

# Equity and Market Support Working Group: Homework #1 Compilation

Date: November 2023

## Asks

1. Priority Indicators – Provide a response to the following:
  - a. Which Indicators (from the Table of Adopted Indicators) are priorities for the Working Group to clarify? Why?
2. OPTIONAL – Feedback on the 11-7-2023 PA Starting Proposal - Table of Adopted Indicators – posted to the EMSWG Meeting #1 webpage.
  - a. PA and non-PA Members can provide feedback on the PAs' Starting Proposals for Equity Indicators (posted 11-6-2023). Note that there will also be future opportunities to provide feedback on the Equity Indicators.
  - b. Non-PA Members can add a tab to the PA Starting Proposals workbook and fill in the Table of Adopted Indicators for Equity Indicators.

## Responses Received from

- 3C-REN (email)
- AMBAG (email)
- BayREN / Grounded Research (memo)
- I-REN (email)
- PG&E (email)
- SDG&E (spreadsheet)
- Silent Running LLC (memo)
- SoCalREN (spreadsheet)
- The Energy Coalition (spreadsheet)
- The Mendota Group (email)

## 3C-REN

1. Equity #3 - Count of equity target participants in market support segment, by sector

This should be a priority for clarification because of the overlap between the two segments implicit in the Indicator Description. It is important to clarify the types of

participants that should be counted on this metric. The vast majority of participants in MS segment programs are building professionals and are therefore not necessarily “equity target participants” of equity programs. To determine if these participants meet equity target criteria would require programs to collect information from individual workers in MS programs that is similar to the information collected from participants in equity programs, which would have a potentially significant impact on MS program participation. Determining if someone meets the criteria for HTR or Disadvantaged Worker involves requesting information that may feel intrusive, and is not commensurate with the value of the service they are receiving from the PA (e.g. disclosing income information and personal address in order to attend a free training). In place of personal information, proxy data is often relied upon. It may indicate if someone is likely to be HTR or DW, but is not always accurate. Or it relies on self reported data that can't be easily verified. This data collection process may affect program participation. In addition, the process of collecting these data adds administrative burden to Market Support program processes.

2. Equity #5 - Sum of all equity segment participants' greenhouse gas reductions (in tons of carbon dioxide equivalent) in equity segment

This indicator was originally characterized as “Equity-All Target Participants” but was adopted as “all equity segment participants”. Clarification is needed on this indicator as this difference will inform collection strategy from only those who meet DAC, HTR, and Underserved criteria to collecting these data from all equity program participants.

NOTE: This applies also to Equity #'s 6, 7, 8, 9 as well.

3. Equity #10 - Median of equity target participants' expected first-year bill savings in equity segment, by sector

This should be clarified in terms of overall methodology as rate would obviously differ by participant. If this requires collection of utility bills and data entry of individual rates, this may have implications on program performance/participation. In addition to potential effects on participation from asking for additional materials from program participants, this approach would also impose additional administrative burden on these programs. This burden would include the actual collection and storage of these bills, in addition to the entry of the rates into program databases, and subsequent calculation required to determine bill savings from participants' collected rate and installed measures.

## AMBAG

Equity indicators 3 and 4 should be prioritized for clarification. This is because in my mind tracking participation of equity target participants in the market support sector and resource acquisition sector implies that one of the goals of the equity segment is to drive participation of equity target participants in programs at large and not just the

equity segment. Clarification would be helpful to understand how indicators 3 and 4 will complement an ecosystem of indicators that mostly seek to track performance within a single segment.

Market support indicator 17. I think it would be important to clarify if the “ Ratio of ratepayer funds expended to private capital leveraged by sector” will be tracked only in market support programs or for all programs regardless of segment.

In my mind it all depends on whether we are looking to measure equity and market support outcomes at the portfolio level, which would imply that a key measure of success for the equity and market support programs is their ability to impact the portfolio, or if the indicators are simply intended to track success within the segments themselves.

## BayREN / Grounded Research

[See detailed memo on Equity Indicators](#)

### I-REN

1. Equity #1e (Public Sector) - Count of equity target participants in equity segment, by sector

Equity\_14 was previously "Total # equity-targeted public facilities and equipment or community projects served by the Equity programs." Based on that wording I-REN had previously defined the unit for this indicator as a project, and the methodology was designed to count I-REN Public Sector NMEC projects only (and did not include I-REN's other equity segment offering, the Public Sector Technical Assistance program). However, the newly adopted indicator does not include the facilities/equipment/project language and only says "participants." With that in mind, should Public Sector participants for this metric be projects, facilities, or local government jurisdictions? Should the methodology count only resource program activities or should it also count non-resource program activities such as technical assistance?

NOTE: Other indicators that also count public sector equity participants/target participants will also benefit from this clarification, e.g., Equity #13e.

2. Equity #3 - Count of equity target participants in market support segment, by sector

This should be a priority for clarification because of the overlap between the two segments implicit in the Indicator Description. It is important to clarify the types of participants that should be counted on this metric. For example, for I-REN's equity segment public sector programs would this mean a local government jurisdiction associated with at least one of the equity segment flags in CEDARS (e.g., hard-to-reach,

disadvantaged, or underserved) who is participating in one of I-REN's market support programs (WE&T)?

3. Equity #5 - Sum of all equity segment participants' greenhouse gas reductions (in tons of carbon dioxide equivalent) in equity segment

Equity\_27 was previously characterized as "Equity-All Target Participants" but was adopted as "all equity segment participants." Confirm this should be updated to be the sum of all equity participants "regardless of whether they are an equity target participant or not" per D.23-06-055 p.60.

NOTE: This applies also to Equity Indicator #'s 6, 7, 8, 9 as well.

4. Market Support #13 - Number of collaborations, with a contextual description, by business plan sector to jointly develop or share training materials or resources.

Does the sector apply to the partner, not the program itself? For example, if an I-REN WE&T program is partnering with a city, would that be counted as a public sector partner? If they partner with a local business, would that be counted as a commercial sector partner? OR- if the sector is intended to apply to the program, then we recommend adding a cross-cutting/WE&T sector row to the spreadsheet template.

NOTE: This also applies to Market Support #14

## PG&E

All of the indicators (except two WE&T indicators) are equally important for the WG to discuss.

It's likely we will not have enough information to report on all of these indicators next year since many of them will require additional information to be collected and until we have clarity on the methodology and definitions, we can't provide guidance to our implementers. Of particular concern are the segment metrics that are expected to be collected across the entire portfolio, including resource acquisition programs.

Optional feedback on the starting proposal

- Indicator #2: Sum of equity target participants' expected first-year bill savings in equity segment, by sector
  - What energy savings values should be used to calculate bill savings? Some PAs specified use of claimed savings. Others did not specify one way or the other.
- Indicators #5-9: Sum of all equity segment participants' GHG reductions/kWh, kW, and Therm savings/TSB

- There were significant differences here: First year vs lifecycle, claimable or not claimable, etc.
- Indicators #11-12: Percent of HTR/DAC customer participants in portfolio
  - Numerator was consistent, but denominator was split between “Count of all customers” and “Count of all participants”.

NOTE: Another option that nobody proposed is using the HTR/DAC populations (respectively) as the denominator. That would be more insightful to see what percentage of the HTR population and DAC population participated in our programs. Then, if we also calculate the percentage of non-equity customers that participate (among the non-equity population), we could do more of an apples to apples comparison to see if we are equitably serving equity populations (at least from a participation rate standpoint). Determining the DAC population should be easy. The hard one would be determining the HTR population because many of the criterion would need to be collected or we'd otherwise need to make some assumptions to estimate.

In addition, I'd like to reiterate our concerns about how statewide programs fit into some of the indicators. Specifically, since the IOUs receive credit for program benefits proportional to their share of the budget, does that mean each IOU will claim a fraction of each "participant" for "count of" indicators? If so, is receiving credit for a portion of a participant outside an IOU's service territory compatible with a local program participant (i.e., can you add these together and still have a meaningful segment/portfolio indicator?). Also, for indicators which are ratios with a total population in the denominator, should the fraction of participants outside of the IOU's service territory be included in the numerator?

## SDG&E

See highlights in [spreadsheet](#)

## Silent Running LLC

See [Word document](#)

In general I've recommended prioritizing those Indicators which I believe are unique (vs derivative) and which I believe is feasible for the PA's to track in the near term. I generally placed a lower priority on indicators where I had doubts about PA Consensus around data elements and/or where I felt there would be significant near term tracking challenges.

I'm seeking to confirm that PAs:

- Have the same understanding of key terms and definitions (e.g. Hard-to-Reach)

- Interpret the Indicators similarly
- Can maximize the leveraging of the CEDARS database
- Similarly understand where any gaps may exist in their own participant databases or CEDARS

There are a couple of other tools that I think we should consider using for this exercise:

1. A data dictionary for claims data . I was unable to extract this from Cedars but have been able to extract a recent claims report in Excel Format which sets forth the vast number of Data Elements that the PA's are currently reporting ( the example I use is from BayRen, and is downloaded from Cedars)
2. A listing of all programs. I've downloaded and attached what I think is the most recent listing. It is VERY comprehensive and even includes those programs which have been closed. It's utility is that it lists Program ID, Program Name, Program Administrator, Program Status, Program Segment, Statewide (or Not), and many others. More specifically, it will be very helpful for our working group in identifying exactly which programs are subject to reporting of Equity or Market Support Indicators (and ultimately metrics)
3. I have not had a chance to do a similar deep dive around Market Support Indicators, but I do note that in the Draft PA Adopted Indicators very little information has been provided by the PA's for the Market Support Indicators other than the Indicators themselves (as set forth in the Decision). It would be very helpful to me (and other members of the EMSWG) if the PA's could take a stab at populating the Market Support Indicators in the same way that they populated the Equity Indicators. The Market Support Indicators capture less quantitative measures than the Equity Indicators, many of which do not appear to be currently reported in Cedars. Having a better understanding of the PA's methodology and reporting of these MS Indicators will enable the working group members to provide more valuable and relevant feedback.

## SoCalREN

[See detailed spreadsheet](#)

## The Energy Coalition

[See detailed spreadsheet](#)

## The Mendota Group

1. Sum of equity target participants' expected first-year bill savings in equity segment, by sector (noting that this data may not be easy to collect)

Why: I think it would be good to clarify why this is the "sum of expected first-year bill savings" vs. average individual customer bill savings. I'm not sure the total bill savings would be a useful value.

2. Sum of all equity segment participants' greenhouse gas reductions (in tons of carbon dioxide equivalent) in equity segment

Why: I'm unsure what value this provides as it's likely to be derivative of kWh, kW and therms savings. It would be good to clarify this.

3. Also, good to clarify this item - Since D.23-06-055 does not define "equity target participant", SoCalREN views D.23-06-055 definition of "equity market participant" to be the same as "equity target participant". (I like SoCalREN's simplification).

### Feedback on Table of Adopted Indicators

Question re: Equity Market Participants: The term "equity market participants" means an equity program participant that is identified by at least one of the equity segment flags in CEDARS (e.g., hard-to-reach, disadvantaged, or underserved).

I see that this term is defined in the Decision. For my information, does CEDARS have a specific set of "equity segment flags"? If so, is this the exhaustive list: HTR, DAC, underserved?

The term "all equity segment participants" means all of the participants that participated in an equity segment program, regardless of whether they are an equity target participant or not.

I agree with SoCalREN that it would be helpful to define "equity target participant" to mean the same as "equity market participant".

Although I reviewed the tabs in "PA Starting Proposal - Table of Adopted Indicators (posted 11-6-2023)", I don't have any specific feedback other than to say it's a bit difficult to follow. I appreciate the comments the PAs provided for the individual Indicators. It may be useful to have a side-by-side of each of the indicators with columns for individual PAs.