

# CAEECC EMSWG Meeting #8 Summary

Date: Wednesday, February 28, 2024

Time: 9:00 am - 12:00 pm PT

On February 28, 2024, the Equity & Market Support Working Group (EMSWG) met for its eighth Meeting via Zoom. There were 28 attendees, including representatives from 15 EMSWG Member organizations and 2 representatives from Ex-Officio agencies, as well as 11 Members of the Public (see [Appendix A](#) for a full list of meeting attendees). This meeting was facilitated by Suhaila Sikand (Sikand) and Sooji Yang (Yang) of Common Spark Consulting and supported by Susan Rivo (Rivo) of Raab Associates.

Supporting meeting materials are available at:

<https://www.caeec.org/equity-and-market-support-wg-mtg-8>. Relevant materials include:

- Agenda (02-28-2024 EMSWG Meeting #8 - Agenda (posted 02-21-24, rev. 02-27-24))
- Slide Deck (02-28-2024 EMSWG Meeting #8 - Slide Deck (posted 02-21-24, rev. 02-27-24))

## Overview

Key Meeting Takeaways:

The WG developed several amendments to the Draft Report which will be reflected in the final. These include the following:

1. For Market Support Indicator #2:
  - a. The report will not include "An entity paying for services on the PA's behalf" as a third bullet to the definition of "non-ratepayer in-kind funds/contributions."
  - b. A sentence will be added to the Recommendation to indicate that EMSWG interprets the "/" in the Indicator language to mean "both/and."
2. For Market Support Indicator #25:
  - a. The definition of "market-rate capital" will not include a sentence regarding market rate for an investment.
  - b. The US Prime rate will not be identified as a good average rate for non-residential customers. Instead, the Recommendation will suggest that the PAs discuss (through their Reporting teams in addition to California Alternative Energy and Advanced Transportation Financing Authority (CAEATFA) members or through another venue) how they will approach this Indicator before filing their Annual Reports.

- c. Include clarification that customers access GoGreen financing directly through the lender or the GoGreen financing programs themselves.
  - d. The recommendation to pause on Market Support Indicator #25 will be removed.
3. Regarding Principles for Reporting:
- a. Bullet 1 will be modified to replace the “Annual Evaluation, Measurement, and Valuation Report” with “Energy Efficiency Annual Report”
  - b. Bullet 2 on providing program-specific data will be removed.
  - c. A note will be added that in the reporting, PAs should include references and links to aid the navigation to program data via CEDARS.
4. Recommendation #21 will be modified to say:
- a. Indicators to be reported quarterly should be done so by uploading a spreadsheet in the Documents area of CEDARS, similar to annual Common Metrics submittals by PAs.
  - b. Indicators to be reported annually should be done so by uploading a spreadsheet in the Documents area of CEDARS, similar to annual Common Metrics submittals by PAs.
5. Recommendation #21 on the Indicator Reporting Process will include:
- a. A sub-recommendation for PAs to consider collaborating on creating a high-level and consistent template to report on these Indicators as feasible and not necessarily before the submission of the Advice Letter. This sub-recommendation will reference the Principle for Reporting Recommendation to not have overly cumbersome processes.
  - b. A note that the recommendation is a short-term solution and that there may be future iterations to adjust this process.
  - c. A non-consensus suggestion for PAs to include a narrative, non-data summary of the Indicator data alongside the spreadsheet of Indicators so the public can easily read, understand, and access the data.
  - d. A note about ongoing efforts at the CPUC to create more comprehensible data through data visualization and other means. In addition, this note will include a non-consensus suggestion for CEDARS to have a landing page with easily digestible language for the public to navigate the system.
6. The definition of “purposes” will be modified to include the language “examples include but are not limited to: Deliver EE products, Outreach, Education, Job training, Diversify funding options, Program enrollment.”
7. Summary Table of Indicators will be modified in the following ways:
- a. Columns will now read:

Indicat or #	Indicator Descripti on	Key Definitio ns	Why (Equity or Market Support sub-bullet/objective)	Units	Methodolo gy	Notes
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- b. It will clearly delineate what is and is not a recommendation and where there is and is not consensus.

8. Next steps include:
  - a. PAs will submit the Advice Letter based on the Indicators that have been clarified through the WG.
  - b. PAs will not plan to file a time extension request for the Advice Letter.
  - c. The Facilitation team will send a revised Draft Report to WG by March 12 for feedback due by March 19. The Facilitation team will send the Final Report to PAs by March 22.
  - d. The Final Report will include a non-prescriptive recommendation that the PAs should consider reconvening or initiating a process to further refine and clarify the Indicators after initial reporting.

*This meeting summary is intended to capture this meeting's discussion of ideas, concerns, alternative options for proposals and consensus; it is a high-level summary and not a transcript.*

Key acronyms that may be used in this document include California Energy Efficiency Coordinating Committee (CAEECC), California Public Utilities Commission (CPUC), Energy Division (ED), energy efficiency (EE), working group (WG), disadvantaged communities (DAC) and hard-to-reach (HTR) communities, CPUC's Environmental and Social Justice Action Plan (ESJ Action Plan), Program Administrator (PA), Investor-owned utilities (IOU), Regional Energy Network (REN), community-based organization (CBO), Disadvantaged Communities Advisory Group (DACAG), and Total System Benefits (TSB).

## Welcome & Introductions

Slides 1 - 4

Yang welcomed and introduced participants to the eighth meeting of the EMSWG. Yang presented the meeting objectives, which included:

1. Continue taking Working Group member feedback on the Draft EMSWG Report
2. Address remaining questions and next steps for the Draft EMSWG Report

To achieve meeting objectives, the Facilitation Team developed the following agenda:

- Welcome
- [Topic 1](#): Definition of "Non-ratepayer in-kind funds/contributions"
- [Topic 2](#): Definition of "Market-rate Capital"
- [Topic 3](#): Definition of "Capital Accessed via Energy Efficiency Programs"
- [Topic 4](#): Principles for Reporting
- [Topic 5](#): Indicator Reporting Process
- [Topic 6](#): Follow-up from Meeting #7
- [Topic 7](#): Next Steps on Unclarified Indicators
- [Topic 8](#): Remaining Issues to Highlight in the Report
- Wrap Up and Next Steps

# Topic 1: Definition of “Non-ratepayer in-kind funds/contributions” (Market Support Indicator #2)

Slides 5 - 6

MS Indicator #	Description
2	Dollar value of non-ratepayer in-kind funds/contributions utilized via partnerships (A, P)

The terms "non-ratepayer in-kind funds" and "non-ratepayer in-kind contributions" (used in Market Support Indicator #2) are defined as:

1. "Non-ratepayer in-kind funds" refers to monetary contributions offered for free (e.g., through a grant)
2. "Non-ratepayer in-kind contributions" refers to goods, services, and other tangible assets that are provided for free or at less than the usual charge
3. "Non-ratepayer in-kind funds/contributions" can also refer to any monetary contributions, goods, services, and tangible assets, that are paid for by another entity on a PA's behalf

Yang directed EMSWG to the topic of Non-ratepayer in-kind funds/contributions on page 21 of the [Draft Report](#). Yang then guided the group with discussion questions (*italicized below*) followed by a Zoom poll and a raise of hands to conduct a vote.

**Based on the discussion on Topic #1, changes to the Recommendation that will be reflected in the Final Report include:**

1. The report will not include "An entity paying for services on the PA's behalf" as a third bullet to the definition of "non-ratepayer in-kind funds/contributions."
2. A sentence will be added to the Recommendation to indicate that EMSWG interprets the "/" in the Indicator language to mean "both/and."

## Summary of Discussion on Topic #1

*Should "An entity paying for services on the PA's behalf" be added as the third underlined bullet to the definition?*

- A PA Member noted that definitions #1 (non-ratepayer in-kind funds) and #2 (non-ratepayer in-kind contributions) are definitional whereas the suggestion is a little different.
- A Member clarified that the suggestion was meant to capture the instances where there would be an entity paying on the other's behalf, e.g. a parent

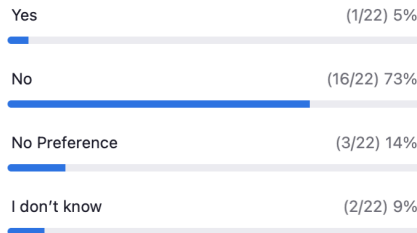
corporation paying an expense on behalf of a subsidiary, legal or professional fees paid on behalf of another person, or employee expense reimbursement.

- A Member from ED raised concern about the example shared which would count a parent company that provides funding to support a subsidiary, and asked for clarification on how this suggestion supports the energy efficiency market. A few Members agreed.
- A Member raised concern that non-ratepayer in-kind funds and non-ratepayer in-kind contributions should not be bundled together, and noted wanting to see transparency in what is captured as funds and contributions. Asked if there was an option to choose “none of the above” for the poll.
  - Yang clarified that the question is whether to add the suggestion, not to choose amongst the three definitions seen on the slide.
- A PA Member commented that the suggestion seems to expand the definition of partnerships. Suggested it does not belong in Market Support Indicator #2 but rather in the “partnerships” definition if the relationship goes both ways.
- A PA Member noted supporting the definitions #1 and #2, and suggested more clearly indicating that monetary contributions are not ratepayer-funding as it seems to be implied in the definition with the placement of the quotation marks. Noted lack of clarity about whether monetary contributions are ever offered for free, and commented that the suggestion is already captured in definition #1.
- A Member did not support the suggestion, stating that the suggestion is not believed to be consistent with what the CPUC is seeking. Elaborated that a PA has a CPUC-approved budget for a given program that is generally broken out into multiple categories, e.g. Direct Implementation, Marketing, Overhead, etc. “An entity paying for services on the PA’s behalf” suggests that a third party has paid or provided services for something originally approved by the CPUC as a direct PA expense. There may be additional funds or services related to a given program that were originally budgeted and are above and beyond those that the PA planned to directly pay. The CPUC’s interest is to better understand whether EE programs are inviting additional funds or services, or put differently, they’d like to assess whether a leveraging of ratepayer funds is creating greater value.
- A Member noted that lumping the suggestion into the definition of “in-kind funds/contribution” is problematic. Suggested transparent reporting of the Market Support activity and the transaction between the parties with its “valuation.”

Yang opened a Zoom poll (screenshot below) to ask EMSWG Members to choose an answer between “Yes,” “No,” “I don’t know,” and “No Preference” to indicate whether the suggestion should be accepted. Sixteen out of twenty-two respondents voted to not accept the suggestion.

1. Should "Non-ratepayer in-kind funds/contributions can also refer to any monetary contributions, goods, services, and tangible assets, that are paid for by another entity on a PA's behalf" be added as a third bullet to the definition? (Single Choice) \*

22/22 (100%) answered



*Does the following clarification of the Indicator Description make more sense? "Dollar value of non-ratepayer in-kind funds and non-ratepayer in-kind contributions utilized via partnerships (A, P)"*

- A PA Member suggested that the slash be interpreted as "and/or" and asked for clarification if this recommendation will be changing the Indicator language but the definitions would remain the same in the report. Several Members supported the "and/or" interpretation.
  - Yang clarified that the recommendation would be to change the "/" in the Indicator language to "and" or whatever the WG decides the "/" should be interpreted as.
  - A PA Member noted that since the Indicator is requesting a single dollar value, it does not matter whether the funds or contributions are monetary or not in nature because the non-monetary contributions will be converted to a dollar amount anyway.
  - A Member from ED supported the idea that the Indicator was meant to report a single value but commented there may be a benefit to making the distinction between funds and contributions since this Indicator is reported annually.
- A few Members suggested that instead of re-writing the Indicator language, the recommendation in the report could be that the WG interprets the "/" to mean "and/or." A few other Members suggested instead to interpret the "/" as "both/and" as it shouldn't be optional to report one or the other.
- A Member asked whether the Indicator could report the differentiated values between non-ratepayer in-kind funds and non-ratepayer in-kind contributions, the types of activities within the funds and contributions, and the parties involved in the transactions (i.e., provider and receiver). A PA Member commented that this is a reasonable suggestion but there's a need to balance simplicity and transparency with the complexity and effort created by the suggestion. Supported the suggestion to differentiate between the in-kind funds and in-kind contributions values.
- A PA Member asked for clarification on how this Indicator would apply to a PA in a program. Another PA Member replied that this Indicator has expanded beyond

Market Support and provided an example of free education or classes for a Market Support or Equity program where the PA would report a monetary value on these classes for this Indicator.

- A Member from ED suggested that PAs could report the Indicator in their Annual Reports and provide the context necessary to understand when there is a difference between funds and contributions.

Yang conducted a vote to interpret the “/” as “and/or” or as “both/and” or if there was no preference with the interpretation. Out of the twenty participants who voted, seventeen participants were in support of the “both/and” interpretation and three had no preference.

Yang then summarized that most participants voted not to add the #3 bullet as indicated in the poll and voted to include in the recommendation that the “/” in the Indicator language should be interpreted as “both/and.”

## Topic 2: Definition of “Market-rate Capital” (Market Support Indicator #25)

Slides 7 - 8

MS Indicator #	Description
25	Comparisons between <b>market-rate capital</b> vs. capital accessed via energy efficiency programs (e.g., interest rate, monthly payment) (A, P)

The term "market-rate capital" (used in Market Support Indicator #25) is defined as:

1. Financing obtained from private investors, financial institutions, or capital markets at prevailing market interest rates that reflect the current economic conditions and risks associated with the investment.
2. The market rate, defined as the rate of interest, on a loan or investment which is commonly available on the market for that product. For a loan, the market rate is the average rate of interest that will be charged to the receiver from a variety of providers. For an investment, the market rate is the average rate of return required by the investor to compensate for the risk of that investment.

Sikand directed EMSWG to the topic of Market-rate Capital on page 22 of the [Draft Report](#). After discussion on the italicized questions below, Sikand prompted the WG to vote by raise of hand on whether they support, do not support, or have no preference to the recommendation:

1. *Is there any disagreement to the underlined addition to the definition?*

2. *Should the US Prime rate be identified as a good average rate for non-residential customers in the definition of "market-rate capital"?*

**Based on the discussion on Topic #2, changes to the Recommendation that will be reflected in the Final Report include:**

1. The definition of "market-rate capital" will not include a sentence regarding market rate for an investment.
2. The US Prime rate will not be identified as a good average rate for non-residential customers. Instead, the Recommendation will suggest that the PAs discuss (through their Reporting teams in addition to CAEATFA members or through another venue) how they will approach this Indicator before filing their Annual Reports.

## Summary of Discussion on Topic #2

*Is there any disagreement to the underlined addition to the definition?*

- A PA Member recommended not to add the underlined statement, noting that the statement requires an understanding of investor needs. Noted this would add to the Indicator beyond its intention. Many Members supported this statement.
- A Member asked whether the "private capital" definitions (used in Market Support Indicator #17) would apply to this Indicator as it is from the perspective of the public sector.
- A PA Member asked for clarification on whether the underlined addition is suggesting a definition of market-rate for an investment or is suggesting that investments rather than loans should be included in the Indicator. Commented that market-rate capital refers to loans that customers obtain to conduct energy efficiency projects and the projects are seen as investments. A Member replied that the underlined addition was meant to define market-rate for an investment, given that the definition of market-rate for a loan was included.
- A Member from ED asked whether "for that product" needs further clarification in #2.
  - A Member replied that "product" was interpreted as a loan product, not an EE device or product.
  - A Member from ED asked whether there is any benefit to further describing the most relevant types of products as there are several different types of loan products available on the market.

Sikand conducted a vote by raise of hand to remove the underlined addition. When asked if there was any opposition to removing the underlined addition, no opposition was recorded.

*Should the US Prime rate be identified as a good average rate for non-residential customers in the definition of "market-rate capital"?*



- A PA Member provided context to the suggestion by sharing that using the US Prime rate might help standardize and simplify calculating the market rate across PAs. Noted that there are limitations to using the US Prime rate across all non-residential customers, e.g. this rate would not apply to small businesses, and government customers would have a lower rate than the US Prime rate.
- A PA Member commented that whatever rate is chosen, the rate should be an annual average as there is a lot of fluctuation throughout the year and there should be clarification on which year is chosen as the annual average to ensure an apples-to-apples comparison.
- A Member commented that the US Prime rate is typically reserved for credit-worthy customers so it provides more of a floor whereas the average would be higher. Cautioned about applying an average rate as it depends on the lender, type of loan, and other various factors.
- A PA Member commented that the average rate chosen needs to be publicly available and clear about which day out of the year the PAs choose to take the US Prime rate.
- A Member suggested keeping the definition open-ended and not referencing specific types of rates. Some Members agreed.
- A Member commented that the US Prime rate is inaccessible to most ratepayers and the general public, let alone communities of concern. A PA Member agreed.
- A PA Member disagreed with the notion that the "market-rate capital" should be the same value for all PAs in all cases. Suggested instead to allow PAs to characterize the "comparisons" as they want. Another Member agreed.
- A Member asked what the average commercial/residential customer loan rate is and what meaningful data does the Indicator intend to capture.
- Sikand asked if an initial approach could be to let PAs characterize the Indicator as they see fit.
  - A PA Member replied that the PAs could work together through the Annual Report process or another venue to come to an agreement on how market rates are chosen. Raised concern that PAs choosing their own approach may not allow for an apples-to-apples comparison.
  - A Member from ED agreed with the statement above. Noted that ideally there could be some comparison made between the PAs. Noted that capital availability is different depending on where you are, who you are, and what you're trying to do, and the intent of this Indicator is to understand what is available in the market and what the PAs are up against.
  - A PA Member suggested that the PA reporting teams should meet before the Annual Report is filed to discuss the parameters for this Indicator, with the understanding that a yearly check-in would help PAs gain alignment where possible. Another PA Member suggested including CAEATFA members in the discussions as they provide this type of information to the state quarterly. A few Members agreed.

- A Member raised whether there is too much concern about needing cross-comparisons between the PAs and suggested that the Indicator should instead focus on capturing how capital accessed via EE programs is beneficial for disadvantaged customers in a service territory. A PA Member commented that this level of granularity and information would be valuable, and added that there's a need to balance the benefits and costs of collecting and reporting on these Indicators with this level of granularity.
- A PA Member suggested noting in the Report that the WG feels using an annual average rate would not provide a meaningful Indicator. Another Member agreed.

Yang conducted a vote by raise of hand to remove the suggestion to use the US Prime rate and instead include as a recommendation that the PA reporting teams should meet before they file their Annual Reports and include CAEATFA in their discussions on how they will approach this Indicator. When asked if there was any opposition to the new suggestion, no opposition was recorded.

### Topic 3: Definition of “Capital Accessed via Energy Efficiency Programs” (Market Support Indicator #25)

Slides 9 - 10

MS Indicator #	Description
25	Comparisons between market-rate capital vs. <b>capital accessed via energy efficiency programs</b> (e.g., interest rate, monthly payment) (A, P)

The term "capital accessed via energy efficiency programs" (used in Market Support Indicator #25) is defined as: financing acquired solely through energy efficiency portfolio initiatives and projects (e.g., energy performance contracts, utility programs, green bonds, CAEATFA [California Alternative Energy and Advanced Transportation Financing Authority] GoGreen financing (Off-Bill Financing, On-Bill Repayment); California Revolving Loan Funds).

Sikand directed EMSWG to the topic of Capital Accessed via Energy Efficiency Programs on page 22 of the [Draft Report](#). After leading discussion on the questions (italicized below), Sikand then prompted the WG to vote by raise of hand on the second question.

1. *For clarification: Do customers access CAEATFA, GoGreen financing, and California Revolving Loan Funds through the EE portfolio or through CAEATFA or another entity directly?*
2. *Should this be added as a recommendation: "Pause on reporting Market Support Indicator #25 until there is PA consensus on data collection"?*

**Based on the discussion on Topic #3, changes to the Recommendation that will be reflected in the Final Report include:**

1. Include clarification that customers access GoGreen financing directly through the lender or the GoGreen financing programs themselves.
2. The recommendation to pause on Market Support Indicator #25 will be removed.

### Summary of Discussion on Topic #3

*For clarification: Do customers access CAEATFA, GoGreen financing, and California Revolving Loan Funds through the EE portfolio or through CAEATFA or another entity directly?*

- A PA Member commented that the PAs were providing some funding to CAEATFA and GoGreen financing but that funding has moved out of the EE proceeding and into the Clean Energy Financing Options (CEFO) proceeding, so the EE proceeding is not providing funding to these items. Noted that GoGreen financing has always been accessed directly through the lender and the GoGreen financing programs themselves.
- A Member commented that CAEATFA has stand-alone programs that people can apply for directly and which generally have prescribed eligible measures and uses. These can be repaid On-Bill or Off-Bill. Utility On Bill Finance programs are applied for directly through utilities and are essentially a loan for EE measures (generally these measures are the same as eligible measures under the EE Portfolio). The loan is zero interest (and thus ratepayer-funded and subsidized) and repaid via debt payments as a line item on a customer bill. Non-payment results in disconnection of a customer's electricity or gas service. PACE is a program administered by local jurisdictions that oversees Property Taxes; it is an example of an Off-Bill repayment approach. An EE measure or project is funded by the program and repaid via the semi-annual property tax assessment. Non-payment of a PACE load can impact a customer's property ownership status. The idea is to leverage ratepayer funds and use those as equity and develop different loan programs for similar EE measures. Tried to address the idea of what On-Bill Financing can fund. Unless it has changed, it has to be an eligible measure in the same way measure is eligible in the EE portfolio.
  - A PA Member clarified that CAEATFA and GoGreen are still receiving ratepayer funds through the CEFO proceeding. Added that there is a gray area when an EE program helps customers address awareness or language barriers to accessing financing opportunities.
- A Member noted the differences between on- and off-bill financing:
  - PAs offer on-bill financing where third-party financing companies provide capital on-bill as a line item on the utility bill.
  - CAEATFA offers off-bill financing, also known as direct billing, where third-party financing companies provide capital that is not repaid via the utility bill.

- CAEATFA off-bill offerings do not require energy savings whereas other IOU on-bill financing offerings do.
- The Member was unaware of whether the California Revolving Loan Fund is active now or will be in the future.

*Should this be added as a recommendation: "Pause on reporting Market Support Indicator #25 until there is PA consensus on data collection"?*

- A Member suggested that unless any of the PAs think there needs to be a pause, there shouldn't be one. A few Members agreed.
- A Member commented that this Indicator seems to be more concerned about the relative proportion of the type of capital (market rate vs capital accessed by ratepayer-funded EE programs). Noted there is no need to determine interest rate costs by program as the focus should be to understand what type and amount of market-rate capital is flowing into a program versus ratepayer-funded capital. Agreed that a CAEATFA expert would be the best resource to add further clarification.
  - Regarding the phrase "market-rate capital is flowing into a program," a Member noted that customers are receiving help to access capital rather than bringing money into the program itself.
  - A Member replied that spending ratepayer money to have PAs assist customers in obtaining third-party capital is a much more cost-effective use of ratepayer dollars and part of the long road that CAEATFA has been on.
- A Member raised whether there may be potential harms from shut-offs or property ownership impacts should a low-income or environmental justice community member fall behind on repaying their portion of EE program upgrade costs or default on property taxes. Shared that something like this occurred in Oakland where an upgrade was received and partially subsidized but when the property owner fell behind on payments, they lost their buildings.
  - A PA Member asked if the example shared is an example of PACE financing. Noted unawareness of any examples of customers losing their homes due to defaulting on a GoGreen loan.
  - A Member replied that this was not an example of PACE financing and is unclear if the commercial property was involved in an EE incentive program. Uplifted that there may be issues with how loans or "programs or program terms" can result in predatory outcomes for people with systemic barriers to income, capital, and generational wealth.

Sikand conducted a vote by raise of hand to pausing Market Support Indicator #25. Out of twenty participants who voted, sixteen voted to not pause the Indicator and four had no preference.

## **Topic 4: Principles for Reporting**

*Slides 11 - 12*

The Draft Report includes the following Principles for Reporting:

1. Indicator reporting should not duplicate existing reporting efforts. PAs report savings claims on a quarterly basis using CEDARS and prepare an Annual Evaluation, Measurement, and Valuation (EM&V) Report. These reporting requirements include data overlapping with Equity Indicators such as savings claims. Additionally, specific Indicators (e.g., Market Support Indicators #3-10) are also Common Metrics, currently reported in a workbook uploaded to CEDARS on an annual basis.
2. Program-specific data should be provided along with the Indicators to support accurate comparisons across PAs and consistent interpretation among readers. This can include program objectives and descriptions. Working Group participants noted that program specific data is already uploaded to CEDARS and Indicators should not result in redundant or duplicative reporting.
3. Indicator reporting should not be overly cumbersome for PAs.
4. Reported Indicator data should be easily accessible to and understandable for interested stakeholders.

Yang directed EMSWG to the topic of Principles for Reporting on page 28 of the [Draft Report](#). Yang then guided the group with a discussion question (*italicized below*) followed by a raise of hands to conduct a vote.

**Based on the discussion on Topic #4, changes to the Recommendation that will be reflected in the Final Report include:**

1. Principle for Reporting Bullet 1 will be modified to replace the “Annual Evaluation, Measurement, and Valuation Report” with “Energy Efficiency Annual Report”.
2. Principle for Reporting Bullet 2 on providing program-specific data will be removed.
3. A note will be added that in the reporting, PAs should include references and links to aid the navigation to program data via CEDARS.

## Summary of Discussion on Topic #4

*How would PAs avoid redundant reporting if program data is already uploaded to CEDARS?*

- A Member noted they didn’t recall talking about bullet #2. Suggested that program-specific data should not be provided along with Indicators. Noted the information is already in the Implementation Plans (to the extent they are up to date) and that including them will cause information overload. Several Members agreed. One noted that the context can be provided through a similar process to Common Metrics, like in proxy explanation/methodology/definitions.
  - Yang clarified that the bullet came from requests to include context from the Equity Indicators Survey.

- A Member agreed to not duplicate work and also suggested there be references or links to where that information is located so those not familiar with CEDARS can still access and comprehend the data. A PA Member noted there can be simple references to the CEDARS Program page or the Data page for general access; however, did not support links to specific data in specific programs as it would get unruly. Members noted in the chat that the data is in the Implementation Plans, CEDARS, etc. The Member noted that any clarity is helpful, noting that few people are familiar with the programs and that links to Implementation Plans and Advice Letters are helpful. Another PA Member responded that knowledge of energy efficiency and CEDARS is necessary to provide meaningful analysis and comments for these reports and that details about references to documents aren't necessary. The original Member of this request noted taking offense to the comment.
  - *Facilitator's note: After the Meeting, the Facilitation Team reached out to the parties of this conversation to address the comment made. The Facilitation Team is working to mitigate future comments of this nature.*
- A Member clarified that any link or reference provided will need to be general as Indicators are not necessarily program-specific. Noted that the references would be on how to use CEDARS data. Members agreed and supported this clarification.
- A Member requested clarification about the EM&V report, noting there isn't one but perhaps the EE Report is being referenced.
  - Yang clarified that this is meant to be the EE Report.

Yang conducted a vote to remove Bullet #2 (Slide 12) and instead include references and links to CEDARS to aid navigation to program data. Out of the twenty participants who voted, nineteen participants were in support and one had no preference.

Yang summarized that program-specific data should not be reshared or reuploaded because it already exists. Summarized, however, that links to where program data exists would be helpful (i.e. links to CEDARS, CEDARS data page, Implementation Plans, Advice Letters, etc).

## Topic 5: Indicator Reporting Process

Slides 14 - 15

The Draft Report suggests the following reporting process in Recommendation #21:

1. Indicators to be reported quarterly should be done so via CEDARS.
2. Indicators to be reported annually should be done so through the Annual Report and/or PA-led workshops.

Yang directed EMSWG to the topic of Indicator Reporting Process on page 28 of the [Draft Report](#). After discussion, Yang conducted a vote by a raise of hands.

**Based on the discussion on Topic #5, changes to Recommendation #21 that will be reflected in the Final Report include:**

1. Recommendation #21 will be modified to:
  - a. Indicators to be reported quarterly should be done so by uploading a spreadsheet in the Documents area of CEDARS, similar to annual Common Metrics submittals by PAs.
  - b. Indicators to be reported annually should be done so by uploading a spreadsheet in the Documents area of CEDARS, similar to annual Common Metrics submittals by PAs.
2. Recommendation #21 will a sub-recommendation for PAs to consider collaborating on creating a high-level and consistent template to report on these Indicators as feasible and not necessarily before the submission of the Advice Letter. This sub-recommendation will reference the Principle for Reporting Recommendation to not have overly cumbersome processes.
3. Recommendation #21 note that the recommendation is a short-term solution and that there may be future iterations to adjust this process.
4. Recommendation #21 will include a non-consensus suggestion for PAs to include a narrative, non-data summary of the Indicator data alongside the spreadsheet of Indicators so the public can easily read, understand, and access the data.
5. Recommendation #21 will include a note about ongoing efforts at the CPUC to create more comprehensible data through data visualization and other means. In addition, this note will include a non-consensus suggestion for CEDARS to have a landing page with easily digestible language for the public to navigate the system.

## Summary of Discussion on Topic 5

- A Member noted that Recommendation #21 does not address that some of the Indicators to be reported quarterly within CEDARS need to pull data out of quarterly energy savings reports and put into an Indicator to make it accessible to the public. Noted there may be tangential processes at the CPUC to make these reports more accessible to the public. Recommended that annual data should be reported within CEDARS because using PA workshops to share reporting deliverables would require attendance at every PA workshop to understand the content. Several Members agreed. A Member agreed, noting that the data needs to be accessible to everyone, even those who don't have a technical background in CEDARS. Another Member agreed.
- A Member suggested that #1 be updated to say "Indicators to be reported quarterly should be done so by uploading a spreadsheet in the Documents area of CEDARS, similar to annual common metrics submittals by PAs." Another Member agreed.
- A Member of ED noted that there's a desire for ED to create tools and resources to enable better and more insightful oversight of PAs, including through the hiring

of a vendor to generate checklists and data visualizations. Highlighted this will be a multi-step approach to improve data accessibility and comprehension. Agreed with Members that the reporting should leverage the Documents folder for CEDARS in the short term, but in the long term, suggested the Reporting Program Coordination Group (PCG) look at these recommendations before the Advice Letter is submitted for additional ideas.

- Sikand clarified that the longer-term solution is a topic for later in this meeting. Responded that the pressed timeline provided to the Facilitation Team by PAs might impact the ability for PCG review and this should be discussed in the next steps section.
- A PA Member agreed with ED. Cautioned about the wording for a long-term solution and suggested to keep it flexible until and unless stakeholders (like the PCG) discover a better way. Suggested to not require a working group to be developed to work on this.
- A Member perceived that there are challenges with uploading to CEDARS and offered language to provide more flexibility with PAs. Referenced their recommendation to include an addendum to Bullet #1, “if at all possible and potentially with needed modifications to the CEDARS database structure to accommodate this reporting.”
- Yang summarized that Recommendation #21 should be adjusted so that the Indicators being reported quarterly and annually are done so via uploaded spreadsheets to CEDARS (like the Common Metrics Workbook) as an initial phase of reporting and that a longer-term solution should be discussed.
- A Member requested that plain, clear, and transparent language for any Indicators reporting be fully accessible to the general public and that CEDARS should have accessible landing pages. Members agreed and provided links to publicly available CEDARS pages including the following links:  
<https://cedars.sound-data.com/programs/list/> ;  
<https://cedars.sound-data.com/documents/standalone/list/> ;  
<https://cedars.sound-data.com/reports/summary/>

Yang issued a vote by a raise of hands to change Recommendation #21 to the following:

- 1) Indicators to be reported quarterly should be done so by uploading a spreadsheet in the Documents area of CEDARS, similar to annual Common Metrics submittals by PAs.
- 2) Indicators to be reported annually should be done so by uploading a spreadsheet in the Documents area of CEDARS, similar to annual Common Metrics submittals by PAs. Nineteen Members were in support.
  
- A Member asked for clarification regarding whether Indicator reports uploaded to CEDARS through the document section will be plainly accessible to the public.



Yang clarified that the document section is publicly available and would not require the public to search through CEDARS to find different indicator data because all data would be in one workbook per PA. Yang also clarified there is a separate process to make reporting more accessible and less cumbersome for the public. Sikand clarified that as it currently stands, the Indicator reporting process would be done so through a spreadsheet and asked for more clarification if the Member is proposing additional language to the recommendation. The Member requested adding language to the Recommendation to ensure there's a non-spreadsheet version or narrative to support the Indicator workbook until the data visualization effort is completed by CPUC. The Member also requested that CEDARS include a landing page to easily see this information.

- A PA Member reminded the WG that Ordering Paragraph 11 directing this work 11 directing this work doesn't ask for new processes to be established, just clarifying Indicators. Another Member agreed.
- A Member presumed that the spreadsheet would include clarity on methodology among other things for readers to follow the spreadsheet. Members agreed. Another Member requested it be made clear in the recommendation that accessibility, clarity, and plain language be a directive versus presumption. Members agreed. A PA Member noted in the chat that adding clarity should be feasible by including or linking to the Final Report (as adopted by disposition after the Advice Letter is approved), and another Member agreed.
- A PA Member noted that it may not be feasible to have a landing page in CEDARS where everyone can understand the website and data. Suggested a spreadsheet might be the easiest way but should shoot for more.
- A PA Member asked if Indicator reporting will leverage a template that PAs fill out to make data readable and understandable. A Member of ED didn't recall that ED was responsible for creating a reporting template. Suggested that if the PAs create a template, ED will work with them. The PA Member noted that if the public wants to compare spreadsheets, they won't be able to compare without a consistent template. Other Members agreed, noting that a template would be really useful and facilitate stakeholder reviews across PA spreadsheets. A Member of ED noted that a template like the Common Metrics template is desired.
  - Yang clarified that folded into this recommendation is a directive for PAs to work together to create a shared template for reporting on these Indicators. A PA Member supported this but raised concern about including the template in the advice letter. Suggested that the Final report include language that PAs will consider working towards a consistent template. Raised concern that this template might cause more complexity like it did for the Common Metrics process, which started from 60 metrics and ended with 330. Yang reminded the WG about the Principle of not having cumbersome reporting and that the template should be at a high

level for PAs to begin reporting and, over time, add granularity that would be useful but not burdensome. Sikand noted for the Final Report to add a callback to the reporting principle along with the recommendation for PAs to work together to create a template.

- A Member noted that what is "easier, or not too burdensome" to report for PAs is not necessarily what is the most publicly accessible nor plainly understandable for a common ratepayer.

Yang summarized that Recommendation 21 should be adjusted so Quarterly and Annual reporting is through the document section on CEDARS ("Indicators to be reported quarterly should be done so by uploading a spreadsheet in the Documents area of CEDARS, similar to annual Common Metrics submittals by PAs). Noted that this is not a long-term solution for reporting these Indicators, and there may be future iterations to adjust this process and there may be shifts for how reporting is done based on feedback. Noted that PAs should aim to create the spreadsheet as accessible, readable, and understandable as possible while adhering to the Principles for Reporting.

## Topic 6: Follow-up from Meeting #7

Slides 16 - 18

### Clarifying "Purposes" in Market Support Indicator #1

MS Indicator #	Description
1	Number of partners by type and purposes (Q,P)

Sikand invited Members to consider the follow-up items from Meeting #7: clarifying "purposes" in Market Support Indicator #1 and creating a summary table of Indicators for the Report. After discussion, Sikand conducted a vote by a raise of hands.

1. *Should examples of "purposes" be included in the definition of Market Support Indicator #1?*
2. *If yes, then should these examples be:*
  - a. *Option 1: Market Support Segment sub-objectives: Demand, Supply, Partnerships, Innovation, and Access to Capital?*
  - b. *Option 2: As previously discussed in Meetings, examples include [but not limited to]: Deliver EE products, Outreach, Education, Job training, Diversify funding options, Program enrollment*

**Based on the discussion on clarifying "purposes," changes to the Recommendation that will be reflected in the Final Report include:**

1. Modify the definition of "purposes" with examples using the language "examples include but are not limited to: Deliver EE products, Outreach, Education, Job training, Diversify funding options, Program enrollment."

## Summary of Discussion on Clarifying “Purposes” in Market Support Indicator #1

- A Member suggested Option 2 with the addition of “including but not limited to.” Noted if the WG decides on Option 1, the sub-counts are easier via this option, but “Partnerships” would need to be taken out as an example.
- A PA Member agreed and noted that partners can be fulfilling multiple sub-objectives in Option 1. Agreed to the recommendation for Option 2 with the “including but not limited to” addition.

Sikand conducted a poll via a raise of hands to modify the definition of “purposes” to include the language “examples include but are not limited to: Deliver EE products, Outreach, Education, Job training, Diversify funding options, Program enrollment”. Out of fourteen participants, fourteen voted in support.

Sikand summarized there is full consensus among those voting on including examples using the language “examples include but are not limited to: Deliver EE products, Outreach, Education, Job training, Diversify funding options, Program enrollment”.

### Summary Table of Indicators

Yang presented a sample Summary Table of Indicators and opened discussion and a vote by raise hands to the following questions:

1. *Does the table summary of Indicators capture the suggestions from Meeting #7?*
2. *Does it make sense to align the “why” to Equity Objective and MS Sub-objectives?*

**Based on the discussion on the summary table of Indicators, changes to the Recommendation that will be reflected in the Final Report include:**

1. The Summary Table of Indicators will include the following columns:

Indicator #	Indicator Description	Key Definitions	Why (Equity or Market Support sub-bullet/objective)	Units	Methodology	Notes
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2. The Summary Table of Indicators will clearly delineate what is and is not a recommendation and where there is and is not consensus.

### Summary of Discussion on the Summary Table of Indicators

- A Member asked for clarification on the “how” column and what it means. Asked how the “what” differs from the description. Loved the “why” column.
  - Yang clarified that the “what” column is the definition of the terms clarified in the Working Group. Clarified the “how” column is what is being counted

and in what way. Noted the “how” column is only applicable if the WG talked about how to count the indicator or if the WG had suggestions or thoughts on it.

- A Member asked if the Common Metrics spreadsheet could provide a helpful framework for this, specifically a couple columns that could be useful include: units of measurement, methodology, and key definitions. Members agreed and another suggested adding the numerator and denominator clarifications. Another Member agreed and noted it seems to fit—the “what” column is the “Key Definitions”, and the “how” column is the “Methodology”.
- A PA Member asked for clarification if each indicator has a recommendation column or if the recommendation is housed in the Notes column. A Member suggested including a recommendations column and not using multiple columns because it’s harder to find.
  - Yang clarified that the table is envisioned to hold all recommendations related to Indicators. Shared an example that the “how” column of Equity 1, has a non-consensus item where the methodology was discussed but consensus was not reached. Noted that all the other comments on What, Why, How, Notes are consensus or near consensus. Noted to add a legend to clarify.
- Yang asked if the group suggests a modification to include “Indicator Number, Indicator Description, and Recommendations” or for it to be “Indicator Number, Indicator Description, Definitions, Objective (Equity or MS sub-bullet/objective), Units, and Methodology.”
  - A Member raised caution about the latter because the WG hasn’t talked about methodology and it may be blank for most of the Indicators. Suggested it needs a separate recommendation column so finding the recommendation is easy. A Member agreed the methodology column would be mostly empty but supported having it.
  - A PA Member noted that all the columns are the recommendations (besides the Indicator Number and Description). Cautioned that a separate “recommendation” column would be repetitive. The Member replied that even if it’s repetitive, it is still beneficial and needed.
  - Yang clarified that perhaps the “recommendation” column would be a checkbox indicating there are recommendations for a specific indicator and if not, why. The Member clarified there needs to be an easy way to digest the recommendation and doesn’t have preferences on how. Another Member suggested an alternative approach to indicate consensus vs non-consensus items within the proposed columns and without a “recommendation” column.

Yang conducted a vote by a raise of hands to replace the “what” column with definitions and the “how” column with Units and Methodology. Out of fifteen participants who voted, twelve voted in support of the suggestion, one in opposition, and three had no preference.

Yang summarized that suggestions to make it more clear on what is and isn't consensus, support for including units, definitions, and methodologies, but that units and methodologies that weren't discussed would have empty cells.

## Topic 7: Next Steps on Unclarified Indicators

*Slides 19 - 20*

Sikand asked the EMSWG to suggest any next steps for Indicators that the Working Group did not discuss nor sufficiently clarify during its time together, and shared that the remaining unclarified Indicators are Market Support Indicators #2-12, 14-16, 19, 21, and 24. In addition, identifying information that can be used for baselines for the Indicators was not addressed as well.

Options discussed by the Working Group include:

1. The EMSWG continues to discuss and clarify specific items. PAs will request an extension to file the Advice Letter.
2. PAs address unclarified Indicators on their own and include their approaches in the Advice Letter to be filed by May 1.

**Based on the discussion on Topic #7, the next steps include:**

1. PAs will submit the Advice Letter based on the Indicators that have been clarified through the WG.
2. PAs will not plan to file a time extension request for the Advice Letter.
3. The Facilitation team will send a revised Draft Report to WG by March 12 for feedback due by March 19. The Facilitation team will send the Final Report to PAs by March 22.
4. The Final Report will include a non-prescriptive recommendation that the PAs should consider reconvening or initiating a process to further refine and clarify the Indicators after initial reporting.

### Summary of Discussion on Topic 7

- A PA Member noted originally understanding the Decision language to state that PAs would receive what they can get from the WG and the PAs would clarify the rest of the Indicators that the WG had not discussed. Presented Option #1 to extend the WG for several months to finalize all of the Indicators and then file the Advice Letter at a much later date, or Option #2 where the PAs will file the Advice Letter by May 1 by filling in the gaps.
- A PA Member disagreed with the idea of PAs adding information that hasn't been considered by the WG and raised concern about transparency issues with PAs making decisions outside of the WG. Asked how many of these Indicators are Common Metrics as these would not need to be clarified.

- A PA Member replied that Market Support Indicators #3 - 10 and #14 are Common Metrics. Noted that the WG discussed Market Support Indicator #2, which overlaps as well.
- A Member asked where the PAs are in their own process of clarifying the Indicators. A PA Member replied that the PAs have not started any process yet.
- A PA Member noted that the Decision language makes clear that the PAs should clarify all Indicators, which means there needs to be more time for the WG to deliberate on the Indicators.
- A PA Member assumed that if the WG did not discuss the other Indicators that are not already Common Metrics, then there is no clarity needed. Interpreted "clarifying" to only apply to Indicators that are not consistently understood by PAs, not that all Indicators need to be clarified.
- Sikand asked if PAs are planning to extend.
  - A PA Member replied that the PA were considering asking for a 3-month time extension.
- A Member of the Public asked if extending the Advice Letter would change when PAs are expected to report on these Indicators.
  - A Member from ED replied that the PAs are expected to report for Q1 and then make any necessary revisions in the Q2 reporting this year. Noted that the WG should consider how the reporting schedule will be impacted if a time extension is issued.
  - A PA Member noted that the PAs will be reporting on Q2 claims, which include Q1 claims by September 16, 2024. Noted that a three-month extension would not be sufficient to address all the Indicators. Suggested instead that the Final Report represent the WG's best efforts at this point and the PAs move forward with reporting as best they can. Added that reporting the Indicators will help PAs flag any issues and identify any areas for further clarification and pursue reconvening the WG or a similar group if needed. Added that since some of these Indicators are annually reported, they would not be revisited until May or June of 2025 to see where improvements and clarifications need to be made.
  - A Member from ED noted that two years from today, the PAs will file applications for a new Business Plan cycle, which means there will be another opportunity to suggest clarifications and additions to the list of Indicators.

Sikand summarized that the WG does not recommend filing a time extension request because the extension for the Advice Letter wouldn't extend the reporting deadline and the PAs do not plan to include the Indicators that have not been clarified by the WG so no further significant clarification is needed. The Facilitation team will aim to get the Final Report to the PAs by March 15 so that the PAs can file their Advice Letter by May 1. Noted that the Facilitation team will include in the Final Report a non-prescriptive recommendation that the PAs consider reconvening or initiating a process to further refine and clarify the Indicators after initial reporting. Suggested that the PAs reach out to the Facilitation team to share when the Advice Letter is open for public feedback so

that they can share it with the WG. *(Facilitator’s note: Following further coordination with PAs, the Facilitation team will send a revised Draft Report to the WG by March 12 for a last round of feedback due by March 19. The Facilitation team will send the PAs the Final Report by March 22.)*

Sikand conducted a vote by a raise of hands to accept the suggestion summarized above. Out of twelve participants who voted, twelve voted in support of the suggestion.

## Topic 8: Identify Remaining Issues to Highlight in the Report

Slides 21 - 22

The WG did not get to this topic due to running out of time. The Facilitators asked EMSWG to send via email any remaining issues Members would like for the Report to highlight.

## Wrap Up and Next Steps

Slides 23 - 25

Sikand summarized the next steps for the WG:

- Meeting #8 Summary will be posted by March 6.
- An Evaluation Survey will be shared with EMSWG along with the Final Report.
- The Facilitation team will send a revised Draft Report to the WG by March 12 for feedback by March 19. The Facilitation team will send the Final Report to the PAs by March 22. *(Facilitator’s note: After speaking offline with PA Members, the original timeline to send the Final Report to PAs by March 15 was extended to allow for one more round of review by the WG before submitting the Final Report to PAs by March 22.)*

## Appendix A: Attendees

Organization	Name
<b>CAEECC Members</b>	
3C-REN	Erica Helson
BayREN	Mary Sutter
MCE	Brandon Ewart
Mendota Group	Grey Staples
Oracle	David Siddiqi
PG&E	Rob Bohn
RCEA/RuralREN	Stephen Kullmann
SBUA	Ted Howard

SCE	Gary Golden
SDG&E	Stacy Risley
Silent Running LLC	James Dodenhoff
SoCalGas	Halley Fitzpatrick
SoCalREN	Patrick Ngo
The Energy Coalition	Rebecca Hausheer
William Worthen Foundation	Alice Sung
<b>Ex-Officio</b>	
CPUC	Pam Rittelmeyer
CPUC, Energy Division	Ely Jacobsohn
<b>Other Interested Stakeholders</b>	
Frontier Energy	Nancy Barba
Frontier Energy	Jesse Farber-Eger
Frontier Energy	Aaron Jones
Frontier Energy	Margaret Marchant
Frontier Energy	Timaree Nelson
PG&E	Moses Gastelum
San Diego Community Power	Sheena Tran
SDG&E	De De Henry
SDG&E	Jen Palumbo
SDG&E	Matt Saintarbor
SoCalRen	Tessa Charnofsky
<b>Facilitators</b>	
Katie Wu	Common Spark Consulting
Sooji Yang	Common Spark Consulting
Suhaila Sikand	Common Spark Consulting
Susan Rivo	Raab Associates