

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@caeccc.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.

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
UC/CSU-1	Public Sector	38	<p>Observations</p> <ul style="list-style-type: none"> At the top of page 38 under section b) Statewide Program Coordination, there are several key topics that have only been addressed with placeholders, including "How lead PA will operate", "IOU/PA lead coordination" and "Solicitation strategy for implementation". <p>Recommended Action</p> <ul style="list-style-type: none"> Based on the intent of the decision to create statewide consistency and efficiencies, these items must be addressed in a way that effectively supports these goals. There needs to be very clear language on how all IOUs will work together to provide consistent offerings (i.e. identical program processes and project eligibility) for customers in statewide partnerships. The lead PA can leverage the authority provided in the decision to standardize all program processes and project eligibility across all IOUs as needed. 	<ul style="list-style-type: none"> Currently and into the indefinite future, statewide institutional partnerships utilize various program offerings (i.e. customized retrofit, deemed, SBD, etc.) across all IOUs. These programs, while essentially the same at a high level across IOUs, often have conflicting eligibility and program rules/processes. This means that a project that is eligible for program participation in San Francisco may be ineligible in San Diego. Conflicting and constantly shifting rules based on varying interpretations by different IOUs create barriers for statewide organizations to execute on consistent system-wide strategies for energy savings and leverage best practices. Under the Single Administrator model, we see the opportunity to solve the consistency problem noted above. For example, if SCE is the lead PA, then a customized project anywhere in the state could be reviewed by SCE and held to SCE's requirements. Likewise, electric deemed measures would be available only from the SCE deemed catalogue. For a true statewide model to provide consistency, the lead utility may use their role as the "final decisionmaker" (Decision, p.103) to create the statewide consistency as directed by the decision- "Local or regional variations in incentive levels, measure eligibility, or program interface are not generally permissible." (Decision, p. 62) More detail on how the gas side of the program will work both in SCE territory and throughout the rest of the state is needed, as the lead utility serves electric commodity only. 		

UC/CSU-2	Public Sector	38	<p>Observations</p> <ul style="list-style-type: none"> On page 38 under section b) Statewide Program Coordination, SCE appears to suggest that the public sector will be transitioned to third party programs. The language in the decision does not specifically make this requirement, and UC would like to understand in more detail what this could mean for our statewide partnership, as currently we utilize almost no third party programs. From a high level, transitioning the UC/CSU partnership to a third party program would create new inefficiencies and cost by inserting a management layer between the customer and the utility that does not exist today, while creating no added value to the customer or cost savings. <p>Recommended Action</p> <ul style="list-style-type: none"> Provide justification and more detail on the requirement/plan to transition statewide institutional partnerships to third party programs. 	<ul style="list-style-type: none"> Based on the CPUC Decision providing guidance for business plan filings, statewide programs do not have to be third party programs. For example, Ordering Paragraph 10 on page 11 states that statewide programs “may” be third party programs, but this is not written as a requirement: “For energy efficiency program purposes, the definition of a third-party program shall be as follows: To be designated as ‘third party,’ the program must be proposed, designed, implemented, and delivered by non-utility personnel under contract to a utility program administrator. Statewide programs may also be considered to be ‘third party’ to the extent they meet this definition.” Currently, the Partnership operates in a collaborative model with all four IOUs and LADWP utilizing a non-utility Program Administrative Manager. The Partnership is a “funnel” for the University to access all types of programs as discussed above. Having a Statewide Third Party recreate all these program offerings is clearly not an effective or efficient approach to serving customer needs. The Partnership provides project tracking, regardless of delivery channel, to give us the comprehensive view of our energy efficiency accomplishments and a rich data set to analyze and inform future strategies. Introducing a Partnership Third Party Implementer into this mix will create unproductive competition between channels and not only compromise our ability to comprehensively track progress, but to select the best fitting approaches. As noted above, we see the opportunity to solve the statewide consistency problem with a Single PA, but do not believe that solution relies on outsourcing to a Statewide Third Party Implementer, which we believe will create new barriers and inefficiencies. 		
UC/CSU-3	Public Sector	38	<p>Observations</p> <ul style="list-style-type: none"> On page 38 under section c) Public Sector Third Party Program Transition Plan, SCE 	<ul style="list-style-type: none"> RFPs that are written specifically for commercial third party entities may contain restrictions that preclude public sector customers from participating. 		

			<p><i>states “No earlier than the 4th Quarter of 2016, SCE will issue a Request for Proposal (RFP) to solicit third-party program design proposals. The public sector will be one of the chapters in the RFP and will solicit proposals targeting specific segments and sub-segments within as well as across the public sector.” The timing of an RFP being released prior to Business Plans being finalized could be problematic in that the solicitation would not incorporate input from public sector stakeholders. The role and requirements of Statewide Program Implementers is not defined, and depending on how this is developed in the Business Plans, it may make sense for a public sector customer to pursue this role.</i></p> <p>Recommended Action</p> <ul style="list-style-type: none"> <i>Provide clarification and more detail on what this RFP will include and how it will accommodate the potential for public sector customers to pursue the Statewide Program Implementer role.</i> 		

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