

Commenter: Please Fill In This Part Of The Form				For PA Use	
Comment #	PA	Page #	Comment	Integrated (Y/N)	Rationale for Y/N
<i>ORA-1</i>	<i>MCE</i>	44	<ul style="list-style-type: none"> • Program Administrator (PA) cost is at or greater than the total resource cost. <ul style="list-style-type: none"> ○ MCE should provide additional justification for the PA costs. 		
<i>ORA-2</i>	<i>MCE</i>	61	<ul style="list-style-type: none"> • Direct implementation strategies require targeting emphasis on hard to reach agricultural segments. <ul style="list-style-type: none"> ○ MCE indicates that its strength and emphasis is on proximity to local demand and ability to reach segments that traditional IOUs cannot reach. However, direct implementation does not demonstrate innovative strategies aimed at the “hard to reach” customers within the agricultural sector. ○ Business plan strategies for the agricultural sector mostly mimics that of the investor-owned utilities. ○ ORA recommends that the agricultural sector logic model demonstrate strategies that target the unique needs of these customers (i.e. smaller farms, greenhouses). 		
<i>ORA-3</i>	<i>MCE</i>	44-46	<ul style="list-style-type: none"> • Agricultural program strategies are not clearly defined. 		
<i>ORA-4</i>	<i>MCE</i>	Metric Table p. 2	<ul style="list-style-type: none"> • The program strategy is unrelated to the market barrier identified in the problem statement. <ul style="list-style-type: none"> ○ MCE proposes to encourage upgrades to specific equipment during slower seasonal periods but it does not address the issue of financial insufficiency during these slow periods. ○ The metric of repeat referrals does not align with the goal of increasing upgrades. 		
<i>ORA-5</i>	<i>MCE</i>	Metric Table p. 2	<ul style="list-style-type: none"> • Intervention Strategy for addressing lack of awareness should identify the outreach targets. <ul style="list-style-type: none"> ○ Discussion is limited to general strategy to train cohorts and utilize peer-to-peer outreach but lacks metrics to set targets and to evaluate the effectiveness of this outreach strategy. 		