Instructions: Please make comments specific, reference pages where appropriate, and be focused on Business Plan level strategies.

Commenter Name: Dan Buch

Commenter: Please Fill In This Part Of The Form				For PA Use	
Comment #	PA	Page #	Comment	Integrated (Y/N)	Rationale for Y/N
ORA-1	BayRENPublic	4.9	<ul> <li>Market Effect Metrics should be tracked using appropriate and reliable methods.</li> <li>Program tracking data is unlikely to provide accurate measurement for metrics related to building footprint and square footage, as these are not reliably included in most program tracking databases.</li> <li>Planning should include alternative methods (e.g. periodic surveys) to accurately quantify changes from baseline surveys.</li> </ul>		
ORA-2	BayRENPublic	4.10	<ul> <li>Concrete budgets aid in stakeholder review, but more detail is needed.</li> <li>ORA appreciates that BayREN has proposed concrete budgets by year as a part of the public sector chapter.</li> <li>More details on the spending categories and activities in each category are needed in order to determine the reasonableness of the requested budget.</li> </ul>		
ORA-3	BayRENPublic	4.12-13	<ul> <li>Clarification is needed of BayREN's role in BEMS acquisition and associated costs.</li> <li>The proposed acquisition tactic appears to be targeted to a concrete market barrier and the proposed solution has a reasonable likelihood of reducing costs and increasing market penetration.</li> <li>However, more detail on the BEMS acquisition tactic is needed to understand the reasonableness of the budget allocated to this item. It is unclear whether ratepayer funds will be used to fund actual acquisition of technology and service or only to support the solicitation process (with indivudal public agency customers funding the actual costs of acquisition).</li> </ul>		
ORA-4	BayRENPublic	4.13	Competitive solicitation of aggregated procurement is consistent with Commission objectives     While BayREN is not currently required to conform to the third-party bidding requirements in D.16-08-019, the proposed tactic of competitive solicitation for aggregated procurement of BEMS services is consistent with Commission objectives for designing mechanisms that increase the cost-efficiency of energy efficiency procurement at scale.		

Date 11/21/2016