

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 2013-2014 Energy Efficiency Program Cycle. This Appendix contains the Responses to Recommendations in the report:

RTR for the Municipal Utility Joint Program Study (Nexant, ED WO #2113, Calmac ID #SCG0216.01)

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.

EM&V Impact, Process, Market Assessment Study Recommendations

Study Title: Municipal Utility Joint Program Study

Program: Residential

Author: Nexant

Calmac ID: SCG0216.01

ED WO: 2113

Link to Report: http://calmac.org/publications/Municipal_Utility_Joint_Program_Study_FINAL_7.22.16_v1.pdf

Item #	Page #	Findings	Best Practice / Recommendations	Recommendation Recipient	Utility/Agency Perspective	Program Actions
1	46	As opposed to engaging individually with each municipal utility on a joint program offering, SoCal Gas may be able to streamline partnership negotiation and achieve greater participation and savings of joint-fuel opportunities by engaging with SCPPA directly to develop an arrangement that municipal utilities can opt into.	Nexant recommends SoCal Gas investigate engaging with SCPPA directly to establish partnerships with municipal utilities. This approach was noted by all interviewed municipal utility program managers as the preferred method for future joint program partnerships.	SoCalGas	SoCalGas agrees that working with SCPPA could possibly facilitate cost-effective and efficient program partnerships with municipalities, especially smaller ones, instead of engaging these smaller municipalities on a one-on-one basis.	SoCalGas is currently in discussion with SCPPA to create a master partnership that will allow SoCalGas to partner with one or more SCPPA members at the same time in the delivery of customer programs.
2	46	Regardless of the type of agreement made, the municipal utilities would benefit from knowing specific details about the process SoCal Gas's partnership agreement.	Nexant recommends SoCal Gas develop a flow chart: <ul style="list-style-type: none"> • That designates each key step in the process, along with key contacts for each step; • that is disseminated to program managers once negotiations begin; and, • provide updated versions to appropriate municipal utility contacts as roles within SoCal Gas shift. 	SoCalGas	SoCalGas acknowledges that there may be benefits to developing a flowchart for the purposes of program partnerships, but such benefits may vary from program and program, and the discretion to create such documents should be left to the Program Managers managing the partnership programs. In some cases, the program process is very simple and straightforward, such that having fully-documented process will not provide any added value, but may create additional burden and distraction from day-to-day program management.	SoCalGas has created many tools that assist program managers and staff in their day-to-day program operations with their municipality counterpart, such as a Partnering Program Handbook that provides detailed process of creating a joint partnership and managing day-to-day partnering activities, Partnership Dashboards that track many aspects of partnership program operations, such as program contacts, performance and results of existing and partnering opportunities on a monthly basis, and centralized billing process that allows for accurate an on-time billing process with the municipal utility partner. SoCalGas will encourage its Program Managers to create a detailed flow chart as outlined in the recommendation, especially if it is deemed helpful in managing their municipal utility relationship(s).

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3	46	Current municipal utility/SoCal Gas joint-fuel saving collaborations are on comprehensive programs. However, additional collaborations may be available in other existing or future municipal utility programs in which SoCal Gas could engage at a measure-level, rather than at a program-level, to support specific dual fuel measures that would, in turn, bolster participation within SoCal Gas's own programs.	Nexant recommends SoCal Gas investigate methods to also partner with municipal utilities at a measure-level and seek opportunities to sponsor sole dual fuel measures within a larger program offered by municipal utilities that would in turn support SoCal Gas's energy efficiency programs.	SoCalGas	SoCalGas consistently explores all available and feasible opportunities with its municipal partners. To be compliant with the CPUC's directive to adopt more of a whole-building approach to energy efficiency, and to encourage property owners to implement every measure that is cost effective, SoCalGas usually leads the municipality engagement with a more comprehensive approach to energy efficiency, and tries to incorporate as many measures and program features as possible. Having multiple measure/comprehensive approach allows SoCalGas to maximize cost effectiveness, as each partnership program requires resources to plan, launch and operate. However, SoCalGas also acknowledges that such a comprehensive approach is not always feasible and therefore will continue exploring partnering opportunities at the measure level where necessary, as long as such partnership is advantageous for both utilities.	SoCalGas will continue exploring opportunities at the whole-building / comprehensive level where feasible and move down to measure-level engagements if necessary as long as such partnership opportunities make economic sense for both utilities.