

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	PG&E Public	24, 26-27	<ul style="list-style-type: none"> New initiatives need explanation and justification in terms of goals, barriers and strategies. <ul style="list-style-type: none"> Example: “Green Bond” pilot program is introduced as a new financing model for public sector customers, but there is no explanation of the program or how it addresses the identified barrier. Example: “Job-Order Contracting” similarly is introduced with no explanation of what it is or how it will address an identified barrier. 		
ORA-2	PG&E Public	23	<ul style="list-style-type: none"> Strategies should address an identified market barrier. <ul style="list-style-type: none"> Example: “Data Analytics” using AMI data appears to be a tactic in search of a justification rather than a strategy targeted to overcoming a specific market barrier. If there is no identified market barrier, then this strategy should not be deployed in this sector. 		
ORA-3	PG&E Public	46	<ul style="list-style-type: none"> Solicitation strategy should be based on Commission directives and should be specific. <ul style="list-style-type: none"> The chapter currently lacks any third-party solicitation strategy and does not conform to the Commission’s direction in D.16-08-019. The absence of a solicitation strategy and accompanying details means that a crucial element of PG&E’s public sector business plan will not be adequately vetted with stakeholders prior to filing and misses an important opportunity to inform the market in advance of RFP issuance. 		
ORA-4	PG&E Public	38-40	<ul style="list-style-type: none"> Performance metrics should have concrete targets in order to judge success/failure of intervention strategies. <ul style="list-style-type: none"> The metrics are currently specified but all targets are unspecified. It is difficult to judge the usefulness of targets and whether they are reasonable measures of success/failure in the absence of (1) numbers that specify the baseline and (2) information showing that PG&E’s goals are ambitious and achievable. Failure to specify the actual baseline and targets means that a crucial element of PG&E’s public sector business plan will not be adequately vetted with stakeholders prior to filing. 		

<i>ORA-5</i>	<i>PG&E Public</i>	8	<ul style="list-style-type: none">• Budgets should be specified for the full ten-year business plan period and should align with market characterization and intervention strategies over the short-, medium- and long-term.<ul style="list-style-type: none">○ The absence of budgets makes it difficult to assess whether PG&E's request for resources aligns with its analysis of the needs in the public sector and its proposed intervention strategy.○ Failure to specify the budget means that a crucial element of PG&E's public sector business plan will not be adequately vetted with stakeholders prior to filing.		
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