

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 and beyond. This Appendix contains the Responses to Recommendations in the report:

RTR for the Impact Evaluation of Home Energy Reports: Residential Sector—Program Year 2018 (EM&V Group A) (DNV GL, Calmac ID #CPU0206.01)

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 CPUC Decision (D.) 07-09-043¹ and the Energy Division-Investor Owned Utility Energy Efficiency Evaluation, Measurement and Verification (EM&V) Plan² for 2013 and beyond.

Individual RTR reports consist of a spreadsheet for each evaluation study. Recommendations were copied verbatim from each evaluation’s “Recommendations” section.³ 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.

¹ 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.”

² 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>.

³ 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: Impact Evaluation of Home Energy Reports: Residential Sector—Program Year 2018 (EM&V Group A)
Program: HER
Author: DNV GL
Calmac ID: CPU0206.01
Link to Report: http://calmac.org/publications/CPUC_Group_A_HER_Evaluation__PY2018_CALMAC.pdf

Item #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	PG&E (if applicable)		SCE (if applicable)		SCG (if applicable)		SDG&E (if applicable)	
				Disposition	Disposition Notes	Disposition	Disposition Notes	Disposition	Disposition Notes	Disposition	Disposition Notes
			If incorrect, please indicate and redirect in notes.	Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.	Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.	Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.	Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.
1	HER continues to be a residential energy savings workhorse with verified energy and demand savings ensuring residential energy efficiency programs deliver sizable and durable energy savings.	The sound experimental design of the HER program provides accurate and highly precise information on the savings that can be attributed to the HER program.	All PAs	Accepted	PG&E agrees and will continue to adhere to best practices in the design and execution of its HER experiments. One focus for PG&E's Early M&V research in 2020 is to improve the accuracy of savings reporting by updating PG&E's savings load shapes, in collaboration with the CPUC and its consultants.	Accepted	Agree	Accepted	SoCalGas continues to use Random Control Trial (RCT) design, normative comparison and ex-post measurement. Several segmentation strategies are also in place such as targeting the top 2 high usage quartiles, propensity to save model to better personalize messaging and other less expensive channels to reach the lower gas usage segments.	Accepted	SDG&E program continues to use Randomized Control Trial (RCT) as it has proven to be an accurate tool to properly attribute savings to HER.
2	The increasing trend of solar use raises some concern about the accuracy with which HER program savings are measured.	DNV GL recommends that greater attention be paid to the interaction of on-site solar adoption with the HER programs. It is a reasonable hypothesis that HER reports could affect the subsequent decision to adopt PV or the size of the installation. If this is the case, then HER savings estimates will no longer solely reflect HER savings. The only complete solution to this challenge is the metering of residential PV which will have multiple additional benefits, but which will represent a massive undertaking.	All PAs, CPUC ED EM&V	Accepted	RCT provides for the measurement of net savings directly, and net energy impacts are used to assess the cost effectiveness and cost-efficiency of measures, programs, and portfolios. PG&E agrees that billing analysis measures net changes in electricity use rather than absolute changes in electricity use, that measuring absolute changes in energy use would require the build-out of a two-way metering infrastructure, and that this would be expensive. PG&E agrees with the implicit observation made in this recommendation that there are partial methodological workarounds to this issue that would not require new metering to employ. For the time being, this evaluation finds no discernable differences in adoption rates of on-site solar between HER treatment and control groups. PG&E agrees that on-site solar adoption should continue to be tracked in HER evaluations moving forward.	Rejected	SCE agrees metering of residential PV would be a massive undertaking that would result in expenditures greater than the costs spent on HER's today. Ultimately this would negatively impact the TRC of HER, as a result SCE rejects this recommendation.	Other	N/A: This does not apply to SoCalGas.	Other	SDG&E agrees that attention to solar adoption and subsequent impacts to savings attributed to HER is should be considered, however, an iterative approach to a complete solution will likely be needed to ensure that it does not result in negative impacts on the TRC.

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3	Unlike current assumption, there is considerable variability in hourly HER program savings by time of day and PA. Since hourly HER program savings have variation by wave, it appears that there is no singular HER load shape that can be applied to all waves.	DNV GL recommends continued refinement of the exploratory load savings shape analysis in future evaluation cycles. The HER load shapes built this way offer a way to develop new program load savings shapes for use in cost effectiveness and other avoided cost calculations.	All PAs, CPUC ED	Accepted	PG&E agrees that no single load shape adequately describes consumption patterns for all HER waves. Moving forward PG&E intends to collaborate with the CPUC and its consultants to update its savings load shape to reflect the HER experiments currently being fielded to improve its accuracy.	Accepted	SCE agrees about the statement related to the HER load shape which is why SCE has worked with the CPUC to use two load shapes when reporting HER savings (Res:DEER:Indoor_CFL_Ltg (95.61%) and Res:DEER_HVAC_Eff_AC (4.39%). SCE is open to working with the CPUC or others to refine the load shapes further.	Other	N/A: This does not apply to SoCalGas.	Accepted	SDG&E agrees that continued analysis and refinement of load shape is needed and is actively collaborating with stakeholders and IOUs to ensure best practices in cost effectiveness.