

## RTR Appendix

Southern California Gas Company (SoCalGas) 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 Emerging Technologies Program Adoption Driver Study*** (Opinion Dynamics, Calmac ID #CPU0370.01)

The RTR reports demonstrate SoCalGas' plans and activities to incorporate EM&V evaluation recommendations into programs to improve performance and operations, where applicable. SoCalGas' approach is consistent with the CPUC Decision (D.) 07-09-043<sup>1</sup> and the Energy Division-Investor Owned Utility Energy Efficiency Evaluation, Measurement and Verification (EM&V) Plan<sup>2</sup> 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.<sup>3</sup> In cases where reports do not contain a section for recommendations, the SoCalGas 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), SoCalGas 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.

---

<sup>1</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>2</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>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:** ETP Adoption Driver Study  
**Program:** Emerging Technologies Program  
**Author:** Opinion Dynamics  
**CALMAC ID:** CPU0370.01  
**ED WO:**  
**Link to Report:** [ETP Adoption Driver Study Final Report](#)

MANAGEMENT APPROVAL AFTER REVIEW		
	Name	Date
SCG Programs	Darren Hanway	05/16/2025
SCG RP&R	Roy Christian	5/16/2025

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	Disposition	Disposition Notes	SCG Proposed RTR Implementation				
							Next Steps:	Timeline:	Status:	Notes:	Impacted Programs:
				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.	For each accepted recommendation, outline the steps required for implementation, responsible parties, and deadlines.  For each rejected recommendation, document the reason provided for rejection. Outline any potential follow-up actions or considerations for the future.	Set deadlines for the completion of each action. Include a start date and end date when possible.	Track the status of each action item (e.g., Not Started, In Progress, Completed).	Add notes for any additional information or updates.	Identify which programs (program IDs) would be impacted by the action items.
1	24	Recommendation 1: It's important for utility and third-party implementer staff to set clear expectations for manufacturers with regard to product claims.	IOU and third-party implementer staff should coordinate and work with manufacturers to ensure that the entities that provide these products have a mutual understanding of energy saving capabilities. Accurate and consistent product testing results can help to mitigate risks associated with measure development early in the process. In some cases, this may require more transparency on the part of manufacturers to reveal and provide details associated with product design and product testing. Ultimately, execution of specific agreements between utilities and manufacturers may be needed to ensure that any product testing results they provide are conducted		Accepted	SoCalGas accepts this recommendation. SoCalGas and our program implementer always work with the manufacturer of the technology to ensure both parties understand how SoCalGas is going to test the product at hand. SoCalGas usually adopts industry-accepted test standards (e.g., American Society for Testing and Materials (ASTM).). SoCalGas will work with the parties involved (e.g., manufacturer, customer, and implementer) to define an appropriate unbiased measurement and verification method, referencing other relevant and available standards and protocols such as those found at IPMVP.	This is standard practice within SoCalGas.	This standard practice was communicated with the program implementer since contract inception in 2021.	Complete	This is standard practice. SoCalGas and our program implementer always work with the manufacturer of the technology to ensure both parties understand how we are going to test the product at hand. SoCalGas typically adopts test standards (e.g., ASTM...) accepted in industry or, if none are available, define one that follows a related test standard or protocol such as IPMLV.	SW Gas Emerging Technologies

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	Disposition	Disposition Notes	SCG Proposed RTR Implementation				
			under rigorous protocols which ensure energy savings claims are verified and consistent.								
2	24	Recommendation 2: There is an opportunity to better incorporate more extensive customer acceptance evaluations within field testing studies.	While field testing studies may not be conducted for all assessed technologies, throughout the course of this evaluation it was evident that in some cases, the lack of information collected in these field-testing studies related to customer acceptance contributed to a lack of success. Customer acceptance evaluations, which seek to understand how individuals interact with technology, might also provide an early indication on whether additional investment by ETP in an emerging technology should be halted due to insurmountable customer acceptance issues.		Accepted	SoCalGas accepts this recommendation. Our practice is to conduct a customer survey on the technology of interest prior to performing lab or field proving tests. However, SoCalGas uses these surveys not only to inform if we should move forward, but also to identify what are the appropriate parameters to examine.		This standard practice was communicated with the program implementer since contract inception in 2021	Complete		SW Gas Emerging Technologies
3	24	Recommendation 3: Adoption of technologies is bolstered by the presence and execution of comprehensive marketing plans, characterized by a sophisticated segmented approach that leverages key market actors and trade allies.	While anecdotal, one finding indicated that the success of some evaluated technologies was associated with a comprehensive marketing approach that effectively leveraged existing marketing efforts by manufacturers, established close coordination with the most influential distributors, retailers & contractors, and provided technical assistance and educational marketing these actors could cascade to end-users to influence adoption. This approach should be patterned across other technologies where applicable, and where the supply chain is concentrated within midstream delivery channels.		Accepted	SoCalGas acknowledges that the program's delivery method should consider all venues and options to reach our customers where appropriate.		This standard practice was communicated with the program implementer since contract inception in 2021	Complete	SoCalGas' Emerging Technologies program approach is to present upcoming projects to our Programs team to allow them the opportunity to influence the project design. We also invite them to our dissemination of results and encourage them and our account executives to send customers to our webinars that present our project findings.	SW Gas Emerging Technologies
4	25	Consideration 1: Measure packages should incorporate a more holistic approach to strike a balance between cost effectiveness and customer appeal. Multiple IOU staff members mentioned this consideration and how it might serve to assist in meeting California's electrification goals. One staff	<ul style="list-style-type: none"> <li>ETP projects should incorporate a more holistic approach during the portfolio stages. Staff should take into consideration technology infrastructure cost, early adopter rates, and the required steps for customers to use the technology. Projects should consider environmental, sustainability, and climate change potential.</li> <li>While cost-effectiveness is, and should be, a primary metric for comparing measures and technologies and ensuring a fiduciary use of funds, staff did indicate that, in</li> </ul>		Other	SoCalGas' Emerging Technologies Program complies with the directions provided in Decisions, Rulings, Dispositions, and Laws. This Finding appears to address the direction provided in recent Decisions for energy efficiency portfolios to provide Clean Energy solutions. Such direction is provided explicitly by the use of the "Clean Energy" term or implicitly encouraged by the adoption of the Total System Benefit and Cost parameters in portfolio evaluation. There is no direction that explicitly states electrification as a goal of an energy efficiency portfolio. Additionally, Emerging Technologies is not a resource funded program and so its contribution to TSB or TSC is indirect and in the future at best. The mention of electrification within this report is inappropriate as it presents a		This standard practice was communicated with the program implementer since contract inception in 2021	Complete	SoCalGas considers cost-and clean energy technologies in its identification of potential projects. Doing so helps support our rate payers, community, and the performance of our portfolio. Where it is appropriate, we also measure emission criteria. Our objective is to identify the performance characteristics of a given technology.	SW Gas Emerging Technologies

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	Disposition	Disposition Notes	SCG Proposed RTR Implementation				
		member shared, “Energy efficiency is about things that make sense from all different aspects, not just economic but also a big emphasis on environmental and sustainable aspects.” As primary metric development moves from total resource cost (TRC) to total system benefit (TSB), the energy efficiency ecosystem in California should assess the extent to which these metrics impact ETs.	<p>some cases, reliance on cost-effectiveness may lead to the exclusion of beneficial technologies from the program.</p> <ul style="list-style-type: none"> <li>IOU staff recommend that measure packages address new California needs, for example, electrification requirements. There is a substantial amount of new ET that can be incorporated into the program, even if they are non-traditional to energy efficiency.</li> </ul>			company(s)’s own directive outside of the energy efficiency portfolio offerings, in-lieu of the CPUC’s stated clean-energy energy-efficiency portfolio direction.					
5	25	<p>Consideration 2: IOU staff presented opportunities to improve the measure package process, from review timelines to the modification of measure package criteria. The scope of this effort did not necessarily include an assessment of the current measure package process, though comments from staff across multiple technologies were captured during interviews. Many of the suggestions provided by staff are peripheral to the established measure review process and are primarily items that should be considered moving forward. The evaluation team believes that the currently established measure</p>	<ul style="list-style-type: none"> <li>IOU staff would like to have more transparency associated with CPUC review, including a set timeline for how long reviews will take and established criteria and scoring used to evaluate measure packages. The review and approval process should be streamlined to the extent possible to keep up with the speed of the market.</li> <li>A consideration should be made to allow flexibility around faster timelines for specific technologies. Some technologies can move faster in the market than regulatory processes. Despite this “fast path,” IOU resource programs still have value to add and can contribute to accelerating adoption.</li> <li>Consider simplifying the process of adding more items to measure packages without the need to complete the entire review process. Simplifying the process of adaptations that do not materially impact results substantially should be considered.</li> <li>Another consideration is to integrate the measure packages that have different components of a technology into one single measure package (e.g., three or four measures associated with one single</li> </ul>		Other	<p>This is not an Emerging Technologies item. It should be removed. Additionally, CalTF now has a new consultant, and they should be granted some time to adopt the likely stated observations here that CPUC and IOU staff have made regarding their processes.</p> <p>Though the following comment does not address the stated Finding, we wish to highlight that SoCalGas’ Emerging Technology team does interface with its Energy Efficiency Engineering team to ensure project definition will meet their needs for a successful Workpaper and includes them in review of the final report disposition review and dissemination efforts.</p>		N/A	N/A		

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	Disposition	Disposition Notes	SCG Proposed RTR Implementation				
		review process, including roles for CalTF and CPUC, is adequate.	technology). Such an approach, it was argued, would save time and financial resources if such an approach were considered.								
6	25	Consideration 3: IOU staff indicated an opportunity to share knowledge with the IOUs following the establishment of CalMTA. There could be a process in place where information and ideas can be streamlined between all stakeholders and take a more holistic approach to incorporating all the key components of the energy efficiency ecosystem, including resource acquisition, emerging technology, market transformation, and codes & standards. Resource Innovations, the current MTA, appears to agree with this assessment, viewing all these components as “being part of the set of tools that can be used during development of the logic model to create long-term change.” <sup>25</sup> Resource Innovations did clarify that work and coordination efforts will nevertheless be exclusively focused on specific markets where an approved market transformation initiative (MTI) Plan is deployed.	There could be a process in place where information and ideas can be streamlined between all stakeholders and take a more holistic approach to incorporating all the key components of the energy efficiency ecosystem, including resource acquisition, emerging technology, market transformation, and codes & standards. Resource Innovations, the current MTA, appears to agree with this assessment, viewing all these components as “being part of the set of tools that can be used during development of the logic model to create long-term change.” <sup>25</sup> Resource Innovations did clarify that work and coordination efforts will nevertheless be exclusively focused on specific markets where an approved market transformation initiative (MTI) Plan is deployed.		Other	Market Transformation transfer of project ideas is already in place, though there is confusion as to how this transfer should occur and at what readiness level a given project should be at when offered for consideration. There also appears to be some confusion in the stated Finding and Recommendation: Market Transformation is an entity that is embodied by CalMTA so it is not clear the intent of listing it as a feeding entity; additionally, Codes & Standards creates laws (communicated via the California Building Code) that establishes a minimum energy performance standard for buildings and appliances. There is no need for market transformation as it must be complied with, no exceptions. Of the presented energy efficiency activities or programs listed, only Emerging Technology and resource programs produce Energy Efficiency product candidates for CalMTA to consider.		This standard practice was communicated with the program implementer since contract inception in 2021	Complete	SoCalGas already has a process in place where technology, upon reaching an appropriate readiness level, is presented to CalMTA for consideration. However, if CalMTA does not adopt it, then ET will continue forward and perform its own market transformation study effort.	SW Gas Emerging Technologies