

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:

<i>RTR for the CPUC Third-Party Equity Programs: Process and Effectiveness Evaluation Final Report</i> (Opinion Dynamics, Calmac ID #CPU0381.01)

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.) 07-09-043¹ 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 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.

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: CPUC Third-Party Equity Program
Program:
Author: Opinion Dynamics
CALMAC ID: CPU0381.01
ED WO:
Link to Report: [CPUC 3P Equity Programs: Process and Effectiveness](#)

MANAGEMENT APPROVAL AFTER REVIEW		
	Name	Date
SCG Programs	Darren Hanway	06/24/2025
SCG RP&R	Roy Christian	6/27/2025

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				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.	Next Steps: 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.	Timeline: Set deadlines for the completion of each action. Include a start date and end date when possible.	Status: Track the status of each action item (e.g., Not Started, In Progress, Completed).	Notes: Add notes for any additional information or updates.	Impacted Programs: Identify which programs (program IDs) would be impacted by the action items.
1	66	Conclusion 1: As instructed by the CPUC, the 2023 3P equity program designs align with goals 1, 2, and 5 of the Environmental & Social Justice (ESJ) Action Plan, and most of the objectives.	Recommendation 1: To continue to support Goals 1, 2, and 5 of the ESJ Action Plan, the CPUC and IOUs should collaborate to invest resources to improve community engagement activities, particularly around 3P Equity program design, implementation, and measures of success. This should involve identifying community needs, barriers to participation, and preferred engagement modes. Beyond supporting CPUC's goal of improving community participation in decision-making processes, this investment would also help inform the development of future requests for abstracts/proposals for 3P Equity Programs so the program designs are rooted in community needs. These novel 3P equity programs may benefit from developmental evaluations that provide recommendations on improving program activities at various stages of equity planning, program development, implementation, and final impact		Accept	SoCalGas is committed to strengthening community engagement and welcomes continued collaboration to explore new opportunities. These efforts are already being advanced through existing equity programs and will remain a central part of our ongoing work. Looking ahead, SoCalGas will continue to partner with the CPUC and other Program Administrators to support and expand these initiatives.	These activities are already being conducted as part of current third-party equity programs and the PAs are in the process of developing community engagement indicators as a result of OP 24, in D.23-06-055.		Completed		3861 – Community Language Efficiency Outreach Program 3935 - Residential Advanced Clean Energy Program 3885 – Residential Mobile Home Program 3884 - Comprehensive Manufactured Homes Program 3936 - Multifamily Energy Alliance Program

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			evaluation.								
2	67	Conclusion 2: The CPUC initiated workstreams to develop portfolio- and segment-level metrics and indicators to measure equity performance, but there is a lack of guidance for program-level tracking	Recommendation 2: The CPUC should consider providing guidance to the PAs on how existing goals in the ESJ Action Plan Version 2.0 may translate or cascade down to the equity segment and then to IOU processes and programs.		Other	The recommendation refers to CPUC.	n/a	n/a	n/a	n/a	n/a
2A	67	Conclusion 2: The CPUC initiated workstreams to develop portfolio- and segment-level metrics and indicators to measure equity performance, but there is a lack of guidance for program-level tracking	Recommendation 2A: Upon the completion of the Market Rate NEBs Equity Segment Study, we recommend that the IOUs utilize standardized key performance indicators (KPIs) and methodologies to quantify NEBs for the equity segment of their portfolio.		Reject	While SoCalGas supports the intent of this recommendation, we note that KPIs must be tailored to the specific goals and design of each contract. As such, applying standardized KPIs across all programs, particularly for a complex and evolving topic like non-energy benefits (NEBs), may not be appropriate. Furthermore, the current NEB study is focused on developing methods for quantifying or estimating NEBs, rather than assigning definitive valuations. Until these quantification methods are more fully developed and validated, implementing standardized KPIs for NEBs will remain challenging.					
2B	67	Conclusion 2: The CPUC initiated workstreams to develop portfolio- and segment-level metrics and indicators to measure equity performance, but there is a lack of guidance for program-level tracking	Recommendation 2B: Once equity segment goals, metrics, and indicators are established and finalized with the CPUC, PAs should work with program implementers to translate these into program implementation plans to ensure clear documentation for how the equity segment goals, metrics, and indicators align with each equity program's PTLMs, how program data will be collected and by whom, and how/when these data will be reported to the CPUC. Due to the current EE program cycle, this will ideally be implemented in preparation for the February 2026 application cycle.		Accept	SoCalGas plans to implement the equity segment goals, metrics and indicators as required by D.23-06-055, OP10 once established and finalized with the CPUC through Resolution E-5351. These indicators should be used prospectively in the 2028-2031 program cycle through the 2028-2031 EE Business Plan Application, filed in early 2026, as to not up-end current programs and contracts.	This recommendation will be handled through the 2028-2031 EE Business Plan Application which is scheduled to be filed in early 2026.	Q2 2026	In progress		
2C	67	Conclusion 2: The CPUC initiated workstreams to develop portfolio- and segment-level metrics and indicators to measure equity performance, but there is a lack of guidance for program-level	Recommendation 2C: It may benefit stakeholders (including the PAs, CPUC, and other energy equity stakeholders) to have all relevant California energy equity documentation in one place		Accept	SoCalGas defers to the CPUC for direction on how this should be done.	SoCalGas will wait for the CPUC's direction on what next steps should be.				

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		tracking	(e.g., the ESJ Action Plan or the CAEECC website) so there is one guiding source for equity information. CPUC should assign an entity to inventory all energy equity documents for the state in one location (e.g., CPUC Energy Division, CAEECC, or other entity). This repository should include a dictionary of key and relevant terms for energy equity (e.g., goals, NEBs) to ensure consistency in terminology across energy equity actors. Ensure the repository is marketed to relevant stakeholders so the public is aware of these valuable materials.								
3	68	Conclusion 3: There are three existing frameworks that guide energy equity in California. There are several guiding documents and ongoing efforts to support energy equity in California, including the CPUC’s ESJ Action Plan, the California Energy Commission (CEC) Justice Access, Equity, Diversity, and Inclusion (JAEDI) Framework, and the DACAG Equity Framework ¹³¹ .				No recommendation	n/a				
4	68	Conclusion 4: The 2023 3P equity programs have overlapping program theories, and each targets hard-to-reach customers and disadvantaged communities				No recommendation	n/a				
5	69	Conclusion 5: Existing PTLMs for the 2023 3P Equity programs do not follow PTLM design best practices	Recommendation 5: Adopt the PTLM updates proposed by the Evaluation Team for each program		Other	The recommendation is not directed at SoCalGas’s programs.	n/a				
5A	69	Conclusion 5: Existing PTLMs for the 2023 3P Equity programs do not follow PTLM design best practices	Recommendation 5A: The current PTLM template provided by the IOUs to 3P implementers proposing equity program designs should be updated to reflect best practices, such as identifying linkages and providing a logical description of each linkage to support the development of indicators and evaluation of 3P Equity programs. A sample PTLM template that could be used for future equity		Other	The recommendation is not directed SoCalGas’s programs, however SoCalGas welcomes the opportunity to improve the PTLM if needed.	n/a				

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			programs can be found in Appendix D.								
6	69	Conclusion 6: Not all desired outcomes of the 2023 3P equity programs are plausible without further theoretical linkages between the activities and outcomes.	Recommendation 6: If fuel substitution is an expected long-term outcome of the REA-R program, we recommend that program staff update the PTLM to specify program activities that lead to a fuel substitution output. Activities may include fuel substitution-focused training for contractors or education campaigns for customers.		Other	The recommendation is not directed at SoCalGas's programs.	n/a				
6A	69	Conclusion 6: Not all desired outcomes of the 2023 3P equity programs are plausible without further theoretical linkages between the activities and outcomes.	Recommendation 6A: If "energy code changes" are an intended outcome of DACMO, we recommend that program staff update the PTLM to include activities that clearly lead to energy code changes, such as interventions that specifically target code officials and/or other stakeholders that influence code-making decisions. These activities, however, may be better suited for a Codes & Standards program.		Other	The recommendation is not directed at SoCalGas's programs.	n/a				
6B	69	Conclusion 6: Not all desired outcomes of the 2023 3P equity programs are plausible without further theoretical linkages between the activities and outcomes.	Recommendation 6B: If "Enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC's decision-making process" is an expected outcome of the Simplified Savings Program, we recommend that the PTLM add program activities that lead to this outcome. Tailored outreach materials could reference the importance of participating in CPUC decision-making processes, the benefits to customers for doing so, and opportunities for participation.		Other	The recommendation is not directed at SoCalGas's programs.	n/a				
7	70	Conclusion 7: Most of the KPIs identified for the 2023 3P equity programs are not feasible to measure based on current data collection/tracking practices	Recommendation 7: For each 3P equity program assessed as part of this study, adopt the KPIs proposed by the Evaluation Team in Appendix B (within the detailed evaluability assessment reports). Each of the KPIs was designed to measure the intended		Other	The recommendation is not directed at SoCalGas's programs.	n/a				

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			outcomes of each program activity.								
7A	70	Conclusion 7: Most of the KPIs identified for the 2023 3P equity programs are not feasible to measure based on current data collection/tracking practices	Recommendation 7A: We recommend that the PAs update the existing data collection and tracking practices for each of the 2023 3P equity programs and ensure all the data necessary to measure the proposed KPIs are collected and tracked. An example data request is included in each evaluability assessment report included in Appendix B to provide the expected level of detail and unit of measure for each data field. The PAs should assign clear responsibilities to implementation staff and contractors (or other market actors) to identify who is responsible for tracking which data and how it will be reported to PA and CPUC staff. The PAs should also ensure any issues or concerns with data privacy are addressed early on in the process.		Accept	SoCalGas already collects all necessary information required to verify/validate the customer of record and all necessary eTRM required data points as stated in the available workpaper. Additionally, all program level KPI data is collected according to the contract. If there are additional data points needed as a result of Resolution E-5351, ample time will need to be given in order to update the contracts to collect this data. Data collection responsibilities are contract specific and are identified in each contract.	This recommendation will be handled through the 2028-2031 EE Business Plan Application which are planned to be filed in early 2026	Q2 2026	In progress		
8	70	Conclusion 8: There has been limited pursuit of community perspectives prior to the design and implementation stages of the 2023 3P equity programs.	Recommendation 8: The CPUC should allow for IOU budgets to include funding for community listening sessions in 3P Equity program contracts. These community listening sessions should be completed soon after the contract award to verify that the program design aligns with community experiences and needs (e.g., barriers). If it is discovered that there is misalignment, this allows the implementers and IOU PAs to work together to modify the program to better meet community needs, program goals, and equity-segment goals. This also serves as an initial step in developing community relationships and supporting future community engagement activities.		Other	The recommendation refers to CPUC.	n/a				
9	71	Conclusion 9: The 3P equity programs aim to overcome trust barriers with vulnerable populations through community engagement.	Recommendation 9: Despite programs being in the ramp-up phase of implementation, the implementers should continue		Accept	SoCalGas will work with its program implementers to continue to evolve program activities to incorporate CBOs and					

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			to evolve program activities to incorporate CBOs and local contractors over time. The PAs should also initiate opportunities for community stakeholders to provide feedback on program design and evolution opportunities. We recommend that the PAs invest in opportunities to improve community engagement by understanding and addressing barriers to community participation in dialogues about goal setting, program design, implementation, and evaluation through communication and research directly with community members and CBOs.			local contractors over time. Furthermore, SoCalGas will look for opportunities to incorporate these recommendations during the RFA/RFP stages of the solicitation.					
9A	71	Conclusion 9: The 3P equity programs aim to overcome trust barriers with vulnerable populations through community engagement. D	Recommendation 9A: While implementation teams emphasize the positive impact of using local contractors to build trust in IOU offerings by establishing more personal connections with customers, it is important to recognize that developing these trusted relationships takes time. We understand that implementers may feel an urgency to launch these programs, but we advise against rushing the development of these relationships just to meet program launch deadlines. We realize this is a difficult balance.		Accept	SoCalGas agrees with the recommendation.	This is an ongoing recommendation, SoCalGas aims to create long lasting trusted relationships with its partners including program implementers and contractors, which takes time.	n/a	Ongoing		
10	71	Conclusion 10: Most of the 3P equity programs expected for launch in 2023 were delayed.	Recommendation 10: We recommend that IOU PAs communicate with the 3P implementation vendors regarding the data sources and requirements for the 3P Program before finalizing the program design or early in the ramp-up/implementation process. Additionally, if the PAs can designate a deputy program manager who is briefed on program activities at a high level, it may enhance program stability during unexpected staff turnover and improve relationships with implementers and other program stakeholders.		Accept	SoCalGas discusses Key performance indicators as part of the solicitation and contract negotiation process well ahead of the program launch. This allows for early discussion of what data needs to be collected to comply with reporting requirements as well as contractual requirements. In terms of program management, SoCalGas program staff have multiple levels of supervisors and managers for each program sector and segment to ensure redundancy during staff turnover. Additionally, program manuals and other documents allow for written documentation of programs and their goals.	SoCalGas has already implemented this recommendation into their processes.	n/a	Completed		