

How do We Ensure MT Success in CA?

Savings Attribution and Goal Setting Issues and Considerations

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MT Success

- How can we create a foundation where the MTA's work will be eagerly welcomed by all program administrators?
- How can we achieve genuine collaboration, without contentiousness or apprehension?
- How can we protect what is already working well so that we can make unimpeded progress towards urgent carbon reduction goals?
- MTWG to address "Overlap", but "overlap" may be an indication of failure of planning and coordination.

Savings Attribution in Case of Overlap

- Should we defer attribution discussion?
 - D.19-12-021: Cost effectiveness is deferred until MTI application
 - "Instead, we will require each MTI brought forward by the MTA to estimate its costs and benefits, using the TRC and PAC tests, as currently configured **or potentially updated in the ongoing cost-effectiveness inquiries in the IDER rulemaking.**" p. 69
 - Attribution is an ex post EM&V issue, depends what work is allocated to each participating market actor during coordination
 - MTI development is expected to take up to 21 months (p. 62)
 - MTI application will have data from Stages 1 through 4, including better pilot test data on MTI efficacy
- It does not seem to make sense to pre-determine attribution

Goal Setting in Case of Overlap

- Overlap is an indication of potential failure of planning and coordination
 - D.19-12-021: "In general, we prefer that individual MTIs set goals at the time that they are formulated, with goals generally incremental to the other energy efficiency resource acquisition goals, because the MTIs should be going after savings that could not be achieved within the normal portfolio"
- Goal setting in case of overlap is discussed in MT Framework
 - Rolling Portfolio goals are already set
 - Resolving MTIs that propose overlap existing goals require prioritization
- It may be more useful to discuss "How can an MTI provide additionality to the Rolling Portfolio?"
- What large, thorny opportunities can an MTA address that RA and C&S are not positioned to address alone?

California Codes & Standards

- Codes and standards in California has a very different context and set of accompanying operations from other states
 - MTWG can delve into MT in other states to learn what can transfer to CA, what parts can't
- California Energy Commission provide direction and has the final say of which measures, market segments, energy & carbon metrics, and compliance approaches should be developed and adopted for code
- The Statewide C&S program supports CEC, and activities that are planned out through 2030+, due to nature of code development process in CA
- Code development in California takes into account its unique state legislation, initiatives, executive orders, state agency requirements which sometimes complicates the adoption of successful efforts from other regions
- Additionality for code development processes is difficult, but probably not impossible.
- The SW C&S program already engages in widespread market transformation activities with multiple market actors in support of code (PG&E to discuss this issue further(?))

Address Additionality

- Goal setting for MTIs depends on Additionality
 - D.19-12-021: "In general, we prefer that individual MTIs set goals at the time that they are formulated, with goals generally incremental to the other energy efficiency resource acquisition goals, because the MTIs should be going after savings that could not be achieved within the normal portfolio"
- Would it be useful for MTWG to look more deeply into how other states determine "additionality"?
- Would it be useful to discuss how to improve planning and coordination to avoid overlap?