

## RTR Appendix

Southern California Edison, Pacific Gas and Electric, Southern California Gas, and San Diego Gas and Electric (“Joint Utilities” or “Joint IOUs”) developed Responses to Recommendations (RTR) contained in the evaluation studies of the 2013-2015 Energy Efficiency Program Cycle. This Appendix contains the Responses to Recommendations in the report:

***RTR for the California Statewide Codes and Standards Program Impact Evaluation Report: Phase One Appliances*** (Cadmus, DNV GL; Calmac ID #CPU0130.01, ED WO #ED\_D\_CS\_1)

The RTR reports demonstrate the Joint Utilities’ plans and activities to incorporate EM&V evaluation recommendations into programs to improve performance and operations, where applicable. The Joint IOUs’ approach is consistent with the 2013-2016 Energy Division-Investor Owned Utility Energy Efficiency Evaluation, Measurement and Verification (EM&V) Plan<sup>1</sup> and CPUC Decision (D.) 07-09-043<sup>2</sup>.

Individual RTR reports consist of a spreadsheet for each evaluation study. Recommendations were copied verbatim from each evaluation’s “Recommendations” section.<sup>3</sup> In cases where reports do not contain a section for recommendations, the Joint IOUs attempted to identify recommendations contained within the evaluation. Responses to the recommendations were made on a statewide basis when possible, and when that was not appropriate (e.g., due to utility-specific recommendations), the Joint IOUs responded individually and clearly indicated the authorship of the response.

The Joint IOUs are proud of this opportunity to publicly demonstrate how programs are taking advantage of evaluation recommendations, while providing transparency to stakeholders on the “positive feedback loop” between program design, implementation, and evaluation. This feedback loop can also provide guidance to the evaluation community on the types and structure of recommendations that are most relevant and helpful to program managers. The Joint IOUs believe this feedback will help improve both programs and future evaluation reports.

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<sup>1</sup> Page 336, “Within 60 days of public release of a final report, the program administrators will respond in writing to the final report findings and recommendations indicating what action, if any, will be taken as a result of study findings. The IOU responses will be posted on the public document website.” The Plan is available at <http://www.energydataweb.com/cpuc>.

<sup>2</sup> Attachment 7, page 4, “Within 60 days of public release, program administrators will respond in writing to the final report findings and recommendations indicating what action, if any, will be taken as a result of study findings as they relate to potential changes to the programs. Energy Division can choose to extend the 60 day limit if the administrator presents a compelling case that more time is needed and the delay will not cause any problems in the implementation schedule, and may shorten the time on a case-by-case basis if necessary to avoid delays in the schedule.”

<sup>3</sup> Recommendations may have also been made to the CPUC, the CEC, and evaluators. Responses to these recommendations will be made by Energy Division at a later time and posted separately.

**Response to Recommendations (RTR) in Impact, Process, and Market Assessment Studies**

**Study Title:** California Statewide Codes and Standards Program Impact Evaluation Report: Phase One Appliances

**Program:** Codes & Standards

**Author:** Cadmus, DNV GL

**Calmac ID:** CPU0130.01

**ED WO:** ED\_D\_CS\_1

**Link to Report:** [http://www.calmac.org/publications/CPUC\\_CS\\_Phase\\_One\\_Report\\_Final\\_Clean.pdf](http://www.calmac.org/publications/CPUC_CS_Phase_One_Report_Final_Clean.pdf)

Item #	Page #	Findings	Best Practice / Recommendations	Recommendation Recipient	Disposition (Accepted, Rejected, or Other)	Disposition Notes (e.g. Description of specific program change or Reason for rejection or Under further review)
1a	6, 65	<p>Delivery of program savings estimates, CASE reports, and CCTRs has improved but there are still significant gaps in the documentation available to evaluators.</p> <p>Improvements include the following:</p> <ul style="list-style-type: none"> <li>Nearly all parameters (the exception was attribution values for federal standards) were provided at the start of the evaluation in the ISSM format.</li> <li>Sources of market volumes were documented as requested.</li> <li>CASE reports and CCTRs were delivered as planned and in a shorter period of time than previously.</li> <li>Although no federal attribution values were provided, attribution documentation in support of federal standard adoption was generally complete and met the requirements identified previously.</li> </ul>	The statewide program administrators and CPUC should resolve data gap issues (Product market volumes, Unit energy savings, Standards developed after CASE reports were completed) before starting the next impact evaluation.	All IOUs	Accepted	The IOUs are working with their consultants, the CPUC's evaluators to address the data gaps and ensure the CASE reports provide the necessary data needed to properly evaluate the program.
1b	6, 65	<p>Significant gaps in documentation:</p> <ul style="list-style-type: none"> <li>Product market volumes                             <ul style="list-style-type: none"> <li>Although the sources were documented by name, it was often not possible to find which specific values in the source were used.</li> <li>As in the past, sources were often several years old and did not represent current market conditions.</li> </ul> </li> <li>Unit energy savings. Values submitted in the estimate did not match the CASE report and no other documentation was provided. The absence of documentation makes it impossible to reconcile evaluation findings to the submitted estimate.</li> <li>Standards developed after CASE reports were completed. For example, the Small Battery Charger, Tier 2 (Standard 30). This product category—USB chargers with greater than 20 Watt hour capacity—is not identified in the CASE report yet it was adopted by the CEC. We received no documentation of the basis for unit energy savings, market volume, or savings potential.</li> </ul>	The IOUs should update the CASE reports or provide supplementary documentation that reflects the adopted standard.	All IOUs	Accepted	The IOUs are working with their consultants, the CPUC's evaluators to address the data gaps and ensure the CASE reports provide the necessary data needed to properly evaluate the program.

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2	7, 66	<p>Verification of compliance is becoming more challenging.</p> <p>There are a few aspects to this issue including:</p> <ul style="list-style-type: none"> <li>· Increasing complexity of regulations. For example, Title 20 regulations on battery charger systems have led to the CEC listing some end-use devices and some battery charger components but these listings do not include the entire battery charger system. There are similar issues with regulations on swimming pool systems which have changed from pump regulations to system regulations.</li> <li>· Product proliferation. For products such as televisions and battery charger systems, the CEC listing process lags the rapidly changing set of products available in the market. To measure compliance, it requires additional research to determine compliance for the set of unlisted products.</li> </ul>	The CPUC and evaluators should consider collaboration with the CEC to make efficient use of resources used to determine compliance.	ED-Recommendations related to policy or regulations	Accepted	The IOUs are happy to facilitate this collaboration in anyway possible.
3	7, 66	<p>Grouping of multiple product types / standards in a single CASE report or CCTR tends to limit the evaluators' ability to assign attribution scores to each standard</p> <p>Examples include battery chargers where a single CCTR was provided for four standards. As noted earlier, the CASE report included three categories but there were no references to the Small Charger, Tier 2 USB product category. A second example is the combined documentation for water heaters, pool heaters, and direct heating equipment.</p>	: Dissimilar technologies not be grouped together in a CASE report or CCTR.	All IOUs	Accepted	CASE reports usually cover all technologies in a single rulemaking. The IOUs are considering breaking out measures within a CASE study and reporting each submeasure separately. This would allow the CEC to receive the documentation they need in a single document while addressing the evaluators concern.