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

> ### RTR for the Emerging Technologies Program Handoff Process Evaluation (Opinion Dynamics, Calmac ID #CPU0201.01, ED WO #17PS5017)

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 CPUC Decision (D.) 07-09-043[1] and the Energy Division-Investor Owned Utility Energy Efficiency Evaluation, Measurement and Verification (EM&V) Plan[2] 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 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.

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[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

Study Title:　　Emerging Technologies Program Handoff Process Evaluation
Program:　　ETP
Author:　　Opinion Dynamics
Calmac ID:　　CPU0201.01
ED WO:　　17PS5017
Link to Report:　　http://calmac.org/publications/CPUC_ETP-3_Handoff_Study_Report_FINAL_10-29-20.pdf

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				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	3.2.1	Leverage TFPs and MT to enable more flexibility in incentive program deployment to promote innovative ETs. The existing processes and requirements for incentive programs hinder IOUs' flexibility in deploying innovative technologies with higher risk profiles. CPUC staff indicated that TFPs and the new MT framework are intended to address this challenge. ETP and MT administrators should ensure that TFPs and MT initiatives, both of which will be developed by third-party implementers, are designed to support more flexible and innovative incentive program deployment strategies, for example, by being tailored to specific technologies' strengths and weaknesses and reflecting market conditions. The outcomes of these activities should provide clear market strategies for ETs that will be deployed in incentive programs and enable program adjustments in response to market feedback and customer needs, which will support programs in managing the risks associated with uncertainty when deploying new technologies.		ETP and MT administrators	Other	ETFPs can accommodate innovative incentive structures. Future ETP Implementers will need to note that the more closely the pilot testing conditions reflect current regulatory guidance about cost effectiveness, the more future program managers would be willing and able to use any findings. Program Managers ultimately decide if innovative ETs should be adopted within their program offerings. The future ETP implementers should consider this recommendation in their proposed program design. The Statewide IOU Lead Administrators will perform implementer oversight to ensure that the ETP implementers will clearly define how they will coordinate with MT administrators/implementers if appropriate, and to consider all these factors in their design of the ETFP.
2a	3.2.1	Ensure close coordination internally and with the CPUC. IOU staff, particularly ETP administrators, must ensure close coordination between ETP implementers, engineering staff, C&S, incentive program implementers, and the CPUC ex ante team, especially during and after the transition to third-party implementation. IOUs should share lessons learned and historical challenges with third-	As observed by those working in external ET programs, the handoff between ETP and incentive programs is most effective when it functions more like a gradual transition. Internal coordination across various actors in the measure development process seems to be most effective when there is a designated group overseeing the entire process and identifying opportunities for improvement, as well as when ETP, C&S, and program staff are on the same team. ETP administrators should ensure that incentive program implementers and ETP implementers coordinate on data needs prior to conducting ETP evaluations, for example by peer-reviewing M&V plans before field tests to ensure that the data collected during the test is valuable to stakeholders downstream in the measure development process.	ETP administrators	Other	This is already being done within some IOUs under local implementation and will be required from the future electric ETP implementers as ETP transitions to statewide administration. Statewide IOU Lead Administrators will perform implementer oversight to ensure ETP implementers coordinate on data needs with CPUC ED deemed and custom measure staff prior to conducting ETP evaluations. ETP cannot influence nor discuss incentive program designs with 3P incentive program implementers or designers; all 3P proposals for incentive program designs must use CPUC-approved savings estimates. It should be noted that data needs likely will vary from one project to another, and the coordination process may need to be determined on a case by case basis and individual program needs.

Any recommendation pertaining to SoCalGas's participation in C&S Advocacy is prohibited by D.18-05-041, OP 53. "Southern California Gas Company is prohibited from participating in statewide codes and standards advocacy activities, other than to transfer ratepayer funds to the statewide lead for codes and standards, during this business plan period." |

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2b	3.2.1	party implementers.	ETP administrators and CPUC ex ante staff should coordinate closely to clarify and align documentation requirements and expectations on the level of data rigor, especially given that ETP projects produce site-specific data. This discussion should also clarify the role of ETP in informing workpaper development, particularly since there are data rigor requirements during workpaper development stages that ETP is not currently well-suited to meet. This coordination will improve alignment between data development capabilities and CPUC's measure approval criteria, which will reduce the number of iterations during the approval process and mitigate delays in this stage.	ETP administrators and CPUC ex ante staff	Other	This is currently being done at various capacities within each IOU under the local ETP administration and their respective workpaper development processes. The locally-administered ETPs already coordinate with their respective internal workpaper and customized project development team, whose primary function is to liaise with the CPUC ex-ante staff. The IOUs have designated lead workpaper roles across the IOUs as they relate to their Statewide Program administration functions. Until the CPUC ex-ante staff directs otherwise, ETP will respect those pre-existing arrangements and relationships. ETP implementers will have access to any workpaper data requirements that the CPUC releases. The future ETP implementers will design projects and investigate whether workpaper development is warranted as is the current ETP practice. The Statewide IOU Lead Administrators will perform Implementer oversight to ensure ETP implementer's ETP evaluations align with documentation requirements and level of data rigor needed for measure development when appropriate, working within the established IOU and CalTF measure development processes.
2c	3.4		ETP administrators should ensure that all key actors involved in the handoff process, such as such as ETP implementers, incentive program implementers, engineering staff, and C&S staff, have a clear understanding of the metrics being tracked. For example, this could be achieved by involving these actors in discussions regarding metrics reporting and clearly communicating the list of tracked metrics to these actors.	ETP administrators	Other	All locally-implemented ETP administrators providing metrics data currently have a clear understanding of the metrics that have been reported since the 2018 ABALs. These metrics have and will continue to be clearly communicated in regulatory reporting and coordination with engineering staff and C&S. Once Energy Division determines the methodology of the other Tracking/Indicator metrics on outcomes beyond ETP's control, ETP administrators will communicate those metrics and methodologies to all stakeholders involved in providing data for those metrics.
2d	3.2.2		ETP and C&S implementers and administrators (SCG and SCE for ETP; PG&E for C&S) should identify potential synergies in priorities, data requirements, and timelines between C&S and ETP by mapping C&S measures with the technologies being considered by ETP. This will enable C&S to leverage results from ETP studies, as well as provide an avenue for C&S to recommend technologies that are not yet code-ready for ETP consideration.	ETP and C&S implementers and administrators	Accepted	ETP and C&S have already developed a Statewide coordination plan and schedule and are coordinated. The current TPMs contain a column indicating the degree to which a technology family is a priority for C&S; this priority was developed around C&S's stated needs. ETP and C&S both acknowledge that ETP and C&S have different data requirements that may not be compatible with every ETP project, and will continue to seek out opportunities to coordinate. As ETP transitions to Statewide administration with a third party implementer, Statewide IOU Lead Administrators will perform Implementer oversight to ensure the implementer's TPM or alternative solution includes activities to coordinate with C&S implementers/administrators on priorities and data requirements.
3a	3.1.2, 3.3.2	Provide additional transparency to technology developers and technology development actors. External actors seek additional transparency into the ETP priorities, the technology intake process,	To support intake, ETP administrators should provide clear technology eligibility requirements (e.g., including the expected level of technological and commercial maturity) and an expected timeline for follow-up. Consider centralizing online applications used for intake and implementing an automated pre-screening process.	ETP administrators	Accepted	The evaluation does not seem to have fully captured the details of the intake process nor the ETP criteria. Ideas traditionally have been submitted through a central ETCC intake website as well as each IOU's intake portals (which were not solely for submitting ETP ideas). , The intake channel for the new SW ETP is being transitioned from the central ETCC website to the new central CA-ETP.com website. The old ETCC website intake portal required submitters to self-report the level of technological maturity, and the website provided immediate and automated feedback if the idea was "proof

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		and the measure development process. ETP administrators might consider several activities to address this gap:				of concept" or "early prototype", which seems to have met the recommendation.
						Although the ETP intake criteria are no longer available on the ETCC website during the transition to the SW ETP, the intake criteria are quite comprehensive and align with multiple utility technology needs, including market transformation. In fact, the ETP technology intake criteria have been adopted by the Commission in D.19-12-021 as part of the Adopted Market Transformation Framework, and can be found in D.19-12-021 Appendix B: Draft Intake Application Form.
						The new intake portal will continue to clarify technology requirements ("production-ready" and "commercially-available") and expected response timelines. Submitters will be asked to consider the TPM priorities, and told that the TPM is high level guidance and not used to conclusively screen out technologies. The new response timelines will be determined after the ETP implementer(s) have been selected, based on need and cost considerations.
3b	3.3.2		As technologies move through the process, ETP administrators should ensure that technology developers are aware of which step of the technology intake and measure development processes their technology is in.	ETP administrators	Other	ETP agrees that it is desirable for idea submitters (who are often not the technology developers) to be aware of the status of their submission, but reminds the evaluators that all submissions to the SW ETP become the property of IOUs, and a submission does not obligate any actions by the IOUs, per the disclaimer on all submission portals. If an idea or technology is accepted for further study, the SW IOU Leads plan to make the status available on the CA-ETP.com website, without revealing the technology manufacturer name(s). If the IOU measure development team decides to develop the technology as a new measure, these internal IOU teams then provide deemed measure development status online (see http://www.caltf.org/statewide-measure-list), per the CPUC-approved processes and timing. Custom measures are determined at the local IOU level; they contain customer data and are subject to privacy regulations. ETP implementers will not have additional visibility into a customer's custom project development.
						ETP can provide to idea submitters the link to the public website where they can determine an ETP project's status including, when shared by the adopting organization, whether a "handoff" has occurred. ETP can also direct idea submitters to the appropriate measure development website for the development status.
						As ETP transitions to Statewide administration with a third party implementer, the Statewide IOU Lead Administrators will perform Implementer oversight to ensure the implementer's ETP evaluations allow visibility to stakeholders who are the intended recipients of ETP findings at important milestones.
3c	3.1.1, 3.3.2		ETP administrators should provide stakeholders with greater visibility into the needs and priorities regarding	ETP administrators	Accepted	TPMs were made available as part of the solicitation process and will be integrated into the central intake system. Electric TPMs can be found here: https://ca-etp.com/TPM. Gas TPMs are under review for update and will be

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		new technologies, technologies that ETP is currently considering, and technologies ETP is actively assessing. For example, ETP administrators should consider making TPMs publicly available to communicate their technology priorities. This would improve the relevancy of ET applications to ETP and minimize duplicative efforts externally.			posted as part of the transition to statewide Gas Emerging Technologies program. Statewide IOU Lead Administrators will perform Implementer oversight to ensure that ETP implementers will make any future prioritization framework available as well.
3d	3.1.2, 3.3.2	To increase the quality of future applications, ETP administrators and implementers should provide feedback to applicants either through automated feedback during the pre-screening process or via debrief meetings.	ETP administrators and implementers	Other	Please see response to Item #3b.
3e	3.3.2	IOUs and CPUC staff, especially those involved in ETCC, should identify potential synergies in data requirements between external research activities (e.g., the EPIC program) and data needs within the IOUs' measure development process to minimize duplicative research by ETP, optimize the use of resources and accelerate the handoff timeline.	All IOUs and CPUC staff	Other	This recommendation is directed to the IOUs; ETP has already been minimizing duplication through regular coordination meetings held by the Emerging Technologies Coordination Council, which was developed specifically for this purpose. ETP will pass this recommendation on to the IOU measure development teams. To the extent that ETP is a party to an external research activity, ETP can direct researchers to the appropriate organization that determines their data requirements. See response to item 3b. To the extent that ETP conducts general outreach activities, the Statewide IOU Lead Administrators will perform implementer oversight to ensure that ETP can facilitate opportunities with the IOU measure development team to provide additional information.
4	3.4	Ensure that metrics track the effectiveness of the handoff process. ETP administrators should ensure that the new ETP metrics are formally tracked once the ED finalizes the calculation methodology, as well as consider additional metrics specific to the handoff process to include as goal or tracking metrics. A list of metrics that can be used as a starting point for this development can be found in Section 3.4. The Emerging Technology to Portfolio Evaluation Study (ETP-2) will identify possible gaps in ETP tracking and additional metrics that could inform future related efforts. Adopting handoff-specific metrics will support PAs in tracking improvements in the recommended areas and identify issues early on.	ETP administrators	Accepted	ETP will consider recommendations from the ETP-2 study.