Commenter Name: Lara Ettenson   Commenter Affiliation: NRDC   Date: 11/17/16

Comment #	PA(s)	Sector	Page #	Comment
NRDC-1	SDG&E	WE&T	Snapshot	• Good snapshot, but needs source data • Either cite the data in the snapshot or if all of that information is footnoted elsewhere in the chapter, indicate that in a footnote.
NRDC – 2	SDG&E	WE&T	General	• The labels for figures/tables are sometimes above, sometimes below. Suggest having them above images to enable easy reading. • P.177 barriers could be expanded. The barriers don't all lead into the strategies and goals. (E.g., the first goal is to ensure a sufficient workforce, but there isn't a barrier that there isn't a strong workforce. Similarly, there is a strategy to collaborate to expand access and reach but there is no related barrier). • Note that "trends" per the ED checklist refers to the trends in the sector, not changes to the WE&T program (p.187). Need to retitle that to proposed changes and then add a trends section. Such a section would include those observed items such as growing HVAC/construction (although note that the overview says a -20% growth), need for upskilling, growing confusion in the education market, C&S training needs, etc. (see for example SCE starting at p.6). • P.183 – "analyzing these primary sectors" – with what data? Was it SDG&E's internal data or the other documents you reference in the chapter? • P.189 – is there data re: how many disadvantaged workers SDG&E trained? Otherwise it's unclear how you are "continuing" to serve that population. (e.g., PG&E (and maybe SCG?) used zip codes to assess how many of their participants were from disadvantaged communities). • NRDC appreciates the references to data sources throughout, but presume some of the Evaluation lessons from PG&E's BP would apply as well. Suggest reviewing PG&E's EM&V trends (p.22) to see if additional evaluation lessons apply. Also suggest including a similar summary to aid the reader in understanding the derivation of the goals. • P.183 – is SDG&E intending to add the other PAs in the table WE&T-7? Or was this just illustrative of one difference? • P.190 WE&T-14; adding a barriers or problem statement column would help the reader link the challenges to the proposals. • P.193 – it worked well in your other chapters to have the blue boxes correspond to "Goal, Strategy, and Tactic" (see for example SDG&E p.31) • P.193 – please make font bigger, most people will likely print these out

				• To help the flow, consider numbering the strategies (e.g., Goal 1, then Strategy 1: Deliver technical training…"). Note that this language is slightly different than the strategy language in the box that says "engage". This has implications for metrics so suggest choosing one and making it consistent. • It would also help the flow to include "tactic" headers like you do for strategy, using the exact language. (e.g., p.193 Goal 1, Strategy 1, Tactic 1 says "Educational Offering targeted at appropriate workers." So that would be the header on p.194 before describing "Sample Tactics.") • Also note, there is only one box tactic for this strategy but there are 2 tactics described on p.194. • Goal 1 Strategy 2 (Collaborate with orgs) Tactic 3 (train the trainer) may need slight modification to capture the full intent of what you describe in the text. (e.g., the text on p.195 describes more than just train the trainer) • Ensure the metrics table is consistent with the text. Understand it's draft, but all the strategies are the same.
NRDC – 3	SDG&E	WE&T	p.187	## Observations • The reader would benefit from a bit more description of changes and why. ## Recommended Action • Include a bit more description of the changes (which I read under 'future trends.') PG&E has a short summary on p.2 you could reference. Note that NRDC recommended to PG&E the following item as there was some confusion between what was continuing with centergies and what was changing. The following language is an example of what NRDC was interested in seeing: "Centergies: PG&E will continue to do X as part of the current centergies program since X got high approval ratings by participant surveys. However, instead of Y, which surveys revealed were not as successful, PG&E will provide a new Technical Education and Training approach to better address the needs of the workforce (see Intervention 1, p.10 for the details of the new approach)"

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				Observations and Recommended Action
NRDC – 4	SDG&E	WE&T	p.190+	• Modify Goal 1: It is unclear what competency demonstration is vs. knowledge gain (is one learned information vs. in the field skills?). Or perhaps one is workers and one is customers? Also, based on the strategies, trends, and barriers, seems like Goal 1 should be something like: *"Upskill current workers and increase the overall amount of workers that are properly skilled to serve the highest needed sectors (e.g., com/res/HVAC/construction) to help the state meet its goal of doubling efficiency by 2030."* ○ The first 2 strategies make sense toward this endeavor (e.g., deliver technical training, etc. and collaborate with organizations to expand reach of education). However the third – educate decision makers on the value of hiring skilled workers – seems to be a strategy for a different goal. Maybe that goal would be "Increase the demand for highly skilled workers." It doesn't seem to fit with increasing competency, but agree it's important. ○ An added strategy for Goal 1 (based on the additional prose on p.193) could be "Ensure education classes provide training on a comprehensive suite of end uses and approaches and are easily accessible." (maybe that fits better as a strategy) ○ The sample tactic of "support certification" (p.194) is unclear re: whether SDG&E plans to develop new ones or align its curriculum with state/nationally recognized certifications • Clarify Goal 2: The rationale for focusing Goal 2 on customers in additional to workforce (like facility managers) is not clear. Seems like those activities would be more components of sector programs although I understand the value in building the market for a strong workforce. Describe further how this makes sense as part of the WE&T program. • Further define Goal 3: Goal 3 seems to be simply advertising for the connections and readiness programs. I understand the rationale is that SDG&E may not own it, but given that lead PAs should still be involved with the process (even if implemented by a non-PA entity) I would recommend the goal could be more like: *"Advance K-12 student understanding of energy efficiency and related career opportunities through the Connections Program"* and *"Advance opportunities for disadvantaged workers to gain access to relevant training opportunities through the Career and Workforce Readiness Program"*