

## 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 CPUC Workforce Standards Evaluation Final Report*** (Opinion Dynamics, Calmac ID #CPU0384.01)

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.

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<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:** CPUC Workforce Standards Evaluation Final Report  
**Program:**  
**Author:** Opinion Dynamics  
**CALMAC ID:** CPU0384.01  
**ED WO:**  
**Link to Report:** [Workforce Standards Evaluation Report Final](#)

MANAGEMENT APPROVAL AFTER REVIEW		
	Name	Date
SoCalGas Programs	Darren Hanway	4/11/2025
SoCalGas RP&R	Roy Christian	4/17/2025

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	58	Conclusion 1: As of April 2023, the Responsible Contractor Policy (SB 350) has yet to be funded. While the CEC is actively working towards securing funding in the next year, implementation has not been initiated	Recommendation 1: We recommend that the CEC review the findings in this report to help inform the development of the Responsible Contractor Policy and Consumer Protection Guidelines.		Other	Existing Contractor and Consumer agency oversight, policies and responsibilities have been resources and references for SoCalGas to rely on for evaluating 3P program design and the potential to manage the programs.	Not applicable	Not applicable			
2	59	Conclusion 2: Currently, CALCTP provides two individual-level training credentials: 1) installer technician training and 2) Acceptance Test Technician (ATT) training. Decision 18-10-008 does not specify which credential is required. C	Recommendation 2: We recommend that the CPUC clarify its preference for the CALCTP installer technician training program as the ALC certification for Workforce Standards as it 1) serves licensed electricians who may be responsible for installing the technologies and 2) can serve as a pre-requisite for the more advanced ATT training program. IOUs should direct 3P implementers to collect the certification number of individuals, and other relevant information (e.g., technician name, contractor name) needed to verify certifications with CALCTP. The CPUC should then direct the IOUs to coordinate with CALCTP			This recommendation is not applicable to SoCalGas					

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			staff to verify the validity of the certifications based on key information (e.g., name, contractor, certification number, date of certification).								
3A	59	Conclusion 3: Our review of HVAC credentials that satisfy the Workforce Standards requirements revealed a lack of consistent and uniform standards	Recommendation 3A: While certification is not traditionally within the purview of the CPUC, they have a vested interest in ensuring the development of a qualified workforce to maximize energy savings and greenhouse gas emission reductions. We recommend that the CPUC collaborate with the California Department of Industrial Relations (DIR), California State License Board (CSLB), California Workforce Development Board, HVAC manufacturers, HVAC Distributors, Unions, California Community Chancellor's Office, and other relevant agencies to identify the best pathway forward for an HVAC technician exam that can be used for Workforce Standards.		Other	As referenced in the recommendation, standards exist for certifying technicians, as well as licensing HVAC operators, managed under the purview of the respective agencies to revise and/or set those standards and requirements.					
3B	59	Conclusion 3: Our review of HVAC credentials that satisfy the Workforce Standards requirements revealed a lack of consistent and uniform standards	Recommendation 3B: We recommend that the CPUC ensure that the IOUs require the collection of necessary information (i.e., certification numbers for contractors and installation technicians and individuals' last names and last four digits of SSN for apprentices) to support verification for Workforce Standards enforcement.		Reject	SoCalGas rejects this recommendation, as this information is already collected by other agencies. Collecting personally identifiable and sensitive information by the PAs may be redundant and significantly heighten cybersecurity risks.					
4	59	Conclusion 4: Our analysis of the HVAC apprenticeships in California found that no federally accredited apprenticeship programs or non-union state-accredited programs were actively recruiting individuals. Non-union contractors indicated that there is a gap in the quality and availability of training depending on a company's union affiliation. Non-union companies cannot send their employees to union-sponsored apprenticeship training of-				No recommendation for response.					

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		ferings, so they view the requirement of a completed apprenticeship in Workforce Standards as a significant barrier to accepting EE projects									
5	60	Conclusion 5: Contractors mentioned the need for more equitable credentialing standards for technicians, specifically identifying language and learning disabilities as barriers to pursuing credentials that require written examination for some of their employees.	Recommendation 5: As stated in D.18-10-008, the CPUC is “concerned that these requirements [do] not create barriers to disadvantaged workers participation in the programs.” Following this guidance, we encourage the CPUC to provide a memo to sister agencies, DIR and CSLB, and training provider CALTCP that draws attention to requests uncovered in this research for training and examination opportunities in multiple languages and providing additional accommodation options for individuals with disabilities, such as additional time for examinations or allowing frequent breaks to make them accessible to a broader community of installers.		Other	This recommendation is directed to the CPUC.					
5A	60	Conclusion 5.2: In alignment with the 2018 decision, the IOUs integrated the language and requirements into any program contract that began on or after July 1, 2019. Due to the shift to 3P programs, the IOUs were no longer responsible for implementing the program and instead passed that responsibility on to the 3P implementers. Third-party implementers were required to develop an implementation plan that included how they would implement, track, and report on Workforce Standards. However, many of these programs were programs in which implementers were not responsible for hiring contractors or performing the work. To account for this, many of the 3P implementers focused on including Workforce Standards language and requirements in their contracts with program customers, associated contractors, and subcontractors. As a re-	Recommendation 5.2: Instead of 3P program designs allowing customers to hire their own contractor when participating in a program, we recommend that 3P program designs integrate the use of a preferred qualified contractor network. To develop this network, program staff would recruit and vet contractors and technicians to ensure that the installers meet the associated Workforce Standards requirements. Staff would then provide a list of these vetted installers for customers to choose from. The utilization of a preferred contractor/technician network in existing 3P programs (e.g., Trade Professional Alliance Network) can be beneficial to 1) ensure individuals and their teams hold the desired qualifications required by the CPUC and 2) streamline the process of submitting necessary program documentation.		Reject	SoCalGas rejects this recommendation. Selection of preferred contractor/technician is a decision that has been left to customers, relying on industry specific guidelines, advisories, recommendations and requirements provided by agencies familiar to consumer/businesses.					

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		sult, the final onus of responsibility for implementation fell on customers, which is not what the CPUC envisioned in 2018 when the CPUC established these standards									
6	61	Conclusion 6: The standardized terms and conditions provided in Appendix B of D.18-10-008 directed the IOUs to request a demonstration of Workforce Standards compliance at least once a year from implementers; however, none of the PAs interviewed believed it was their responsibility to enforce or police Workforce Standards. As a result, there has been minimal enforcement of Workforce Standards since they were enacted in 2019....	Recommendation 6: We recommend that the CPUC formally designate the IOUs as the entity responsible for enforcing Workforce Standards and provide explicit guidance on what that means for the PAs in their interactions with 3P implementers. The CPUC historically and currently holds the IOUs accountable for achieving desired outcomes (e.g., energy savings), and thus, the IOUs are responsible for ensuring all their programs are successful in accomplishing these goals even if they are outsourcing the design and implementation of these programs to third-party implementers. As stated in D.18-10-008, “The Commission does not have experience with the practical implications of requiring workforce standards.” While this report provides evidence of some challenges in implementing workforce standards, we recognize that everyone is learning. As the IOUs take on the responsibility of enforcing Workforce Standards, the IOUs should present lessons learned and recommendations on how to make it work to the CPUC in an ongoing dialog.		Other	Given the existing role of government assigned agencies for enforcing contractor compliance with industry-wide workforce standards, the CPUC directing IOUs to only request implementers demonstration of compliance to appropriate workforce standards, seems most efficient and would avoid confusion for implementers.					
7	61	Conclusion 7: Due to the timing of Workforce Standards and the shift in IOU portfolios to include more 3P programming, we found that the role of IOU program managers shifted from managing the program's implementation to managing the contract and ensuring that 3P implementers meet performance deadlines.	Recommendation 7: While the CPUC aimed to ensure that there were equal opportunities for implementers to secure contracts to implement 3P programs, we recommend that the Procurement Review Group (PRG) explore additional opportunities to support 3P implementers—especially smaller firms—with the data collection and verification requirements associated with Workforce		Accept	SoCalGas accepts this recommendation. Program designs that can easily be implemented and adherence with contractor and workforce standards that exist under the purview of the respective industry agencies would seem less administratively burdensome to smaller entities.					

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			Standards. This may include but is not limited to discussions around the proportion of contracts associated with pay-for-performance models, utilization of fixed fees to support the ramp-up phase of the program, and additional support mechanisms during the contract negotiation process. Additionally, we recommend that the CPUC develop a regular feedback mechanism to solicit 3P implementer feedback on program effectiveness and challenges and integrate implementer feedback into updates to the contracting process, program design, or measurement and verification processes.								
8	62	Conclusion 8: In identifying projects that triggered Workforce Standards, we identified discrepancies in the measure descriptions provided and their relevance to lighting control measures to determine whether Workforce Standards would be triggered.	Recommendation 8: We recommend that the CPUC ensure that there is a standardized definition for what constitutes “lighting controls”. We recommend that the CPUC consider using the definition developed by the CALCTP Board to include: 1) occupancy and photosensors for both indoor and outdoor applications; 2) low and line voltage dimming systems; 3) demand response control systems, including Energy Management and Control Systems (EMCS) with Direct Response (DR) functionality/modules; 4) track lighting systems including current limiting devices; and 5) time-based scheduling systems, including automatic time switches, programmable lighting control panels, and part-night lighting. <sup>57</sup> Additionally, the CPUC should direct all the IOUs to utilize this definition when recording project measures in the CEDARS database. We recommend that there be a filter or flag for lighting controls within CEDARS.			Not applicable to SoCalGas					
9	62	Conclusion 9: At the time of this retrospective study, there was insufficient data to measure the	Recommendation 9: We recommend that the CPUC take the		Other	While this recommendation is not directed at SoCalGas, standards exist for					

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		impact of Workforce Standards on project quality and energy savings. Moving forward, a retrospective impact analysis of Workforce Standards will not be possible until 1) a standard definition of what constitutes lighting controls that is utilized by the IOUs and tracked in the CEDARS database, 2) a statewide HVAC technician certification that can be used for Workforce Standards, 3) the ability for IOUs and 3P implementers to obtain certification information from credentialing providers to verify that HVAC and ALC installers meet Workforce Standards requirements, and 4) improved IOU and 3P implementer capacity to track installers on qualifying projects.	following actions to better support the implementation and evaluation of Workforce Standards: 1) direct the IOUs to develop a process to enforce Workforce Standards using the lessons learned codified in this report and the findings from the discussions called for in Recommendation 3A and 3B above, 2) ensure a standard definition of what constitutes lighting controls is defined and utilized by the IOUs and tracked in the CEDARS database, 3) continue to collaborate with other state agencies (e.g., CWDB, CSLB, DIR) on relevant workforce certifications for HVAC and lighting technicians.			certifying technicians, as well as licensing HVAC operators, managed under the purview of the respective agencies to revise and/or set those standards and requirements.					