><u>Recommended Action</u></p> <ul style="list-style-type: none"> Greenlining appreciates SCE’s approach on “Policy Trends” and encourage all of the PAs to discuss legislation and their impact on the statewide programs in a similar manner. For example, as the lead PA for statewide ME&O, we would like to see PG&E’s discussion on how AB 793 will impact the strategies for the program. 	
GLI – 4	PG&E SoCalGas SDG&E	<u>General input/observation:</u> Greenlining appreciates its ability to participate as a CAEECC member and collaborate with PA representatives. We recognize that incredible work that went into preparing the BP drafts.			

	SCE	<p>However, it is discouraging to find many missing pieces in the BPs, particularly in their various Statewide Programs discussion.</p> <p><u>Recommendation:</u> We hope to continue to work with the PAs to fill in gaps on information where Greenlining can assist. If there is a legitimate reason why a particular discussion on a statewide program is missing, we hope that the PAs include an explanation.</p>	
--	------------	--	--