

Statewide Plug-Load & Appliance Program

QUALITY ASSURANCE PLAN

Contents

Introduction.....	4
Quality Assurance Plan Purpose.....	4
Quality Assurance Plan.....	4
Industry Partner Eligibility.....	4
Participating Retailer Selection.....	4
Requirements for Participating Retailers	5
Participating Distributor Selection	5
Requirements for Participating Distributors.....	5
Onboarding	6
Pre-Enrollment Form.....	7
Promotion Agreement (“PA”).....	7
Tax Document Requirements.....	7
Other Document Requirements	7
Training.....	7
Training for Administrative Team	8
Training for Sales Team.....	8
Program Policies	9
Program Procedures	9
Training Delivery Methods	9
1:1 Sessions.....	9
Eligible Products and Rebates.....	9
Rebate Reimbursement Requirements	9
Retailers.....	9
Distributors.....	10
Confirm Customer Eligibility.....	10
Confirm Product Eligibility.....	10
Distributor Invoice	10
Rebate Reimbursement and Data Upload Requirements	10
Rebate Reimbursement Request	10
Submitting Rebate Sales Data.....	11
Sales Data Spreadsheet.....	11
Product Returns	11
Sales Data and Rebate Processing Timeline	11
Quality Assurance and Quality Control Plan.....	12
Sales Data Review.....	12
Instant Rebate Platform.....	12
PPC Platform.....	13

Field Team Quality Control and Quality Assurance.....	14
Measure Verifications.....	15
Stakeholder Survey and Communications	16
Stakeholder Pool	16
Frequency	16
Content	16
Communication Plan.....	16
Retailer and Distributor Engagement.....	16
Communication Channels	16

Introduction

Purpose

The Quality Assurance Plan (QAP) describes the strategy and methods used to verify that the program:

- Produces high-quality outputs (quality control/quality assurance)
- Seeks to continuously improve itself (quality improvement)
- Satisfies customers (customer centric)

Background

The California Statewide Plug-Load & Appliance Program (Program) provides the expertise and infrastructure needed to maximize customer/supply chain participation and energy savings while supporting the data collection and the products required to support program cost-effectiveness. The Program harnesses proven technology to provide an instant rebate experience for customers at the point of sale (POS) for a discounted price with Program attribution. Customers receive their incentive at the POS through one of three channels: a) validated Instant Rebate b) midstream distributor markdown, or c) retailer POS markdown. This streamlines the participation experience for all market actors and enables consistent and equitable statewide service delivery.

Quality Assurance Plan Purpose

The Program Implementer has developed this QAP to demonstrate how the Program will monitor, assess, and verify adherence to processes, procedures, and standards to determine the quality and on-time delivery of all deliverables and services for the program. This plan will serve as the blueprint for maintaining consistent quality through all components of the project and in each task.

The QAP documents the procedures by which the team assesses performance for all aspects of the program against contractual requirements. The plan describes the approach for activities, including program tracking and reporting, process reviews, program audits, project engineering analyses and reports, procedures, and techniques for implementing and sustaining overall quality for the program.

Quality Assurance Plan

Industry Partner Eligibility

Only industry partners that meet the Program's definition of a retailer or distributor and meet the requirements in this section may participate. Once a retailer or distributor obtains a fully executed Promotion Agreement (PA), the retailer (Retailer) or distributor (Distributor) can begin participating in the Program. The mechanisms and/or processes used to provide a rebate are based on each measure's workpaper requirements as well as the unique operational characteristics of retailers and distributors, therefore, program processes and/or procedures may differ between participating retailers and distributors. The sections below therefore provide separate descriptions for retailers and distributors.

Participating Retailer Selection

Prior to selecting retailers, the Implementer will use our proprietary Retail Sales Allocation Tool (RSAT) to estimate the percent of sales that to go to customers of funding utilities (leakage rates) for each retail brick and mortar location under consideration for the Program. The Implementer will then use these RSAT allocations to select a portfolio of store locations that minimize leakage to non-funding utility customers while meeting other program objectives (e.g., serving disadvantaged communities, maximizing program performance).

Requirements for Participating Retailers

In addition to satisfying all other requirements of the Program and the Implementer's contract with SDG&E, for a Retailer to qualify and remain qualified for the Program or the rebates, a Retailer must:

- Purchase Program-qualified Products directly from a manufacturer or wholesaler and sell such Products to be installed at the qualifying Customer's residence.
- Be approved to participate in the Program by the Program Implementer.
- Have a license to sell Program-qualified product in the State of California.
- Provide an IRS W-9 and California 590.
- Agree to display Program-approved or Program-provided promotional materials and/or Point of Purchase materials (POP) at POS locations in accordance with SDG&E policies and guidelines, or non-Lead IOUs as agreed upon between the Implementer and the non-lead IOU. As the Lead IOU, SDG&E will provide the necessary facilitation between Implementer and other funding IOUs to ensure a streamlined process for approval of promotional materials.
- Be able to collect and report all required Program data as directed in Implementer's contract with SDG&E and detailed in the Program Policy and Procedures and/or retailer Promotion Agreements.
- For measures with validated Instant Rebate, retailer will be able to confirm that the Instant Rebate coupon is only eligible for qualifying Products and may only be redeemed once, for installation in a qualified residential site located in the Program territory.
- Be able to provide POS discounts for qualifying products either through a price markdown/discount on eligible products or through Program's Instant Rebate coupon system.
- Indicate the amount discounted on sales invoices/receipts and/or shelf pricing for qualifying products.
- Commit to implement the POS discount for the entire Agreement Period. If the Retailer becomes aware of issues or circumstances that may prevent the Retailer from implementing the Program for all or part of the Program Period, then the Retailer must notify the Implementer within the timeframe outlined on their Promotion Agreement.
- Agree to not provide POS discounts for any product purchased at a participating distributor where the Program's incentive has already been provided.

Participating Distributor Selection

As part of approving participating Distributors, the Implementer will use our proprietary Distributor Sales Allocation Tool (DSAT) to estimate the percent of sales that go to customers of funding utilities (leakage rates) for each ZIP code in the state. The Implementer will use this information to create a list of targeted ZIP codes for each distributor that minimizes leakage while meeting other program objectives.

Requirements for Participating Distributors

In addition to satisfying all other requirements of the Program and the Implementer's contract with SDG&E, for a Distributor to qualify and remain qualified for the Program or the rebates, the Distributor must:

- Purchase Products directly from the manufacturer and sell such Products to be installed at the qualifying Customer's facility or residence. If a Distributor is also the manufacturer of the product, then the Manufacturer may qualify with the requirements of the Program.
- Be approved to participate in the Program by the Implementer.
- Only submit sales from the preapproved list of ZIP codes supplied by SDG&E.

- Have a license to sell product in the State of California.
- Provide an IRS W-9 and California 590.
- Agree to display Program-approved or Program-provided promotional materials at POS locations in accordance with SDG&E policies and guidelines, or non-Lead IOUs as agreed upon between the Implementer and the non-lead IOU. As the Lead IOU, SDG&E will provide the facilitation between Implementor and other IOUs necessary to ensure a streamlined process for approval of promotional materials.
- Be able to collect and report all required Program data as directed in the Implementer's contract with SDG&E and detailed in the Program Policy and Procedures and/or distributor Promotion Agreements.
- Confirm that qualifying products are sold at a participating location within the Program territory.
- If POS discounts are provided to the distributor's customer, the distributor must include on all sales invoices for qualifying products a line item indicating the Program's incentive as the amount discounted.
- Agree to participate in an initial survey during the onboarding phase and any subsequent surveys conducted by the Program indicating how incentive funds are utilized by distributors. This process is applicable when the total incentive is not passed down to the end use customer. A checklist of how the funds can and cannot be utilized will be provided in the Program Policy and Procedures and reflected in the Promotion Agreement. Additionally, for all incentive funding not passed down to the distributor's customer, the Distributor will be required to respond annually to surveys that provide information regarding appropriate use of funds. If funds are found to be misappropriated, then the Distributor is liable to return misappropriated funds to the Implementer, who will return the funds back to SDG&E.
- With each eligible sale, provide the customer/purchaser a copy of the Program Notification. The Program Notification is a written notification provided to all purchasers of a measure from a Distributor, which contains the Program terms and provisions. A sample Program Notification form shall be included in the Program Manual. Distributors shall provide the Program Notification to the purchaser for them to provide to the customer at whose site the applicable Measure will be installed (if the purchaser is not the customer).
- Commit to implement the POS discount for the entire Agreement Period. If the Distributor becomes aware of issues or circumstances that may prevent them from implementing the Program for all or part of the Program Period, then the Distributor must notify the Implementer within the timeframe outlined on their Promotion Agreement.

Onboarding

The Program onboarding process requires participating Retailers and Distributors to do the following:

- Complete Program orientation led by the Program Implementer.
- Receive Program forms and documents as outlined in the Policies and Procedures Manual.
- Sign the Promotion Agreement.
- For participating Distributors, obtain access to Program's distributor-specific web-based tool called Program Partner Central ("PPC").

- For Retailers providing Instant Rebates through the Program’s instant validation system, ability to provide retailer-specific single-use coupons that will be provided to customers upon instant validation.
- For Retailers providing Instant Rebates through Program’s instant validation system, ability to report sales according to Program’s invoicing requirements and Policies and Procedures.
- Participate in required training(s) (administrative and sales staff).
- For Distributor onboarding, distributors will agree to participate in an initial Enrollment Survey during onboarding regarding their business practices and how they stock, promote and price equipment. The Program will use this information to establish a baseline for the percentage of qualifying equipment stock, past sales activity, current product promotion, and the incremental price premium they place on higher efficiency units. The Implementer will work with SDG&E to finalize the survey questions prior to implementation.

Pre-Enrollment Form

This form captures distributor business and contact information for use by the Implementer.

Promotion Agreement (“PA”)

The PA is a legal document formally establishing a Participating Retailer or Distributor for the Program. It contains contractual language and provides the Program’s terms and conditions.

Tax Document Requirements

Unless otherwise instructed by the Implementer or not applicable, Participating Retailers and Distributors are required to complete and submit an IRS W-9 and California 590 form.

Other Document Requirements

Additional documentation may be requested depending on varying Program requirements.

Training

The Program will educate participating retailers and distributors on the benefits of high-efficiency products. Feedback received from the Program’s Stakeholder Survey process described below will be retained as program documentation and used to continuously improve training approaches, content and processes.

Retailer Training:

For Retailers, the Program team will provide trainings in person, via webinar or by phone. For Retailer location staff, trainings will provide Program and product information to support sales staff in guiding customers towards eligible incentivized products. Where applicable, retailer trainings will include an orientation to the Instant Rebate customer validation portal and coupon system. Additional training may be required based on individual retailer’s needs and performance. Trainings will be provided during the Program’s launch period and as part of onboarding any new retailers to the program.

Considering the nature of the retailer environment, in-person trainings may be scheduled or unscheduled, where Program staff will assist retail management or sales staff with any additional questions or issues that arise throughout Program implementation. Training or assistance is available upon request and will be provided on an ongoing basis during each program year to accommodate for retail staff turnover and ensure retail partners are trained on program updates as needed. Retailer trainings will be logged in the Program’s tracking system to document each training’s date, time of visit, training topic and number of

attendees and/or other information as outlined in the Program Policies and Procedures. Information about retailer trainings completed each quarter will be reported in the Program's quarterly reports.

Distributor Training:

For Distributors, all employees working in the Program at participating locations are required to complete training delivered by the Implementer via webinar, by phone, or in-person. Trainings will include sales enablement, using the PPC customer and product validation tools, and the process for submitting sales data, including templates for formatting data. Additional training may be required based on individual Distributor's needs and performance.

All Participating Distributors must complete trainings on Program criteria and goals, data collection requirements and the rebate claim process. The Program will supplement this training with informational materials about the benefits of efficient products as well as detailed Program processes and procedures. Information about distributor trainings completed each quarter will be reported in the Program's quarterly reports.

Critical information emphasized during the training will include, but will not be limited to, the following:

- An overview of the Program, including a review of objectives and timelines
- Qualifying products and rebate levels
- The importance of verifying customer and product eligibility prior to applying rebates
- Product installation time frame expectations for contractors/installers
- The importance of attributing Program rebates and benefits to the Program as applicable
- A step-by-step review of the rebate payment reimbursement request submittal process to Implementer, including:
 - Submittal guidelines
 - Required data fields (e.g. product serial number)
 - Expected timelines for rebate processing
- Processes and timelines for incomplete or incorrect rebate claim submissions, including the issue resolution process

The Implementer will schedule a training with Distributor staff designated to submit distributor's first rebate claims and will schedule additional trainings as needed.

Trainings will cover policies and procedures and will be tailored for two (2) primary Distributor staff roles: the administrative team and the sales team.

Training for Administrative Team

Administrative tasks include gathering sales data for incentivized products, entering all relevant data into PPC via the correct template, and submitting that template for rebate reimbursement. Administrative staff are trained on relevant software systems and all other administrative functions. Distributors must complete this training session before using the distributor PPC to verify Customer eligibility.

Training for Sales Team

Training for Distributor sales staff consists of Customer and product eligibility requirements as well as general Program brand awareness.

Program Policies

This content includes general Program information and data submittal and reimbursement timelines, eligibility requirements for Distributors and Distributor Customers, rebate levels, and quality assurance/quality control activities. Distributors should ensure all staff operate in accordance with established Program policies.

Program Procedures

This content focuses on the day-to-day tasks of Distributor participation, including an explanation of and tutorials on the customer validation process, rebate reimbursement request, backup sales data upload file format, and any other required documentation.

Training Delivery Methods

Training is delivered by the Program team in the following formats: in-person, by phone, via webinar, and through pre-recorded content. Recorded trainings, written documentation, guides, and how-to manuals shall be available for use at any time.

1:1 Sessions

A personal 1:1 session may be scheduled to assist Distributors with any additional questions or issues that arise throughout Program implementation. Training or assistance is available upon request.

Eligible Products and Rebates

To be eligible for rebates, the product models must meet Program criteria and approved workpaper requirements. For retailers, product eligibility is verified as part of the initial and ongoing administration required for setting up POS markdowns or Instant Rebate coupons. Retailer Promotion Agreements indicate specific product eligibility requirements per each product's workpaper, including Energy Star certification when applicable.

For Distributors, product eligibility is verified using the PPC online tool. Eligible Program measures and models may change over the life of the Program at the discretion of the Implementer and SDG&E. High-efficiency products that meet program standards but are not listed on the qualified product list may be eligible based on an engineering review upon Distributor request and submittal of supporting documentation. Engineering review of products meeting program efficiency standards requires fifteen (15) business days for evaluation and approval. Upon approval the product will be added to the program's list of qualified products in the PPC tool.

The Qualified Product List should be verified at a minimum annually by SDG&E or whenever there are changes to measure eligibility or additions to the eligible measure list.

Rebate Reimbursement Requirements

Retailers

Retailers must follow Program requirements as specified in their Promotion Agreement and/or this document to offer program rebates. Before submitting rebate payment reimbursement requests, retailers must complete all onboarding requirements. Retailers must submit sales data and invoices by the date of each month as designated in their Promotion Agreement. Retailers should keep a copy of the related sales invoices as they may be requested to verify sales data.

The previous calendar month of retailer sales activity will be determined based upon the sale date. Retailers may report sales activity at any time.

Distributors

Distributors must follow Program requirements as specified in their Promotion Agreement and/or this document to offer program rebates. Before submitting rebate payment reimbursement requests, distributors must complete all onboarding requirements. This section documents the policies and procedures for program rebates and receiving reimbursement through the Program.

Confirm Customer Eligibility

Before distributors may offer a rebate for the sale of a qualified product, they must verify the end-use customer's site eligibility using the Customer Validation tool in PPC. Customer eligibility will be based upon zip code according to IOU service territories; customer eligibility requirements will be reviewed and updated to align with workpaper requirements as needed. Once the customer installation address has been deemed eligible, the distributor may proceed with the sale, may apply a rebate for the qualified product(s) as a discount to the purchasing Contractor, and request payment of the full rebate from the Implementer. Qualifying products must be purchased for installation at a residential customer's residence.

Confirm Product Eligibility

Before a distributor may offer a rebate to a qualified customer or claim a Distributor rebate reimbursement payment, they must verify the eligibility of the product using the PPC Product Validator. The PPC Product Validator is updated weekly or as otherwise indicated in the Program Policy and Procedures to reflect the most current version of each Qualified Product List (QPL) being used by the program. The Qualified Product List will also be updated in the event of relevant workpaper and/or code changes and will indicate ENERGY STAR requirements when applicable. If a product is not listed as eligible in PPC and meets the efficiency requirements, the distributor may request an engineering review of the high-efficiency product from the Implementer to determine eligibility.

Distributor Invoice

Distributors are required to retain a copy of related sales invoices of their customer transactions according to requirements in their Promotion Agreement. Implementer will review a copy of related sales invoices at 10% of each distributor's submissions against the documentation inputted into the PPC Platform. Process details, schedule, and corrective action plan for reviewing distributor submissions will be outlined in Program Policies and Procedures. Implementer will provide any related documentation according to processes outlined in Program Policies and Procedures.

Rebate Reimbursement and Data Upload Requirements

Distributors are required to upload sales activity for any given calendar month according to the required date on their Promotion Agreement. The previous calendar month of sales activity will be determined based upon the sale date. Distributors may upload sales activity at any time. Distributors are highly encouraged to upload sales from the previous calendar month no later than the second day of the following calendar month. Distributors will be notified via email of exceptions to sales upload timing due to holidays or other unplanned events.

Rebate Reimbursement Request

This section documents the process for submitting sales data to receive a rebate payment/reimbursement, which must be followed in its entirety.

For Retailers, Retailers must submit invoices and any required supporting documentation by the date of each month as designated in their Promotion Agreement. The previous calendar month of Retailer sales activity will be determined based upon the sale date. Retailer sales data must include all required fields as outlined in retailer's Promotion Agreement. Retailers may report sales activity at any time. Implementer's invoice review process will be set up to flag any duplicative sales data for follow up with retailer.

For Distributors, the PPC tool will support this task.

Submitting Rebate Sales Data

Sales Data Spreadsheet

Retailers:

Retailers must provide required sales data in Program provided spreadsheet (.xls or .xlsx file). If a retailer has a customer relationship management ("CRM") tool that can export a report containing the required data fields, Implementer will accept that data.

Distributors:

For each qualified sale during the month, a Distributor must enter required data in Program provided spreadsheet (.xls or .xlsx file). If a Distributor has a CRM tool that can export a report containing the required data fields, Implementer will accept that data.

Once this spreadsheet has been completed, the sales data upload process via PPC may begin. All required data collected needs to be populated in SDG&E's system. This can be achieved by API, Hand entering or spreadsheet uploads. The information collected must contain all data fields necessary to report and validate all claims as indicated by SDG&E.

It is important to note that the required data fields and information collection requirements may change based on CPUC reporting requirements and SDG&E requirements. SDG&E will work with the implementer to ensure that data requirements are updated and acknowledged as they become known.

Product Returns

For Retailers and Distributors, when relevant, specific processes regarding product returns will be outlined in their Promotion Agreement.

Retailers participating in the Instant Rebate coupon system will not be expected to tie returns back to coupons.

For Distributors, returns must be tracked and reported to the Program according to the specific processes outlined in their Promotion Agreement.

Sales Data and Rebate Processing Timeline

Retailers' timeline is as detailed in the Rebate Reimbursement Request section.

Distributors:

Sales data will be collected during the month in which the sales are made and then submitted to the Implementer according to the required date on their Promotion Agreement. Sales data is uploaded through the Distributor PPC, as detailed in the Rebate Reimbursement Request section. Corrections to this data must occur before the sales are batched and uploaded to EECP or invoiced by the Implementer.

Corrected rebate reimbursement requests must be submitted by the following calendar month, according to the date required on their Participation Agreement. Distributors will receive payment according to the timeline in their Participation Agreement. It is encouraged that all sales within a calendar month be submitted by the next upload date to support timely reimbursement to the participating distributors.

Distributors may submit sales to the Program through the PPC as frequently as they like. Submittals for the prior month that are received after the deadline on their Promotion Agreement will not be rejected due to tardiness.

Quality Assurance and Quality Control Plan

The defined protocols and policies in this document, along with any respective metrics and key performance indicators (“KPIs”), will serve as a quality assurance (“QA”) mechanism and ensure that Program goals are met. The Quality Control Plan includes the following processes:

Sales Data Review

Data integrity is critical to the success and effective evaluation of the Program. The Implementer will ensure all sales data is thoroughly reviewed to identify discrepancies per the different processes outlined below for Implementer’s Instant Rebate and PPC data management platforms. The Implementer’s Instant Rebate and PPC platforms include a variety of automated controls and audit devices to ensure data accuracy. Upon the Implementer receiving access to each investor-owned utility’s customer database, the Implementer will validate end-use customers’ information that is captured in Implementer’s Instant Rebate and/or PPC data management platforms.

Instant Rebate Platform

The Program’s Instant Rebate tool’s validation function is specifically designed to assure customer and product eligibility. Before issuing a coupon to a customer, the Instant Rebate portal collects customer data to validate eligibility against IOU customer data provided to the Implementer.

The Instant Rebate portal can be configured to collect additional necessary data required. For measures where baseline data is needed (per the requirements referenced in the Implementer’s contract with SDG&E and listed in the Program Policy and Procedures), the portal can be configured to have a drop-down menu where the customer must provide basic information about their home and/or existing equipment if it is known. For example, for smart thermostat rebates, the portal will require the customer to provide the following data for properly claiming savings for this measure:

- Customer name
- Address (including zip code)
- Customer phone number and email address
- Customer’s utility/utilities
- HVAC type/equipment (per workpaper requirements)
- Building type
- Agreement to Program Terms and Conditions (including installation requirement and potential for program to contact customer per QA/QC processes)

When this data is collected, the Instant Rebate system’s processing logic checks for customer eligibility in its database using customer provided data, available past participation data as well as checking validity of email, physical, and IP addresses to enforce established coupon or product limits for each product discount issued. Once the customer has been deemed eligible, the Instant Rebate portal provides the customer a coupon they can redeem at their selected retailer in order to receive the rebate as a discount.

The Instant Rebate system will also be configured to cross-reference between retailer sales records within Implementer's system to flag potential double-dipping attempts. Any transactions determined to be double dip within Program will not be reimbursed by SDG&E.

Implementer will perform regular review of industry partner transactions to identify abnormal trends or unusual sale amounts, which will be flagged for follow-up with partners.

For verification of sales data from retailers participating in Instant Rebate, each retailer must provide the following data points:

- Coupon code used
- Date of purchase
- Item number of product purchased
- Store ID or ship-to zip code where purchase was made

Once that data is received, the Implementer's team matches the coupon codes reported to the coupon records in the Program's internal Instant Rebate database. If a coupon code is not able to be matched, it is flagged for follow-up. If a coupon is found to have an incorrect status, (e.g., a coupon being submitted for reimbursement is already marked in the system as "redeemed" or "invoiced") it is flagged for follow-up and Implementer will not reimburse a retailer if it is determined that duplicative data was received. If the product reported is not on an approved product list, it is flagged for follow up.

It is important to note that a retailer is not aware of what individual coupons have been issued to customers. Therefore, when a retailer submits sales data including redeemed coupon codes with their invoice for reimbursement, as a Quality Control measure, the Program is able to confirm that the codes submitted for reimbursement were indeed issued to customers. If there is any case where a coupon had not been issued to a customer yet is submitted for reimbursement by the retailer, it will be flagged for follow up with the retailer.

In cases where a sale is not verified, the Implementer's team will follow up with the participating retailer to gather additional information if necessary. Additionally, the redeemed coupon associated with that sale will be noted accordingly in the Instant Rebate database and that rebate will not be invoiced to SDG&E.

PPC Platform

Distributors will upload their sales of qualified equipment to the PPC portal using convenient upload templates. Standardized templates make upload requirements clear and simple and facilitate automated system checks for completion. The PPC platform has a variety of built-in rules that validate the inputs within the configured parameters. Any discrepancies found in the inputs are flagged in real time with steps for correction.

The PPC platform requires data to be submitted in a specified format that allows automatic validation and automated Quality Control that checks the following:

- Products' installation zip code is within the applicable service territory (validated through the zip code verification on PPC)
- Product is listed on the Qualified Product List
- Sale date is within Program Dates
- Product was sold at a Participating Distributor location
- Serial # has not previously been submitted in PPC

If any data is missing or does not match eligible parameters the participating Distributor will receive an error message when attempting to submit the upload file and will be prompted to resubmit the data with corrected information, providing an immediate quality assurance check. Sales that do not meet the eligibility requirements are not accepted.

All uploads are then subjected to a desk review by Implementer’s incentive processing team. This desk review checks any discrepancies that might indicate attempts at fraud—such as duplicate records or a disproportionately high percentage of sales from a single retailer or distributor—and notifies the program team for follow-up action. If the upload is in good order, then an Implementer team member inputs the unit and rebate totals associated with the distributor invoice and compares it to the data uploaded by the distributor; if they match, the system advances the invoice to the next stage and a second Implementer team member repeats the process. If all inputs match, the invoice is approved for rebate payment.

If the participating Distributor receives an error message, the Implementer can help resolve the issue. For example, if a product submitted for a rebate is not on the QPL, the Distributor must provide the appropriate information and request an engineering review by the Implementer to determine if the product qualifies. If the product is proven to meet Program requirements per an engineering review, the Implementer will manually add the product to its database.

At its sole discretion, the Implementer reserves the right to suspend Distributors from the Program. Reasons for a suspension may include, without limitation, the submission of incorrect or inaccurate Application information, Program inactivity, breach of this Agreement, or violating Program policies and procedures, Product or customer eligibility rules, or the Program’s terms and conditions. Distributor may apply for reinstatement to the Program after ninety (90) Calendar Days of such suspension. During the suspension period, Implementer reserves the right to disqualify all of the Distributor’s Product sales from the date of suspension to the date of reinstatement.

Field Team Quality Control and Quality Assurance

Implementer’s team of field staff is a critical component of supporting participating retailers and distributors in their program participation. Field staff responsibilities and expectations will be outlined in Implementer’s Field Manual and updated as needed with program changes. The Field Manual includes details related to safety protocols, process, expectations, deliverables, and timelines.

Field staff responsibilities include routine in person field visits to participating retail and/or distributor locations where Program signage is checked and updated as needed, inventory status is noted, and product pricing is checked, per the processes outlined in Program Field Manual and/or Policy and Procedures. Cadence of field staff visits will be outlined in Program Field Manual and/or Policy and Procedures. Field visits may also include informal or scheduled retailer/distributor sales staff training. Details of each field visit are logged in Implementer’s database and used for program reporting and for continuous improvement to field and/or program operations.

Implementer’s program team will monitor field activity by routinely reviewing field visit reports, as well other QC/QA measures such as:

- Program management will conduct regular “ride along” visits with each field staff to participating retail and/or distributor locations. Frequency of these visits are to be outlined in Implementer’s Field Manual and/or Policy and Procedures.
- Program management will conduct independent QC visits to participating retail and/or distributor locations to check field staff’s work without the field staff being present. A minimum number of participating locations will be visited on a monthly basis, as outlined in Implementer’s Field Manual and/or Policy and Procedures.

- Weekly or bi-weekly field team conference calls that cover safety, organizational updates, updates from the field staff, review of field reports as needed, as well as any additional training topics.

Measure Verifications

As part of the Program's Quality Control and Quality Assurance Plan Implementer will develop and implement a sampling plan that verifies that measures are purchased and installed in accordance with the program requirements. The sampling plan should be statistically based and expected to provide a level of confidence of not exceeding a maximum failure rate (typically 90% confidence that failure rate does not exceed 10%, though these levels can be adjusted based on program quality performance). Appropriate verification sampling should be conducted for all program measures to check for purchase and installation, and some measures might also have additional verification requirements based on measure packages or other CPUC or Program Administrator guidelines. For proper verification, as much as possible, sampling should be random. For example, purchase can be verified by requesting a sample of supporting invoices based on a random sample selected by the verifier as opposed to having the channel partner submit a sample of invoices for review. Processes related to the sampling plan and related verification processes and Inspection Percentage Rates per measure basis will be outlined in the Program Policy and Procedures.

For measures delivered through the Instant Rebate channel such as smart thermostats, room ACs, gas water heaters and heat pump water heaters, Implementer will conduct verification for customers who purchased the measure to verify installation, per the data collection requirements outlined in the Program Policy and Procedures:

For smart thermostats, data collection requirements are according to workpaper SWHC039-03 dated 6/8/20. Customer survey rate of five percent aligns with the rate of rebate participants who completed surveys as part of the DNV GL-Energy *Impact Evaluation of Smart Thermostats Residential Sector - Program Year 2018, 4/16/2020*.

For measures sold through the distributor channel, including electric heat pump water heaters, fuel substitution electric heat pump water heaters and gas water heaters, the Implementer will conduct verification for customers who purchased the measure to verify installation, per the data collection requirements presented in the Program Policy and Procedures. Reference Program Policy and Procedures for the inspection percentages.

For all measure verifications, customer communication will be conducted through email and/or phone or other methods as outlined in Program Policy and Procedures. Details of the customer communication and a photo of the installed measure will be recorded in the Implementer's system and included as part of any relevant invoicing or reporting requirements.

When a customer confirms the measure was not purchased and/or installed, the Implementer will credit SDG&E per the process outlined in Program Policy and Procedures.

If other measures are added to the Program during the contract Term, the verification process for a new measure will be added to the Program Policy and Procedures.

Stakeholder Survey and Communications

The Program will perform satisfaction surveys to assess stakeholder awareness of and satisfaction with the program and to inform continuous Program improvement. Program industry partners are required to participate in these surveys.

Stakeholder Pool

The Program may reach out to the following stakeholders: manufacturers, participating Retailers, participating Distributors, contractors, and/or end-use customers.

Frequency

The Program may reach out to the stakeholder pool up to four (4) times per year, or once per quarter.

Content

The Program may collect information including but not limited to Program participation, Program activity, levels of satisfaction, areas for improvement, Program challenges, Program preferences, business size and/or business type.

The Program shall notify all stakeholders listed in Stakeholder Pool above that are contacted for survey purposes that SDG&E, the Utility Participants, and the CPUC each have the right to contact them to verify the purchase and installation of a Program product and compliance with the requirements of the Program.

Communication Plan

The Program seeks to maintain open communication with all parties involved in Program delivery.

Retailer and Distributor Engagement

The Implementer will be the point of contact for the Program. Retailer and Distributor communications should be directed to the Implementer. The retailer or distributor should provide key points of contact to the Implementer at the branch and corporate level as appropriate.

Communication Channels

The following methods may be used to communicate information to Retailers and Distributors:

- Webinars
- In-person visits
- Newsletters
- Email announcements
- Implementer Meetings