

## 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 Pacific Gas & Electric Energy Star Retail Products Platform (ESRPP) Program Pilot Early Evaluation*** (EMI Consulting, Calmac ID #PGE0437.01, ED WO #2134)

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.) 07-09-043<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 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.

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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:** Pacific Gas & Electric Energy Star Retail Products Platform (ESRPP) Program Pilot Early Evaluation  
**Program:** ESRPP  
**Author:** EMI Consulting  
**Calmac ID:** PGE0437.01  
**ED WO:** 2134  
**Link to Report:** [http://calmac.org/publications/EMI\\_Consulting\\_PGE\\_ESRPP\\_Eval\\_Report.pdf](http://calmac.org/publications/EMI_Consulting_PGE_ESRPP_Eval_Report.pdf)  
**Link to Table:** [http://calmac.org/publications/EMI\\_Consulting\\_PGE\\_ESRPP\\_Eval\\_Report\\_Appendices.pdf](http://calmac.org/publications/EMI_Consulting_PGE_ESRPP_Eval_Report_Appendices.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.
1.1	56	<b>The PG&amp;E ESRPP Program Pilot has implemented key activities necessary for the program to operate effectively, but impacts vary by product category.</b> This reinforces the need for the program to have product category-specific strategies and goals that can be tracked and periodically reevaluated. It also suggests that not all product categories may be suitable to include in the ESRPP program.	<b>Continue to develop product category-specific strategies and targets that are tailored to each product.</b> Additionally, for product categories where an increase in market share is not the primary objective, make sure that another objective has been identified and is clearly documented. For instance, there may be products where the primary objective is to help advance ENERGY STAR specifications. In these cases, there should be a specific need that ESRPP can address (for instance, by providing full-category sales data). To ensure that credit is given to PG&E, it is critical to document the impacts that these data have on subsequent developments for specifications, codes, or standards.	PG&E	Other	The ESRPP Pilot will be ending in March 2020. PG&E encourages anyone planning to implement a program like ESRPP in the future to consider adopting this recommendation.
1.2	56	<b>The PG&amp;E ESRPP Program Pilot has implemented key activities necessary for the program to operate effectively, but impacts vary by product category.</b> This reinforces the need for the program to have product category-specific strategies and goals that can be tracked and periodically reevaluated. It also suggests that not all product categories may be suitable to include in the ESRPP program.	<b>Product categories for which we have not yet observed an increase in sales or assortment share should be closely monitored to ensure they are making reasonable progress toward the objective for that product category.</b> For some product categories, the value of obtaining full category sales data from retailers may provide substantial benefit to PG&E efforts to advance specifications, codes, and standards. In these cases, there is an argument for keeping these product categories in the program, assuming that the relevant sales data can be used to advance voluntary or mandatory requirements (see Recommendation #1.1 above). It may be prudent to make downward adjustments to the incentive amounts for these product categories to reflect this strategy.	PG&E	Other	The ESRPP Pilot will be ending in March 2020. PG&E encourages anyone planning to implement a program like ESRPP in the future to consider adopting this recommendation.

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3.1	56-57	<b>National ESRPP program processes could be improved by adopting a simplified approach for defining tiers within a product category and, to the extent possible, aligning these tiers with ENERGY STAR requirements.</b> An important feature of the ESRPP program design is the ability to “ratchet up” tier requirements as program-qualified share increases for these product categories. To date, the ESRPP collaborative has used a flexible method in which tier eligibility requirements are aligned annually with ENERGY STAR specifications except in cases where the market share for that product category is already high. In these cases, the tier requirements have been set to “ENERGY STAR + XX%” (where the precise percentage varies based on the current program-qualified market share). This is a necessary adjustment for the program to make. However, in some cases it has caused logistical difficulties for the program and for retailers because it becomes more difficult to determine which models actually qualify for each tier.	<b>In the future, PG&amp;E should work with other program sponsors to explore simplifying the qualifying requirements used for the national ESRPP program and, to the extent possible, keeping these qualifying requirements aligned with ENERGY STAR definitions.</b> For instance, ESRPP could choose to align qualifying requirements with ENERGY STAR Most Efficient (ESME) in categories where there is such designation. In categories that lack ESME, there may be value in working with the EPA to establish such a designation.	PG&E	Other	The ESRPP Pilot will be ending in March 2020. PG&E encourages anyone planning to implement a program like ESRPP in the future to consider adopting this recommendation.
4.1	57	<b>The full category sales data provided by participating retailers are a valuable tool, particularly for facilitating the development of specifications, codes, and standards.</b> Interviews with external collaborators indicate that these data have already been used to facilitate the development of ENERGY STAR specifications. Further research has revealed that these data do not exist anywhere outside of the ESRPP efforts, making it an even more valuable resource.	Given the long-term program goals of changing mandatory and voluntary specifications, PG&E should continue to work with regulatory bodies to provide data and analysis to accelerate the adoption of these rules.	PG&E	Other	The ESRPP Pilot will be ending in March 2020. PG&E encourages anyone planning to implement a program like ESRPP in the future to consider adopting this recommendation.
6.1	58	<b>As the PG&amp;E ESRPP Program Pilot continues to operate moving forward, the current baseline approach (i.e., a pre/post model averaging baseline) will become less useful as the pre-period sales data become outdated.</b> Therefore, it will become increasingly important to use a baseline approach that is able to account for new developments and external changes in the market.	<b>Moving forward, the PG&amp;E ESRPP Program Pilot should adopt a baseline approach similar to that employed by NEEA to help understand and assess market transformation effects due to the ESRPP program.</b> There are several benefits of using a baseline approach similar to that utilized by NEEA: (1) the approach has already been in use for some time, (2) it is transparent and flexible, and (3) using such an approach would facilitate evaluation consistency across two of the most important ESRPP program sponsors.	PG&E	Other	The ESRPP Pilot will be ending in March 2020. PG&E encourages anyone planning to implement a program like ESRPP in the future to consider adopting this recommendation.