

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 Assessment of Local Government Partnerships (CPUC Contract Group B: Deliverable 22A Year 2 Study) (Opinion Dynamics, Calmac ID #CPU0323.01)

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: Assessment of Local Government Partnerships (CPUC Contract Group B: Deliverable 22A Year 2 Study)
Program: LGP
Author: Opinion Dynamics
Calmac ID: CPU0323.01
Link to Report: http://calmac.org/publications/Group_B_Yr2_Assessment_of_LGPs_Final_Evaluation_Report_2021.10.25.pdf

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	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.
1	133	Based on the evaluability assessment of select LGPs' non-resource activity data, the evaluation team found the quality and completeness of the non-resource program data provided by the IOUs to be much improved compared to the year one study with many of the datasets containing fields mergeable with CPUC and IOU resource databases. However, the organization and quantity of data provided varied among LGPs relative to the non-resource activities they listed in their response to the data request and other planning documents. Our in-depth interviews and review of data request materials also revealed that there are not any established protocols pertaining to non-resource tracking, which explains the lack of standardized tracking found in both this year and last year's study.	The ongoing transition to third-party implementation, which is significantly impacting the design of LGPs going forward, should be leveraged to improve non-resource data collection protocols and reporting. Newly selected LGP implementers should adopt processes that facilitate the collection of non-resource participant information including, at a minimum, tracking customer names, phone numbers, email addresses, service addresses, dates of participation in the non-resource activity, and type of non-resource activity participated in. We also recommend the collection of any associated customer IDs used by the PAs in their data-tracking systems. As data quality and completeness improve, evaluators can more fully capture the attributable energy savings from non-resource activities. Analysis of this sort goes far to demonstrate the benefits of non-resource activities and the unique value that LGPs provide. Additionally, data systems should be designed to track non-resource participants over a multi-year time frame to better understand how ongoing engagement with LGPs drives program participation.	All IOUs/LGPs	Accepted	PG&E supports this recommendation and will commit to working with Local Government Partners to provide enough data to feasibly connect non-resource participation to resource participation. PG&E has implemented improved KPI tracking protocols and established Lead-Opportunity linkage in a project data tracking database.
2	133	By identifying matches in the CPUC and IOU resource program databases, the channeling analysis found that 20% (85 out of 430) of the LGP non-resource participants identified in the non-resource datasets took part in a PA resource program after engaging in an LGP non-resource activity. This was a great improvement compared to the year one study, and in large	To further improve future channeling analyses, LGPs should clearly identify the date in which each customer participates in a non-resource activity in their non-resource tracking datasets, and also provide the capacity to enter project records, such as claim IDs, should these participants go on to complete projects through a PA program. This will improve the accuracy of matching non-resource and	All IOUs/LGPs	Accepted	PG&E supports this recommendation and will commit to working with Local Government Partners to provide enough data to feasibly connect non-resource participation to resource participation. PG&E has implemented improved KPI tracking protocols and established Lead-Opportunity linkage in a project data tracking database.

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		part could be attributable to more complete non-resource data.	resource databases.			
3	133	Reinforcing the year one study findings, the LGP non-resource activities evaluated in this year's study were more successful at influencing municipalities' decisions to install EE equipment and engage in energy saving behaviors. For EE upgrades, the average influence scores of LGP non-resource activities versus other factors ranged from 5.3 to 8.3 out of 10, with an overall average of 6.3 among respondents. Regarding energy savings behaviors, the average influence scores of LGP non-resource activities versus other factors ranged from 5.0 to 7.2 out of 10, with an overall average of 6.2 among respondents.	N/A	All IOUs/LGPs		
4	134	Based on the results of the engineering and attribution analysis, the evaluation team found that the success of LGPs in driving customers to install EE equipment was mixed. For the five LGPs studied in this evaluation, we estimate the net electric savings attributable to LGP non-resource activities to be 95 MWh Based on survey participants' responses of which EE upgrades were rebated, approximately 55% of those savings are accounted for in the CPUC and IOU resource program databases. In the case of natural gas, of the attributable first-year net therm savings from EE equipment installations (1,572 therms), approximately 60% resulted from installing EE equipment outside of a PA resource program.	N/A	All IOUs/LGPs		
5	134	RCEW's single comprehensive non-resource tracking dataset was a significant improvement compared to the disparate databases provided by the LGPs studied in the year one evaluation, and by other LGPs for this year's evaluation. The single dataset improved the evaluation team's ability to conduct the channeling analysis for RCEW's non-resource activities. The majority of non-resource tracking data fields were sufficiently populated and of good quality for our channeling analysis. This is likely why the channeling analysis was able to identify a significantly higher percentage (74%) of municipal customers who went on to participate in a resource program after engaging in a RCEW non-resource activity compared with the percentages identified for the other LGPs in this study. A compari-	N/A	PG&E's Redwood Coast Energy Watch		

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	Disposition	Disposition Notes
		son of non-resource activities tracked in RCEW's database to the non-resource activities listed in the various marketing, education and outreach (ME&O) materials provided to the team for review indicates that RCEW is very comprehensive in the number of total possible non-resource activities being tracked. The quality of RCEW's non-resource activity tracking data puts it in a much better position to receive full credit for these tracked activities.				
6	134	Among LGPs included in this study, RCEW's non-resource activities had the highest average influence score versus that of other factors for both municipal EE upgrades (8.3 out of 10) and behavioral changes (7.2 out of 10).	N/A	PG&E's Redwood Coast Energy Watch		
7	134	SBEW provided significantly more municipal records (171) of unique contact information in their non-resource databases than the other LGPs evaluated, accounting for 55% of the total municipal records in this year's study. The evaluation team also found a number of non-resource activities targeting municipalities that were listed in SBEW's narrative description of its non-resource activities but did not have associated tracking databases. Despite SBEW providing the most non-resource municipal records, the inconsistency of data collection across its non-resource activities limited the extent to which the evaluation team could assess the benefits of SBEW's non-resource activities.	SBEW should expand its collection of customer data to include as many of its non-resource activities as possible. This will enable future evaluations to better examine and quantify the impact of these activities, thereby capturing the value of their non-resource activities more comprehensively. Considering that the Energy Division seems to be increasingly interested in the value of PA non-resource activities, other LGPs and programs offering non-resource activities, including SBEW, should follow RCEW's standardized approach to tracking these types of activities using a single comprehensive and high-quality database as discussed previously in Finding #5.	PG&E and SCG's Santa Barbara Energy Watch	Accepted	Santa Barbara County Energy watch partnership sunset. Central Coast Leaders in Action Program (CC-LEAP), a new PG&E partner, now covers Santa Barbara & San Luis Obispo territories. PG&E supports this recommendation and will commit to working with Local Government Partners to provide enough data to feasibly connect non-resource participation to resource participation. PG&E has implemented improved KPI tracking protocols and established Lead-Opportunity linkage in a project data tracking database.
8	134	Three of SBEW's five non-resource-tracking databases were lacking phone numbers and email addresses, which can be used to match non-resource data to resource databases. This likely limited the number of municipal customers identified in the channeling analysis as having gone on to participate in a resource program after engaging in a SBEW non-resource activity (14%).	SBEW should establish data collection protocols that ensure consistent collection of non-resource activity participant email addresses and phone numbers.	PG&E and SCG's Santa Barbara Energy Watch	Accepted	Santa Barbara County Energy watch partnership sunset. Central Coast Leaders in Action Program (CC-LEAP), a new PG&E partner, now covers Santa Barbara & San Luis Obispo territories. PG&E supports this recommendation and will commit to working with Local Government Partners to provide enough data to feasibly connect non-resource participation to resource participation. PG&E has implemented improved KPI tracking protocols and established Lead-Opportunity linkage in a project data tracking database.
9	135	Prior to the data request response, SDG&E staff indicated that the ECP's contributions to EE savings in San Diego County are primarily through reach code ordinances and climate action planning and cautioned that ECP's non-resource activities would likely have limited corresponding resource activities represented in the resource databases. Additionally, many of their non-resource activities outside of Orange County are	ECP should expand its collection of customer data to include as many of its non-resource activities as possible. This will enable future evaluations to better examine and quantify the impact of these activities, thereby capturing the value of their non-resource activities more comprehensively. Considering that the Energy Division seems to be increas-	SDG&E's Emerging Cities Partnership		

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	Disposition	Disposition Notes
		<p>conducted in partnership with their SANDAG LGP and were captured in those tracking databases. SDG&E policy and program staff recommend that savings be calculated with methods similar to those that Codes and Standards uses in order to measure the impact of these activities. However, given the evaluation team’s limited budget, timeline, and focused scope, it was not feasible to develop a new methodology for quantifying the impacts of reach code ordinances and climate action planning support. The evaluation team did receive a limited set of ECP non-resource databases useable for the channeling analysis and participant survey from SDG&E’s data request response, including jurisdictions that received ordinance/climate action planning support. Although the channeling analysis did not identify any municipal customers as having gone on to participate in a resource program after engaging in a ECP non-resource activity (0%), we did find that 17% of ECP non-resource participants participated in a resource program the same year.</p>	<p>ingly interested in the value of PA non-resource activities, other LGPs and programs offering non-resource activities, including ECP, should follow RCEW’s standardized approach to tracking these types of activities using a single comprehensive and high-quality database as discussed previously in Finding #5. During the year two LGP study implementation staff and local municipalities raised the importance of LGP’s supporting local reach code ordinances and climate action planning in in-depth interviews and participant surveys. Staff across LGPs and IOU territories raised concern that there may become a gap in funding for CAP support going forward if LGPs reduce funding for these types of activities. Similar sentiments were also mentioned by LGPs interviewed in year 1 which leads us to believe this is a widespread concern across local governments. The CPUC should consider a study to develop a methodology for quantifying the impacts of reach code ordinance/climate action planning support using methods similar to those used for the Codes and Standards program, especially if new third-party, public-sector implementers choose to continue to offer this non-resource activity.</p>			
10	135	<p>The evaluation team found the non-resource data provided by VCP to be sufficient in completeness and quality. It contained enough fields mergeable with CPUC and IOU resource databases (e.g., contact name, phone number, email, etc.) to conduct the channeling analysis. In total, however, VCP provided only two non-resource related tracking databases. One originated from SCE and one from SCG (in PDF file format), which consisted of lists of the partnership’s primary local government contacts. In SCE’s VCP response to Question 3 of our data request, which asked for all non-resource tracking databases, they stated that “SCE does not track customer level information from LGP non-resource activities.” The implementing partner did provide a list of 59 VCP events between 2017– 2019, which detailed the type of event (e.g., outreach, training, or workshop), and the city where the event took place, but did not list customer tracking data. This limited the team’s ability to conduct this study’s channeling and surveying</p>	<p>We recommend expanding customer tracking to include non-resource activities and using a single database to record both customer contact information and details on the types of non-resource activities in which each contact participates.</p>	<p>SCE’s Ventura County Energy Leader / SCG’s Ventura County Partnership</p>		

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		tasks. Consequently, a limited number of municipal customers were identified in the channeling analysis as having gone on to participate in a resource program after engaging in a VCP non-resource activity (10%).				
11	135	Similar to VCP, WRP provided only three non-resource related tracking databases, two of which were generic contact lists. This limited the team's ability to conduct this study's channeling and surveying tasks.	We recommend expanding customer tracking to include non-resource activities and using a single database to record both customer contact information and details on the types of non-resource activities in which each contact participates.	SCE's Western Riverside Energy Leader Partnership / SCG's Western Riverside Energy Partnership		
12	136	Many of the email addresses and phone numbers provided in WRP's non-resource-tracking databases were not complete. This made it more difficult to perform the channeling analysis and participant survey. Despite these issues, the channeling analysis did find that 31% of municipal customers listed in their non-resource databases went on to participate in a resource program after engaging in a WRP non-resource activity. This was the second highest percentage among the LGPs assessed in this evaluation and leads us to believe that with improved data collection protocols, an even higher percentage of customers may have been found.	SCE and SCG should establish data collection protocols that ensure consistent collection of non-resource activity participant email addresses and phone numbers. As noted previously, the evaluation team didn't expect for the year 1 data collection protocol recommendations to have been implemented and reflected in our year 2 study due to the timing of the studies.	SCE's Western Riverside Energy Leader Partnership / SCG's Western Riverside Energy Partnership		