

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. This Appendix contains the Responses to Recommendations in the report:

RTR for the Analysis of 2008 Title 24 Nonresidential Compliance Site Audits (Cadmus, Calmac ID #SCE0412.01, ED WO #2128)

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.

Response to Recommendations (RTR) in Impact, Process, and Market Assessment Studies

Study Title: Analysis of 2008 Title 24 Nonresidential Compliance Site Audits
Program: Nonresidential
Author: Cadmus
Calmac ID: SCE0412.01
ED WO: 2128
Link to Report: http://www.calmac.org/publications/2008_Title_24_Compliance_Site_Audits_Final_Report.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 | 53 | Envelope performance showed consistent under-compliance with Title 24. | Direct envelope performance compliance improvement efforts towards gas station and restaurant building types as well as classroom buildings, high-bay industrial, medical buildings, multifamily/group living, museums, office buildings and retail buildings. | All IOUs (Electric) | Accepted | The IOUs will investigate platforms to direct envelope compliance improvement efforts towards the mentioned building types. |
| 2 | 53 | Establishing an energy performance target early in a project timeline is key to ensuring that the building performs well compared to Title 24. | We recommend engaging building owners early in a project timeline to help influence and improve compliance. | All IOUs | Other | The IOUs engage building owners via separate programs such as the IOU Statewide Savings by Design program. The C&S team already has built (and will further build on) relationships with such programs for early engagement. For example, the IOUs have created a series of short videos in conjunction with BOMA to explain when permits are required and permit requirements for the 2016 tenant improvement. The IOUs also offer courses that are applicable to building owners that offer AIA (American Institute of Architects) CEUs. The IOU Statewide Savings By Design program also encourages building owners to engage early in the project timeline. |
| 3 | 53 | Smaller design companies may not have the resources for a thorough investigation of Title 24 requirements or the continuous education needed to keep up with the changing code requirements. | Targeting these smaller organizations with education and outreach is a good opportunity for IOU code compliance improvement efforts. | All IOUs | Other | The IOUs have local marketing, education & outreach initiatives which may be more suitable to take on the recommendation. In addition, the IOU C&S team, through our EnergyCodeAce website and education activities, have application guides, a variety of in-person and on-line classes (many with either AIA or ICC [International Code Council] CEUs) and other free resources. |
| 4 | 53-54 | Several stakeholders play an essential role in identifying noncompliance issues and improving compliance. | We recommend additional interviews with acceptance testing professionals on the specific issues they encounter, how they could be prevented, and how they are resolved. | All IOUs | Accepted | The IOUs will propose an EM&V study for a detailed needs assessment of acceptance testing professionals to identify issues, barriers and challenges and proposed solutions. |
| | | | Consider developing an incentive program that encourages or requires Certified Energy Analyst (CEA) involvement on new construction projects. | All IOUs | Accepted | The IOUs are currently reviewing permit files across numerous Bay Area building departments to prove (or disprove) that the certification is a useful tool for ensuring accurate compliance documentation. Results of this C&S program-funded study will be used to encourage incentive programs to require the use of CEAs in addition to possibly encouraging the CEC to mandating use of CEAs in future code cycles. |