

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

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	SDG&E C&S	225	<ul style="list-style-type: none"> • Discussion of using Codes & Standards (C&S) to increase efficiency of existing buildings should include discussion of AB 802 and problems encountered in lighting retrofit codes. <ul style="list-style-type: none"> ○ SDG&E's focus on using building codes as an intervention strategy for existing buildings moves in the opposite direction of AB 802's directive to use incentives. ○ C&S chapter fails to acknowledge that customers are under no obligation to make alterations in existing buildings and code requirements for existing buildings may in fact discourage efficiency adoption through IOU incentive programs (example: lighting retrofit code requirements). 		
ORA-2	SDG&E C&S	239	<ul style="list-style-type: none"> • C&S chapter should include discussion of the impact of statewide (SW) administration, timeline for SW transition, SW roles and responsibilities and how SW C&S work will be bid out. <ul style="list-style-type: none"> ○ C&S chapter should have a robust discussion of the new SW structure and its impact on C&S administration, activities, and structure. ○ Failure to include C&S SW issues in the business plan draft means that a crucial element of the C&S business plan will not be adequately vetted with stakeholders prior to filing. 		
ORA-3	SDG&E Financing	216	<ul style="list-style-type: none"> • Financing chapter should include a discussion of how energy savings from financing will be quantified resource program. <ul style="list-style-type: none"> ○ This is relevant to current initiatives as well as potential future transaction structures that SDG&E is proposing in its financing chapter. ○ The EM&V section does not appear to address energy savings measurement either but there should be a plan for attributing savings to financing efforts. 		
ORA-4	SDG&E Financing	213-214	<ul style="list-style-type: none"> • Financing chapter should include a discussion of the cost-effectiveness of financing and whether ratepayer funds should be directed to On-Bill Financing (OBF). <ul style="list-style-type: none"> ○ The chapter makes no mention of the potentially substantial ratepayer opportunity costs in fully funding OBF transactions and whether the risk and return on that funding merits tying up large sums of ratepayer funding. 		

<p><i>ORA-5</i></p>	<p><i>SDG&E Financing</i></p>	<p>216</p>	<ul style="list-style-type: none"> • Business Plan chapters should include specific performance metrics and targets that can be used to judge the success/failure of proposed intervention strategies and market influence. <ul style="list-style-type: none"> ○ Metrics should include both market-level metrics and intervention metrics that can be used to judge the success/failure of individual intervention strategies. ○ Failure to include financing performance metrics in the business plan draft means that a crucial element of the financing business plan will not be adequately vetted with stakeholders prior to filing. 		
<p><i>ORA-6</i></p>	<p><i>SDG&E WE&T</i></p>	<p>186</p>	<ul style="list-style-type: none"> • Workforce Education & Training (WE&T) chapter should include discussion of impact of statewide administration, timeline for SW transition, SW roles and responsibilities, or how SW WE&T work will be bid out. <ul style="list-style-type: none"> ○ WE&T chapter should have a robust discussion of the new SW structure and its impact on WE&T Connections administration, activities, and structure. ○ Failure to substantively address SW WE&T Connections issues in the business plan draft means that a crucial element of the WE&T plan will not be adequately vetted with stakeholders prior to filing. 		
<p><i>ORA-7</i></p>	<p><i>SDG&E ET</i></p>	<p>171</p>	<ul style="list-style-type: none"> • Emerging Technologies (ET) program chapter should include a discussion of what role(s) if any the non-lead utilities will play in the administration and activities of the statewide ET program. <ul style="list-style-type: none"> ○ The only mention of non-lead utilities in the ET chapter notes that PG&E has a different stage-gate process than other utilities. ○ The new SW structure would appear to require harmonization across utilities and/or elimination of direct program administration and implementation at non-lead utilities, which is not evident in the ET chapter. ○ Failure to substantively address SW ET issues in the business plan draft means that a crucial element of the ET plan will not be adequately vetted with stakeholders prior to filing. 		