

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:

<i>RTR for the Process Evaluation of the San Bernardino County Local Government Partnership Program</i> (Evergreen Economics, Calmac ID #SCG0218.03, ED WO #2115)
--

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: Process Evaluation of the San Bernardino County Local Government Partnership Program
Program: LGP
Author: Evergreen Economics
Calmac ID: SCG0218.03
ED WO: 2115
Link to Report: http://calmac.org/publications/LGP_SanBernardino_092217.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	27	The most significant challenge identified by the San Bernardino staff member we interviewed is the one-year contract structure of the LGP agreement.	We recommend that San Bernardino County LGP staff continue negotiations to extend the term of the agreement to be a multi-year term that better aligns with SCE and SoCalGas program cycles. This would provide greater flexibility for project identification and completion, and would remove an administrative barrier for the San Bernardino County LGP.	San Bernardino County, SCE, SCG	Accepted	SCG/SCE supports multi-year program contracts and supports continuing negotiations to establish multi-year terms. SCG/E will give full consideration to multi-year program contracts once the Commission rules on the Business Plans and program implementation scopes of work and budgets are finalized.
2	27	Staff from San Bernardino County, SCE and SoCalGas reported that Title 24 changes and the impact on which measures can be incentivized is likely to negatively impact the viability of their retrofit projects.	We recommend that San Bernardino County, SCE and SoCalGas staff add a recurring agenda item to their monthly meetings to discuss the impact of the 2016 Title 24 changes. Specifically, San Bernardino County staff requested assistance with identifying alternative strategies, including any opportunities for other measures, to complete projects identified prior to the 2016 Title 24 changes. This will help San Bernardino County staff understand the impact of Title 24 changes better, and will help ensure that opportunities for energy efficiency projects are not missed.	San Bernardino County, SCE, SCG	Other	Code updates occur every three years. SCG/SCE offers ongoing Title 24 workshops for the county staff and will provide Title 24 updates and refreshers upon request. SCG/SCE also provides technical assistance to the County upon request, should a project need re-scoping due to code changes.
3a	27	San Bernardino County staff identified the length of time that it takes for review of projects at the IOUs and the CPUC as a challenge. San Bernardino County LGP projects are required to be approved and completed within a fiscal year, and utility and CPUC review have led to some project delays and cancellations.	We recommend that SCE, SoCalGas, the CPUC and San Bernardino County work together in the following ways to address the issues related to the length of the custom process: <ul style="list-style-type: none"> We recommend that SCE and SoCalGas connect San Bernardino County to future Ex-ante Working Group meetings to share their experience and provide inputs as it relates to Task 6. Task 6 aims to compile suggestions to streamline the custom review process and while agreement to establish 	San Bernardino County, SCE, SCG	Accepted	SCG/SCE supports the communication of County deadlines to the CPUC during the custom review process. The IOUs will recommend to the County that they can participate in the ex-ante working group if they are interested.

			fixed timeframes has been reached, there are still plans for further refinement. It would be useful for San Bernardino County to participate in these discussions.			
3b			<ul style="list-style-type: none"> We recommend that San Bernardino County make internal deadlines clear to both the IOUs and the CPUC during the custom review process. 	San Bernardino County, CPUC, SCE, SCG	Accepted	SCG/SCE supports this and already has been facilitating the communication of County deadlines to the CPUC during the custom review process.
3c			<ul style="list-style-type: none"> We recommend that SCE and SoCalGas share their internal tracking of the CPUC review process with the San Bernardino County staff so that staff are aware of which projects may be delayed in the approval process longer than projects that were not selected for review by the CPUC. 	San Bernardino County, SCE, SCG	Accepted	SCG/SCE supports the tracking and communication of County project deadlines and already facilitates this through biweekly meetings with County staff to discuss the status of projects, including what SCG/SCE knows of the status of the CPUC approval review.