

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	SoCalGas Public	5	<ul style="list-style-type: none"> • Intervention strategies should address specific market barriers and opportunities and should be distinct from tactics. <ul style="list-style-type: none"> ○ Many of SoCalGas’ strategies are the same as the tactics; e.g. partnering, direct install, and financing. ○ Intervention strategies appear to be a list of current programs and practices (i.e. tactics) and do not map onto key market barriers they are targeted to overcome. 		
ORA-2	SoCalGas Public	7	<ul style="list-style-type: none"> • Market characterization and intervention strategies should be relevant to the targeted market segment. <ul style="list-style-type: none"> ○ Example: SoCalGas public sector chapter identifies four distinct segments and relevant sub-segments with unique challenges, but the interventions strategies are generic across segments and do not appear to substantively target distinct market barriers by segment. 		
ORA-3	SoCalGas Public	18	<ul style="list-style-type: none"> • Intervention strategies are generic and the same strategies are targeted repeatedly to diverse problem statements and market barriers. <ul style="list-style-type: none"> ○ The same generic strategies (partnering, outreach, direct install, etc.) are identified as interventions to overcome a wide variety of problems/barriers (limited resources, competing priorities, serving disadvantage communities). ○ The failure to target specific interventions to specific barriers risks a generic approach to the sector that ultimately does not overcome the specific barriers identified. 		
ORA-4	SoCalGas Public	43	<ul style="list-style-type: none"> • Solicitation strategy should be based on Commission directives and should be specific. <ul style="list-style-type: none"> ○ The chapter currently lacks a defined third-party solicitation strategy that outlines the types of public sector solicitations SoCalGas will run and a strategy for balanced procurement. ○ The only reference to solicitation objectives concerns innovation, with no significant discussion of how the solicitation strategy will encourage efficiency, cost-control, or market targeting to support state and Commission objectives. ○ The absence of a developed solicitation strategy and details means that a crucial element of SoCalGas’s public sector business plan will not be adequately vetted with stakeholders prior to 		

			<p>filing and misses an important opportunity to inform the market in advance of solicitation issuance.</p>		
<i>ORA-5</i>	<i>SoCalGas Public</i>	43	<ul style="list-style-type: none"> • Activities proposed for in-house implementation should contain a compelling showing that the utility is uniquely positioned to provide the greatest value at the lowest cost. <ul style="list-style-type: none"> ○ The current discussion of activities to be maintained by the utility is vague and rests on assertions rather than facts and analysis. ○ Instead, the business plan must explain in detail why the utility is the best entity to continue to implement distinct activities and make a reasonable showing that it is the least cost/best fit implementer for those activities. 		
<i>ORA-6</i>	<i>SoCalGas Public</i>	45-46	<ul style="list-style-type: none"> • Participation metrics should only be used when appropriate and should be specifically tailored to relevant goals and intervention strategies. <ul style="list-style-type: none"> ○ Example: It is unclear how participation counts of public customers in SoCalGas programs are a useful and specific metric to measure whether a variety of intervention strategies are overcoming the barrier of customers having access to limited resources. ○ More useful metrics would target the specific barrier (resource constraints) and whether specific intervention strategies are overcoming those barriers. 		
<i>ORA-7</i>	<i>SoCalGas Public</i>	4-5	<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 SoCalGas' 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 SoCalGas' public sector business plan will not be adequately vetted with stakeholders prior to filing. 		