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| 1 | *Workforce Standards and Certifications**Raised by:* *CEE*See [here](http://media.wix.com/ugd/0c9650_6f9be5e39b5141b888298332c36f4e8d.pdf) for original CEE 3/11/16 discussion document See [here](http://media.wix.com/ugd/0c9650_d4cfaf7786d64695a00b8c2a8984d69a.pdf) for 7/13 CEE proposal document This item was discussed on DATE, DATE, DATE, and DATE.**Organizations in support of Proposal:** | (A) PA business plans should include clear and detailed descriptions of how PA incentive programs will ensure EE measures are installed by a skilled and trained workforce in order to increase energy savings by reducing lost or forgone energy savings. | (A) This should be done to address poor-quality workmanship and ensure engagement of a higher skilled and more effective workforce.(B) The proposal cites to studies summarized in the DVC *Workforce Issues and Energy Efficiency Programs: A Plan for California’s Utilities Appendix 2B* that show the benefit from having such certifications in HVAC, lighting, among other end-uses. | (A) Agree with intent to have skilled workforce.(B) Certifications are sector/subsector specific. Therefore these discussions should occur at the subcommittee level utilizing available studies, evaluations, and including key experts and stakeholders.(C) Some literature has found inconclusive evidence that certifications lead to improved savings. (e.g., Opinion Dynamics - CITE)(D) The difference in energy savings may be due to poor workmanship, but there are a number of other reasons as well (e.g., estimated useful life, hours of operation, net-to-gross). It is therefore difficult to assess how much of the change is due to installation vs. these other factors. Future EM&V studies should be designed to further tease this out in order to inform improvements.(E) There was concern about impacts on contractor availability to support program and price impacts if a given certification is not widely adopted by contracting community, whether due to cost or other reasons. | (A) Instead of including specific certifications in the BPs, the BPs should include a stated intent and plan to determine the appropriate workforce standards after BP approval. (B) The discussion would occur within the sector-specific subcommittee process for development as part of the implementation plans. (C) Rather than a blanket application of standards and certifications, this process should rely on the best available information (e.g., DVC, Opinion Dynamics, etc.) to inform which certification to use for particular subsector/end-use work or to identify whether none exists. **Organizations in support of Alternative Approach:** | OTHER POSITION? |

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| 2 | *Municipal, Universities, Schools, and Hospitals (MUSH) & Affordable Multifamily (AMF) Sector Programs**Raised by:**CEE*See [here](http://media.wix.com/ugd/0c9650_6f9be5e39b5141b888298332c36f4e8d.pdf) for original CEE discussion document that this summary is based on. See [here](http://media.wix.com/ugd/0c9650_9cefb42d3fc441e99e23384832da8f04.pdf) for savings potential estimates provided by Non-CC Member in support of the CEE proposal at request of PAsThis item was discussed on DATE, DATE, DATE, and DATE. **Organizations in support of Proposal:** | (A) Identify and launch programs specific to MUSH and affordable multifamily (AMF) housing segments to ensure that all energy efficiency opportunities are pursued and savings realized. | (A) This sector is currently underfunded compared to the potential for capturing savings.(B) Free ridership should be less of a concern for the CPUC when using funds to support projects for public projects. | (A) There was no disagreement that the MUSH & AMF sector has additional energy savings opportunities (although claimable savings are still in question). (B) MUSH is called out through a new sector identification (Public) and will be invested in to the degree a cost-effective portfolio can be maintained. In addition, all LGPs have the goal of leading by example by improving the efficiency in their public buildings.(C) Without presuming to speak on behalf of the Energy Division or the Commission, observations to date have not indicated that the policy rules regarding free ridership would be applied differently to the public sector. (D) AB 802 could address some of the claimable savings concerns. However the CPUC AB 802 guidance is just beginning to be implemented. The impacts on this (and other) sectors will be clearer during the implementation planning process. This could include applying a “dynamic baseline” approach as used in the northwest to better assess the impact of the programs on the market and called out in D.16-08-019 p.# as one possibility to improve upon free-ridership assessments.(E) Since the MUSH sector is not currently discussed separately from commercial in the CPUC Navigant potential study, it is not clear what CPUC-sanctioned potential is available. This makes it difficult to assess how much can be invested in while also maintaining a portfolio TRC of 1.25.(F) AMF is outside the scope of the general EE proceeding, but general funds that are available to common AMF areas should be closely coordinated with the Energy Savings Assistance Program to ensure such funds are being pooled in line with policy guidance.(G) While the budget for the public sector will be included in the BP filed in January, what specifically will be invested in will be determined at the implementation planning level (e.g., through the bidding process). | (A) Since the BPs are not identifying programs, they should instead outline strategies to better reach this sector with a corresponding budget to enable achievement of the strategies. (B) Efforts should continue to improve free ridership and baseline issues under the current AB 802 guidance and in line with Commission direction and Policy Rules.**Organizations in support of Alternative Approach:** |   |

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| 3 | *WE&T training and inclusion programs.* *Raised by:**CEE*See [here](http://media.wix.com/ugd/0c9650_6f9be5e39b5141b888298332c36f4e8d.pdf) for original CEE discussion document that this summary is based on. See [here](http://media.wix.com/ugd/0c9650_d4cfaf7786d64695a00b8c2a8984d69a.pdf) for 7/13 document which includes this item.*Also, Greenlining’s presentation at CC Mtg #5 as described* [*here*](http://media.wix.com/ugd/0c9650_9c7f48bc0f8c48a599361031028f9b8c.pdf) *in the notes @ p.8*This item was discussed on DATE, DATE, DATE, and DATE.**Organizations in support of Proposal:**1.
 | (A) Create an inclusion program to broaden opportunities for workers from minority, low-income and disadvantaged communities to enter rewarding careers related to EE and ensure that jobs generated by ratepayer investment provide living wages and defined pathways for advancement. This inclusion program should be tied to state-certified apprenticeship, which provides the structure and pathways for successful inclusion programs in the construction and utility industries.(B) Expand Workforce Education and Training programs to include greater alignment with, leveraging of, and support (including funding) for California’s main training and education institutions, including community colleges, the state-certified apprenticeship system, colleges and universities (in addition to the IOU energy efficiency centers).  | (A) The primary goal of PA EE programs is to conserve energy, but they also serve as a significant source of job generation in the state and they inevitably affect not just the number of jobs but also the type of jobs that are created in energy efficiency work, including the skills and wages for workers hired by contractors, as well as who gets the jobs. (B) Training programs alone will not ensure that EE measures are installed by skilled workers nor will they ensure that disadvantaged workers receiving this training will be hired. (C) Intervention on the demand side of the labor market is also needed to meet the LTEE Strategic Plan energy and equity goals. (D) EE program design can raise the standards for EE work and provide better job opportunities for graduates of training programs targeted to disadvantaged workers by relying on the state-certified apprenticeship system and tying EE incentives to the employment of a skilled and trained workforce. (E) The CPUC has acknowledged that training programs for disadvantaged workers are, on their own, not enough to achieve this goal, and recognized the importance of efforts to broaden access to jobs in the EE sector. (F) The LTEE Strategic plan also includes a goal to “ensure that minority, low-income and disadvantaged communities fully participate in training and education programs at all levels of the demand-side management (DSM) and energy efficiency industry.” | **(A) Regarding expanding WE&T for improved access to training:** The IOUs presented a [new WE&T program concept](http://media.wix.com/ugd/0c9650_70533b83c0474b27bc57f656ff357c4b.pdf). The details of the program will be determined after approval of the BPs by the CPUC (excerpt from IOU WE&T Table presented in each IOU WE&T cross-cutting sector chapter). Program: Career & Workforce Readiness Audience: People not prepared to enter a traditional energy job/career higher education path: * Disadvantaged communities
* Disadvantaged workers

General Offerings/Purpose:* Career prep/job readiness services (via partnerships)
* Job placement

Partners:* Workforce Investment Boards
* Community-based organizations
* Job-training organizations

(B) **Regarding creating a specific inclusion program linking trained workers from these programs to careers:**It is not within scope of the EE programs to create a job placement program nor should customer funding duplicate other existing programs that serve that purpose. However, there are likely opportunities that PAs can explore to partner with other organizations who work to connect workers to careers that should be explored further. | (A) Implement the two identified BP proposals if approved. The specific details of the programs will be developed as part of the implementation planning process.(B) Explore options for partnering with such organizations that create career paths to link the EE programs where feasible. **Organizations in support of Alternative Approach:** |  |

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| 4 | *Disadvantaged workers and jobs.**Raised by:**CEE*See CC Mtg #4 [notes](http://media.wix.com/ugd/0c9650_9c7f48bc0f8c48a599361031028f9b8c.pdf) for further discussion and *Greenlining’s presentation at CC Mtg #5 as described* [*here*](http://media.wix.com/ugd/0c9650_9c7f48bc0f8c48a599361031028f9b8c.pdf) *in the notes @ p.8*This item was discussed on DATE, DATE, DATE, and DATE.**Organizations in support of Proposal:**1.
 | (A) Define “disadvantaged worker” for adoption in PA Business Plans. (B) Fund training programs with a track record of connecting disadvantaged workers to good paying middle class jobs and career pathways/ New projects should include a specific goal to connect disadvantaged worked with high-road energy efficiency jobs.(C) Data collection on job quality, workforce diversity, and other measures. (D) RFP process should include workforce inclusion as a factor in ranking proposals with third party contractors in energy efficiency solicitations | (A) To ensure consistency across programs and implementation, need a common definition.(B) See rationale for inclusion proposal in Item # 3 above.(C) Without understanding the baseline state of the workforce, the CPUC cannot assess success of efforts or progress toward a more inclusive workforce.(D) Allowing additional credit for companies that integrate workforce inclusion into their practices provides an incentive for companies to pursue such an approach. | (A) The IOUs defined “disadvantaged” in their 2015 Advice Letter ## found here. However, given the CEC effort pursuant to SB 350, it doesn’t make sense for the IOUs to proceed with their definition if the CEC’s forthcoming definition will be different. (B) See discussion re: inclusion program in Item #3 above.(C) Data collection for this type of information can be limited by legal requirements. Need further guidance from the Commission on how to proceed.(D) DISCUSSION? | (A) **Definition**: Defer to the CEC’s forthcoming final decision to be consistent across the state.(B) **Inclusion**: See above item #3(C) **Data:** Defer to CPUC(D) ?**Organizations in support of Alternative Approach:** |  |

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| 5 | *Bottom up Budget Justification**Raised by:**ORA*See CC Mtg #10 [notes](http://media.wix.com/ugd/0c9650_97057b736aa74db19767a0c9cfc2dba9.pdf) for further discussion.This item was discussed on DATE, DATE, DATE, and DATE.**Organizations in support of Proposal:** | (A) BP applications need to have a companion comprehensive budget that includes the basis and justification for the proposed budget, in line with the BP proposal. (B) Includes all elements that are expected to be recorded to EE balancing account (Using a GRC-type forecast with basis for forecast, with labor and non-labor separately presented, for each of the budget categories previously specified by the Commission for EE)(C) Budget proposal should align with business plan objectives, vision, and strategies. | (A) Without such a breakdown, the Commission and stakeholders cannot tell how the budget was derived or what the rationale is for the proposed budget.  | (A) The Commission direction is at a much higher level than this request since the business plans are intended to provide high level strategic intervention approaches.(B) Until the business plans are approved, such an exercise could be moot and need to be redone if the Commission moves in a substantially different direction than the proposals in the plans. (C) Timing may not allow for such a breakdown by January, 2017.(D) A number of the detailed analyses being sought will change due to the CPUC direction to have at minimum 60% third party programs by the end of 2020 (e.g., budgets will need to follow what’s available in the market).  | Alternative proposal is for the BP filings in January to remain consistent with the high level Commission direction and submit a bottom-up approach analysis at a later date (e.g., as part of the 9/1/17 Annual Advice Letter (AL) – but not to be expected every year hence unless directed by the Commission). **Organizations in support of Alternative Approach:** |  |

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| 6 | *Single Statewide Local Government Administrator**Raised by:**LGSEC*The LGSEC proposal was discussed at two official CAEECC meetings—10/19/16 and 10/27/16 (webinar). See 10/19 meeting [notes](http://media.wix.com/ugd/0c9650_97057b736aa74db19767a0c9cfc2dba9.pdf), 10/27 meeting [page](http://www.caeecc.org/10-27-deel-dive-lgsec), and 10/27 meeting [notes](http://media.wix.com/ugd/0c9650_dc47a528ea0847db9415cfe0f8c4219d.pdf).This item was discussed on 10/19 and 10/27. **Organizations in support of Proposal:** | The proposal’s Elements include: “One realm Instead of four IOU Territories; Leverage LG energy, sustainability, climate action adaptation programs; Continuity, Consistency, and Enhanced Measurability and Refinement; Standardized, Enhanced and Responsible Data Access; Leveling of cross-LGP capacity and function; Remediation of Local Government Barriers; Promote LGP Constituency and Market Reach; Pilot Program, Program design clinics, Best-In-Class and BMP Library.” (Slide 8, LGSEC ppt) | This approach is needed to address the following challenges identified by the LGSEC (slide #): (A) LGPs are vessels for IOU plans and are typically not included in designing programs, but are held accountable for program performance (B) LGPs do not have consistent access to useful energy data(C) LGP contract terms, timeframes, budgets and performance metrics are inconsistent and there are no established mechanisms for contract modifications(D) LGP program funding can be capricious(E) LGPs are not integrated with other energy and climate programs(F) Each of the IOUs use different methods, metrics, accounting and budgeting processes | (A) The assertions of the identified problems were countered by at least two parties (in particular to the reference of not being a part of the planning process). (B) The problem statements identified (e.g., limited opportunity for local governments to design their program) is not a universal problem. (C) Some existing PA Local Government Partnerships are generally working and PAs are making improvements, so not worth throwing the whole existing set of programs away. (D) The proposal doesn’t provide a clear path to how this approach would address the key issues. For example, it’s unclear how the proposal will solve data access issues or provide an analysis of how administration costs would be reduced. (E) Proposal is relying on funding based on “conceptual support.” What happens to the proposal if full support does not materialize?(F) How would co-mingling of the funds address the CPUC rules of ensuring funding collected from customers only goes back to those customers? Similarly, how would the proposal enable allocation of savings to the PAs, LGs, and implementers (vs. other reasons) to enable claimable savings that are critical to maintain cost-effectiveness.(G) Local presence afforded by local PAs and local governments is preferred by some Local Governments. It is difficult to assess how the proposal will address the challenges without undermining partnerships or approaches that are seemingly working.(H) This is a big change amongst other very large changes (e.g., statewide lead and transition to 60% third party programs). Instead of adding another big shift, we should first see how the statewide and third party transitions go.  | (A) Maintain the current structure and look into improvements to address the problems being experienced by Local Governments before considering a wholly new structure.**Organizations in support of Alternative Approach:** |  |

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| 7 | *Downstream statewide pilot* *Raised by:**MCE**9/21/16 CC Meeting presentation found* [*here*](http://media.wix.com/ugd/0c9650_8be16d4d254a4185bc97665f12338b54.pdf)See 10/14/16 webinar presentation [here](http://media.wix.com/ugd/0c9650_70533b83c0474b27bc57f656ff357c4b.pdf).This item was discussed on 9/21 and 10/14**Organizations in support of Proposal:** | (A) Rather than establishing downstream programs as statewide pilots, take functions that support local programs that would benefit from consistency and economies of scale and administer those functions on a statewide basis (e.g., work papers, workforce training, etc.). (B) In this way, the local touch of local program is maintained while benefiting from more efficient support functions.  | (A) Saving ratepayer funds through eliminating duplicative administration (B) Providing consistency among service areas when appropriate (C) Fostering a positive and valuable experience for the customer, contractor, and installer (D) While it is true that many downstream programs must vary due to the diversity of customers and end uses, it is not clear that that necessarily means that all program designs and approaches downstream must be different. For example, even in the industrial sector, where custom projects vary perhaps the most among any sector because of the diversity of processes involved, it could still be desirable to have a consistent set of program rules, documentation requirements, savings measurement requirements, etc. regardless of the area of the state in which the program is operating. (D.16-08-019 Page 59)  | (A) Similar concerns were raised about downstream programs going Statewide given local touch. One additional idea would be to have a statewide training and curriculum specifically to support the home upgrade program (e.g., the training will be the same even if the individual programs are slightly different for local needs). (B) There is value to development of work papers for Statewide programs. (C) Agreement that statewide processes should be consistent across the state, but this should be done separately from the statewide downstream program requirement. (D) Some of these things are happening already, not necessarily in formal downstream programs For example, with respect to work papers and deemed values, there is CalTF to work through these issues. With respect to metered analysis, SDG&E wants to work together for consistent methodology. With respect to the custom program the PAs created a custom handbook to ensure uniformity across territories and there is an ongoing working group addressing related issues. | (A) Maintain current approach to downstream statewide pilot programs and continue working on statewide consistency through current approaches and explore additional items that would benefit from consistency.**Organizations in support of Alternative Approach:** |  |

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| 8 | *Oversight of implementation (after BPs are filed)**Raised by:**ORA and CEE*See 9/8 notes [here](http://media.wix.com/ugd/0c9650_ac62d20067104be299602d57f6fce437.pdf), 9/21 notes [here](http://media.wix.com/ugd/0c9650_345e433413804d20bd71642bd4d58760.pdf), and 10/19 notes [here](http://media.wix.com/ugd/0c9650_97057b736aa74db19767a0c9cfc2dba9.pdf). Also see ORA document for presentation at 10/19 [here](http://media.wix.com/ugd/0c9650_7831b0a88b6249138afb253042ce1348.pdf). This item was discussed at the 9/8, 9/21 and 10/19 meeting.**Organizations in support of Proposal:** | (A) Implementation of Business Plans: Meaningful oversight of procurement process – independent from the CAEECC using an EE-PRG and Independent Evaluator and submitting contracts to CPUC for approval.(B) Implementation Plan Review Process: Regular status updates at CAEECC of PA activities using Business Plans as review point, as described in D.15-10-028.  | (A) Stakeholder process should reduce party protests, or at least expedite the protest period (no need for extensive data requests). CPUC approval reduces PA and implementer community uncertainty about contracts.(B) Oversight to ensure implementation is in line with Commission direction and the Business Plans | (A) CAEECC developed a proposal for a revamped Energy Efficiency Procurement Review Group with Independent Evaluator. This proposal was vetted at the 12/7 CAEECC meeting and includes options for those items where consensus was not met. This proposal is filed as Appendix 1 to this Comparison Document.(B) CAEECC is developing a process that addresses these and other oversight components. Such an approach will continue to be vetted in the new year and will require CAEECC member support and/or Energy Division guidance.  | No alternatives at this time as both of these suggestions are currently in process.**Organizations in support of Alternative Approach:**1. n/a
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| 9 | *Statewide Administration- Upstream/Midstream bundling**Raised by:**ORA & NRDC*See CC Meeting #9 notes [here](http://media.wix.com/ugd/0c9650_345e433413804d20bd71642bd4d58760.pdf) and #10 notes [here](http://media.wix.com/ugd/0c9650_97057b736aa74db19767a0c9cfc2dba9.pdf) for discussion. See the statewide administration page [here](http://www.caeecc.org/statewide-admininstration) for ORA and NRDC comments. This item was discussed on DATE, DATE, DATE, and DATE.**Organizations in support of Proposal:** | (A) Given that there is a similar formula for upstream/midstream end-use market transformation initiatives (even if there are different players), the SW HVAC, PLA, and Lighting programs should be administered by one entity. | (A) Having one administrator would ensure a consistent market transformation approach as appropriate and would reduce the potential for duplicative efforts to develop and create such a MT plan for each end use.(B) “[I]f the CAEECC process cannot reach consensus [on the lead administrator roles for specific statewide programs], the business plans should identify the options considered and bring the proposals forward to the Commission to resolve.” D.16-08-019 (p.#) | (A) The end uses are quite different with different interventions therefore it doesn’t make sense to put them all together. | (A) Allow different PAs to administer these end-use upstream/midstream programs and coordinate to avoid duplication concerns raised by proposers.**Organizations in support of Alternative Approach:** |  |

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| 10 | *Contracting Practices**Raised by:**BayREN*See 7/13 meeting notes [here](http://media.wix.com/ugd/0c9650_0fb3c5d45d4742e683ad1236773b2d85.pdf) and discussion topic proposal document [here](http://media.wix.com/ugd/0c9650_b4b6b884799c4aae9575fb7633b3b54a.pdf).This item was discussed on DATE, DATE, DATE, and DATE.**Organizations in support of Proposal:** | (A) The IOUs should be directed to have executed contracts with all implementers, vendors, and program administrators by December 12th. (B) The contracts should be for 5 year periods and should allow for amendments if budgets or other material terms change during the contract period. (C) After several years, programs are in need of operational improvements to improve performance, and scope adjustments should be encouraged. (D) In addition, specific direction should be given to the IOUs regarding funding carryover methodology and the IOUs should be directed to apply the methodology consistently to all contractors. | (A) The process of contract negotiation with IOUs typically takes several months and often is not completed until well after the New Year. (B) In addition to added administration time, the non-IOU PAs cannot enter into contracts with their vendors until after the IOU contract is executed causing a potential delay in program implementation. (C) This risk creates a start/stop cycle that is not healthy for the industry and keeps a lot of contractors and vendors from working in programs. This is exactly what the Rolling Portfolio seeks to prevent against. (D) Unfortunately, in the years since the Rolling Portfolio was established, contracts under the IOUs are often limited to one year terms, and scope changes are often deferred until the phased Rolling Portfolio process is complete, which is still uncertain. (E) Having certainty for when contracts will be executed and having multiyear contracts will reduce administration costs and will allow programs to continue uninterrupted. This will also allow for proper planning, staffing, etc.  | (A) One-year cycles create challenges. Sometimes implementers can’t provide work for customers because they hit the end of the contract period before the project can be installed when program contracts are short. (B) This should also apply to amending contracts.(C) Sometimes a contract’s scope really is limited to one year’s worth of work and contracts should be able to reflect that. (D) PAs need flexibility in contracting practices to determine lengths depending on what type of program is being proposed as new or continuing. There are other criteria that should be considered as well, like program performance. (E) Not all contracts are on a 1-year term (e.g., SDG&E local government partnerships have 5 years contracts). (F) However, all contracts (no matter what length) are going to be contingent on Annual Advice Letter approval given the new requirement to file a Tier 2 September 1 Advice Letter. This by itself creates uncertainty that the PAs cannot avoid even with multi-year contracts. | (A) Keep the status quo**Organizations in support of Alternative Approach:** |  |