

Pacific Gas and Electric 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 EM&V Group A Regional Energy Networks, Program Year 2022 (DNV, Calmac ID # CPU00372.01)

The RTR reports demonstrate PG&E's plans and activities to incorporate EM&V evaluation recommendations into programs to improve performance and operations, where applicable. PG&E's 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 PG&E 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 PG&E's 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. PG&E believes 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: EM&V Group A Regional Energy Networks, Program Year 2022
Program(s): N/A
Author: DNV
Calmac ID: CPU00372.01
ED WO: EM&V Group A Regional Energy Networks, Program Year 2022
Link to Report: calmac.org/publications/CPUC_Group_A_REN_Evaluation_Report_DNV_FINAL2.pdf

MANAGEMENT APPROVAL AFTER REVIEWING ALL IOU RESPONSES		
Name		Date
PG&E	Claire Braico, Senior Manager	6/17/2024
PG&E	Michael Burger, Senior Manager	6/18/2024

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	Disposition	PG&E 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	106	DNV process evaluators found that all REN programs approached decarbonizing through electrification to contribute to state GHG reduction goals. As a result, they encountered similar issues and challenges related to electrification such as a lack of understanding about electrification and fuel-substitution measures among program participants and contractors, low incentives relative to the high equipment and installation costs, and complicated coordination.	RENs are in the unique position of being able to support more effectively CPUC policies and California’s larger decarbonization goals through innovative solutions and scalable activities. For this reason, RENs should consider increasing efforts to create a pathway to electrification such as higher incentives and rebates, varying levels of incentives, and equity-focused multipliers that target low-income participants, DACs, and environmental justice areas.	RENs	N/A	N/A
2	106	The REN multifamily programs catered to the unique needs of their customers by allowing for greater customization and flexibility with measure and eligibility requirements. The programs also confronted split incentives by increasing benefits for property owners and helping achieve renter equity by requiring certain core measures or providing larger incentives for projects that included in-unit measures.	Given their mandate to pilot activities where there is no current utility or CCA program offering, specifically where there is potential for scalability to a broader geographic reach, we recommend that the RENs consider sharing their successes serving the multifamily sector (including best practices for addressing split incentives and renter equity) during their coordination meetings with utilities. This type of sharing could expand useful approaches beyond the RENs.	RENs	N/A	N/A
3	106	Providing additional hands-on support addressed unique challenges faced by multifamily property owners and public agencies, such as lack of in-house technical expertise and administrative burdens associated with energy efficiency upgrades. The RENs embedded staff to provide services such as project management, procurement, financial, and construction management.	We recommend that the RENs collaborate with the utilities and other stakeholders to share best practices and lessons learned from their experience and to identify opportunities for coordination and alignment of programs and incentives, particularly for programs that traditionally experience challenges serving the multifamily sector.	All	Accept	PG&E is supportive of the recommendation that RENs collaborate with the IOUs to share best practices and lessons learned. In fact, such coordination exists at this time. PG&E currently attends, and will continue to attend, regular coordination calls with the RENs, including those addressing the multifamily sector. Additionally, a monthly all-PA call is also scheduled to ensure communication among all PAs.
4	106	In accordance with their JCMs, RENs coordinated with utilities and CCAs for most of their programs. However, third-party implementers managed a majority of both REN and utility programs and the JCMs did not mention the role that third-party implementers should play in coordination efforts. DNV found there was a variance in attendance by IOUs at regular coordination meetings but relied on the third-party implementers to attend the meetings in their place. As third-party implementers have performance-based contracts with the PAs, their interests may not always align with the need to coordinate or cooperate directly with other PAs or implementers.	DNV recommends that the PAs (utilities, RENs, and CCAs) and/or their representatives (e.g., technical and regulatory consultants) continue or begin to attend all official coordination meetings as defined in the JCMs even when third-party implementers manage the programs. The PAs should attend the coordination meetings and then direct the program implementers to follow through with any necessary actions identified during the meetings. The PAs should consider including a RACI (responsible, accountable, consulted, informed) chart in the JCMs and PIPs that defines the role of PAs, implementers, and any other stakeholders. A RACI chart would help clarify who needs to	All	Partial Accept	PG&E will continue to attend all coordination meetings as defined in the JCMs. PG&E shared the DNV Report’s findings and recommendations for this item at a monthly joint PA call on 6/13/24. While no specific feedback was provided by participants, PG&E indicated that the use of a RACI chart may create additional formality that may not be necessary. However, PG&E is in support of continuing to document meeting attendance, as they do already.

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	Disposition	PG&E Disposition Notes
			<p>attend the coordination meetings, define their role, and help eliminate any confusion related to coordination efforts. The RACI chart should be a living document and an updated version of the RACI could be included with both the JCM and PIP documentation.</p> <p>DNV also recommends that attendance at the meetings be documented and made available to future evaluators.</p>			
5	106	<p>The BayREN single-family program achieved gross savings at or above claimed levels. Program interventions included several electrification measures that contributed to achieving gross savings. However, while the program intended to benefit low- to moderate-income households (with the assumption that these households need the program), the attribution results indicate that the program served a relatively high proportion of households that would have installed the measures without program support.</p>	<p>The program should continue its successful effort to electrify and achieve realistic and ambitious single-family energy consumption reductions. However, the program should target more underserved populations that would not undertake similar upgrades without program support. To reach such customers, the program could increase incentives for populations unlikely to install expensive fuel substitution technologies without program support.</p>	BayREN	N/A	N/A