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 Review and Validation of 2015 Pacific Gas and Electric Home Energy Reports Program Impacts (Final Report) (DNV GL, Calmac ID #CPU0155.01, ED WO #ED_D_Res_3)

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. 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.

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.

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."

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: Review and Validation of 2015 Pacific Gas and Electric Home Energy Reports Program Impacts (Final Report)

Program: HER

Author: DNV GL

Calmac ID: CPU0155.01

ED WO: ED_D_Res_3

Link to Report: http://www.calmac.org/publications/DNVGL_PGE_HERs_2015_final_to_calmac.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	-	For Wave Five, PG&E early evaluation only considered savings from October 2015 to December 2015 when calculating total gas savings for 2015.	Calculate total savings for all 12 months in 2015.	PG&E	Accepted	No change scheduled. A typographical error in Nexant's analysis caused this problem. After correction, the new estimate confirms DNV GL's estimate.
2	-	The post-difference method used in PG&E early evaluation does not correct for the pre-existing differences in peak load consumption found in some of the waves.	Use the difference-in-differences approach for calculating peak demand savings. The California IOUs agreed on a standardized approach that uses the difference-in-differences approach for calculating peak demand savings.	PG&E	Accepted	The method used in future early evaluations will be modified to account for this recommendation. However, PG&E and Nexant believe both approaches are valid in a randomized control trial (RCT).
3	-	DNV GL and PG&E are using different approaches in calculating joint savings at the peak.	DNV GL will work with PG&E to standardize the approach in calculating joint savings at the peak.	PG&E	Accepted	PG&E welcomes any initiative that helps developing stronger evaluation methods and that promotes increased communications with the CPUC and its evaluators.
4	-	The assumptions used for upstream joint savings calculation are based on earlier studies on upstream lighting program.	We recommend updating the key assumptions with the most recent available upstream lighting studies and using efficient bulb uplift estimates for each of the wave based on DNV GL's recent online survey.	PG&E	Accepted	The 2015 early evaluation was performed at a time the most recent assumptions around upstream lighting program were unavailable. Future early evaluations will be based on the conclusions of DNV GL's recent online survey.
5	-	Gamma Standard and Gamma Reduced share the same control group. The reported rebate savings of the control group for Gamma Standard and Reduced should be identical.	We recommend revisiting the joint savings calculation and apply the necessary corrections for future evaluations.	PG&E	Accepted	No change scheduled. An error in Nexant's analysis code caused this problem and has been corrected.
6	-	PG&E switched from using a fixed effect model to using a post only model specification that makes use of lagged dependent variables.	We recommend reporting the savings estimates from the two models for comparison when switching from a fixed effect model to another specification.	PG&E	Accepted	The post-only model will remain for future early evaluations. If PG&E switches to another model, the results of the two models will be provided. The motivation to adopt the post-only model was to maintain consistency with estimates produced by vendor Opower, which adopted this change.
7	-	PG&E early evaluation continued to report standard errors for the aggregated savings that were based on a separate regression model.	The standard errors of the total program savings should be calculated using the combined monthly parameter standard errors weighted by the number of treatment counts.	PG&E	Accepted	The method used in future early evaluations will be modified to account for this recommendation. However, PG&E and Nexant believe both approaches are valid.