

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 Residential Insulation Measure Effective Useful Life Study Final Report
(DNV, Calmac ID #CPU0368.01)

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.) 07-09-043¹ and the Energy Division-Investor Owned Utility Energy Efficiency Evaluation, Measurement and Verification (EM&V) Plan² 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.³ 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.

¹ 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."

² 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>.

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
SCG Response**

Study Title: Residential Insulation Measure Effective Useful Life Study Final Report
Program: N/A
Author: DNV GL
Calmac ID: CPU0368.01
ED WO: Group A
Link to Report: [CPUC Energy Evaluation Public Comment \(energydataweb.com\)](https://energydataweb.com)

| MANAGEMENT APPROVAL AFTER REVIEWING ALL IOU RESPONSES | | |
|--|---------------|-----------|
| | Name | Date |
| SCG EE Programs | Darren Hanway | 7/31/2024 |
| SCG RP&R | Roy Christian | 7/31/2024 |

| Item # | Sec. # | Findings | Best Practice / Recommendations (Verbatim from Final Report) | Recommendation Recipient | Disposition | SCG 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 | 5 | Based on the persistence (i.e., retention and degradation) evidence shown by evaluated site-specific data, DNV concludes that the existing wall and ceiling insulation measure EUL values of 20 years is low for ceiling and wall insulation. DNV applied a parametric model with a Weibull distribution to estimate lower and upper bound estimates of retention (i.e., survival) to inform insulation EUL values. DNV estimated wall insulation EUL of 28 years using a conservative approach that treats any degradation of more than 10% as a failure. A more generous approach that ignores the partial degradations would result in a wall insulation EUL value of 34 years. While the lower bound of EUL is below the 30-year cap allowed by D.23-04-035 25, the upper-bound EUL estimate is still well above the 30-year cap, and these upper and lower bound results bracket the proposed 30-year EUL cap. | An average of the two bounds is 31 years, which is greater than the 30-year cap allowed by decision, so an EUL of 30 year is recommended for the wall insulation measure. | All | Accepted | The wall insulation measure package (SWBE007-03) was updated and submitted to CPUC on 12/28/23 using the new 30-year EUL beginning on 1/1/2024 per D 23-04-035 |
| 2 | 5 | For the ceiling insulation measure, DNV estimated a lower-bound EUL of 45 years using a conservative approach. DNV estimated an upper-bound EUL of 267 years using a more generous approach that ignores the partial survival. While these results provide a wide range of possible outcomes, the 30-year cap allowed by D.23-04-035 25 is clearly well above the estimated lowest possible EUL value. T | Therefore, an EUL of 30 year is recommended for the ceiling insulation measure. | All | Accepted | The ceiling insulation measure package (SWBE006-03) was updated and submitted to CPUC on 12/28/23 using the new 30-year EUL beginning on 1/1/2024 per D 23-04-035 |