

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 2013-2015 Energy Efficiency Program Cycle and beyond. This Appendix contains the Responses to Recommendations in the report:

<i>RTR for the Custom, Industrial, Agricultural, and Commercial (CIAC) 2022 Impact Evaluation</i> (DNV GL, Calmac ID #CPU0373.01)
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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 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 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 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

MANAGEMENT APPROVAL AFTER REVIEWING		
Name		Date
SDG&E	John Zwick	7/29/2024
SDG&E	Kelvin Valenzuela	7/29/2024

Study Title: Custom, Industrial, Agricultural, and Commercial (CIAC) 2022 Impact Evaluation
Author: DNV GL
Calmac ID: CPU0373.01
Link to Report: https://www.calmac.org/publications/CIAC_2022_Evaluation_Final_Report.pdf

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	Disposition	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		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	SDG&E will direct third-party implementers to include statements in program documentation that addresses customers obligation to participate in evaluations.
2		Some PAs did not submit custom project applications on a bi-monthly basis for CPR 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.	PAs must submit signed agreements to the bi-monthly CPR list on 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.		Accepted	SDG&E follows CPUC guidance and submits new applications that it has reviewed (under the status "PAAppRev") on the 1st and 3rd Monday of each month.

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	Disposition	Disposition Notes
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.		Accepted	SDG&E agrees with this recommendation and will continue to strive to ensure that associated calculations align with tracking data.
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 1.442 and should be used when determining the appropriate MAT.		Accepted	SDG&E will continue to make efforts to ensure the correct MAT is applied to each claim.
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. 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	SDG&E agrees with this recommendation and will make every effort to complete the accelerated questionnaire for all accelerated replacement projects.
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 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.	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 be verified and replicated readily.		Accepted	SDG&E agrees with this recommendation and makes every effort to provide unlocked tools to the evaluation team.

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	Disposition	Disposition Notes
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.		Rejected	SDG&E requires that customer contact information be collected as part of the project's application. Therefore, a contact log is unnecessary. While contacts may change over time, maintaining continual outreach following a project's completion is overly burdensome. Additionally, as programs have transitioned to third-party implementation, SDG&E's interactions with the customer are more limited.
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)		Other	SDG&E has been following the CPUC guidance document "Energy Efficiency Savings Eligibility at Sites with non-IOU Supplied Energy Sources" and will continue to do so. There are different data collection requirements for PV versus cogeneration.
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 HOPPs compliant framework	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 with third party (3P) implementers to ensure that they are aware of CPUC requirements, including baseline selection, incremental cost, and eligibility requirements.		Other	Per the Statewide Custom Project Guidance Document Version 1.4 Section 2.2.1, the "Behavioral, Retro commissioning, and Operational MAT is used for measures that either restore or improve energy efficiency and that can be reasonably expected to produce multi-year energy efficiency savings. By definition, BRO measures result in performance that does not exceed the nominal (rated or original) efficiency of the pre-existing condition." Custom programs are, therefore, allowed to use BRO measures that do not exceed code, and this eligibility is not exclusive to NMEC or HOPPs only. SDG&E is aware of these CPUC Decisions, Resolutions, and guidance and works to ensure that its third-party implementers is aware as well.
10		The installed equipment must operate for at least five years. 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		Rejected	SDG&E is not aware of any current CPUC policy that requires lifecycle savings of at least five years. This recommendation appears to be based on legacy guidance that is no longer applicable.
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 SPs 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		Other	SDG&E agrees that appropriate baselines should be used at the time of project approval. SDG&E does not support the recommendation that new ISPs are required every 5 years, nor that new ISPs are required when projects are extended due to installation delays.

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	Disposition	Disposition Notes
			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.			
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	SDG&E does ensure that projects are claimed within the year of installation, however, as programs have transitioned to third-party implementation, SDG&E does not stipulate or approve an installation date. Customer agreement documents are now administered by third-party implementers. The Customer agreement documentation may include an approved installation period and/or language that the customer will need to formally request extensions from the third-party implementer to remain eligible for financial incentives. In such cases, SDG&E will direct third-party implementers to provide a copy of the extension. Equipment cannot be purchased prior to PA project approval, however an "Exception to Purchase" can be requested from the customer and implementer. SDG&E reviews the request and will formalize the approval/denial for project documentation.
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	Implementers should ensure proper education is provided to the customer, versus PAs. SDG&E has discussed this issue with its third-party implementers. They have reported a common challenge with customer education for BRO-RCx measures is that there is often customer organizational change that impacts knowledge sharing. Often, the original employee that implements the measure may not be involved through the entire project life cycle, and the new employee may not be familiar with the project nor are they as engaged with the project.
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	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		Other	SDG&E does not entirely agree with this recommendation. M&V plans are tailored to each project and affected by the measures installed, project size, and customer profile. SDG&E agrees accurate M&V plans are necessary, but M&V plans should be tailored to the level of customer incentive and specific project circumstances.

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	Disposition	Disposition Notes
		not inform on potential changes in load over longer durations and seasons	weather where applicable) between pre- and post-installation periods. Consideration should be given to the level of customer incentive and specific project circumstances			
15		When using the GrowGreen calculator, PAs often overestimated the interactive impacts of installed lighting on the building HVAC equipment , as the calculator does not account for localized weather conditions from CZ2010 data, does not use site specific equipment efficiencies, and overestimates hours	PAs should update the GrowGreen calculator to consider local weather patterns from CZ2010 weather data and use site-specific space conditioning efficiencies to improve savings accuracy.		Other	SDG&E uses approved calculation tools, including those listed in the Customized Tool Archive. Many of those approved tools undergo periodic SW review and updates. We will continue to use the most recent versions.
16		The GrowGreen calculator (horticultural projects) uses standard practice baseline efficacy values based on a very limited number of high intensity discharge (HID) lighting fixtures. These few fixtures do not correctly account for products that are available for purchase on the California market and that are already commonly used by growers.	The PAs should consider additional research be conducted to 1) show the appropriate lighting technology mix for growing cannabis in California, and 2) find the appropriate baseline efficacy values associated with this technology mix. The survey data collected by Cannabis Business Times annually provide a saturation of various technologies installed every calendar year since 2016.		Other	SDG&E uses approved calculation tools, including those listed in the Customized Tool Archive. Many of those approved tools undergo periodic SW review and updates. We will continue to use the most recent versions.
17		CEDARS data entry errors can result in incorrect savings claims. The evaluation team found that for seven projects, savings values entered in the CEDARS system were incorrect when compared to project documentation and the evaluation findings.	PAs should conduct either manual or automated quality control processes on CEDARS inputs prior to posting claims. This should include cross verification of total savings against PA tracking systems and the CEDARS system. If discrepancies are found, the cause should be identified and rectified in a timely manner, prior to finalization of program year submissions.		Accepted	SDG&E has an automated reconciliation process in place to identify any savings discrepancies between the PA tracking systems and what is reported to the CEDARS system.
18		The lighting end use is usually a small fraction of the total energy usage at most non-residential sites. Sometimes the MLC-predicted savings are close to (or exceed) the site energy use as provided in the Utility Usage tab of the MLC. It is not impossible for a customer to have a lighting-dedicated utility meter, especially for exterior lighting. However, when dedicated lighting end-use meters are not present, the metered account should reflect a significant post-installation usage drop largely matching the claimed savings. This was of-	PAs should ensure that if the MLC Utility Usage tab indicates that the MLC-projected savings are close to the customer utility bill, then (1) ensure that the MLC Utility Usage tab contains the customer's total usage across all utility meters at the site, and (2) ensure that the CEDARS claim includes all utility accounts		Other	SDG&E agrees that the MLC Utility Usage tab should contain the customer's total usage across all utility meters at the site and will strive to ensure that is the case. With respect to recommendation 2, the current CEDARS PII Site table only includes one field each for the electric and gas service accounts (ElectricServiceAccountID and GasServiceAccountID) for a claim.

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	Disposition	Disposition Notes
		ten not the case and the claimed savings continued to exceed the post-installation billed usage.	for the customer.			
19		The evaluation team found that for accelerated replacement (AR) projects, PAs claim RUL as 1/3 of the EUL of the measure installed (RUL=4). The correct RUL is 1/3 of the EUL of the measure removed.	PAs should claim the EUL and RUL as shown in the MLC Executive Summary Reporting tab. MLC v.13 calculates the correct EUL and RUL based on rated life and HOU for both existing and proposed measures.		Accepted	SDG&E utilizes the latest approved MLC when approving projects and agrees that the EUL and RUL shown in the MLC at the time of approval should be claimed. Projects should not be subject to retro-activity after they are approved and claimed
20		DEER HOU and CDF parameters for interior lighting, as referenced in the Modified Lighting Calculator (MLC) are very rarely within 25% of reported DEER HOU and CDF. Specifically, 15 out of the 43 lighting projects installed interior (non-horticultural) lighting, only three sites had evaluation-adjusted lighting HOU and CDF within 25% of DEER values. Evaluation-adjusted lighting HOU or CDF for Light Manufacturing, Small Retail, Unconditioned Warehouse and Grocery sites were all more than 25% different (high or low) than DEER values. Grocery chains with long operating hours, had much higher HOU and CDF than DEER	Recommendation for eTRM/MLC teams: expand DEER lookup options. Add at least one option for businesses with 24/7 operation. This would require a detailed M&V study to update DEER lighting HOU's to add additional facility and fixture types.		Other	Updates to the MLC are ongoing in a SW working group. SDG&E will utilize the latest approved version for all project submissions.
21		DEER CDF parameters for exterior lighting, as referenced in the MLC, are nonzero for climate zones 1, 5, 7, and 8 – yielding nonzero kW savings. This is consistent with expected exterior lighting operation during 4-9 PM coincident peak hours for the September peak days in these climate zones. However: climate zones 4, 6, 9 and 10 also have September peak days, yet the exterior lighting CDFs are zero in these climate zones.	Recommendation for eTRM/MLC teams: ensure CDF consistency in the MLC DEER lookup tables.		Other	Updates to the MLC are ongoing in a SW working group. SDG&E will utilize the latest approved version for all project submissions.
22		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		Accepted	SDG&E is closing out legacy projects with small savings, even though our regional SBD program is closed to new applications. SDG&E complies with program rules, and CPUC guidance, and implement all “as-built” conditions within the energy models.
23		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		Rejected	All Title-24 codes required on a building project are clearly shown on the lead sheet (A-1, T-1, G-1, or other) of the construction documents. It is also listed in the construction specifications and is within the Energy models. Permit drawings are not necessary to re-verify the applicable codes. Additionally, Certificates of Occupancy, Letters of Substantial Completion, etc. are acceptable documents to show permitted Code compliance.

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	Disposition	Disposition Notes
		trying to identify the AHJ and associated permit dates to ascertain the Title 24 code that would apply to the evaluated project				
24		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 is planning on examining this decline in project activity as part of the evaluation of the CPR process		Other	Statewide groups have previously submitted an extensive list of obstacles to increased adoption process. The CPR team is reviewing and revising their Custom Review processes to address these obstacles.
25a		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/pay-		Accepted	SDG&E continues to work with the program implementers to document and collect project influence documentation, showing how the customer could not move forward without program Incentives/technical guidance.

Item #	Page #	Findings	Best Practice / Recommendations (Verbatim from Final Report)	Recommendation Recipient	Disposition	Disposition Notes
			back 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.”			
25b		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 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.		Other	As programs transition to third-party implementation, the third-party implementer becomes responsible for engaging with the customer and not PAs. SDG&E agrees that the implementer should engage the customer early in the decision-making process, and SDG&E will continue to review its project screening processes.
26		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	SDGE agrees that a corporate sustainability policy should not be used to evaluate a NTG ratio.