

Commenter Name:

Commenter Affiliation:

Date:

Considerations for reviewing and providing comments on Full PA Business Plans

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 Business Plan Checklist found on the CAEECC [Guidance webpage](#). In addition to comparing the Business Plan contents against the Updated Business Plan Checklist, the following questions are intended to highlight those items that would be helpful in updating the business plans. These questions are food for thought; we do not expect stakeholders to specifically address these questions in their form. Please choose those that are relevant to your interests.

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 Updated Business Plan checklist 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@caeec.org. If you have any questions about using this form or the review process, please contact the facilitator by phone or email.

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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

Comment #	PA(s)	Sector	Page #	Comment
CPUC-1	PG&E	Residential	5	<p>Observations</p> <ul style="list-style-type: none"> PG&E describes data analytics efforts and suggests that these strategies will be deployed in the “mid-term”. PG&E will thus not deploy customer-targeting strategies until 2021 at the earliest? It’s unclear, with the AMI deployment and related product development in the energy management technology field, why this effort would face such a delay. <p>Recommended Action</p> <ul style="list-style-type: none"> PG&E should take a more aggressive approach regarding data analytics and related energy management technology products. Waiting until 2021 for deployment of these customer-targeting strategies for the residential sector appears to be unwarranted, based on AMI deployment and the burgeoning EMT market
CPUC – 2	PG&E	Residential	7	<p>Observations</p> <ul style="list-style-type: none"> PG&E references the RPP midstream incentive program. It’s unclear, based on the underwhelming results of phase 1 of the pilot, how successful phase 2 will be. Consequently, statements that assert the success of the RPP effort should be qualified. <p>Recommended Action</p>
CPUC – 3	PG&E	Residential	7	<p>Observations</p> <ul style="list-style-type: none"> PG&E cite of the 2010-2012 HEES impact evaluation raises the question of what has been accomplished in the three years since the evaluation was complete. Certainly PG&E has followed this recommendation and can present a baseline regarding customization improvements and what’s left to be done. <p>Recommended Action</p> <p>PG&E should provide evidence of what has been done in the aftermath of such recommendations and what needs to be done. “improvement” without a corresponding baseline is very difficult to measure and success can be elusive.</p>

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Comment #	PA(s)	Sector	Page #	Comment
CPUC-4	PG&E	Residential	8-9	<p>Observations</p> <ul style="list-style-type: none"> Table 2 would be much more helpful if the savings PG&E projects to achieve were broken out by measures (at least the predominant measures such as lighting and home energy reports) to give readers a better understanding of where sector savings are coming from.
CPUC – 5	PG&E	Residential	11	<p>Observations</p> <ul style="list-style-type: none"> Figure 2 presents 2015 Residential sector savings of 57.5 GWh. However, in PG&E’s 2017 Budget Advice Letter filing, 2015 claimed savings are ~175 GWh, while 2017 forecast savings are 148 GWh. Which numbers are correct?
CPUC – 6	PG&E	Residential`	11	<p>Observations</p> <ul style="list-style-type: none"> Figure 3 highlights the need for advanced data analytics to be deployed sooner than 2021. While programs should and will be available to all demographics, it’s clear that SF owners and the installed AMI infrastructure are the primary target for Residential efforts.

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<p><i>CPUC-7</i></p>	<p>PG&E</p>	<p><i>Residential</i></p>	<p>12</p>	<p>Observations</p> <ul style="list-style-type: none"> • <i>Figure 4 presents confusing numbers. Total customers are listed as 4,698,657. However, on page 11, PG&E cites 5.6 million residential customers and cites 6.5 million on page 4. Additionally, program participants are listed as 91,945 in figure 4, but 100,855 in figure 2.</i> <p>Recommended Action</p> <ul style="list-style-type: none"> • <i>Please reconcile these numbers with the most accurate data source. It is concerning that, from a data collection and management view, a number that should be relatively easy to determine (# of customers) features such a wide disparity.</i>
<p><i>CPUC – 8</i></p>	<p>PG&E</p>	<p>Residential</p>	<p>18</p>	<p>Observations</p> <ul style="list-style-type: none"> • <i>PG&E uses confusing language in referencing home energy management programs. It's not clear how or in what instances EMT programs would rely on financing options.</i> • <i>PG&E highlights customers' desire for energy usage visibility and use of mobile devices and social media to stay connected. This desire should be tapped sooner than 2021, when PG&E intends to deploy customer targeting strategies.</i> <p>Recommended Action</p>
<p><i>CPUC – 9</i></p>	<p>PG&E</p>	<p>Residential</p>	<p>21</p>	<p>Observations</p> <ul style="list-style-type: none"> • <i>Section G seems more important than the duplicative information presented on pp. 5-6</i>
<p><i>CPUC-10</i></p>	<p>PG&E</p>	<p><i>Residential</i></p>	<p>22</p>	<p>Observations</p> <ul style="list-style-type: none"> • <i>See earlier comments about the year-4 deployment of customer-targeting data analytics.</i>
<p><i>CPUC – 11</i></p>	<p>PG&E</p>	<p>Residential</p>	<p>23</p>	<p>Observations</p>

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				<ul style="list-style-type: none"> PG&E cites the HUP impact evaluation of 2013-2014 regarding geographic-related savings opportunities. This was also a finding from the 10-12 evaluation . Has PG&E made any progress in an effort to improve program targeting? <p>Recommended Action</p>
CPUC -12	PG&E	Residential	26	<p>Observations</p> <ul style="list-style-type: none"> The effectiveness of the PG&E marketplace is still unclear. <p>Recommended Action</p> <p>PG&E should rely on evidence-based claims of program success/effectiveness</p>
CPUC-13	PG&E	Residential	30	<p>Observations</p> <ul style="list-style-type: none"> PG&E's Residential chapter may have been written prior to finalization of the 2015 HUP process evaluation. Consequently, the citation regarding "near-participants with incomes under \$50,000" may have been updated, since there were question about whether these customers were indeed suitable for the HUP program or instead should have been directed to CARE/ESA efforts. <p>Recommended Action</p> <ul style="list-style-type: none"> PG&E should revise the statement as warranted based on the final process evaluation for HUP.
CPUC – 14	PG&E	Residential	57	<p>Observations</p> <ul style="list-style-type: none"> PG&E cites "increase plug load efficiency" as a market goal. Which plug load(s)? in an average house, there may be 50 or more devices "plugged in" that would fall under "plug loads", but not each of them are deserving of equal attention. Is PG&E going after the devices themselves, customer use of those devices, or a combination of both? And which ones? Not likely toothbrush chargers? <p>Recommended Action</p>

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