

# Implementation Plan

SoCalGas

Commercial Building Energy Solutions & Technology (C-BEST)

Filing Date:

12/18/2020

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## Appendix A: Implementation Plan Template (2.0)

The following Implementation Plan is located on the CPUC-maintained website, the California Energy Data and Reporting System (“CEDARS”)<sup>1</sup>, in accordance with applicable CPUC decisions and Energy Division guidance.

### Program Overview

The Commercial Building Energy Solutions and Technologies (“C-BEST”) Program (“Program”) will target small and medium business (SMB) customers of Southern California Gas Company (“SoCalGas”), with an emphasis on Hard to Reach and Disadvantaged Communities, and will offer the following services:

- Education and training on the benefits of energy management and energy efficiency
- Virtual, phone and in-person energy audits
- Direct installation of select measures as an entrée to more comprehensive rebate measures
- Rebates for higher cost equipment promoted and delivered through a network of trade allies
- Information and support to utilize financing solutions, including SoCalGas On-Bill Financing (“OBF”) program and CHEEF Pilot Programs.

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<sup>1</sup> California Energy Data and Reporting System (CEDARS), <https://cedars.sound-data.com/>

## Program Budget and Savings

1. Program and/or Sub-Program Name Commercial Building Solutions & Technologies (C-BEST)
2. Program / Sub-Program ID SCG3845
3. Program / Sub-program Budget Table \$5,996,023
4. Program / Sub-program Gross Impacts Table

<b>First Year Annualized Deliverable<sup>1</sup></b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>Total</b>
Gross Therm Savings	374,279	526,092	605,904	1,506,275
Net Therm Savings	254,404	357,553	411,780	1,023,737
Gross kWh Savings	72,863	109,487	146,498	328,848
Net kWh Savings	51,197	76,911	102,857	230,965
Gross kW Reduction	-5,690	-7,965	-9,100	-22,755
Net kW Reduction	-3,413	-4,777	-5,458	-13,648

5. Program / Sub-Program Cost Effectiveness (“TRC”) 1.63
6. Program / Sub-Program Cost Effectiveness (“PAC”) 1.69
7. Type of Program / Sub-Program Implementer (PA-delivered, third party-delivered or Partnership)  
Third Party delivered
8. Market Sector(s) Commercial
9. Program / Sub-program Type Resource
10. Market channel(s) Downstream and Intervention Strategies Downstream and Direct Install incentives with financing options campaign goals: 1,506,275 Gross Therms and 1,023,737 Net Therms over 3-year program period.

# Implementation Plan Narrative

## 1. Program Description:

The Commercial Building Energy Solutions & Technologies (C-BEST) will target small and medium commercial (“SMB”) businesses that have a gas energy usage up to 50,000 therms. The program will have an emphasis on customer segments with predominantly high natural gas loads, such as hospitality, restaurants, laundries, small medical, and office buildings. Commercial customers located in San Bernardino or Riverside counties are not eligible to participate in the C-BEST program.

The C-Best program will offer a suite of measures that have a set incentive rate as well as measures that are offered through Direct Install. C-BEST will utilize a comprehensive outreach strategy that leverages Business Energy Advisors, contractor/trade allies and community-based organizations that cater to small and medium sized businesses. C-BEST will also have a primary focus on helping select businesses, particularly Hard to Reach/Disadvantaged Communities (HTR/DAC) customers. ICF will work with community-based organizations “CBOs” that work with HTR/DAC customers to promote EE and workforce development. Business Energy Advisors will engage commercial market experts as well as local Chambers of Commerce who provide the appropriate support for HTR/DAC customers. Financing support for customers who participate in the C-BEST program will also be leveraged by offering access to several financing agencies based on the company and project history, project size, and project scope.

## 2. Program Delivery and Customer Services:

The C-BEST Program has a goal to deliver therm savings each year of the 3-year program cycle. Please see the chart below which outlines therm savings that the program must achieve.

<b>First Year Annualized Deliverable<sup>1</sup></b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>Total</b>
Gross Therm Savings	374,279	526,092	605,904	1,506,275
Net Therm Savings	254,404	357,553	411,780	1,023,737

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<sup>1</sup> IP Guidance from D.15-10-028: "Describe how the energy efficiency (EE) program will deliver savings (upstream, downstream, direct install, etc.), how it will reach customers, and the services and [sic] it will provide.

The C-BEST Program will target small and medium commercial business (“SMB”) customer groups (up to 50,000 therms per year) with an emphasis on customer segments, such as restaurants, lodging, laundry, retail, office, small medical, and others. C-BEST will target the downstream market channel during the 3-year contract cycle by including incentives, financing, and direct install to increase the adoption of deemed measures within the SMB segment. C-BEST will partner with contractors to form a comprehensive trade ally network to address natural gas end uses. This comprehensive approach to building energy usage will be achieved through partnerships with municipal electric utilities and water utilities.

A primary focus of the program will be HTR customers and customers within disadvantaged communities (DACs). Based on an initial high-level analysis, it is estimated that at least 25% of SMB customer groups will be HTR customers and customers within disadvantaged communities. The program will serve HTR/DACs within the SoCalGas service territory. DACs will be prioritized by geotargeting communities for local blitz marketing and outreach.

The program includes a mix of energy saving deemed measures and direct install measures which will be delivered to customers via the program’s unique engagement strategy utilizing local and national account managers as well as an extensive contractor/trade ally network.

### **3. Program Design and Best Practices:**

Program design components that will be instrumental for C-BEST to achieve its program goals are listed below:

- C-BEST will use an analytics-based approach to better target customers. Using historical utility usage paired with supplemental data, ICF can then benchmark specific commercial business sectors to focus outreach efforts. Outreach efforts will also leverage key partnerships such as local Chambers of Commerce (for HTR/DAC) and other organizations that will be important for program engagement and success.
- C-BEST will use an SEM-lite approach that includes customer and contractor trainings, workshops, seminars, and webinars on implementing a long-term energy planning strategy.
- C-BEST will use incentives and financing to reduce the cost of capital equipment. Incentives will be used to increase market adoption of new emerging technologies; financing will be used for mature technologies.
- C-BEST will deliver financing options such as On-Bill Financing (OBF) to customers that are installing more mature measures. When projects do not qualify for OBF, external financing offerings, such as the California Hub for Energy Efficiency Financing (“CHEEF”) will be offered. CHEEF partners with several financing companies, therefore the customer should have multiple platforms for financing approval.
- C-BEST will work through a contractor/trade ally network and use a direct install approach to deploy free or low-cost measures. These measures include faucet aerators, laminar flow devices, pre-rinse spray valves and pipe insulation as an additional incentive. These measures will serve as gateway measures to encourage increased program participation over time for more mature technologies where financing will be needed.

#### 4. Innovation

C-BEST program will utilize several components to deliver an innovative and user-friendly program. C-BEST will use marketing, outreach services, incentives for deemed measures, financing options, and direct install incentives to achieve customer adoption of energy efficiency. This will lead to high program results and a cost-effective program that will penetrate the small and medium sized business market. Targeted marketing will provide appropriate messaging to customers to peak interest in the program and showcase measures that customers are most interested in. Customers will then participate in the program at the appropriate level to meet their needs. Financing options will be made available to help customers install those more mature measures and technologies. Small Business Owners often have exponential responsibilities and usually do not know where to start when it comes to energy efficiency. C-BEST's local and national account management team as well as its contractor/trade ally network will support these SMB owners and make adoption of energy efficiency effortless. The program will also offer direct install incentives to penetrate a customer's interest in energy efficiency. These gateway DI measures will engage a customer with the intent of installing more mature and comprehensive deemed measures.

#### 5. Metrics

The C-BEST Program will have several Key Performance Indicators (KPIs) that are integrated into the program to measure and track program success. These KPIs will be the primary assessment of the program's performance. The majority of these KPIs will be tracked monthly throughout the 3-year cycle while those focused on cost-effectiveness will be tracked annually. C-BEST KPIs will have a rating scale of 0-4. A breakdown of this rating scale is below:

0 – Unsatisfactory

1 – Below Expectations

2 – Meeting Expectations

3 – Exceeding Expectations

4 – Greatly Exceeding Expectations



KPI	SoCalGas Metric	Description
Performance: Goal Accomplishment (net therm savings)	S1: Energy Savings	Percentage of net annual and lifecycle energy savings achieved vs forecasted
Cost Effectiveness Alignment: TRC Calculation	N/A	TRC – Actual vs. forecasted Difference: Actual Minus Approved
Performance: Cost Per Unit Saved	Cost Per Unit Saved	Levelized PAC Cost - Actual vs. forecasted  Difference: Actual Minus Forecasted
Performance: Disadvantaged Communities	Penetration of EE	Percentage of customers in disadvantaged communities
Performance: Hard-to-Reach	P4: Penetration of EE programs	Percentage of customers meeting HTR definition
Schedule Adherence (committed/ installed)	N/A	Number of projects compared to the forecasted number of projects
Service Delivery	N/A	Program Advisor-determined rating of 0 – 4, based on: - Timely response for out-of-scope requests - Proactive in continuous program delivery - On-time invoice and Monthly report

		- Quality of Deliverables - Willingness to partner -Communication
Supply Chain Responsibility: DBE Spend		To date DBE spending as percent of total spend / DBE % commitment compared to agreed goal

ICF will follow all continuous monitoring mechanisms listed in the chart above such as monthly and annual reports for the designated KPI. This will ensure that all KPIs are tracked properly and accurately communicated to SoCalGas.

**6. Programs claiming to-code savings**

Not applicable for the C-BEST Program

**7. Pilots**

Not applicable for the C-BEST Program

**8. Workforce Education and Training<sup>2</sup>**

During the 3 year term of C-BEST, the program will comply with, and shall cause its employees, agents, representatives, subcontractors, independent contractors, and all other persons performing services for the program to comply with, the workforce qualifications, certifications, standards, and requirements.

The program will leverage, expand, and initiate partnerships with community-based organizations (CBO's) that offer job placement and other services that cater to HTR/DAC customers.

The program will ensure qualified candidates are hired from a broad pool of candidates using fair hiring practices. Program representatives will ensure qualified candidates have all required certifications to support the program.

The program will also be hiring local representatives to support the program and execute services as well as onboard contractors/trade allies onto the program. The Energy Advisors will live in the communities the program serves and through program training will become skilled SMB auditors and will develop valuable sales skills. The program will also use a diverse supplier to provide additional local support to the program, and this staff will receive the same training benefits.

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<sup>2</sup> D.18-05-041, page 20-21 and Ordering Paragraph 7

## 9. **Workforce Standards**

For all Program Projects and for each Measure, installed, modified, or maintained in a non-residential setting where the project is seeking an energy efficiency incentive of \$3,000 or more, ICF will ensure that each contractor/trade ally involved in the project meets at least one of the following criteria:

- (1) Completed an accredited HVAC apprenticeship.
- (2) Is enrolled in an accredited HVAC apprenticeship.
- (3) Completed at least five years of work experience at the journey level according to the Department of Industrial Relations definition, Title 8, Section 205, of the California Code of Regulations, passed a practical and written HVAC system installation competency test, and received credentialed training specific to the installation of the technology being installed.
- (4) Has a C-20 HVAC contractor license issued by the California Contractor's State Licensing Board.

This standard shall not apply where the incentive is paid to any manufacturer, distributor, or retailer of HVAC equipment, unless the manufacturer, distributor, or retailer installs or contracts for the installation of the equipment.

## 10. **Disadvantaged Worker Plan<sup>3</sup>**

The C-BEST program does not require a disadvantaged worker plan to be developed or implemented based on the nature of the program. However, ICF will meet the CPUC workforce standards as required and support the hiring of disadvantaged workers, especially since many of the stakeholders of this program will be in disadvantaged communities. ICF will also track disadvantaged worker and job creation KPIs as stated in the program manual.

## 11. **Additional information**

No Additional Information

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<sup>3</sup> D.18-10-008, Attachment B, Section D, page B-9.

## Supporting Documents

### 1. **Program Manuals and Program Rules**

See below

### 2. **Program Theory<sup>4</sup> and Program Logic Model<sup>5</sup>**

A main focus of the C-BEST program is adoption of energy efficiency for small and medium businesses in all communities within the SoCalGas service area, but especially in areas that have a high concentration of HTRs. To align with this focus, C-BEST will offer DI measures as an engagement strategy so customers may (1) become aware of offerings available to them through this program and (2) bring energy efficiency to the forefront of their businesses.

C-BEST will utilize strategic outreach through business energy advisors as well as an extensive contractor/trade ally network. Outreach activities will include both electronic outreach via email and phone in addition to on the ground canvassing. Adoption of energy efficient measures will be the result of these actions.

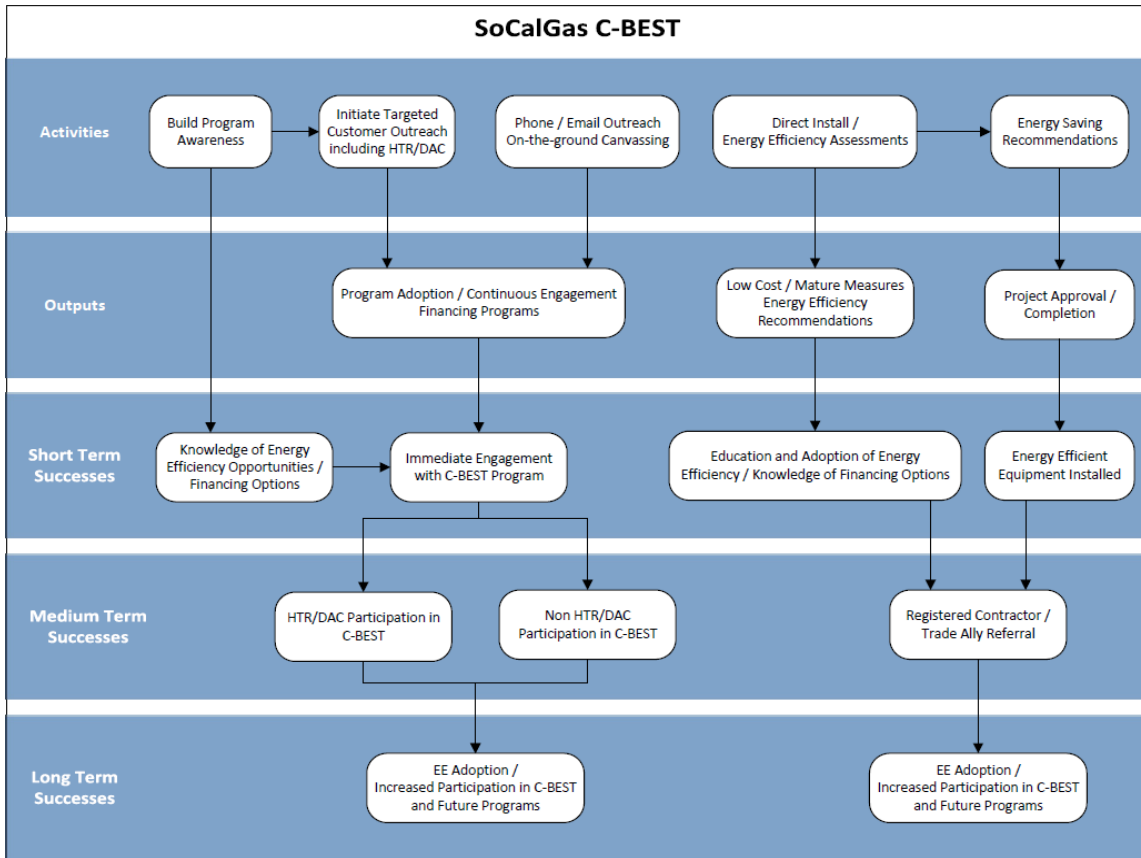
Another important component of the program is assessing energy efficient projects that can be completed at small and medium sized business. This assessment will be completed via audits either virtually or in person. These assessments will then identify and recommend energy efficiency improvements that can be completed to achieve energy savings. Once completed, the business energy advisors will work with customers and/or contractors/trade allies to drive project completion and submission into the program.

Through the actions mentioned, this program will have multiple positive outcomes, including increased program participation, awareness of energy efficient equipment, and program adoption within the HTR/DAC market. These projects will also help foster a relationship between customers and trade allies which will encourage customers to install other measures that might require financing through either OBF, CHEEF, or additional financing mechanisms.

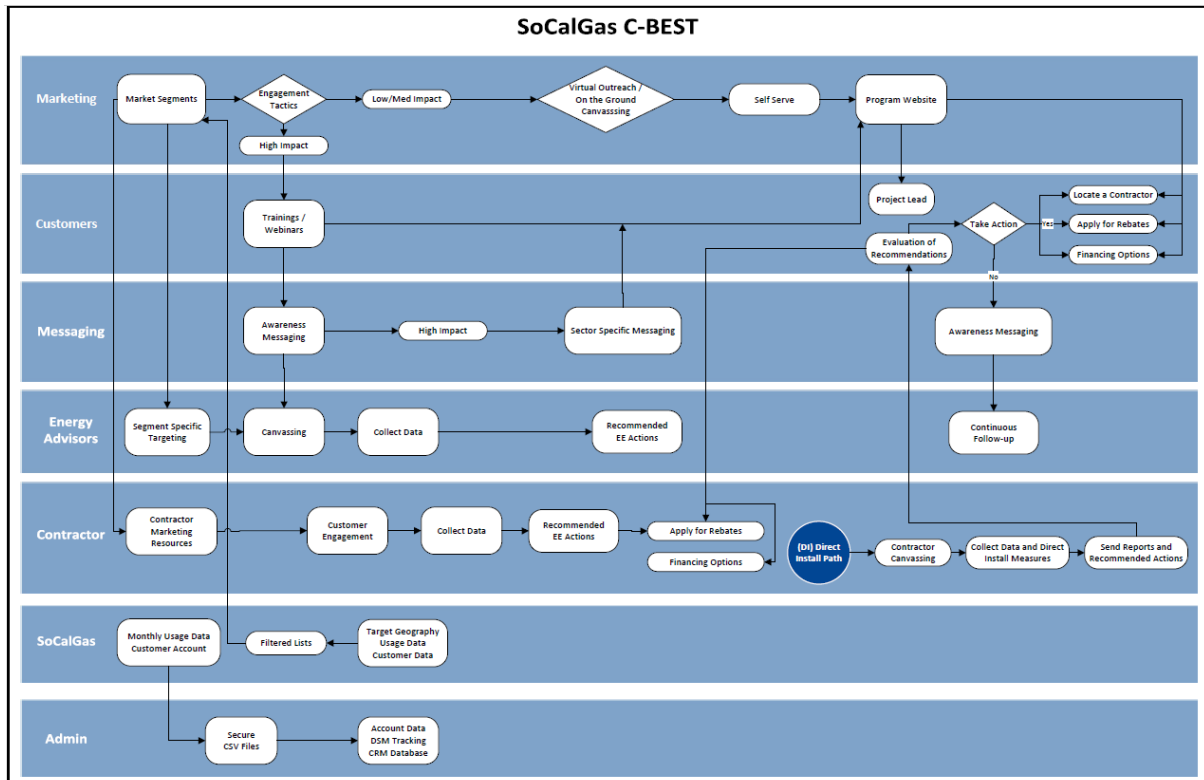
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<sup>4</sup> The expected causal relationships between program goals and program activities in a way that allows the reader to understand why the proposed program activities are expected to result in the accomplishment of the program goals. A well-developed program theory can (and should) also describe the barriers that will be overcome in order to accomplish the goals and clearly describe how the program activities are expected to overcome those barriers. California Evaluation Framework, June 2004.

<sup>5</sup> The graphical representation of the program theory showing the flow between activities, their outputs, and subsequent short-term, intermediate, and long-term outcomes. California Evaluation Framework, June 2004.



### 3. Process Flow Chart



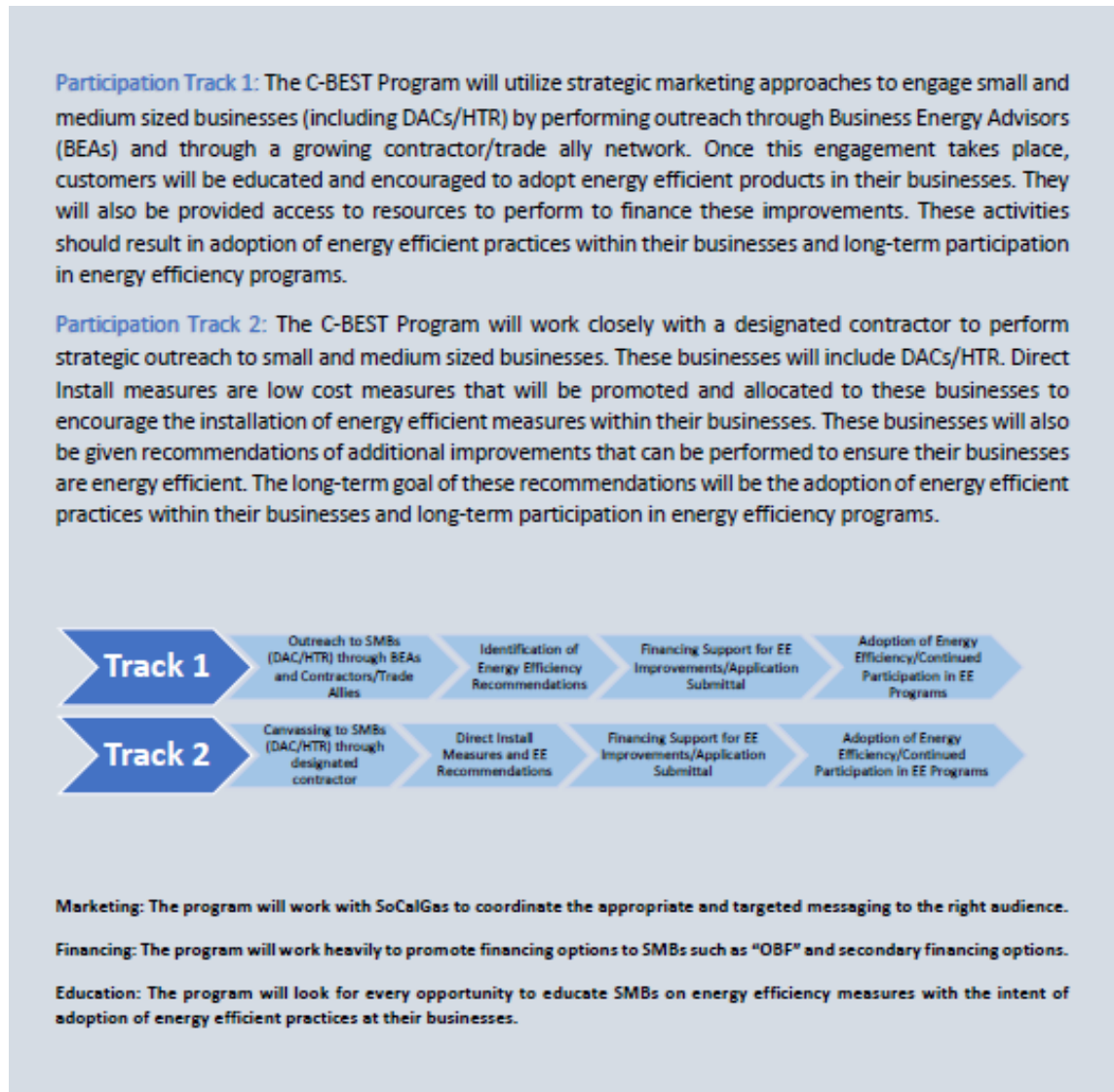
4. **Incentive Tables, Workpapers, Software Tools:**

Measure Description	Workpaper
Laminar Flow Restrictor - 1.0 GPM	SWWH004-01
ProcessBoiler-Steam(>=83%CE)	SWWH008-01
ProcessBoiler-Water-Tier1(>=85%CE)	SWWH008-01
ProcessBoiler-Water-Tier2(>=90%CE)	SWWH008-01
CommercialBlr-DWH-Large(>200MBtuh)-Tier2(>=90%TE)	SWWH005-01
CommercialBlr-DWH-Large(>200MBtuh)-Tier1(>=84%TE)	SWWH005-01
CommercialBlr-DWH-Small(<=200MBtuh)-Tier2(>=90%EF)	SWWH005-01
CommercialBlr-DWH-Small(<=200MBtuh)-Tier1(>=84%EF)	SWWH005-01
Pipe Insulation 1 Insulation <= 1 pipe Hot Water_Indoor	SWWH017-01
Low-Flow Pre-Rinse Spray Valves <0.75 gpm	SWFS013-01
SpaceHeatingBoilers-Steam-Medium(>=83%CE)	SWHC004-01
SpaceHeatingBoilers-Water-MediumLarge-Tier2(>=90%CE)	SWHC004-01
SpaceHeatingBoilers-Water-Medium-Tier1(>=85%CE)	SWHC004-01
Steam Traps	SWPR003-01
Commercial Stor. Heaters <=75 kBtu/hr 50G-HD-0.68 UEF	SWWH007-01
Tankless Water Heaters-Large(>200MBtuh)-Tier2(>=90%TE)	SWWH006-01
Tankless Water Heaters-Small(<=200MBtuh)-Tier1(>=0.82EF)	SWWH006-01
Tankless Water Heaters-Small(<=200MBtuh)-Tier2(>=0.90EF)	SWWH006-01
Commercial Combination Oven/Steamer < 15 pan capacity (Gas)	SWFS003-01
Commercial Combination Oven/Steamer 15 to 28 pan capacity (Gas)	SWFS003-01
Commercial Combination Oven/Steamer > 28 pan capacity (Gas)	SWFS003-01
Automatic Conveyor Broilers Belt Width <20	SWFS017-01
Automatic Conveyor Broilers Belt Width 20-26	SWFS017-01
Automatic Conveyor Broilers Belt Width > 26	SWFS017-01
Commercial Fryer (Gas)	SWFS011-02
Comm Griddle	SWFS004-01
Commercial Double Rack Oven - Gas	SWFS014-02
Commercial Full-Size Convection Oven (Gas)	SWFS001-02
Commercial Steam Cooker	SWFS005-02
NATURAL GAS POOL HEATER >=84% TE	SWRE003-01
Tank Insulation - Low Temperature Applic. (LF) 1 in Indoor	SWWH018-01
Tank Insulation - High Temperature Applic. (LF) 1 in Indoor	SWWH018-01
Tank Insulation - Low Temperature Applic. (LF) 2 in Indoor	SWWH018-01
Tank Insulation - High Temperature Applic. (LF) 2 in Indoor	SWWH018-01

5. **Quantitative Program Targets**

Quantitative Program Targets are not applicable for this program.

## 6. Diagram of Program



## 7. Evaluation, Measurement & Verification (EM&V)

For the C-BEST program, project level data will be collected, managed, and stored to ensure program requirements including eligibility and technical criteria are satisfied. C-BEST will capture savings from deemed measures as these are the most appropriate for an SMB program delivery strategy. Internal performance analysis and program performance metrics will be tracked and reported to SoCalGas through dashboard reports and regular reporting intervals (i.e. monthly narratives, quarterly business reviews and annual reporting). The program will then work with evaluators to ensure the proper data is collected and gathered. This data may include the following:

Customer contact information

- Project Information
  - Pre and Post Estimated Therm Savings
  - Project Costs
  - Incentive Data

The data collected will then be available for review by the EM&V contractor as well as the SoCalGas customer.

## 8. Normalized Metered Energy Consumption (NMEC)

Not applicable to this program.

## Program Manuals

All programs must have manuals uploaded in CEDARS to clarify eligibility requirements and rules of the program for implementers and customers. Program rules must comply with CPUC policies and rules. Table templates are available at CEDARS. At minimum, manuals should include:

### 1. Eligible Measures or measure eligibility, if applicable

Provide requirements for measure eligibility or a list of eligible measures.

Measure Description	Size Thresholds	Criteria
Process Heating Steam Boiler	<= 20MMBtuh	>=83%CE
Process Heating Hot Water Boiler	<= 20MMBtuh	>=85%CE, >90%CE
Commercial Hot Water Boiler	<=200, >200MBtuh	>=84%EF/TE, >=90%EF/TE
Space Heating Hot Water Boilers	300-2500, >2500 Mbtuh	>=85%TE, >=94%TE
Space Heating Steam Boilers	300-2500, >2500 Mbtuh	>=80%TE, >=82%TE
Tankless Water Heater	<=200, >200MBtuh	>=82% EF, >=90%TE/EF
Storage Water Heater	>75MBtuh	>=83%, 90%, 96% TE
Pipe/Fitting Insulation	<=1",1-4",>4"	Hot Water, Steam <=15psig
Tank Insulation	1", 2"	120-170°F, 170-200°F
Pre-Rinse Spray Valve	<1.07 GPM	Limited Sectors
Laminar Flow Restrictor	<=2.2 GPM	Limited Sectors
Steam Traps	Any	>=12 Hrs./day
Pool Heater	Any	>=84% TE
Combination Oven	<15,15-28,>28 Pans	Steam;>=38%, Oven;>=44%
Conveyor Broiler	2, 3, 4 Lane	Only Qualified Products
Fryer	Any amt. of vats	>=50%
Griddle	Any amt. of linear feet	>=38%
Rack Oven	Single or Double	>=50%
Convection Oven	Any amt. of Ovens	>=46%
Steam Cooker	Any amt. of compartments	>=38%

### 2. Customer Eligibility Requirements

Small and Medium Sized Businesses (SMB) with an annual usage under 50,000 therms and a valid account with SoCalGas are eligible to participate in the C-BEST Program. Customers located in San Bernardino and Riverside counties are ineligible to participate as well as customers that have recently applied for the same measures.



### **3. Contractor Eligibility Requirements**

All contractors/trade allies that work in the SoCalGas service area, especially those that work in disadvantaged communities, are eligible to participate in the C-BEST program.

### **4. Participating Contractors, Manufacturers, Retailers, Distributors, and Partners**

This program is considered an open network program which means participating contractors, manufacturers, and other stakeholders can participate in the C-BEST program if they are supporting customers that have an annual usage of less than 50,000 therms.

### **5. Additional Services**

Additional services are not applicable to this program since a sub program is not offered.

### **6. Audits**

The C-BEST program will offer either virtual or field post energy audits. Post audits will take place at a facility to determine whether a project meets eligibility requirements. Projects may be randomly selected for post audits. The select criteria is based on the complexity of the project as well as project scope and size.

### **7. Sub-Program Quality Assurance Provisions**

Not applicable to this program.

### **8. Expectations of Employees**

Employees of ICF are expected to follow all policies and processes that has been provided and outlined to them. Employees are also expected to use their best and most logical judgement when something is not satisfactory. If something is not satisfactory, make others aware of the situation. Once others are made aware, collaborate to develop the most logical solution. If needed, seek the assistance of a manager or supervisor to address the problem.

Ensure work is reviewed thoroughly. Also, please obtain a secondary review to ensure work completed is satisfactory.

Document important processes to ensure project done to the best of its ability. Take note of these processes for future best practices.

### **9. Inspections**

Projects submitted through the C-BEST program will go through a thorough administrative review process. It will provide a detailed analysis of qualifications of the project documentation provided, which may include, but is not limited to a project scope review, verification of eligible measures, site photos, and invoice verification. These thorough reviews can be either on-site or virtual. These reviews are performed at random as an added layer of quality assurance.

Projects will also be reviewed in accordance with the following guidelines:

- Verification processes are per codes in addition to applicable industry and utility accepted technical guidelines.
- Inspections are completed comprehensively and accurately.
- Inspections are documented appropriately for thorough review.

Inspections also help maintain a high standard of quality for the trade ally network and to ensure that measures are installed and operating as intended. Inspections are also intended to ensure program objectives as it relates to the project are met and that the savings associated with a project are accurately captured.

### Tools and Activities

- Sightline Platform-A cloud-based tracking software that provides an application framework to manage a program’s lifecycle including processing applications, supporting rebate processing and payments, recording project leads, and delivering compliance and management reporting.
- SSRS Reporting Platform – A Microsoft based reporting platform that tracks energy savings and can be used to evaluate KPIs that relates to goal performance. SSRS can also be used to track number of projects compared to the forecasted number of projects.
- Cognos Reporting Platform – A financial management platform that tracks the financial status of a program. Cognos can be used to track project staffing, labor and costs, and additional metrics related to the financial tracking of the program.
- Microsoft Teams- A program management and platform that can be used to house documents, notes, deliverables, and additional resources to easily management the day to day performance of the program.

### 10. Other Program Metrics:

The metrics gathered in the C-BEST Program will be as follows:

#### Key Performance Indicators (KPIs) for Marketing Tactics

<p><u>Website</u></p> <ul style="list-style-type: none"> <li>a. Users</li> <li>b. Sessions</li> <li>c. Unique page views</li> <li>d. Time on site</li> <li>e. Bounce rate</li> <li>f. Traffic source</li> <li>g. Geographic Distribution</li> </ul>	<p><u>Direct Mail</u></p> <ul style="list-style-type: none"> <li>a. Response Rate</li> </ul> <p><u>Paid Media</u></p> <ul style="list-style-type: none"> <li>a. Impressions</li> <li>b. Clicks</li> <li>c. CTR</li> <li>d. CPC</li> </ul> <p><u>Social Media</u></p> <ul style="list-style-type: none"> <li>a. Posts</li> <li>b. Followers</li> <li>c. Impressions</li> <li>d. Engagements</li> </ul>	<ul style="list-style-type: none"> <li>e. Engagement Rate</li> </ul> <p><u>Outreach and Education</u></p> <ul style="list-style-type: none"> <li>a. Event attendance</li> <li>b. Attendee feedback</li> <li>c. Direct interaction (e.g., number of giveaways distributed, specific attendee information collected, program leads received, etc.)</li> </ul>
<p><u>Email</u></p> <ul style="list-style-type: none"> <li>a. Open Rate</li> <li>b. CTR</li> </ul>		

#### Portfolio Benefit/Cost Metrics (Cumulative to Date and Annual)

- a. Total cost to bill payers (TRC, administrative cost and incremental cost per the Standard Practice Manual)
- b. Total savings to bill payers (TRC)
- c. Net benefits to bill payers (TRC)
- d. TRC Ratio
- e. PAC Ratio
- f. Levelized cost per therm (TRC) - as calculated in CET
- g. Levelized cost per therm (PAC) - as calculated in CET

## Disadvantaged Worker and Job Creation

This data will be tracked and provided to SoCalGas in the format designated on a monthly basis and at completion of the contract. The metrics that will be collected includes:

- Number of new employees;
- Number of job promotions;
- Number of hours worked by employees or subcontractors;
- Number of hours worked by employees or subcontractors residing in targeted zip codes provided by the Company;
- Number of disadvantaged workers as defined by CPUC2;
- Partnership and/or employment goals and results from partnering with training or apprenticeship programs such as community colleges;
- Percent of incentive dollars spent with a demonstrated commitment to provide career pathways to disadvantaged workers; and