

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 California Zero Net Energy State Buildings Decision Maker Study
(Opinion Dynamics, Calmac ID #CPU0176.01, ED WO #ED_D_ZNE_2)

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: California Zero Net Energy State Buildings Decision Maker Study
Program: ZNE
Author: Opinion Dynamics
Calmac ID: CPU0176.01
ED WO: ED_D_ZNE_2
Link to Report: http://calmac.org/publications/CPUC_ZNE_State_Agency_Study_Report_2017_10_06_FINAL.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	73	See section 7.1 of study.	State decision makers should continue to pursue new ZNE funding sources.	State decision makers		
2	73	See section 7.1 of study.	DGS should develop a ZNE Manual for use by other state departments.	DGS		
3	73-74	See section 7.1 of study.	The State of California should focus ZNE, at least initially, on those departments that represent the most significant portion of state-owned building square footage. <ul style="list-style-type: none"> • CDCR should consider installing individual electric and/or gas meters on at least some buildings. • In addition to CDCR, focus on campus settings. • Across all departments, identify high potential buildings and prioritize them. • Continue to work toward energy efficiency goals with all departments. 	State departments		
4	74	See section 7.1 of study.	State departments should select buildings for energy efficiency retrofits, toward the goal of reaching ZNE, on a case-by-case basis as each building's condition and circumstances are unique.	State departments		
5	74-75	See section 7.1 of study.	DGS should supplement the Energy Star Portfolio Manager (ESPM) data collection process. <ul style="list-style-type: none"> • Review and carefully consider data elements that could be collected as part of the ESPM data collection process. • Identify buildings, leveraging institutional knowledge, that make little practical sense to address in terms of taking aggressive steps to reduce energy use. 	DGS and state departments		
6	75	See section 7.1 of study.	The CPUC, IOUs, and DGS should work collectively to develop a legal template to cover interconnection issues in situations where a state department owns the solar PV. As a general rule, key issues have been worked out when renewables are purchased through a Power Purchase Agreement (PPA) as the PPA technically "owns" the solar PV and signs the interconnection agreement. However, when the state owns the solar PV, and therefore must sign the interconnection	All IOUs, CPUC, DGS	Accepted	The IOUs agree that the CPUC, DGS, and IOUs work collectively to address interconnection issues in situations where a state department owns the solar PV. The IOUs have begun this discussion by participating in a meeting with DGS on July 27, 2016 where the various interconnection options and tariff options were explored based upon the ZNE definition contained in the DGS document,

			agreement, there are inconsistencies and issues that arise when trying to satisfy both IOU, DGS and state legal and indemnification requirements. Generally, when budgets permit, some departments view owning the solar PV installation as preferable to a PPA. Other department, due to either budget limitations or concerns about long-term PV maintenance, prefer PPAs. Nevertheless, solving complicated legal issues is important to departments preferring to own the solar PV.			“Definition of Zero Net Energy (ZNE) for California State Agency Compliance with Executive Order B-18-12” dated May 19, 2016. However, the IOUs would like to continue discussions to gain a better understanding of the needs of the state departments to best serve them and to determine whether a legal template would be beneficial.
7	75	See section 7.1 of study.	IOUs should consider providing ZNE technical assistance to state departments. IOUs are uniquely positioned, given their long-standing role in promoting energy efficiency, to provide advice and expertise around energy efficiency improvements. Some of the IOUs also have staff that are intimately familiar with ZNE challenges in both new construction and retrofit. Finally, utility staff are often aware of the resources that can be leveraged (e.g., consulting firms, contractors, distributors, etc.) toward the goal of improving energy efficiency and reaching ZNE. Many state department decision makers are less familiar with ZNE and how to achieve it. Thus, key IOU personnel could provide needed levels of expertise and guidance. Ultimately, it is up to the CPUC to determine whether or not—and to what extent—incentives are needed to encourage IOUs to promote ZNE within state government and include the service in their respective State Partnership Programs.	All IOUs	Accepted	The IOUs agree that consideration be given to providing ZNE technical assistance. The statewide Savings By Design Program has been successfully providing energy efficiency technical assistance to state agencies for new buildings since program inception. Other statewide IOU programs including the Partnerships program and various retrofit programs have been successfully providing energy efficiency, demand response, and self-generation technical assistance to state agencies for existing buildings for several years. More recently, the IOUs have been providing DGS and state agencies with ZNE technical support by contracting with NBI (New Buildings Institute) for developing design process briefs, virtual audit tool, checklists for design, construction, operations; case study based technical training, ZNE verification, etc. IOU staff also has expertise and available resources to support customers in achieving ZNE and intends to provide ZNE services to state agencies. However, there is a significant barrier to offering these services under current CPUC policies that generally keep the funding of these programs limited to either EE, DR, or self-generation separate which makes offering an integrated and cohesive ZNE service offering extremely difficult. The IOUs welcome a discussion with the CPUC and DGS and how ZNE technical assistance can be more easily offered and funded. In addition, IOUs also recommend a modification to also address D.16-08-019 that transitions EE program design and delivery to 3Ps. The IOUs recommend adding the following language: “IOUs should encourage 3P program implementers to design and implement programs that provide ZNE technical assistance to state departments. The IOUs should be encouraged to fund such 3P programs.”