

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 Local Third-Party Programs Evaluation, PY 2022 Impact Evaluation
(DNV, Calmac ID #CPU0369.01)

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.) 07-09-043¹ and the Energy Division-Investor Owned Utility Energy Efficiency Evaluation, Measurement and Verification (EM&V) Plan² 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.

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: Local Third-Party Programs Evaluation, Program Year 2022
Program: CLEO, SCG 3861, SMCP, SCG 3882, ACE, SCG 3883, CMHP SCG 3884
Author: DNV
CALMAC ID: CPU0369.01
ED WO: EM&V GROUP A
Link to Report: [CPUC Energy Evaluation Public Comment \(energydataweb.com\)](https://energydataweb.com)

MANAGEMENT APPROVAL AFTER REVIEW		
	Name	Date
SCG Programs	Darren Hanway	12/19/2024
SCG RP&R	Roy Christian	1/8/2025

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Disposition	Disposition Notes	SCG Proposed RTR Implementation				
						Next Steps:	Timeline:	Status:	Notes:	Impacted Programs:
				Choose: Accepted, Rejected, or Other	Examples: Describe specific program change, give reason for rejection, or indicate that it's under further review.	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.	Set deadlines for the completion of each action. Include a start date and end date when possible.	Track the status of each action item (e.g., Not Started, In Progress, Completed).	Add notes for any additional information or updates.	Identify which programs (program IDs) would be impacted by the action items.
1	68	Program attribution is high or on par with claimed values, indicating the programs are reaching the intended population segments. Program delivery performance also improved or remained stable. Programs that had difficulties meeting energy savings and spending goals and were cost effective in PY2021 performed better in PY2022. Programs that performed well in all three areas continued to do so in PY2022.	Other programs should consider emulating the strategies these programs have taken to achieve success, including offering measures that better align with customer preferences, such as electrification and deeper gas usage saving measures, and employing more effective outreach strategies, such as direct multi-language outreach and community engagement (e.g., events).	Accepted	SoCalGas will continue to pursue these strategies.	Starting in 2024, SoCalGas has collaborated with Program Implementers to introduce new measures and enhance the installation of deeper, more persistent energy-saving solutions. Program Implementers, who are well-acquainted with assigned customer segments, target participation through various channels. These channels include coordination with other energy and water programs, as well as community booths, schools, and other emerging opportunities.	These strategies will be reviewed again in 2025. Upon consultation with Implementers the process may be updated.	These actions are ongoing.	The programs are expected to achieve their agreed upon goals for budget, deeper energy installs and target market segment.	SCG 3861, SCG 3883, SCG 3884
2	68	Multifamily programs run by implementers of local 3PPs face systemic challenges that have resulted in the closure of two of these programs. Challenges included the inability to make inroads in the multifamily sector, possible competition from other PAs, inadequate funds for direct install activities, and limited measure options that programs can offer participants	PAs could consider offering multifamily programs as equity rather than resource acquisition programs. Such an approach would allow them to provide higher incentives to property owners that reduce split incentive barriers and offer more measures attractive to multifamily participants. They could also consider requiring core measures for tenant units to improve renter equity.	Rejected	This recommendation is not directed at SoCalGas.					
3	68	There is inadequate data (KPIs) to track the impact of local 3PP innovations.	Given the heightened focus on innovation, PAs should develop and require standardized metrics to record and track the success of local	Rejected	Program innovation is evaluated as part of the third-party program solicitation process during the RFA/RFP scoring of bids.	SoCalGas has reviewed KPIs from program Implementation Plans (IPs) and has collaborated with the implementers to develop KPIs that more effectively track performance.	N/A	N/A		N/A

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			3PP innovations in all areas, including outreach and program delivery. For example, programs should track their outreach efforts: when, where, what, how, and who they reached.		Given that each program is unique in its design and goals, tracking program innovations through standardized KPIs on an ongoing basis may not fully capture the distinctiveness and specific objectives of each program.	KPIs are not goals, and it is important to ensure that they do not conflict with each other but allow for better program management through the program year.					
4	68	The program implementers did not track efforts to obtain input from HTR/DAC communities, making it impossible to evaluate their efforts at procedural equity.	Track efforts to obtain input from HTR/DAC communities and track HTR/DAC community input. It is essential to track when outreach includes two-way communication that allows communities to provide feedback.	Accepted	At the start of 2024, SoCalGas reconfigured its program software to better track DAC/HTR participation. Additionally, changes to program contracts now allow for more effective tracking and better understanding of this market segment.	Having a clear understanding of this customer segment has allowed SoCalGas to be able to modify agreements to direct the implementer to target this group more effectively.	1/1/24.	Implemented and ongoing			SCG3883
5	68	Outreach performance of local 3PPs to HTR customers and DACs remained consistent year over-year with improved reach of DAC customers in PY2022.	Existing and developing local 3PPs should take note of the marketing and outreach innovations that have continued to work for this pool of programs year-over-year: direct outreach and strategic partnerships.	Accepted	SoCalGas accepts this recommendation and will share the strategies and findings with its program implementers.	3PP implementers prioritize DAC/HTR customers while still serving all customers. They are tasked with identifying and enrolling the DAC/HTR customer segment. SoCalGas incentivizes implementers for enrolling these customers. Additionally, implementers have introduced measures, such as crossover duct replacement, which are particularly attractive to this segment.	1/1/24.	Implemented and ongoing			SCG 3861, SCG 3883, SCG 3884
6	69	The evaluated programs do not meet all the equity standards embedded in the CPUC ESJ goals and other equity frameworks because the programs were designed and contracted before any equity plans were in place	The next time PAs negotiate contracts with local 3PP implementers, they should include terms that cover a standardized equity framework.	Accepted	CPUC ESJ goals and frameworks are already integrated into SoCalGas program contracts.	In 2024, program SCG3883 was split into two programs with two budgets. This allowed SoCalGas to better track HTR/DAC customers as well as create separate goals for these customers. SoCalGas incentivizes the implementer for enrolling these customers for certain measures. Additionally, the implementers have added measures such as crossover duct replacement that is attractive to this segment.	This was implemented in 1/1/24 and will continue through 2027	Implemented and ongoing			SCG3883