# Purpose

The purpose of this Report section is to describe the stakeholder engagement and reporting process associated with the Working Group’s proposal. Using CAEECC to problem solve throughout program implementation – in addition to prior to filing Applications – would benefit the success of the programs and best serve customers. In addition, new technologies, particularly smart meter data, make it possible to rethink how EE programs are tracked, presented, and ultimately evaluated.

# Overview

We are proposing four elements of stakeholder engagement associated with the new energy efficiency Application process and ongoing oversight of the Program Administrators’ (PA) portfolio implementation: (a) CAEECC joint problem-solving workshops on major cross-cutting issues or challenges related to upcoming applications (approximately 9 months ahead of filings), (b) a pre-filing preview at the full CAEECC on how major cross-cutting issues were addressed approximately 3 months before the filing; and presentation on filing 7-10 days after the filing, and (c) regular data-driven updates on how the efficiency portfolios are doing at the full CAEECC along with collaborative CAEECC opportunities to address significant issues/challenges/opportunities as they arise throughout the implementation of the portfolios.

# Goals

1. Create a process to integrate collaborative planning and problem-solving prior to filing Applications.
2. Ensure transparent review and tracking of energy efficiency portfolios through CAEECC to increase understanding of progress and to help maximize cost-effective savings.
3. Increase the usefulness of reported data by striving for less, but targeted data more frequently as opposed to more data less frequently.
4. Establish effective and transparent collaborative opportunities to brainstorm solutions to challenges that arise during implementation.

# Current issues that this proposal aims to solve

1. There is no opportunity to delve into the details of developing a compliant Application with the opportunity to solve for challenges prior to filing.
   * How can we utilize CAEECC to increase collaboration, transparency, and problem-solving as PAs develop their Applications?
2. There is little meaningful insight into programs until after final analysis.
   * How can we use ongoing data to understand progress and solve for challenges as they occur?
3. Reporting criteria are onerous to generate and review.
   * How much does this churn contribute to program cost without contributing to program improvement or cost-effectiveness?
   * Are all the data useful and/or used? If not, should CAEECC propose reporting requirement modifications to focus time and money on the most useful data?
4. Current information and timing of data is not helpful to improve programs.
   * How can we use information to conduct mid-cycle modifications to increase cost-effectiveness and improve customer experience?
5. There is no opportunity to discuss challenges or expand successes.
   * How can we utilize CAEECC to best solve issues as they come up or expand successes when they occur?

# Stakeholder input prior to filing new Applications

1. *Stakeholder Engagement in Pre-Planning of Key Items/Challenges*

Given the extensive nature of applications, the proposal here is to identify a few key items/challenges (as opposed to vetting the entire application) that are (a) of high importance and (b) have the most likelihood for collaborative resolution. Being more surgical in identifying and addressing key issues would also be more manageable for stakeholders.

To do so, the CAEECC should convene either as a full CAEECC or in targeted CAEECC-hosted Working Groups or Workshops[[1]](#footnote-1) after the issuance of the Commission Guidance document and beginning approximatley 9 months prior to filing in order to outline the key items that are needed to be addressed.

For example, prior to bringing a draft to the CAEECC for review, conversations could focus on the following types of questions:

1. Given all the technical and policy aspects, what is the strategic vision of the PA moving forward?
2. How can we solve for upcoming major technical changes (e.g., lighting standards going into effect and cutting cost-effective savings from the portfolio)? What are viable options to make up savings in a cost-effective manner. What additional items are related that need to be resolved?
3. What are the new state or Commission directions that will modify how programs are designed and/or implemented?
4. If there are technical issues, how can we bring in the California Technical Forum?

This would allow for the following:

1. Energy Division and stakeholders would have an inside view of how the PAs formulate their applications and what challenges they face.
2. Key issues that are challenging the PAs would be discussed in the open with collaborative brainstorming to vet solutions and garner buy-in prior to filing.
3. Issues beyond PA control that are preventing implementation of policies could be identified and potential solutions could be developed and submitted to the Commission for consideration.
4. *Stakeholder Engagement Regarding the Application Process.*

The following two options (that are not mutually exclusive) outline opportunities for meaningful review of the applications prior to and soon after filing to improve understanding and input:

1. Preview of Application modifications per collaborative CAEECC process:Assuming that the above collaborative process to address issues before filing is adopted, this presentation would focus on demonstrating what components of the collaboration were integrated and how. This would be focused on closing the loop on the conversations that took place months prior during the collaborative process addressing key items. It would not be the time for open-ended recommendations from stakeholders as previous experience has shown that such an opportunity results in mis-alignment of expectations and often results in frustration. This would take place approximately 3 months prior to the Application filing.
2. Review of Application after filing: There would be a workshop for stakeholders and Energy Division approximately 7-10 days after the filing as an orientation to the applications. This would allow time for stakeholders to review the documents and be better equipped to ask informed clarifying questions, which would be helpful for refining party responses and protests.

# Stakeholder input in response to filed Applications

In addition to the items proposed above for pre-application review, there are also existing formal Commission requirements for stakeholder participation. For example, once the applications are filed, the assigned Commissioner and Administrative Law Judge will determine the formal course of action through a scoping memo after initial protests or responses of the applications are filed. The process could follow a path that includes (1) workshops, rulings, and party comments; (2) an approach that typically relies on testimony and hearings; and (3) a process that may also include a more formalized negotiation and settlement process. Regardless of the pathway, parties to the proceeding will have ample opportunities to intervene formally in the proceeding.

# Collaborative Opportunities to Increase Transparency, Solve for Challenges During Implementation, and Address Interim Filings

In addition to joint problem solving 9 months ahead of an application and feedback on the draft application a few months before filing (depending on the decision outlined above in V.b, there should also be an opportunity throughout the program implementation cycle both on a regular basis and associated with any interim (trigger based or required) filings.

1. *Stakeholder engagement on an on-going basis*

As CAEECC would be receiving bi-ennial updates based on the existing reporting requirements, described in more detail in the next section, there is an opportunity to identify significant challenges or potential new significant opportunities during the presentations and establish a process to brainstorm solutions in a timely fashion.

1. For example - Flow of an identified challenge: If challenges arise in a Q2 presentation on the Annual Report, the CAEECC facilitator could take note of the challenges during the presentation and discuss with the membership at the end of the meeting which items should be prioritized for problem-solving.
   * 1. Small task forces/working groups could be established per category of challenge to brainstorm recommended solutions between quarterly meetings (timing to be decided in the meeting), noting that these recommended solutions would be advisory to the PA and implementer.
     2. At the next meeting (i.e., Q3 or later depending on what CAEECC determined is a reasonable timeline), the task force would present a proposal to solve for the challenge identified in Q2, and identify any modifications to targets, budgets, etc. if necessary.
     3. The CAEECC members who were not on the task forces would provide input. The recommendations would be provided directly to the PAs (and implementers?) for consideration.
2. This would allow for additional expertise to be included in the solution, including those that could be deemed financially interested. Without input from those impacted, the solution may not be the most productive or effective.
3. Identifying issues and proposed solutions in this manner also provides CAEECC (and the public) transparency into the process of correcting for any issues while creating a more collaborative approach to problem-solving.
4. If the problems are not resolved and PAs need to close programs to improve metric performance, the PAs could use the scheduled presentations to inform the CAEECC of their plans for such closures and the timing of when the Tier 2 Advice Letter will be submitted to the Commission.
5. *Stakeholder Engagement for Interim Filings*

In addition to solving challenges as they arise, CAEECC provides an opportunity to work together to increase transparency and collaborate regarding interim filings (be they trigger-based or mid-cycle) to ensure challenges are addressed and input is sincerely integrated prior to such filings. The objective of this effort is to solve for any challenges ahead of time, reduce forthcoming litigation, and improve the portfolios.

If there is an event that results in a trigger-based filing (e.g., a new application), the PAs could use the quarterly reports to highlight the trends they observe, get input from CAEECC on possible course corrections, and then bring proposals (e.g., for an updated application) for discussion to CAEECC at least 3 months prior to filing consistent with the process outlined in Section V above.

# Details of Annual and Quarterly CAEECC Progress and Challenges Presentations

The following items are examples of what would be expected of PAs for their annual and quarterly presentations to CAEECC. Note, the presentations would be a select few metrics, as detailed below, that are currently part of the PA reporting requirements and those that are of the most interest to Energy Division and CAEECC members. This is consistent with the stated goal in Section III for sharing fewer data sets more frequently. The additional task needed for CAEECC would be to present the current data in digestible charts and tables, with a narrative assessment of progress and identification of challenges, if any, for discussion.

## *Yearly CAEECC Presentation on Annual Report*

The proposal here is to utilize the Annual Report (Q2 – May) to kickstart the year of review. At the Q2 meeting, the PAs will present key trends to watch (potentially identifying issues that need attention, which would follow the outlined process above), overall metrics of progress, any program closures, and a selection of specific metrics from D.18-05-041, Attachment A, to be determined by Energy Division and CAEECC. The intent is to focus on the most useful data to inform the review of progress and focal points for improvements.



* 1. General Metrics:
     1. Total kWh/MW/therm savings
     2. Percentage toward goals
     3. $/kWH and $/therm
     4. Budget detail (e.g., how much was allocated vs. spent)
     5. Total Resource Cost (TRC) & Program Administrator Cost (PAC) tests
     6. Consider adding other metrics (e.g., HTR)
  2. Format of Presentations:

1. Charts
2. Tables
3. Comparison to yearly projections
4. Short description of significant challenges/issues/successes
5. Programs that are due for closure or extension

## *Mid-Year CAEECC Presentation*

The intent of the mid-year presentations is to provide insight into the progress since the Q2 annual report. These presentations would focus on overall metrics by sector and portfolio (as outlined above) as well as any challenged programs.

## *Non-CAEECC Member Stakeholder Input Opportunities*

1. Input on PA identified items: For those items that are raised by PAs, there should be sufficient time for Energy Division and CAEECC Members, as well as non-CAEECC stakeholders, to provide feedback or raise questions. The CAEECC’s role in this effort is to increase transparency related to the progress of the PA portfolios and to identify significant issues that could benefit from collaborative problem-solving. It is not a venue for raising issues with particular PAs, programs, or the Commission.
2. Additional items not raised by the PAs: Similar to the current process, stakeholders could raise topics to be discussed through the CAEECC topic form. This form will be shared with CAEECC one month prior to the scheduled meeting to allow discussion by members and Energy Division as to whether the topic is within the scope of the CAEECC process and if it will be placed on the next agenda.
3. Specific input on programmatic goals and metrics: Per the current process, each implementation plan must be vetted through the CAEECC. Given that such a process does not require facilitation, each PA manages their own webinar to vet implementation plans, which is posted and noticed by CAEECC. This is the venue for stakeholders to provide input on proposed goals, metrics, and implementation strategies for specific programs.

1. Add fn on Working Groups and Workshops definitions, and inclusion of stakeholders besides CAEECC Members [↑](#footnote-ref-1)