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* Custom Industrial, Agricultural, and Commercial (CIAC) 2022 Impact Evaluation** (DNV, Calmac ID #CPU0373.01)

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.) 07-09-043[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 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.

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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
SCG Responses

Study Title: Custom Industrial, Agricultural, and Commercial (CIAC) 2022 Impact Evaluation
Program: Custom
Author: DNV
CALMAC ID: CPU0373.01
ED WO: Group D
Link to Report: CPUC Energy Evaluation Public Comment (energydataweb.com)

MANAGEMENT APPROVAL AFTER REVIEW		
	Name	Date
SCG Programs	Darren Hanway	11/24/2024
SCG RP&R	Roy Christian	11/27/2024

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				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.	Next Steps: For each accepted recommendation, outline the steps required for implementation, responsible parties, and deadlines. For each rejected recommendation, document the reason provided for rejection. Outline any potential follow-up actions or considerations for the future.	Timeline: Set deadlines for the completion of each action. Include a start date and end date when possible.	Status: Track the status of each action item (e.g., Not Started, In Progress, Completed).	Notes: Add notes for any additional information or updates.	Impacted Programs: Identify which programs (program IDs) would be impacted by the action items.
1		**PY2022 custom program customers were unaware of evaluation participation requirements.** Evaluators encountered a resistance to customer participation in the evaluation effort: Some customers asked for evidence that they had signed documentation that included a requirement to cooperate with evaluators under the terms and conditions for program participation; others agreed to participate only after their account representative intervened; yet others contacted the implementation contractor, and subsequently refused outright after hearing from the contractor that this was not a requirement. Evaluators also found a number of customers unaware that the cost reduction for their project was due to their participation in an energy efficiency program.	**PAs should ensure implementation contractors, especially those who work for direct installation programs, are making participating customers aware of their program participation and their obligation to participate in evaluations as needed.** Contractors should understand that they must (1) inform the customers that their project receives a public funds rebate, (2) are fully aware that customers might be required to take part in evaluation efforts, and reinforce this with customers if/when they reach out to them to confirm program requirements, and (3) obtain customer signature on Terms and Conditions documents, and submit these as part of the documentation package for each project.	Accepted	SoCalGas accepts this recommendation.	SoCalGas will share this feedback internally with Account Executives for the remaining projects that will close in the Core Custom Program (EECIP/SCG3910) and with Third Party Implementers for the active EE programs offering custom.	This effort is ongoing. SoCalGas will address this recommendation for all projects as they are closing out and this will be an ongoing effort.	Not Started	N/A	Active Non-Res EE Programs that offer Custom: SCG3910 (Core Program, not active for new applications but several projects in Reserve status) 3rd Party: SCG3890 SCG3892 SCG3899 SCG3942 SCG3943 SCG3944
2		**Some PAs did not submit custom project applications on a bi-monthly basis for CPR**	**PAs must submit signed agreements to the bi-monthly CPR list on**	Accepted	SoCalGas accepts this recommendation and submits projects that are ready for review	SoCalGas will share this feedback with Third	The implementation of this	In Progress	N/A	SCG3890 SCG3892

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		selection and review in accordance with SB1131 or did not submit project applications in a timely manner. The evaluation found multiple occurrences where projects were not submitted to CMPA or were submitted late. Future program requirements may deem projects not submitted in accordance with SB1131 as ineligible if selected for evaluation.	**the first and third Monday of each month.** Once submitted, the CPR team may select projects from the weekly list for Custom Project Review. If selected, the project moves through the CPR process in accordance with SB1131. If not selected, the project is waived and can commence implementation.		on the bi-monthly CPR list. SoCalGas makes sure to adhere to the submission guidelines for bi-monthly CPR.	Party Implementers. SoCalGas will work cross-functionally with internal company staff to ensure alignment, review current internal/external process guidance, and make updates as needed.	recommendation will be ongoing as custom projects are ready for CMPA bi-monthly submission for CPR.	Ongoing submissions. All custom projects have been submitted in a timely manner per the guidance year to date.		SCG3899 SCG3942 SCG3943 SCG3944
3		**This evaluation encountered discrepancies between the tracking data and the reported savings in the PA documentation.** In five cases, tracking data discrepancies were observed resulting in difficulty tracing savings from the project documentation through to the tracking system.	**The PAs should thoroughly document project files and associated calculations that align with the tracking data before sending files to the evaluators.** If there are notable discrepancies, the PAs should point them out in the files and provide explanation for the discrepancies.	Other	The projects in question were not SoCalGas projects.	N/A	N/A	N/A	N/A	N/A
4		**This study encountered instances of incorrectly applied MATs, such as RCx projects, which were documented as NR.** These projects did use the correct EULs but did not have proper MATs applied, which should be flagged during project file review or engineering quality control. These are a subset of 20 occurrences of inappropriate baseline applications observed in this study. Inappropriate baselines resulted in a reduction of 22% of first-year electric savings and 15% of first-year gas savings.	**PAs should apply appropriate MATs to each claim.** MATs are defined in the Statewide Custom Project Guidance Document version 1.4[42] and should be used when determining the appropriate MAT.	Accepted	SoCalGas accepts this recommendation and agrees that PAs should utilize the Statewide Custom Project Guidance Document to ensure that MATs are appropriately applied to each claim.	Currently, SoCalGas interprets MATs via Custom Guidance Documents. As needed, a Bi-weekly CPUC / SoCalGas call is utilized to address grey areas of MATs.	Currently in effect.	Ongoing	N/A	SCG3910 SCG3890 SCG3892 SCG3899 SCG3942 SCG3943 SCG3944
5		**Accelerated replacement baselines were overturned to normal replacement for a high fraction of the lighting-only projects sampled for evaluation. Specifically, PAs claimed 39 projects accelerated replacement.** Based on the customer responses, the baseline was determined to be normal replacement for 15 of these (38%) projects.	**PAs should complete the accelerated replacement questionnaire for all accelerated replacement projects to ensure supporting evidence is documented as defined in Resolution E:5115[43].** This can be accomplished by probing participants to verify baselines qualify as accelerated replacement before claiming savings. Projects where equipment is not providing the intended service, or where the customer was already planning a lighting project in the very near future, should not be claimed as "Accelerated Replacement."	Accepted	SoCalGas accepts this recommendation.	Currently, SoCalGas interprets MATs via Custom Guidance Documents. As needed, a Bi-weekly CPUC / SoCalGas call is utilized to address grey areas of MATs.	Currently in effect.	Ongoing	N/A	SCG3910 SCG3890 SCG3892 SCG3899 SCG3942 SCG3943 SCG3944
6		**This study encountered hardcoded or locked forecasted analysis spreadsheets.** For several projects, PAs only provided hardcoded savings analysis in PDF or Excel format or provided password protected files where it was unclear to determine	**PAs should provide native unlocked analysis files which clearly document calculations, inputs, and assumptions that match tracking reported savings as part of the evaluation data requests.** This will ensure the forecasted savings can	Accepted	SoCalGas accepts this recommendation and has provided all technical workbooks unlocked and accessible for CPUC evaluators to follow.	SoCalGas prioritizes transparency in unlocked modeling and custom calculation files submitted to CPUC for review. Any transparency hurdles in modeling files are addressed on the CPUC / SoCalGas bi-weekly call.	Currently in effect.	Ongoing	N/A	SCG3910 SCG3890 SCG3892 SCG3899 SCG3942 SCG3943 SCG3944

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		how savings were calculated and where inputs and assumptions were being derived. Without the native unlocked analysis spreadsheets, it was difficult to verify the forecasted savings estimate, and in some cases, forced the evaluator to create a custom savings model which may have not been necessary if the applicant-provided model was accessible and deemed viable for evaluation use.	be verified and replicated readily.							
7		**Accurate customer contact information was not always present in program files.** Many projects did not have accurate customer contact information, or it was missing entirely. Accurate customer contact information is crucial to gross and net recruitment. DNV recruiters often had to review project documentation to obtain new contact information. Support in recruiting efforts provided by the PAs proved to be very effective, instrumental in follow-up contact attempts, and often led to successful recruitment.	**PAs should update contact information for customers on a regular basis in support of evaluations and support evaluation recruitment efforts through proactive outreach to customers selected for evaluation.**	Accepted	SoCalGas updates contact information throughout the project and when closing out projects. During PY evaluations, the information is confirmed with the Account Managers. SoCalGas will continue to work with implementers for future projects on accuracy, specifically for project decision makers that may move on to new roles or other companies and their replacements. Challenges may arise if the original contact has moved on, and their replacement is not fully informed about the project. SoCalGas is committed to assisting in the evaluation process by ensuring the appropriate contact is identified and engaged during the evaluation period.	SoCalGas will share this feedback internally with Account Executives for the remaining projects that will close in the Core Custom Program (EECIP/SCG3910) and with Third Party Implementers for the active SoCalGas EE programs offering custom.	This effort will be ongoing. SoCalGas will address the request for all projects as they are closing out.	Not Started	N/A	Active Non-Res EE Programs that offer Custom: SCG3910 (Core Program, not active for new applications but several projects in Reserve status) 3rd Party: SCG3890 SCG3892 SCG3899 SCG3942 SCG3943 SCG3944
8		**Impacts of on-site generation or non-IOU delivered fuels were not consistently documented.** Consistent with PY2020/2021 findings, in several projects with on-site generation of power, the PA did not consider the impacts of photo-voltaic (PV) on-site generation appropriately while estimating the savings. DNV found projects where non-IOU fuels were delivered, where the PA did not adjust reported savings to only claim savings for grid impacts.	**The PAs should consider the impact of the on-site generation and only claim savings for periods the customer is purchasing power from the PA.** As part of the evaluation data request, PAs should provide on-site generation data for a period of no less than one year pre- and post-installation (two years total).	n/a	This recommendation is not applicable to SoCalGas.	N/A	N/A	N/A	N/A	N/A
9		**Installed measures must exceed baseline energy performance.** Installed measures were not always above code baseline efficiency. Measures are required to be more energy efficient than the applicable code or standard practice baseline. Programs shall not include to-code measures that do not exceed code except for an NMEC or	**The PA should provide all necessary information to show that installed measures exceed baseline energy performance.** Any measure technology that matches a DEER definition for a code baseline is considered a to-code measure (i.e., has zero savings). PAs should also work	Other	While this recommendation was not applicable to SoCalGas for the PY2022 CIAC evaluation, SoCalGas agrees with the recommendation and will ensure that Third Party (3P) implemented programs are aware of CPUC requirements for future projects and 3P programs.	SoCalGas currently utilizes ongoing office hour discussions with Third Party Implementers to clarify and address CPUC requirements related but not limited to baseline selection, incremental cost, and eligibility requirements.	Currently in effect	Ongoing	N/A	3rd Party: SCG3890 SCG3892 SCG3899 SCG3942 SCG3943 SCG3944

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		HOPPs compliant framework.	with third party (3P) implementers to ensure that they are aware of CPUC requirements, including baseline selection, incremental cost, and eligibility requirements.			SoCalGas will share this feedback with Third Party Implementers.				
10		**The installed equipment must operate for at least five years.**[44] DNV found multiple projects that had EULs of less than five years. New equipment or system retrofits must provide energy savings for a minimum of five years. This equates to lifecycle savings of at least five years for all measures.	**PAs should ensure that installed equipment has lifecycle savings of at least five years.**	Other	EUL is based on measure MATs which is documented in the Statewide (SW) Custom Guidance Document v.1.4 section 2.2 4, page 11, table 3. Any new or retrofitted measure with a minimum 5-year EUL is reasonable as most NG measures are 15-20 years.	This item makes references to 2021 Investor-Owned Utility Customized Offering Procedures Manual for Business v1.0 1/1/2021. Page 10 in that document states that customized program offerings require 5-year measure minimum life cycle savings. However, it also states PA discretion is allowable. Lifecycle savings are based upon appropriate MAT requirements. SoCalGas refers to Statewide guidance document to reference the EUL compliance for specific MATs.			Based on the latest version 1.4 of SW guidance document last updated 6/3/2021 this minimum requirement was stricken out of the guidance.	3rd Party: SCG3890 SCG3892 SCG3899 SCG3942 SCG3943 SCG3944
11		**This study encountered incorrect or outdated baseline information.** Consistent with the PY2020/2021 evaluation, many sources used for baseline information were based on old and/or inaccurate information.	**PAs should ensure appropriate baselines and ISPs are being used at the time of project approval.** If available SP studies are used, the PAs should ensure the studies are less than five years old at the time of project application and approval. Per Energy Efficiency Industry Standard Practice (ISP) Guidance document version 3.1,[45] market studies should be less than five years old. If an SP is greater than five years old, the PA should reassess the SP for continued applicability or replace with an updated standard practice.	Other	SoCalGas currently follows the ISP Guidance document, however, the projects in question were not SoCalGas projects.	Natural Gas technologies have a slower market transformation rate, greater than five years. SoCalGas has the desire to discuss further with CPUC regarding the possible extension of ISP life for NG only measures. This discussion is to be held in near-term Bi-Weekly CPUC/SoCalGas call.	In Q4 2024 discuss at Bi-Weekly CPUC/SCG call.	In progress	Future policy discussion with CPUC.	3rd Party: SCG3890 SCG3892 SCG3899 SCG3942 SCG3943 SCG3944
12		**Project extensions are not always documented as required in the customer agreement.** Projects were found to have been installed past the approved installation date without contract extensions and/or lacked continuing measurement requirements in the customer agreement.	**PAs should ensure that projects are installed before the approved installation date and savings are claimed within the approved installation year.** If projects cannot be installed before the approved installation date, provide written extensions on an annual basis before the expiration of the agreement. At this time, the PAs should also ensure that equipment has not been ordered by seeking evidence such as the copy of dated purchase order or require invoices that show the date of purchase order. PAs should formalize the customer agreement extension process to ensure that proper procedures are followed when extensions are granted.	Other	This finding is based on the CPUC's interpretation of D.05-04-051. However, custom programs have evolved significantly since 2004 and 2005. Today, these programs conduct more extensive M&V to verify *ex ante* savings calculations, particularly for larger projects. As a result, projects take longer to close out, increasing the likelihood they will not fit neatly into a single calendar year. Additionally, post-installation M&V savings are now more likely to be updated from pre-installation estimates. If it was ever practical to claim savings in the year of equipment installation, it is even less practical now. SoCalGas also believes that this concept applies to Deemed, SEM, NMEC and all other delivery types with the goal of simplifying the claims process and avoiding reporting inconsistencies. SoCal-	SoCalGas will be requesting a more formal discussion on this topic.	TBD	Not Started	N/A	Active Non-Res EE Programs that offer Custom: SCG3910 (Core Program, not active for new applications but several projects in Reserve status) 3rd Party: SCG3890 SCG3892 SCG3899

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					Gas will be requesting a more formal discussion on this topic.					SCG3942 SCG3943 SCG3944
13		**The evaluation found installed RCx equipment to be operating at pre-existing conditions.** There were instances of projects where RCx equipment was found to be operating at pre-installation conditions. Many of these projects reverted during the periods of COVID-19 operation for reasons such as increased air ventilation requirements, building schedules, minimum outdoor air requirements, etc., but were never re-programmed to settings as implemented to save energy, resulting in heavy reductions in evaluated savings or even zero savings in some cases.	**PAs should ensure proper education on equipment and controls is provided to the customer, especially for BRO-RCx based measures.** This will maximize savings and reduce the chance of equipment and control sequences being changed drastically or reverted to pre-installation conditions.	Other	Typically, BRO-RCx measures are evaluated thoroughly through field investigations and verification that the measures are classified according to MAT guidance within SoCalGas's process. While this recommendation seems electric related, SoCalGas would need to know specifics to determine if the recommendation has NG impacts at all.	Post-installation field investigations ensure strong project closures and bolster customer confidence in the operation of installed equipment, maintaining measure persistency.	Currently in effect.	Ongoing	N/A	
14		**Short-term or limited data was used to inform annual savings.** Consistent with the PY2020/2021 evaluation, there were several instances where PAs used short-term metered data (1 week), or spot measurements from limited parameters to extrapolate savings. This methodology is not necessarily accurate in determining savings as limited data does not inform on potential changes in load over longer durations and seasons.	**PAs should consider conducting a longer-term pre- and post- installation M&V that represents a typical operation to develop more accurate savings estimates.** The PAs should also normalize for production fluctuations (and other variables like weather where applicable) between pre- and post-installation periods. Consideration should be given to the level of customer incentive and specific project circumstances.	Other	According to the International Performance Measurement and Verification Protocol (IPMVP), the Measurement and Verification (M&V) reporting period for industrial accounts is determined by one full production period that encompasses all changes. For commercial buildings, where gas savings are influenced by ambient temperature, a longer M&V period is recommended. However, SoCalGas has historically set a high standard for the M&V period duration, requiring it to be three months but acknowledging that is subject to change.	SoCalGas currently implements a three-month minimum duration for M&V collection periods.	Currently in effect.	Ongoing	N/A	
15		**Modeling errors in reported savings estimations:** For three SBD projects that were sampled, we found modeling errors in the PA savings calculation files which had a considerable impact on their realization rates. These inaccuracies led to considerable deviations in predicted energy consumption for heating and cooling components, diverging from expected levels based on installed equipment quantities, capacities, or efficiencies.	**We recommend that the PAs improve training and quality control** by implementing a rigorous simulation model validation and vetting process before approving savings through the SBD program.	Other	SoCalGas does not do any simulation models in the analysis of custom projects. All calculations are transparent and visible for the evaluators to see. Additionally, as the SBD Program is closed, training on SBD modeling is not applicable. The program is in the ramp down phase with all eligible projects having approved savings. SoCalGas believes that training and quality control for future programs is in the best interest for the success of EE Programs.					
16		**Absence of permit drawings and permit dates in PA documentation:** Consistent with the PY2020/2021 evaluation, for some sampled SBD projects, there was no documentation provided by the PAs on AHJ providing building permits, application and approval dates of the building permit, and permit drawings associated with mechanical, architectural, and lighting plans. Evaluators had to spend additional resources	**When as-built specifications are not available, we recommend that the PAs include permit drawings that clearly indicate the date the permit was applied and the AHJ approving the permit within project documentation to the evaluation team.**	Other	This recommendation is not applicable as SoCalGas does not have any SBD programs.	N/A	N/A	N/A	N/A	N/A

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		trying to identify the AHJ and associated permit dates to ascertain the Title 24 code that would apply to the evaluated project.								
17		**The number of custom projects decreased substantially from those observed in the 2020/2021 program years.** The PY2022 CIAC program had fewer than 300 projects, compared to more than 2,000 for the PY2020-2021 CIAC program.	**Explore reasons for the drop-in custom project activity from the previous evaluation period.** Understanding the cause of the drop-in activity may provide insights into program changes that might make the custom offering more appealing, customer needs that are not being met with the current program design, or marketplace changes that are making the program less valuable in helping customers pursue energy efficiency. The CPUC staff s planning on examining this decline in project activity as part of the evaluation of the CPR process.	Other	SoCalGas welcomes the findings and insights from CPUC's examination. The transition to third-party (3P) programs has affected custom project development and, consequently, the overall activity in the number of customer projects as the new 3P programs launch. This shift has also impacted customer outreach and the identification of custom projects. It takes time for the implementers to launch and develop programs that would increase participation within a custom framework.	N/A - The responsible party is the CPUC.	N/A	N/A - Not Started	N/A	
18		**Survey evidence indicates there is room for further improvement in NTG ratios.**	**Better identification of projects for which incentives serve as the "tipping point" should improve NTGRs in the future.** While this same recommendation appeared in the PY2020-2021 CIAC evaluation, the evidence from the PY2022 evaluation makes it more compelling. In the PY2020-2021 evaluation, 81% of the participants with top quartile NTGRs rated payback/ROI considerations important while only 56% of those in the bottom NTGR quartile did. In the PY2022 evaluation, 82% of the participants with top quartile NTGRs rated payback/ROI considerations important, while only 13% of those in the bottom NTGR quartile did. Further evidence that the PY2022 lower NTGR projects did not value the program incentives appears in the data concerning the timing of project decision-making discussed below. Because ROI/payback considerations were so unimportant for these bottom quartile projects, there was no need to seek for or wait for incentives before the projects were "greenlighted."	Other	The decision-making process is non-linear and does not restart with each individual project. Typically, a designated point of contact oversees a portfolio of projects. The influence of incentives and program knowledge is to determine the best course of action for moving forward with projects. As customers become more comfortable with the process, they collaborate with program staff to establish an optimal pace for their portfolio. This involves ongoing internal discussions on effectively influencing customers through program offerings, as well as continuous conversations with customers regarding energy efficiency program eligibility and the specific requirements set by the CPUC.	SoCalGas will share this feedback with Third Party Implementers.	Share Final RTR once it is publicly posted with implementers.	Not Started	None	3rd Party: SCG3890 SCG3892 SCG3899 SCG3942 SCG3943 SCG3944
19		**Survey evidence indicates there is room for further improvement in NTG ratios.**	**The PAs should engage with customers early in the decision-making process and improve project screening practices to ensure that the decisions to go forward with**	Other	This evaluation only included two SoCalGas projects. SoCalGas Net to Gross Ratios (NTGR) for first year savings was the highest among all PAs. Since the evaluation team only sampled two projects from	Share this feedback with Third Party Implementers.	Share Final RTR once it is publicly posted with implementers.	Not Started	None	3rd Party: SCG3890 SCG3892 SCG3899 SCG3942

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			the project were not already made. This recommendation also appeared in the PY2020-2021 CIAC evaluation but remains valid based on more recent survey evidence. Eighty-eight percent of the PY2022 bottom quartile participants reported making the decision to install the EE measures *before* they began discussing incentives with the PA programs. This was up from 32% for the bottom quartile participants in PY2020-2021. In contrast, only 12% of the PY2022 participants who were in the top NTGR quartile reported making such a project decision before discussing the incentives.		SoCalGas, the percentages in the recommendation section does not apply to SoCalGas. If the evaluators believe that this recommendation specifically applies to SoCalGas, it must be specifically addressed to SoCalGas.					SCG3943 SCG3944
20		**The change in the NTG method to remove corporate sustainability policies from the scoring of the non-program impacts had only very small impacts on NTGRs.** Only two of the 68 sites (3%) had their NTGRs altered due to this scoring change, and the program-wide NTGRs were unaltered. As discussed, the main reason for this small impact is the PAI-1 calculation method. Because the PAI-1 factor uses the maximum value of many non-program factor scores, the removal of the corporate sustainability policy as a non-program factor only impacts a site's NTGR if its value is greater than all the other non-program factors – a rare occurrence.	N/A	n/a	As there is no recommendation included with this finding, SoCalGas asks for clarification on what is being requested.	N/A	N/A	N/A	N/A	N/A