

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:

RTR for the Third-Party Commercial Programs Impact Evaluation, Program Year 2022 Report (DNV GL, Calmac ID #CPU0371.01)

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	Kelvin Valenzuela	9/10/2024
SDG&E	John Zwick	9/10/2024

Study Title: Third-Party Commercial Programs Impact Evaluation, PY 2022
Author: DNV GL
Calmac ID: CPU0371.01
Link to Report: https://www.calmac.org/publications/CPUC_Group_A_Commercial_Third-Party_Programs_PY2022_Impact_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	57	The GRRs for electric energy savings attributed to PAs exceeded 100%. This outcome can primarily be attributed to adjustments in relative humidity levels for anti-sweat heater controls. The recalibration of passage time and duration parameters for auto-closer measures in refrigeration cases is another impact factor but not a high-profile update.	To enhance the accuracy of savings estimations, especially for significant refrigeration measures, it is recommended to incorporate the data collected during the evaluation into the update process for measure packages. This should include more detailed information on types, efficiencies, and operational parameters of refrigeration and HVAC systems.	All PA	Other	SDG&E is not the measure package lead for the specific measures mentioned in recommendation, but in general the recommendations from impact evaluations are reviewed by CPUC Ex-Ante review and measure package Lead IOU. Appropriate updates are managed through DEER resolution and measure update process.
2	57	Third-party implementers reported a lack of brand recognition and market momentum from past utility-run initiatives due to PAs not allowing effective affiliation or co-branding	Allow programs to reference the utilities and past utility-run programs.	All PA	Accepted	SDG&E's co-branding agreements allow implementers to reference its affiliation with SDG&E with respect to the program as long as accompanied by the approved auspices statement. However, Implementers may not include the SDG&E name and/or logo on business cards, apparel, or any other form of identification. Under no circumstances may the EE Implementer, its employees or subcontractors imply that they are a representing, employed by or speaking on behalf of SDG&E.
3	57	The project contact data provided by the PAs and implementation contractors often did not contain accurate key project decision-makers even after the evaluation team had specifically requested such decision-maker names. Consequently, this led to many NTG surveys having incomplete information.	Ensure PAs and implementation contractors provide contact details for end-user sites and decision-makers. This streamlines evaluations by facilitating simultaneous communication, avoiding delays when site contacts aren't key decision-makers, and reducing the need for additional data requests.	All PA	Other	Employee turnover at a customer's place of business may present issues in contacting the decision-maker at the time the project was started. SDG&E requires its implementers to collect customer contact information for every project and SDG&E provides that contact information to evaluators when requested.
4	57	Actual program practices as reported in implementer interviews are inconsistent with what is written in the PIPs	Review PIPs at least annually to assess them against actual practice and justify variance from written	All PA	Accepted	SDG&E will collaborate with its implementers to review implementation plans on an annual basis and make updates if required by implementation plan guidelines.

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			plan through amendments, including updating logic models.			
5	57	The third-party run programs are recognized for their potential to drive innovation. However, the analysis indicates that these programs frequently capitalize on established relationships and existing savings opportunities.	For future third-party program designs, the CPUC should enforce the use of the updated definition of innovation as documented in the latest version of the Energy Efficiency Programs Implementation Plan Program Guidance (May 2020 as of the publication of this report). It's implied that the IOUs must align their program designs with the updated definition. This recommendation aims to ensure consistency and clarity across all third-party program designs.	All PA	Other	Third-party implementers are responsible for designing programs. For current and future solicitations, SDG&E requires a response regarding program innovation as defined by the CPUC. Bidders must explain how their proposed program is innovative, and their responses are evaluated against the CPUC's definition of innovation. CPUC staff are members of the Procurement Review Group, which monitors solicitations, including innovation.
6	58	Coordination between third-party programs and existing utility-operated programs is minimal, despite the participant crossover between multiple commercial programs. This lack of interaction fails to recognize the diverse experiences of participants when engaging with PAs and third parties, leading to a disjointed program experience.	Establish a collaboration framework to facilitate more frequent information sharing, checks and balances, and coordination between utility-run and third-party-run programs.	All PA	Other	Although we do not have a formal collaboration framework, SDG&E has segmented its third-party Resources Acquisition programs to mitigate customer overlap and encourage a one-stop shop, helping reduce the confusion that arises when multiple options exist. Additionally, SDG&E has incorporated language in its contacts, where applicable, that requires its third-party implementers to promote and coordinate with other relevant programs.
7	58	Program attribution was very high with overall program NTGRs being 97% for electric energy savings and 98% for gas energy savings. Survey respondents emphasized the importance of the program incentives in project implementation. The program's focus on refrigeration technologies that are less commonly known or adopted in the marketplace likely also contributed to these high NTGRs	Continue the program's focus on refrigeration technologies that are less commonly known or adopted in the marketplace since these technologies will likely continue to have high NTGRs until market adoption becomes more common. Minimize the promotion of widely-marketed energy-saving technologies like TLEDs, which have lower evaluated NTGRs (e.g., 35% for TLEDs), since the market already supports them without program help.	All PA	Other	Implementers design their programs and select the measures to market. SDG&E can discuss and suggest, ultimately, the decision lies with the implementer and the opportunities available at each site.
8	58	Programs met savings and cost-effectiveness goals on the strength of the high evaluated NTGRs. As filed with ex ante NTGRs, no program met goals	All else being equal, continuing to enroll customers that would not otherwise install energy efficiency measures will be important for programs to meet their goals.	All PA	Accepted	SDG&E meets with its implementers monthly to discuss progress towards goal, KPIs, marketing efforts, etc.