

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 the CPUC Third-Party (3P) Equity Programs Process and Effectiveness Evaluation (ODC, Calmac ID # CPU0381.01)

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: CPUC Third-Party (3P) Equity Programs Process and Effectiveness Evaluation
Program(s): Simplified Savings Program for Small Businesses
Author: Opinion Dynamics (ODC)
Calmac ID: CPU0381.01
ED WO:
Link to Report: [Report \(calmac.org\)](https://calmac.org)

MANAGEMENT APPROVAL AFTER REVIEWING ALL IOU RESPONSES		
Name		Date
PG&E	Billy Roderick, Manager	11/18/2024
PG&E	Jeff McDowell - Supervisor	11/5/2024

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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.
3P Equity Program Alignment with IOU Business Plans and ESJ Action Plan						
1	66	<p>Conclusion 1: As instructed by the CPUC, the 2023 3P equity program designs align with goals 1, 2, and 5 of the Environmental & Social Justice (ESJ) Action Plan, and most of the objectives. According to D.21-05-031, in their design, the programs under the equity segment of the IOU energy efficiency portfolios are tasked with “providing energy efficiency to hard-to-reach or underserved customers and disadvantaged communities,” as defined by the CPUC’s ESJ Action Plan.¹²⁶ The ESJ Action Plan provides nine goals and 28 objectives that illustrate the broad vision and steps the CPUC will take to ensure equity in its programs and services. Specifically, the IOUs’ equity programs included in the 2024-2031 Business Plans were intended to support Goals 1, 2, and 5 of the ESJ Action Plan, as stated in D.21-05-031. The 2023 3P equity programs (REA-R, REA-NR, DACMO, and Simplified Savings) align with most of the objectives under the ESJ Action Plan goals 1, 2, and 5. The objectives that the 2023 equity programs do not address are not relevant to the implementers as they focus on standardized CPUC processes (ESJ Objectives 1.1 and 5.1) or studies of the impact of EE strategies on ESJ community health, well-being, and other benefits (ESJ Objective 2.2). While the 3P equity programs may collect data regarding the non-energy benefits received by program participants, the current description of Objective 2.2 is focused on sector-level studies across IOU territories.</p> <p>Each of the 2023 3P equity programs leverages ESJ Action Plan definitions for HTR customers and DACs to target potential participants, and each of the programs expands opportunities for access among these target segments. The Simplified Savings Program is the first equity program to provide offerings to micro and small business customers, thus expanding opportunities for access to energy efficiency benefits among HTR commercial segments. The remaining programs each support increased engagement among HTR residential customers. To accomplish this, almost all of the programs—with the exception of REA-R—aim to improve customer awareness of energy efficiency programs, products, and benefits by 1) ensuring that outreach materials are developed to</p>	<p>Recommendation 1: To continue to support Goals 1, 2, and 5 of the ESJ Action Plan, the CPUC and IOUs should collaborate to invest resources to improve community engagement activities, particularly around 3P Equity program design, implementation, and measures of success. This should involve identifying community needs, barriers to participation, and preferred engagement modes. Beyond supporting CPUC’s goal of improving community participation in decision-making processes, this investment would also help inform the development of future requests for abstracts/proposals for 3P Equity Programs so the program designs are rooted in community needs. These novel 3P equity programs may benefit from developmental evaluations¹²⁷ that provide recommendations on improving program activities at various stages of equity planning, program development, implementation, and final impact evaluation.</p>	All	Accepted	To provide closer coordination with community resources and actors, PG&E and the implementer are finalizing a 2025 strategy to engage Local Government Partnerships, not to duplicate their work but assist in identifying community groups with influence. Through 2024 efforts we have also identified groups with a sharp local perspective on customer needs. Now that the program is a proven concept, the 2025 PY phase will include more direct opportunities to do in market events and education. Existing multilingual marketing materials appear to address the majority of targeted customers, but we will continue to expand translation as communities are identified. PG&E will also market the program internally to community affairs and government relations teams to connect with customer influencers in DAC communities. PG&E intends to strike a balance in this evolution to ensure the maximum budget available is directed toward helping customers reduce their energy costs. The vision of the Simplified Savings program has always been that the PA and Implementer would establish a basic program on the basis of the knowledge, experience, and research in constructing them. Once established the expectation is this basic model can be modified to address and compliment community efforts and needs, evolving to the program to best serve each community. This economy of scale is intended to keep costs down and maximize budget to deliver customer benefits.

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		be locally relevant and accessible and 2) identifying opportunities to connect with HTR customers through existing community events and functions.				
2	66	<p>Conclusion 2: The CPUC initiated workstreams to develop portfolio- and segment-level metrics and indicators to measure equity performance, but there is a lack of guidance for program-level tracking. The CPUC has issued decisions to define goals, indicators, and metrics for the EE portfolio and the equity segment.128 D.18-05-041 included common metrics and indicators across the three energy efficiency portfolio segments (resource acquisition, market support, and equity), and D.23-06-055 mandated the assembly of the CAEECC EMWG to define indicators for the new equity segment. Specifically, the CPUC established the CAEECC EMWG to develop the objectives for the equity segment and design indicators to evaluate success toward these objectives. While the CPUC provided clear guidance that the equity segment of PA portfolios should support goals 1, 2, and 5 of the ESJ Action Plan, according to D.23-06-055, IOUs are not expected to develop their own equity-specific program goals, targets, and associated metrics until March 2025. Currently, goals, metrics, and indicators are published in at least these three sources (i.e., the ESJ Action Plan, CAEECC EMSWG report, and Grounded Research Common Metrics Working Group report), and it is not clear what level of consolidation is requested or required by the CPUC.</p> <p>In D.23-06-055, the CPUC instructed the IOUs to contract with a vendor to support the process of proposing and adopting long-term equity segment accountability goals, including defining goal constructs, demonstrating alignment with objectives, identifying the granularity of reporting detail (statewide, by PA, by territory), identifying relevant metrics and indicators to measure progress to goals, determining timeline for goal achievement, and providing necessary baseline information. To support the development of these goals and metrics, the CPUC is preparing a request for proposal (RFP) for a Market Rate NEBs Equity Segment Study that aims to improve the quantification of non-energy benefits129 (NEBs). In June 2024, the IOUs participated in a Working Group to support the development of the RFP.130 It is not clear to what extent the vendor will leverage existing sources to consolidate historic efforts and create a pathway for the equity segment and its programs moving forward. Finally, the CPUC recently issued an RFP for Energy Efficiency Technical Consultant Services that will also support the development of equity segment accountability goals to quantitatively measure segment performance.</p>	<p>Recommendation 2: The CPUC should consider providing guidance to the PAs on how existing goals in the ESJ Action Plan Version 2.0 may translate or cascade down to the equity segment and then to IOU processes and programs.</p> <p>Recommendation 2A: Upon the completion of the Market Rate NEBs Equity Segment Study, we recommend that the IOUs utilize standardized key performance indicators (KPIs) and methodologies to quantify NEBs for the equity segment of their portfolio.</p> <p>Recommendation 2B: Once equity segment goals, metrics, and indicators are established and finalized with the CPUC, PAs should work with program implementers to translate these into program implementation plans to ensure clear documentation for how the equity segment goals, metrics, and indicators align with each equity program's PTLMs, how program data will be collected and by whom, and how/when these data will be reported to the CPUC. Due to the current EE program cycle, this will ideally be implemented in preparation for the February 2026 application cycle.</p> <p>Recommendation 2C: It may benefit stakeholders (including the PAs, CPUC, and other energy equity stakeholders) to have all relevant California energy equity documentation in one place (e.g., the ESJ Action Plan or the CAEECC website) so there is one guiding source for equity information. CPUC should assign an entity to inventory all energy equity documents for the state in one location (e.g., CPUC Energy Division, CAEECC, or other entity). This repository should include a dictionary of key and relevant terms for energy equity (e.g., goals, NEBs) to ensure consistency in terminology across energy equity actors. Ensure the repository is marketed to relevant stakeholders so the public is aware of these valuable materials.</p>	All	Accepted	Through the month of December 2024 and into PY2025 Simplified Savings has started to revisit completed projects to ascertain realized NEBS from customers. While the post project customer satisfaction survey does address some of these considerations, the environment of small business owners limits their opportunity to respond. By design, the program intended to have the initial project be an introduction to EE projects and a potential starting point for a continuing journey. This post project follow up will support that intent and provide the opportunity for in person, guided feedback on NEBS the customers may not have already expressed. Regarding the tracking of NEBS, it is our hope that the process and procedures prescribed for the Equity segment remain as streamlined as possible to continue to keep the resource focus on customer EE momentum in lieu of a complex process for data's sake. Through 2025 we will be able to assess the quantity and value of the data we receive with the specific intent of including them in program KPIs as well as to enhance the pre-project marketing and education of the Simplified Savings Program. Per the OD suggestion, our goal would be to include these metrics in the next application cycle. Certainly, a centralized repository of the gathered data would be an asset to identifying best practices, ascertaining the real value of NEBS in EE from a customer perspective, and refining and substantiating the message of participation with Equity customers.
Relevant CA Policies and Frameworks that Guide Energy Equity						
3	68	Conclusion 3: There are three existing frameworks that guide energy equity in California. There are several guiding documents and ongoing efforts to support energy equity in California, including the CPUC's ESJ Action Plan, the California Energy Commission (CEC) Justice Access, Equity, Diversity, and Inclusion (JAEDI) Framework, and the DACAG Equity Framework131. Each key energy equity framework referenced in California covers at least three of the four forms of equity, as shown in Table 28. All three frameworks aim to support distributive equity and ca-	[No recommendation provided the evaluation team]	N/A	N/A	N/A

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		pabilities among target equity populations (e.g., hard-to-reach and underserved customers and disadvantaged communities) but are not consistent in providing guidance on procedural equity and recognition.				
Commonalities in the Program Theory and Logic Models of the 3P Equity Programs						
4	68	Conclusion 4: The 2023 3P equity programs have overlapping program theories, and each targets hard-to-reach customers and disadvantaged communities. Although the 2023 3P equity programs target different sectors (REA-R, REA-NR, and DACMO targeting residential and the Simplified Savings Program targeting commercial), each specifically targets hard-to-reach customers and those residing/operating in DACs. In the short and medium term, programs aimed to increase awareness and interest in IOU programs, build community trust in IOU offerings, and increase participation in IOU EE programs. The REA-R and Simplified Savings programs do this more directly by offering free assessments and direct install measures for immediate energy and bill savings to the customer. REA-R and the Simplified Savings Program also provide workforce training to improve access to qualified contractors in disadvantaged communities. The REA-NR and DACMO programs seek to achieve increased awareness through marketing, outreach, and engagement activities. The two programs take cultural competency into consideration when developing marketing materials and engagements, including developing in-language materials and DACMO partners with CBOs to increase trust with customers.	[No recommendation provided the evaluation team]	N/A	N/A	The Simplified Savings 2025 strategy of closer coordination with CBOs will help to magnify the impact of the influence and work within each region. Our implementer currently organizes weekly check-ins with participating contractors to provide as smooth a workflow as possible and to provide PG&E and contractors the opportunity to provide mutual feedback. A successful track record within a community should help to attract additional contractors as the budget allows. Our expectation is a growing local network which benefits customers and tradespeople as the value of EE benefits are validated and momentum occurs.
5	68	Conclusion 5: Existing PTLMs for the 2023 3P Equity programs do not follow PTLM design best practices. The original REA-R, REA-NR, and Simplified Savings PTLMs provided to the Evaluation Team by program staff did not provide explicit links between program activities, outcomes, and associated outcomes, nor logical connections between various short-, medium-, and long-term outcomes. Including these elements in a PTLM is tantamount to ensuring program activities lead to expected outcomes and KPIs can be established to measure program success. The original PTLM for DACMO followed some PTLM best practices, including linkages from program activities to outputs and outcomes. However, the original DACMO PTLM did not provide plausible connections between various short-, medium-, and long-term outcomes and expected program outputs. Each original PTLM was based on a template provided in RFP documents from the PAs to 3P implementation firms. The Evaluation Team updated the original PTLMs to follow PTLM design best practices as part of this evaluation study. The updated PTLM for each program is included in Appendix B.	Recommendation 5: Adopt the PTLM updates proposed by the Evaluation Team for each program. Recommendation 5A: The current PTLM template provided by the IOUs to 3P implementers proposing equity program designs should be updated to reflect best practices, such as identifying linkages and providing a logical description of each linkage to support the development of indicators and evaluation of 3P Equity programs. A sample PTLM template that could be used for future equity programs can be found in Appendix D.	All	Accepted	The OD suggestions are noted and Simplified Savings would expect to update and post a revised PTLM per the specifications by Q2 of 2025. The PG&E and Implementer Team have reviewed appreciate the feedback and resources provided.
Evaluability of the 3P Equity Programs						
6	69	Conclusion 6: Not all desired outcomes of the 2023 3P equity programs are plausible without further theoretical linkages between the activities and outcomes. A list of each program's outcomes and the plausibility of them occurring based on the original program design can be found in Section 5.7. The Evaluation Team provided updated PTLMs to ensure plausible linkages for each of the 3P equity programs (See Appendix B); however, the following outcomes were removed from the updated PTLMs for each program due to unclear linkages between program activities and outcomes. For REA-R, the expectation that a long-	Recommendation 6: If fuel substitution is an expected long-term outcome of the REA-R program, we recommend that program staff update the PTLM to specify program activities that lead to a fuel substitution output. Activities may include fuel substitution-focused training for contractors or education campaigns for customers. Recommendation 6A: If "energy code changes" are an intended outcome of DACMO, we recommend that program staff update the PTLM to include activities that clearly lead to energy code changes, such as	All	Other	Regarding Recommendation 6B the long-term goal is two-fold; to provide a versatile and scalable program accepted by diverse communities whose participation serves to inform the decision-making process (what customers are willing to participate in and what is practical do deliver) and expose diverse community stakeholders who can speak for their constituencies in ongoing Equity Working Groups. It is hoped the strategy of the program identifies and enables community spokespersons to participate in future planning. This goal is plausible if we create the opportunity and potential results evaluated by past success, enabling communities to inform and shape future iterations of the program.

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		term outcome of the REA-R program will be “gas equipment and appliances substituted for high-efficiency electric alternatives” is not likely without fuel substitution-focused interventions. For DACMO, the expectation that a long-term outcome of the program will be “energy code changes” is not likely given that the program targets customers rather than other market actors, such as code officials, so energy code changes are not currently a theoretical outcome of the program. Additionally, the Simplified Savings Program activities do not plausibly lead to ESJ communities participating in CPUC decision-making processes. In the original PTLM, the Simplified Savings Program intended to fulfill objectives under Goal 5 of the CPUC’s ESJ Action Plan.132 However, the expectation that a long-term outcome of the program will be “enhanced outreach and public participation by ESJ communities in CPUC’s decision-making process” is not likely. The program targets small business customers in ESJ communities with energy-efficiency program offerings but expecting this experience to lead to participation in regulatory processes is not a theoretical outcome of the program.	interventions that specifically target code officials and/or other stakeholders that influence code-making decisions. These activities, however, may be better suited for a Codes & Standards program. Recommendation 6B: If “Enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC’s decision-making process” is an expected outcome of the Simplified Savings Program, we recommend that the PTLM add program activities that lead to this outcome. Tailored outreach materials could reference the importance of participating in CPUC decision-making processes, the benefits to customers for doing so, and opportunities for participation.			
7	69	Conclusion 7: Most of the KPIs identified for the 2023 3P equity programs are not feasible to measure based on current data collection/tracking practices. REA-R and REA-NR are only somewhat feasible to measure based on current data collection/tracking practices, while the KPIs for DACMO and Simplified Savings are not currently feasible to measure. Current data collection practices do not collect the data required for future program evaluation of all KPIs. Additionally, the KPIs identified to measure program performance do not fully capture all intended outcomes from the program activities.	Recommendation 7: For each 3P equity program assessed as part of this study, adopt the KPIs proposed by the Evaluation Team in Appendix B (within the detailed evaluability assessment reports). Each of the KPIs was designed to measure the intended outcomes of each program activity. Recommendation 7A: We recommend that the PAs update the existing data collection and tracking practices for each of the 2023 3P equity programs and ensure all the data necessary to measure the proposed KPIs are collected and tracked. An example data request is included in each evaluability assessment report included in Appendix B to provide the expected level of detail and unit of measure for each data field. The PAs should assign clear responsibilities to implementation staff and contractors (or other market actors) to identify who is responsible for tracking which data and how it will be reported to PA and CPUC staff. The PAs should also ensure any issues or concerns with data privacy are addressed early on in the process.	All	Other	PG&E and the Implementer Team appreciate the level of insight and detail regarding data and process tracking practices, all of which can provide valuable insight into the quality of program delivery. We respectfully request these suggestions be implemented as an evolution toward the improvement of the program to maintain a balance of budget/effort toward customer focused successes and detailed analysis. Reviewing the suggestions our team would like to set the expectation that those in green and blue segments be the primary focus of PY2025, followed by suggestions in red. Some of the red category information is already being gathered and our Teams will work toward establishing a format to parse out the detail requested.
Successes and Barriers to Implementing 3P Equity Programs in California						
8	70	Conclusion 8: There has been limited pursuit of community perspectives prior to the design and implementation stages of the 2023 3P equity programs. There was no explicit solicitation of community feedback for IOU PAs on developing the RFP for 3P equity programs outside of the Procurement Review Groups (PRGs) at each IOU. PAs expected 3P implementers to have conducted sufficient research to inform the program design that met the RFP; however, implementers predominantly based their proposals on previous experience rather than collecting ESJ community feedback on the design of the proposed program. Following contracting, some implementers sought to reach out to community leaders to ensure that the outreach and communication materials were relevant but were met by resistance from PAs who wanted finalized outreach materials prior to engaging with community members about the program.	Recommendation 8: The CPUC should allow for IOU budgets to include funding for community listening sessions in 3P Equity program contracts. These community listening sessions should be completed soon after the contract award to verify that the program design aligns with community experiences and needs (e.g., barriers). If it is discovered that there is misalignment, this allows the implementers and IOU PAs to work together to modify the program to better meet community needs, program goals, and equity-segment goals. This also serves as an initial step in developing community relationships and supporting future community engagement activities.	All	Other	While in concept we agree with pre-launch evaluation of a program’s design, we feel any such budget would be more prudently spent after a basic program has been launched to allow a foundation to be laid on which to evolve a solid program. Prelaunch community feedback is problematic in that the diversity of this customer group is so broad that choosing spokespeople to be the ‘voice of the people’ is, in itself, limiting. Our view is the outcome of the RFP is not the final product, but the starting point from which the program design can demonstrate and evolve. We completely agree with having a budget provided to obtain this valuable input, but feel its strength is derived not from modifying an unproven design but improving and customizing an existing proven platform.
9	70	Conclusion 9: The 3P equity programs aim to overcome trust barriers with vulnerable populations through community engagement. During interviews, program staff identified a lack of trust among underserved	Recommendation 9: Despite programs being in the ramp-up phase of implementation, the implementers should continue to evolve program activities to incorporate CBOs and local contractors over time. The PAs	All	Accepted	Simplified Savings has now been active for over 12 months and the suggestion of trust over time has certainly been proven in the field. The program was due to launch in March of 2023 but was delayed until July of 2023 because both PA and implementer

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		customers as a main barrier to implementing 3P equity programs. As such, three of the four Programs (REA-R, REA-NR, and Simplified Savings) have design elements that incorporate CBOs and local contractor networks into program delivery to build trust with community members, leverage CBO's existing networks to promote awareness of the program, and build positive relationships with CBOs to increase their likelihood of participating in future IOU programming.	<p>should also initiate opportunities for community stakeholders to provide feedback on program design and evolution opportunities. We recommend that the PAs invest in opportunities to improve community engagement by understanding and addressing barriers to community participation in dialogues about goal setting, program design, implementation, and evaluation through communication and research directly with community members and CBOs.</p> <p>Recommendation 9A: While implementation teams emphasize the positive impact of using local contractors to build trust in IOU offerings by establishing more personal connections with customers, it is important to recognize that developing these trusted relationships takes time. We understand that implementers may feel an urgency to launch these programs, but we advise against rushing the development of these relationships just to meet program launch deadlines. We realize this is a difficult balance.</p>			teams wanted to introduce a program which lived up to its name and vision. 'Customers' for the program included not only the business owners, but the contractors who were to be key to success of the program, so it was important that 'simplified' applied to both groups. Only when our team was confident, we could provide a simple and streamlined eligibility and enrollment process, was the program rolled out to earn credibility with Equity customers. Our program team sought out feedback from contractors on available budgets, payment terms, product choices and continue that process today. The implementer organizes weekly meetings with every contractor which PG&E team members often join to ensure consistency of focus. Outreach through CAGBN supports program credibility and PG&E has completed the first video customer case study/success story with the Stockton Food Bank. The project revisitation schedule for December 2024 and Q1 2025 hopes to determine some sense of the word-of-mouth impact of the program.
10	71	Conclusion 10: Most of the 3P equity programs expected for launch in 2023 were delayed. Internal turnover at IOUs, novel program eligibility requirements, and data sharing complications caused program launch delays. The DACMO and PG&E's Simplified Savings Program both launched in 2023, but the REA-R, REA-NR, and Simplified Savings programs in SCE and SDG&E territories are delayed into 2024. As each 3P equity program adopts KPIs developed as part of this evaluation, communication regarding data sources, access, and transfer protocols among implementers and evaluators will be pertinent.	Recommendation 10: We recommend that IOU PAs communicate with the 3P implementation vendors regarding the data sources and requirements for the 3P Program before finalizing the program design or early in the ramp-up/implementation process. Additionally, if the PAs can designate a deputy program manager who is briefed on program activities at a high level, it may enhance program stability during unexpected staff turnover and improve relationships with implementers and other program stakeholders.	All	Accepted	Aside from the program readiness considerations which impacted decisions to delay launch, Simplified Savings also had some changes in personnel which had some impact on the smoothness of roll out, but not the timing. Program credibility was of paramount concern as stated in response 9. Agreed that operational depth in launch and maintenance provides program stability with all stakeholders and implementers, especially considering this was one of its first kind of Small Business Equity Program.