

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 2013-2014 Energy Efficiency Program Cycle. This Appendix contains the Responses to Recommendations in the report:

RTR for the Survival Analysis of SCE/CPUC CFL Lab Study (Brett Close & Associates, Calmac ID #SCE0379.01)

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 2013-2016 Energy Division-Investor Owned Utility Energy Efficiency Evaluation, Measurement and Verification (EM&V) Plan¹ and CPUC Decision (D.) 07-09-043².

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 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>.

² 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.”

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.

EM&V Impact, Process, Market Assessment Study Recommendations

Study Title: Survival Analysis of SCE/CPUC CFL Lab Study

Program: Upstream Lighting

Author: Brett Close & Associates

Carmac ID: SCE0379.01

Link to Report: http://calmac.org/publications/CFL_Lab_Study.pdf

Item #	Page #	Findings	Best Practice / Recommendations	Recommendation Recipient	Disposition (Accepted, Rejected, or Other)	Disposition Notes (e.g. Description of specific program change or Reason for rejection or Under further review)
1	29	This final analytical section presents the model predictions for the lamps offered by SCE through its upstream lighting program in 2010-2012. The estimates are all based on the model developed and analyzed in the previous sections, cycling times from the KEMA (2005)12, and lamp characteristics are based on data from SCE for the population of lamps supported through the upstream lighting program. [...] In general, estimates are larger for these predictions than for the values from the laboratory study because the sample for the study was quite different from the program lamp population. Specifically, there was a shift away from standard lamps into specialty lamps, which tend to have a longer life.			Other	SCE concurs.
2	31, 32	5.2 Lamp Life by Lamp Type A more meaningful breakdown is the lamp life by lamp type. For each of the estimates, the predictions are based on the average cycling time for all lamps from KEMA (2005). Again, that means the estimate is not based on any differential usage between lamp types. There is quite a marked difference between basic spiral lamps and specialty lamps. While this is true for each category of specialty lamps, it is particularly true for high-wattage lamps, i.e. those with wattage greater than 30 watts. Thus, the lamp selection of the program compared to the lamp selection for the study sample has driven the increase in the median life. Mean Median Lifetimes by Lamp Type [From table:] All - 7237 h. Basic Spiral - 4047 h. All Specialty - 7520 h. Specialty Shape - 6300. Specialty Controls - 4414. high Wattage 9171 h.	My recommended values for estimates of technical lamp life from the SCE program are the values found in the "Mean Median" column [see findings above]. They represent the expected value of the median lamp life, which is the closest estimate to the desired value of the true median of the population. A direct estimate of the median of the full distribution would, while technically possible, be practically unfeasible due to the computational intensity of the process.	ED-Recommendations about work papers	Other	SCE will continue to support specialty lamp types for which this study has indicated longer life, in accordance with the best practices / recommendations. SCE hopes that the CPUC will give consideration to the estimates of CFL EULs obtained through this study, as they combine extensive lab tests and population data. EUL values are updated through the DEER process. Recent DEER updates (June 2015) did not take into account the results of the present study. We urge CPUC to give consideration to this study, as the combination of lab and population data is preferable to population data alone.
3	33		SCE should adopt the ""mean median"" lamp hours for the lamp types from Table 5, reproduced as Table 6, as planning estimates for lamp EULs. Mean Median Lifetimes by Lamp Type [Values from table 6:] Basic Spiral - 4047 h. Specialty Shape - 6300. Specialty Controls - 4414. high Wattage 9171 h.	SCE	Accepted	SCE will, where applicable for planning purposes, incorporate the "mean median" lamp hours as specified in the best practices / recommendations.

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4	33		SCE should use the model results to estimate lamp lives for the program populations for newer populations, and use those values for planning purposes.	SCE	Accepted	SCE will, where applicable for planning purposes, use the model results to estimate lamp lives for the program populations for newer populations, as specified in the best practices / recommendations. While SCE would recommend updating these EUL values in SCE workpapers, EUL is updated through the DEER review process.
5	33		The Energy Division should undertake an updated lighting metering study to gather newer data on average cycle times and hours of use, and how they correlate with lamp conditions.	CPUC	Other	SCE concurs.