

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**

Comment #	PA(s)	Sector	Page #	Comment
CPUC-1	SCE	Commercial	Pg 9-10	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li><i>The statistics for savings are based on potential savings by industry group; and aligned with the potential study – that is all good.</i></li> <li><i>PG&amp;E includes statistics of participation per customer group – which is a very useful metric for understanding penetration.</i></li> </ul> <p><b>Recommended Action</b></p> <ul style="list-style-type: none"> <li><b><i>Please include statistics (using a common method of defining participants) on participants as a percent of eligible customers</i></b></li> </ul>
CPUC-2	SCE	Commercial	Pg. 14	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li><i>Acknowledge that NTG ratios are high (and attributable to “fixable” issues of documentation) in some core programs and statements to improve are good.</i></li> </ul> <p><b>Recommended Action</b></p> <p><b><i>More specifics (in the course of the implementation plans) will be necessary to illustrate the likelihood of improvements. Work with Evaluators and CPUC staff to make sure documentation protocols are sufficient.</i></b></p>
CPUC-3	SCE	Commercial	Pg. 15, Figure 12	<p>Observation: The triangle is not proportionate to the energy savings or the size of the customers; that may help to illustrate the customer base</p> <p>Recommended Action: Make the triangle segments proportional to the sector usage or the number of accounts.</p>
CPUC-4	SCE	Commercial	Pg. 15, Figure 12	<p>Observation: Strategic Energy Management is cited as a strategy for Large Commercial;</p> <p>Recommendation: Ensure the definition used is consistent with that for detailed program being developed for Industrial – and all of the components of evaluation (specifically segregation of capital projects v. BROs).</p>
CPUC-5	SCE	Commercial	Pg. 22, Table 5	<p>Observation: The Summary of Proposed Pilots do not seem tied to the strategies that are identified earlier; makes them look like a random set of ideas that happen to be underway.</p> <p>Recommendation: Modify to include linkage between the proposed pilots and the strategies</p>

				that they are related to (add a column in the table to capture this information.)
CPUC-6	SDG&E	Commercial	Pg 40	<p>Observation: The “future” approaches include “Increase focus on energy efficiency in legislation”</p> <p>Recommendation: This doesn’t seem appropriate to include in strategies – if it stays it should be more specific so the Commission can judge appropriateness in review of the business plans.</p>
CPUC-7	SDG&E	Commercial	Pg41	<p>Observation: The division between aptitude and attitude is helpful.</p> <p>Recommendation: Consider that aptitude may also include knowledge of programs (not just familiarity with rules); and would locational grid value and potentially compensating for it come in to this binary framework? Similarly how would longitudinal/long term engagement fit into aptitude or attitude?</p>
CPUC-8	SDG&E	Commercial	Pg42 (figure Com2)	<p>Observation: “Need to innovate” is cited as a Problem</p> <p>Recommendation: The problem may be lack of innovation – but calling this out requires more explanation of WHY you “need to innovate”.</p>
CPUC-9	SDG&E	Commercial	Pg42 (figure Com6)	<p>Observation: Missing the Goals and strategies tied to deemed, direct install, premium cooling, retrocommissioning, etc.</p> <p>Recommendation: finish the table - This is an interesting and useful linkage table.</p>
CPUC-10	SDG&E	Commercial	Pg 46	<p>Observation: The 0-4 employee group that makes up a large number of customers, in figure 9.</p> <p>Recommendation/Question: Are there other external groups that support this “micro employer” group that SDG&amp;E can leverage for outreach and understanding? Or is the potential too small to warrant significant outreach?</p>
CPUC-11	SDG&E	Commercial	Pg 49	<p>Observation: CEUS is the common source for the end use pie charts</p> <p>Recommendation: Not clear why the Commercial Saturation and Commercial Market Share Tracking data from 2012 are not being used as more recent data.</p>
CPUC-12	SDG&E	Commercial	Pg 50	<p>Observation: The discussion of potential – does hit on participation rates – which is good. The discussion of whole building potential does not align with commercial and refrigeration and food service potential.</p> <p>Recommendation: Elaborate on the potential connection with whole building potential and the commercial refrigeration and food service potential which is presumably called out in Figure 5.</p>
CPUC-13	SDG&E	Commercial	Pg 54	<p>Observation: Legislative Impacts table is nice description</p> <p>Recommendation: More quantitative summary of which strategies may contribute most to SB350 (amongst those cited: intuitive energy platform, innovative procurement vehicles).</p>
CPUC-14	SDG&E	Commercial	Pg 57	<p>Observation: Strategy for Property Management Market – does not include locational value opportunities</p> <p>Recommendation: Consider locational value amongst the sample tactics</p>
CPUC-15	SDG&E	Commercial	Pg 60	<p>Observation: Continuous information to encourage advancement</p>

				<p>Recommendation: In the “easy to understand, customized energy plan” be sure to include documentation strategies for those things done OUTSIDE the program (with and without) to understand progress more completely</p>
<i>CPUC-16</i>	<i>SCG</i>	<i>Commercial</i>	<i>Pg 6</i>	<p>Observation: Sector Challenge #4 is “improper HVAC” replacement and maintenance                  Recommendation: Clarify what “improper” means. Not to code, not trained or not right equipment?</p>
<i>CPUC-17</i>	<i>SCG</i>	<i>Commercial</i>	<i>Pg6</i>	<p>Observation: The list of state legislation doesn’t include AB802 (baselines, benchmarking or metered savings)                  Recommendation: Include AB802</p>
<i>CPUC-18</i>	<i>SCG</i>	<i>Commercial</i>	<i>Pg6</i>	<p>Observation: Each IOU has a different classification of segment and sub-segment                  Recommendation: Seems like a common classification of segment and sub-segment would be helpful for tracking participation penetration.</p>
<i>CPUC-19</i>	<i>SCG</i>	<i>Commercial</i>	<i>Pg8</i>	<p>Observation: Penetration of participation in eligible population is not provided                  Recommendation: Provide statistics on the penetration of programs in customer segments not just energy savings and counts of total participants.</p>
<i>CPUC-20</i>	<i>SCG</i>	<i>Commercial</i>	<i>Pg 8</i>	<p>Observation: Figure 1-4 has almost no commentary on what the large difference in market and economic potential means for the programs and potential.                  Recommendation: Add a discussion of the implications of this difference for the commercial sector (why is it so big? What barriers does it represent? )</p>
<i>CPUC-21</i>	<i>SCG</i>	<i>Commercial</i>	<i>Pg 9</i>	<p>Observation: “Significant Market Adoption” is cited                  Recommendation: Provide quantitative estimate of “significant”</p>
<i>CPUC-22</i>	<i>SCG</i>	<i>Commercial</i>	<i>Pg11</i>	<p>Observation: Objective of increasing adoption levels does not capture the breadth or depth of this expectation.                  Recommendation: Specify if the intent is to increase the impact per customer or the penetration of the customer base (or both)</p>
<i>CPUC-23</i>	<i>SCG</i>	<i>Commercial</i>	<i>Pg 13, 14</i>	<p>Observation: Perceived market barriers table includes many market barriers that are relevant.                  Recommendation: High first cost shouldn’t be limited to ZNE discussion; Capital planning extending beyond program cycles seems to be moot in a rolling portfolio cycle paradigm (if plans are in place the influence and role of the program is questionable – creates a barrier to claiming savings but not necessarily the project); Statement that “not enough work has been done to measure and validate the energy savings generated by the programs” needs to be more specific (this may be specific to gas programs only).</p>
<i>CPUC-24</i>	<i>SCG</i>	<i>Commercial</i>	<i>Pg 15 Table D2</i>	<p>Observation: Sector metrics are “high” and “increase” ; Increase in EE Levels of commercial leased properties is not clear.                  Recommendation: Make them more specific and actionable to identify numbers of participants, or percent of eligible population (breadth) or more adoptions by customers (depth) ; decrease in endues intensity of commercial leased property is more tangible.</p>

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CPUC-25	SCG	Commercial	<i>Pg 15 Table D2 (cont)</i>	Observation: the 10 year vision of “increased installation and improved maintenance of HVAC” is not hitting on the objective of the interventions. Likewise the sector metric is increase in EE savings in HVAC – but that may not align with vision and goal. Recommendation: Modify to specify the goal is increased high quality installations (if that is the goal); and/or increase in high efficiency HVAC installations, or orient the vision to the skills needed to get at the problem statement – like trained work force to ensure quality installations and high efficiency recommendations across the service territory?
CPUC-26	SCG	Commercial	<i>Appendix B and other spots</i>	Observation: Strategic Energy Management is cited as a strategy Recommendation: Ensure the definition used is consistent with that for detailed program being developed for Industrial – and all of the components of evaluation (specifically segregation of capital projects v. BROs).

Commenter—please replace **red text** with the information you wish to provide. Please submit completed comments to [facilitator@caeec.org](mailto:facilitator@caeec.org)