

Comment #	PA	Page #	Comment	For PA Use	
				Integrated (Y/N)	Rationale for Y/N
ORA-1	SCE	5	<ul style="list-style-type: none"> <li>Section on Common Characteristics provides useful information but should include technological change – i.e. metered savings, cheaper sensors – and the regulatory change that has sought to take advantage of it.</li> </ul>		
ORA-2	SCE	13	<ul style="list-style-type: none"> <li>Explain the cause of declining Totally Resource Cost Test (TRCs) shown in Figure 10 and discuss how SCE is addressing the decline.</li> </ul>		
ORA-3	SCE	19	<ul style="list-style-type: none"> <li>Table 3, “Key Commercial Sector Characteristics and Strategies” provides a useful summary, but requires a complete discussion in the document.                             <ul style="list-style-type: none"> <li>An analysis of market barriers is necessary along with strategies/opportunities to address them.</li> </ul> </li> </ul>		
ORA-4	SCE	21	<ul style="list-style-type: none"> <li>Performance metrics should have concrete targets in order to judge success/failure of intervention strategies.                             <ul style="list-style-type: none"> <li>The current draft specifies some metrics, but the targets for these metrics are unspecified. It is difficult to judge the usefulness of targets and whether they are reasonable measures of success/failure in the absence of (1) numbers that specify the baseline and (2) information showing that SCE’s goals are ambitious and achievable.</li> <li>Failure to specify the actual baseline and targets means that a crucial element of SCE’s commercial sector business plan will not be adequately vetted with stakeholders prior to filing.</li> </ul> </li> </ul>		
ORA-5	SCE	20	<ul style="list-style-type: none"> <li>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"> <li>The absence of budgets makes it difficult to assess whether SCE’s request for resources aligns with its analysis of the needs in the public sector and its proposed intervention strategy.</li> <li>Failure to specify the budget means that a crucial element of SCE’s public sector business plan will not be adequately vetted with stakeholders prior to filing.</li> </ul> </li> </ul>		