

# **Southern California Gas Company**



## **Appendix G:**

### **Compliance Requirements Review and Associated Updates Summary**

## SoCalGas Advice Letter 4449-A, Appendix G

Information below sent by the CPUC Energy Division on March 27, 2013 SoCalGas additions are in "SCG Reply" column. Does not contain "Issues / Programmatic Areas" for LGP or ET programs provided separately. "ED Contact" column / ED staff names removed.

### Request for Supplemental Information - Friday, March 15, 2013

IOU	Issues/Programmatic Areas	Supplemental Request	SCG Reply
<b>Residential</b>			
<b>RNC</b>			
All (except PG&E)	Update PIP language for RNC re: start date and incentive level	Reference Column C	See Section 4.c. titled "CAHP Incentive Rationale." Also see deletions in Section 6.iii.
All	Request IOUs to confirm incentives that exceed 10-12 and incentives that provide 50% of IMC at the 20 % savings level and above	Reference Column C	See Section 4.c. titled "CAHP Incentive Rationale."
All	Update Strategic Plan milestones for CAHP	Reference Column C	See Section 5.e., Advancing Strategic Plan goals and objectives, Goal #1.
<b>Energy Advisor - Home Energy Reports and Behavior Target</b>			
All (except PG&E)	Request all IOUs show they are meeting 5% behavior program participation target	Reference Column C	Pursuant to conversations with ED staff on March 26 and April 3, and April 19, 2013, see additions to Energy Advisor PIP at Section 5, Program Design to Overcome Barriers and Section 6.e., Pilots / Initiatives. The revised PIP, Attachment 3 (at Table B), demonstrates compliance with the 5% target for residential households employing comparative usage and disclosure, ex-post measurement, and experimental design.
All	Need better program summaries	Reference Column C	See "Attachment 1 Energy Advisor PIP_Supplemental Filing.xlsx" document for this information.
All	IOUs add language regarding persistence and evaluating savings	Reference Column C	See additions in Section 8, Program Logic Model.
	TRCs	Reference Column C	Pursuant to conversation with ED staff on March 26, 2013, no further action required. For SCG this is a non-resource program, so TRC is not applicable.
SCG	Missing summary for HER.	Reference Column C	See Section 6.e., Pilots / Initiatives.
<b>Plug Load &amp; Appliances (PLA)</b>			
All	Request IOUs refile with more description on PLA pilot projects and related EM&V (referencing EM&V LT Study Plan)	Reference Column C	Pursuant to conversation with ED staff on March 26, 2013, no further action required. SCG did not include a pilot in its PIP.
All	PL A - Training - "may coordinate with Energy Centers to design and implement" should commit or not	Reference Column C	N/A - Comment specific to PG&E PLA issue list.
All	PLA- Marketing - need number of specific commitments and budget	Reference Column C	See Section 10.i.vi. added description. Although this item was included under the PG&E issues for PLA, SCG provides information about specific commitments in the PIP.
All	PLA - Included Measures - compliance letter discusses removal of measures and TRC dropped...need more info	Reference Column C	N/A - Comment specific to SDG&E PLA issue list.
All	Table 11 - PLA Attachment 3 -out of compliance	Reference Column C	See updated Table 11 in PIP.
All	Table 3.1 Short Term PPMs - incomplete and out of compliance	Reference Column C	See Table 3.1. SCG believes table is complete and in compliance.
All	Table 5 - subprogram milestones	Reference Column C	See Table 5; table is N/A as SCG has not identified a pilot.
All	Tables 1,2 and 8 -	Reference Column C	See updated Tables 1 & 2; no change to Table 8 (SCG believes is complete).
All	PLA trials - need updated plans for ARP trial/pilot	Reference Column C	Not applicable for SCG
<b>Commercial</b>			
All	Reducing the split-incentive barrier in commercial multi-tenant buildings;	Explanation of this directive in the PIP is very vague. Revise PIP to include how commercial programs will reduce the split incentive barrier in multi-tenant buildings. The PIP should also include a plan for how IOUs will track against this directive.	See Section 5.c., additional content regarding split incentive barrier.

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IOU	Issues/Programmatic Areas	Supplemental Request	SCG Reply
All	Focus on Sub-metering and plug load control technologies;	Explanation of this directive in the PIP is very vague. As per the SW Commercial call on February 28, 2013, the IOUs should also be looking into whether the DEER database proposed incentives for these technologies. Please revise PIP to include: (1) numerical targets for how many buildings will integrate sub-metering and plug load control technologies; and (2) how this directive will be tracked throughout the program.	See Section 5.c., additional content regarding sub-metering and plug load control.
All	Collecting and utilizing performance data	Explanation of this directive in the PIP is very vague. As per the SW Commercial call on February 28, 2013, revise PIP to include where and how this directive will be implemented. Include how this directive will closely coordinate the finance pilot/programs and how IOUs plan collect performance data to inform finance pilots.	See Section 5.c., additional content regarding collecting and utilizing performance data.
<b>Third Party</b>			
All IOUs	IDEEA365 - Table 5 is useful and should be completed by all IOUs, especially the date to issue their RFP	With the understanding that IDEEA 365 is not a subprogram, ED requests an updated Table 5 to be included in the IDEEA365 revised PIP. Table 5 would allow ED to have a better understanding of the schedule for which ED input is needed/useful for the IOU PRG's with respect to RFAs and RFPs. While PG&E and SCE did not fill out this table, they have both already hosted PRGs. Sempra started to complete Table 5, but left no identified date for when the RFP will be issued. Revise PIP to insert Table 5 with the best available information.	See Section 4, Timelines, modifications to Table 3 (not Table 5).
All IOUs	IDEEA 365 Program - language for non-resource to be an option for innovative solicitation	Revise PIP language for IDEEA365 Program to acknowledge that non-resource program designs are eligible under the second solicitation that promotes "innovation".	See additional text in Section 2, Description.
SCG	Clarify placeholder in Budget placemat is IDEEA 365	Update Budget Placemat to insert the IDEEA365 Program Name- this is currently labeled placeholder.	Name revised - see PIP Table 1; Appendix C, cell C87 in "Budget Placemat" and cell D88 in "Savings Placemat"; Appendix D, Table 1.9, Table 3.4, and Table 4.1.
All IOUs	PRG must include ED Correct language re PRG – it must shape the process not only provide feedback after the fact.	Update PIP language that PRG must include Energy Division, and specify that PRG will shape the process not only provide feedback after the fact.	See additional text in Section 2, Description.
<b>Finance</b>			
All IOUs	<b>ARRA Pilots</b> Pilot descriptions - general guidance	Please refer to memo from ED staff	Each ARRA Program profile is included in Section 9 (Sub-Program Description, Objectives and Theory) of the ARRA Originated Financing Programs PIP.  The ARRA Budget broken out by category is shown in Table 3 in Section 8 (Projected Sub-Program Budget) of the ARRA Originated Financing Programs PIP.  The term "incentives" is not referenced in relation to the ARRA Originated Financing Programs.  A high level budget that combines all ARRA program budgets is provided in Section 8 (Projected Sub-Program Budget) of the ARRA Originated Financing Programs PIP.  SoCalGas has removed descriptions of the ARRA

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### Request for Supplemental Information - Friday, March 15, 2013

IOU	Issues/Programmatic Areas	Supplemental Request	SCG Reply
All IOUs	<ol style="list-style-type: none"> <li>1. Customers eligible or targeted, including FICO score range, etc., renters, owners, etc.;</li> <li>2. Source of private capital. Identify lenders;</li> <li>3. Credit enhancement. Who will hold these funds, what percent are they of loans, etc.;</li> <li>4. Relationship to Hub if any;</li> <li>5. Loan terms – length, interest rate (does it vary by lender or customer?), fees, etc.;</li> <li>6. Any securitization of loan;</li> <li>7. Financeable measures? Which IOU or other retrofit programs are involved? Can retrofits be done outside of IOU programs? If solar, DG, water energy measures are included (CHF) explain how they are funded through EE support;</li> <li>8. Contractor eligibility and any QA;</li> <li>9. Any project QC, audits before or after, by what percent sample, etc.;</li> <li>10. Credit checks: based on what? Explain "meets responsible lending criteria."</li> <li>11. Explain process of how loan transaction begins. Is it contractor or bank driven? What role does the contractor play versus the bank or other lender? How do funds flow: where does capital come from? How is it collected? How is lender paid back? What is the process in case of default or partial payment? Etc.;</li> <li>12. Targets of number of loans, size of loans, dollars loaned, type of customer reached, etc.;</li> <li>13. Milestones in roll out of program through 2014;</li> <li>14. Identify where finance pilots overlap in geographical territory if they serve the same customers; and</li> <li>15. Highlight and explain any other aspects of the pilot design that characterize it or distinguish it</li> </ol>	Revise PIP to include Pilot design elements in Column C, also refer to ED staff's memo	Program Design Elements have been included as part of Section 9 (Sub-Program Description, Objectives and Theory) of the ARRA Originated Financing Programs PIP.
All IOUs	<p>Logic Models:</p> <ul style="list-style-type: none"> <li>• PG&amp;E – Empower SBC logic model is not readable; CHF logic model seems to be missing a lot of information (Same in SCE PIP)</li> <li>• SoCalGas &amp; SDG&amp;E – Please provide logic models for ARRA pilots to illustrate how pilot works</li> </ul>	Revise PIP to include logic models as described in Column C, also refer to ED staff's memo	Logic Models have been included as part of Section 9 (Sub-Program Description, Objectives and Theory) along with their respective program in the ARRA Originated Financing Programs PIP.
All IOUs	<p><b>OBF</b></p> <p>Relationship to rebate/incentive: (Page 7 of statewide PIP) Please clarify this section across the statewide PIP – what rebate/incentive terms the IOUs will offer in 2013, beginning when, and when they might consider changing them, and how. Refer to the decision section that clarifies the CPUC is not asking the IOUs to stop offering rebates with OBF loans. (I do not think the "finance as a resource" issue figures in here. Please explain how it fits if references to it are kept.)</p>	Revise PIP to include Pilot design elements in Column C, also refer to ED staff's memo	Please refer to <i>Relationship to rebate/incentive</i> in Section 9 (Sub-Program Description, Objectives and Theory) of the OBF PIP.
All IOUs	Define "site bundling" in the statewide PIP on Page 7	Revise PIP to include Pilot design elements in Column C, also refer to ED staff's memo	Please refer to <i>Site Bundling</i> in Section 9 (Sub-Program Description, Objectives and Theory) of the OBF PIP.
All IOUs	Update passages that refer to actions IOUs will take to say when (month/year) they will occur, if they haven't already: For example the PIP section on "vendor support" on Page 3 of the SDG&E (statewide) PIP says: "Utilities will adopt vendor support guidelines and standard participation agreements to monitor performance, manage customer expectations, and set clear roles and responsibilities for all parties."	Revise PIP to include Pilot design elements in Column C, also refer to ED staff's memo	Please refer to Section 10 (Program Implementation details) of the OBF PIP.
All IOUs	Tables in the PIP template: Where you used a table provided in the PIP template – include it in the body of the PIP, not as an attachment. If you did not use the table, do not attach it and note that in the relevant section of the PIP where the table is referred to. For example, on Page 10 of the SDG&E PIP, Table 9: Contractor Participant Eligibility Requirements (Joint Utility Table) says "See Table 9 in Attachment 2." There is no information in that table. Please note that rather than referring the reader to an empty table. The same is the case with the next table, Table 10, and other tables. If the table says "TBD," then note that in the PIP, not in an attachment.	Revise PIP to include Pilot design elements in Column C, also refer to ED staff's memo	Tables have been embedded within the PIP template and if the table is not available or irrelevant it's been noted as such.
All IOUs	Where the narrative and text of your PIP (not budget tables) differs from the statewide PIP that the other IOUs are using, please underline that text so the reader can more easily find it. (For example, on Page 138 SCE says: "The Statewide OBF Team has worked closely to align OBF program features and requirements to the maximum extent possible . . ." These two paragraphs are just in the SCE PIP. Similarly, where IOUs provided an estimate of billing system upgrade costs in their PIPs, the projections differ but they are not easy to find without an underline.	Revise PIP to include Pilot design elements in Column C, also refer to ED staff's memo	Utility-specific information that deviates from the statewide PIP is underlined and bolded throughout the PIP.
All IOUs	Budget tables at the front of the PIP section on statewide OBF Programs: SDG&E and SoCalGas – Note in the table the entire funding amount for OBF so that it matches budget decision table; identify non-program funds as the source for the loan pool if necessary	Revise PIP to include Pilot design elements in Column C, also refer to ED staff's memo	Please refer to Table 1 in Section 2 (Total Projected Program Budget and Savings) and Table 1 in Section 8 (Projected Sub-Program Budget).
All IOUs	SoCalGas & SCE – Please describe in more detail your plans to coordinate joint projects. (This is discussed as a possibility in the decision.)	Revise PIP to include Pilot design elements in Column C, also refer to ED staff's memo	Please refer to Section 13 (Additional information as required by Commission decision or ruling or as needed) of the OBF PIP.

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 "ED Contact" column / ED staff names removed.

**Request for Supplemental Information - Friday, March 15, 2013**

IOU	Issues/Programmatic Areas	Supplemental Request	SCG Reply
All	<b>C&amp;S</b> Savings- Gross/Net	Revised PIP tables to illustrate savings Gross/Net with/without interactive effects. PIPs to include savings for C&S in placemats.	Pursuant to conversation with ED staff on March 19, 2013 no further action required. SCG provided information in PIP for both Gross and Net savings. Also agreed because SCG is a single fuel utility that interactive effects are not applicable.

## I. General Issues—All IOUs.

### 1) Budgets—All IOUs

**Compliance budgets do not indicate actual budgets for 2013-14- all IOUs are requested to refile placemats with actual budgets indicated.** IOU “actual” budgets for 2013-14 include the additional unspent/uncommitted funds from before 2013, discussed on page 92 of Application decision, and in OP 38. The placemats only indicate the new revenue requirements, not the full budget for the program, including carried over funds from before 2013. For instance, PG&E filed in their E3 a budget of \$12.9 million for their RNC (CA Advanced Homes) program versus \$4.9 million in the PIPs and placemats. We cannot do oversight without the actual budgets indicated also in the PIPs and the placemats.

- **SCG reply: Pursuant to conversation with ED staff on March 19, 2013 no further action required. SCG provided information in different format than other IOUs. The SCG budgets do indicate actual budgets for 2013 - 2014 in placemats. Compliance Table 6.2 shows the unspent / uncommitted funds that will be returned during each program year to offset the Gas PPP Surcharge revenues.**

### 2) Short Term PPMs- all IOUs

SDG&E (p. 5) indicates a June 1, 2013 timeline for providing quantitative targets for the program short term PPMs. This seems acceptable, and all IOUs are requested to indicate they will comply with the same date in a refiled compliance AL.

- **SCG reply: Pursuant to conversation with ED staff on March 19, 2013 no further action required. SCG provided the same language as SDG&E noted above at p. 5 of AL 4449, and in the PIPs.**

### 3) Incomplete placemats – SDG&E

- a) SDG&E- savings placemats in the online Advice Letter **are not complete**, and **these must be completed and reposted**. These tables must be provided publicly in excel, not just PDF.

- **SCG reply: Item n/a.**

## II. Res / RNC Program Issues:

### 4) Res New Construction- CAHP Program – all IOUs

a) **New incentive levels- the IOUs did not indicate the start date and incentive level for the “Future Code Preparation” kicker of \$1000/builder that reaches above Title 24 (2008).** A Nov 27 2012 CPUC, CEC, IOU meeting agreed that such a kicker need not wait until 2014 to be launched. It was apparently available starting Jan 1, 2012, but the text

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below does not recognize this. We request that the following text is deleted and the new kicker incentive level, percentage above Title 24 (2008), start date and name are added to the PIP. Also, we request that kickers remaining for NSHP or other are indicated.

*Example of text to delete: SDG&E- P. 7 (AL cover letter), and p. 198 (PIP Appendix B, redlined, just below incentive figure- statement of concern in italics): "D.12-11-015 directs utilities to confer with Commission staff to update incentive levels for the California Advanced Home Program and Energy Start Manufactured Homes Program. The Joint Utilities, after discussions with Commission staff, proposed the following incentives, support adjusting program incentive levels in conjunction with the more stringent Title 24 code taking effect in 2014. More efficient incentives will be critical in helping builders defray additional compliance costs associated with the stronger code. However, the Joint Utilities believe there is a need to explore the deadline for incentive adjustments. A date after March 2013 may be appropriate to delay finalizing the incentive levels. A primary concern for the delay is that changing incentive levels before the new code takes effect may provide an added incentive for builders to rush to beat the code. Ideally, the incentive adjustments would be timed to coincide with the implementation of the new code so as to incentivize building owners to meet the more aggressive newer Title 24 codes. The aggressive schedule would also prevent the Joint Utilities from determining the ideal incentive structure. Given uncertainty about the market's response to the unprecedented updates to Title 24, extra care should be taken in calibrating incentive levels to optimize program participation and maximize program savings."*

- **SCG reply: See updated Section 4.c. titled "CAHP Incentive Rationale". Also see deletions in Section 6.iii consistent with SDG&E text to delete example above.**

**b) Because of the above omission, it is not yet clear that the IOUs have all proposed: i) incentives that exceed those offered in 2010-12, as required in the recent decision; b) incentives that provide 50% of IMC at the 20% savings level and above, as required in D. 09-09-047. We request that the PIPs is refiled to clearly indicate this.**

- **SCG reply: See updated Section 4.c. titled "CAHP Incentive Rationale".**

**c) Strategic Plan milestones relevant to the CAHP were not updated:** D. 09-09-047 requires the CPUC/IOUs to update the Strategic Plan milestones with each code update. The IOUs did not do this in their RNC PIP (ED staff didn't raise it in recent talks as we weren't aware of it). IOUs are requested to include in the refiled PIP new Strategic Plan RNC/ZNE res milestones as directed in that decision.

One proposal for the updated Strategic Plan RNC/ZNE res milestones could be:

#### **2013:**

- **45% of new homes exceed Title 2008 Title 24 by 20%; and**
- **20% of new homes exceed Title 24 2008 by 40%; OR**
- **45% of new homes achieve 95% of Title 24 2013 levels; and**
- **20% of new homes exceed Title 24 2013 by 15%**

#### **2014:**

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- **100% of new homes meet 2013 Title 24**
- **20% exceed 2013 Title 24 by 15%**

\*\* These proposed updated SP milestones assume that 2013 Title 24 is 25%/14% more stringent than 2008 Title 24 for SF/MF respectively

Updating these Strategic Plan milestones is relevant to see if, for instance, IOU programs are contributed to 24-50% of the achievement of these milestones (this is a rough estimate of appropriate IOU contribution, not in any decision).

- **SCG reply: See updated Section 5.e., Advancing Strategic Plan goals and objectives, Goal #1.**

5) **Energy Advisor, Home Energy Reports and Behavior Targets-- 5% of res customers**

a) **All IOUs-**

i. **It is not at all clear that all IOUs are meeting 5% behavior program participation targets:** It is not clear that all IOUs are meeting the directives provided in D. 12-11-015 and D. 12-05-015 to ensure that all IOUs target 5% residential of all households for participation levels in behavioral programs that “are required to employ comparative usage and disclosure, ex-post measurement, and experimental design” (p. 76, D. 12-11-015). Refiling of the Energy Advisor PIP and associated Home Energy Report Appendix is required for the IOUs to indicate that they are meeting this 5% target of behavior programs using: a) comparative usage and disclosure; b) ex-post measurement; c) experimental design.

- **SCG reply: Pursuant to conversations with ED staff on March 26, April 3, and April 19, 2013, see additions to Energy Advisor PIP at Section 5, Program Design to Overcome Barriers and Section 6.e., Pilots / Initiatives. The revised PIP, Attachment 3 (at Table B), demonstrates compliance with the 5% target for residential households employing comparative usage and disclosure, ex-post measurement, and experimental design.**

ii. **Need better program summary tables:** We request that the refiled EA PIP indicate the unique budgets, savings, TRCs, and quantitative targets for the various Energy Advisor components.

We request that a revised table of program/program element targets for the program indicate the following. IOUs are currently completing a data request for this information. We request that this completed table is also added to the refiled PIP:

- **SCG reply: See “Attachment 1 Energy Advisor PIP\_Supplemental Filing.xlsx” document for this information.**



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IOU	Program Element	2013 Participation Targets	2014 Participation Targets	Total Participation Targets	2013 Budget	2014 Budget	Total Budget	net TRC	gross TRC	Total Kwh	Total KW	Total therms
PG&E	Home Energy Reports											
	Home Energy Advisor-online											
	HEA other											
	<b>Total for EA</b>											
SCE	Home Energy Reports											
	Home Energy Advisor-online											
	HEA other											
	<b>Total for EA</b>											
SDG&E	Home Energy Reports											
	Home Energy Advisor-online											
	HEA other											
	<b>Total for EA</b>											
SCG	Home Energy Reports											
	Home Energy Advisor-online											
	HEA other											
	<b>Total for EA</b>											
Total all IOUs	Home Energy Reports											
	Home Energy Advisor-online											
	HEA other											
IOU	Total Residential Meters	Total Home Energy Reports participants	Residential Customers Participating in Behavior Program (2013-14)									
PG&E												
SCE												
SDG&E												
SCG												

- iii. **Persistence: All IOUs are requested to add language to their Energy Advisor /Home Energy Report PIPs describing basic plans on how their behavioral pilots and related evaluation, will be designed to evaluate savings generally, including, when applicable, how to test the persistence of behavioral program savings. This would be met by SDG&E, for example, Adding to Appendix 1 on the Home Energy Report pilot (\$2.5 M):**

“The persistence and reliability of behaviorally based savings is not yet well understood. IOUs will ensure evaluation attention to this issue in 2013- 14, in cooperation with ED staff and consultants by: 1) varying the frequency of home report mailings for some customers from monthly to quarterly, and considering the option of discontinuing mailings altogether for some customers that have previously received comparative energy reports; and, 2) ensuring appropriate and robust evaluation design of these tests in cooperation with Energy Division staff and consultants. “

- **SCG reply: See additions in Section 8, Program Logic Model.**

- iv. **TRCs-** all IOUs are requested to provide TRCs for the Home Energy Report component of the EA program, on its own.

- **SCG reply: Pursuant to conversation with ED staff on March 26, 2013, no further action required. For SCG this is a non-resource program, so TRC is not applicable.**

v. **Individual IOUs:**

i. **SDG&E – Home Energy Reports**

- a) **Provide Quantitative participation targets for Home Energy Reports** : p. 10 of PIP references “Appendix A” that has Home Energy Reports targets, but where this “App A” is is not clear. **Not provided; please provide** (there is an “Appendix 1, but it does not contain Home Energy Reports customer targets, only awareness/ action targets. Can include in above table.
- b) The PIP for the - Energy Advisor “Residential & Small Business Behavior Change Program” (\$2.2 M) has **several gaps**, including:
  - TRC/PAC not provided
  - Energy and demand savings not provided (Table 2)
  - non energy objectives not indicated

- **SCG reply: N/A item applies to SDG&E.**

- ii. SCG does not appear to provide a summary of the Home Energy Report program element. A full summary of HER plans is requested to be submitted in refiled PIP.

- **SCG reply: See Section 6.e., Pilots / Initiatives.**

6) PLA

a) Overall IOU issues

**All IOUs are requested to refile their PIPs with the more complete description of the proposed PLA pilot projects** and related EM&V in the PIPs. The IOUs are requested to insert into their PIPs the PLA pilot description that they included in the EM&V Long Term Study Plan proposal, recently circulated to the EE Service List.

- **SCG reply: Pursuant to conversation with ED staff on March 26, 2013, no further action required. SCG did not include a pilot in its PIP.**

b) SDG&E PLA Compliance issues

- i. PIP- TRCs/PACs not provided on p. 23
- ii. PIP- subprogram budget not provided, same pg.

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- iii. **PIP- PLA - TRAINING-** PIP states the PLA sub-program "may coordinate with Energy Centers to design and implement training curriculum...." This is vague. Can SDG&E please commit or not. P. 42
- iv. **PIP- PLA - MARKETING-** Increased online marketing of highly efficient appliances was one of the main recommendations from the BCE/HEER 2010-12 Process evaluation. We request that the refiled PIP indicate specific commitments for numbers of online marketing partnerships that will be executed in 2013-14.
- v. **PLA tables -**
  - a. Table 1, 2 not complete.
  - b. Table 5 is meant to contain PLA subprogram milestones, not CPUC ones.
  - c. Table 11 is incomplete, does not contain inspection /QA sampling rates. It also is not integrated with other IOUs into **one table for all IOUs.** (in excel format).
  - d. Table 14 regarding QA provisions does not indicate which products these rates apply to; it appears that not all HEER, BCE, ARP products are listed- all must be; finally, the phrase "inspector" does not mean anything. What training or certification requirements must QC professionals have?

- **SCG reply: N/A items apply to SDG&E.**

vi. **PG&E PLA compliance issues**

- **SCG reply: Items in this section N/A as they apply to PG&E, unless a particular response is provided to be consistent statewide or as interpreted as necessary.**

**a) PLA - TRAINING-** PIP states the PLA sub-program "may coordinate with Energy Centers to design and implement training curriculum...." This is vague. Can PG&E please indicate commitment or not.

**b) PLA - MARKETING-** Increased online marketing of highly efficient appliances was one of the main recommendations from the BCE/HEER 2010-12 Process evaluation. IOUs are requested to indicate specific commitments for numbers of online marketing partnerships that will be executed in 2013-14.

- **SCG reply: See Section 10.i.vi. added description. Although this item is included under the PG&E issues for PLA, SCG provides information about specific commitments in the PIP.**

**c. Table 11** on included measures in the PLA in Attachment 3 is not complete. All IOUs are requested to submit **a complete list of all IOU measures in one table.**

- **SCG reply: See updated Table 11. Although this item is included under the PG&E issues for PLA, SCG provides information.**

**d) PLA- Tables and PPMs-**

**Table 3.1** on Short Term PPMs is incomplete

- **SCG reply: See Table 3.1. SCG believes table is complete and in compliance.**

**Table 5:** Subprogram Milestones and Timelines is incomplete and includes CPUC rather than IOU program milestones.

- **SCG reply: See Table 5; table is N/A as SCG has not identified a pilot.**

**Tables 1, 2, 8** must also be completed in a resubmitted PIP, for all IOUs.

- **SCG reply: See updated Tables 1 & 2; no change to Table 8 (SCG believes is complete).**

**e) PLA trials** – PG&E did not summarize its **updated plans for the ARP trial/pilot** in 2013. Please include in refiled PIP.

**f) Customer/Retailer participation-** Why is PG&E indicating that out of service territory participation is accepted within program?

**Table 8: Customer Eligibility Requirements (Joint Utility Table)**

Customer Eligibility Requirement (list of requirements)	PGE	SCE	SDGE	SCG
Working (e.g., cooling) appliance	X	X (AR Only)	X	TBD
Refrigerator/Freezer are 10 - 32 cubic feet in size	X	X (AR Only)	X	TBD
Units are located in IOU service territory	X	X	X	TBD
Customer has "active" service account	X	X	X	X
Residential Dwelling	X	X	X	X
Retail Store within IOU Service Territory		X	X	X
Customers within IOU Service Territory		X	X	X
Business Customers	X (AR Only)	X (AR Only)	X	
A qualifying product must be purchased and installed within program application guidelines.	X	X	X	X

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Proof of purchase must be provided with application.	X	X	X	X
1 product per active service account.		X	X	X
Product and installation may be inspected.	X	X	X	X

c) SCE PLA compliance issues:

a) **Table 11 is not complete.** All information requested for ALL IOUs in one table.

b) **Table 14 - is not complete.** What does “not applicable to SCE mean,” and what does “inspector” mean?

- **SCG reply: N/A items apply to SCE.**

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PIP Compliance Supplements for All IOUs

**ARRA Pilots**

Please profile each ARRA pilot, keeping the information about that pilot in one place in the PIP as much as possible. Please don't intersperse or mix descriptions of different pilots. Information should include ARRA pilot design elements. Make sure to identify those that the pilot is testing that differentiate it from other pilots. These design elements could include but not be limited to elements on the list below.

Please provide up front in the ARRA pilot profile a pilot budget that breaks out administrative and marketing costs, the amount available for credit enhancement, etc. Make clear what "incentive" refers to in a budget for a finance program. Provide a budget table for each ARRA pilot where it is profiled. At the beginning of the section on ARRA pilots, provide a high level budget table that combines all ARRA pilot budgets and breaks out the main budget categories. The total spending for ARRA pilots should match the line item in the budget decision. (SoCalGas – Please make sure to differentiate ARRA pilots your IOU has selected to fund from those that SoCalRen has proposed as its finance program elements.)

- SCG Reply: The ARRA Budget tables broken out by category and program are shown in Table 3 in Section 8 (Projected Sub-Program Budget) of the ARRA Originated Financing Programs PIP. Only budget details that are available and final have been provided at this time. SoCalGas will make any modifications to the various budget tables via the PIP addendum process, as applicable.

If you included savings estimates, please explain the method you used.

- SCG Reply: No savings estimates were provided for the ARRA Originated Financing Programs.

Include any PIP template tables that are applicable in the profile of the ARRA pilot. Do not attach tables in an appendix, including empty tables you did not need.

- SCG Reply: Tables and program logic models that are available have been provided in Section 9 (Sub-Program Description, Objectives and Theory) of the ARRA Originated Financing Programs PIP along with the respective program. SoCalGas will make any modifications via the PIP addendum process as applicable.
- SCG Reply: Logic models for emPower SBC and LACBPP were appended to the PIP to maximize clarity.

**Pilot design elements:**

1. Customers eligible or targeted, including FICO score range, etc., renters, owners, etc.;
2. Source of private capital. Identify lenders;
3. Credit enhancement. Who will hold these funds, what percent are they of loans, etc.;
4. Relationship to Hub if any;
5. Loan terms – length, interest rate (does it vary by lender or customer?), fees, etc.;

6. Any securitization of loan;
  7. Financeable measures? Which IOU or other retrofit programs are involved? Can retrofits be done outside of IOU programs? If solar, DG, water energy measures are included (CHF) explain how they are funded through EE support;
  8. Contractor eligibility and any QA;
  9. Any project QC, audits before or after, by what percent sample, etc.;
  10. Credit checks: based on what? Explain “meets responsible lending criteria.”
  11. Explain process of how loan transaction begins. Is it contractor or bank driven? What role does the contractor play versus the bank or other lender? How do funds flow: where does capital come from? How is it collected? How is lender paid back? What is the process in case of default or partial payment? Etc.;
  12. Targets of number of loans, size of loans, dollars loaned, type of customer reached, etc.;
  13. Milestones in roll out of program through 2014;
  14. Identify where finance pilots overlap in geographical territory if they serve the same customers; and
  15. Highlight and explain any other aspects of the pilot design that characterize it or distinguish it.
- **SCG Reply: Pilot design elements have been provided in Section 9 (Sub-Program Description, Objectives and Theory) of the ARRA Originated Financing Programs PIP along with the respective program.**

Logic Models:

- PG&E – Empower SBC logic model is not readable; CHF logic model seems to be missing a lot of information (Same in SCE PIP)
- SoCalGas & SDG&E – Please provide logic models for ARRA pilots to illustrate how pilot works
  - **SCG Reply: Program logic models that are available have been provided in Section 9 (Sub-Program Description, Objectives and Theory) of the ARRA Originated Financing Programs PIP along with the respective program. SoCalGas will make any modifications via the PIP addendum process as applicable.**
  - **SCG Reply: Logic models for emPower SBC and LACBPP were appended to the PIP to maximize clarity.**

**OBF Program Supplements for All IOUs**

1. Relationship to rebate/incentive: (Page 7 of statewide PIP) Please clarify this section across the statewide PIP – what rebate/incentive terms the IOUs will offer in 2013, beginning when, and when they might consider changing them, and how. Refer to the decision section that clarifies the CPUC is not asking the IOUs to stop offering rebates with OBF loans. (I do not think the “finance as a resource” issue figures in here. Please explain how it fits if references to it are kept.)
  - **SCG Reply: Please refer to *Relationship to rebate/incentive* in Section 9 (Sub-Program Description, Objectives and Theory) of the OBF PIP.**

- SCG Reply: Through follow up discussions (April 19, 2013 email with Energy Division staff), it was suggested to replace the Decision language in this section. However, the language referenced in D.12-11-015, is specific to New Financing Pilots and thus was not included as part of the OBF PIP.
2. Define “site bundling” in the statewide PIP on Page 7
    - SCG Reply: Please refer to Site Bundling in Section 9 (Sub-Program Description, Objectives and Theory) of the OBF PIP.
  3. Update passages that refer to actions IOUs will take to say **when** (month/year) they will occur, if they haven’t already: For example the PIP section on “vendor support” on Page 3 of the SDG&E (statewide) PIP says: “Utilities will adopt vendor support guidelines and standard participation agreements to monitor performance, manage customer expectations, and set clear roles and responsibilities for all parties.”
    - SCG Reply: Please refer to Section 10 (Program Implementation details) of the OBF PIP.
  4. Tables in the PIP template: Where you used a table provided in the PIP template – include it in the body of the PIP, not as an attachment. If you did not use the table, do not attach it and note that in the relevant section of the PIP where the table is referred to. For example, on Page 10 of the SDG&E PIP, Table 9: Contractor Participant Eligibility Requirements (Joint Utility Table) says “See Table 9 in Attachment 2.” There is no information in that table. Please note that rather than referring the reader to an empty table. The same is the case with the next table, Table 10, and other tables. If the table says “TBD,” then note that in the PIP, not in an attachment.
    - SCG Reply: Tables have been embedded within the PIP template and if the table is not available or irrelevant it’s been noted as such. SoCalGas has indicated that tables may be updated as applicable via the PIP addendum process.
  5. Where the narrative and text of your PIP (not budget tables) differs from the statewide PIP that the other IOUs are using, please underline that text so the reader can more easily find it. (For example, on Page 138 SCE says: “The Statewide OBF Team has worked closely to align OBF program features and requirements to the maximum extent possible . . . .” These two paragraphs are just in the SCE PIP. Similarly, where IOUs provided an estimate of billing system upgrade costs in their PIPs, the projections differ but they are not easy to find without an underline.
    - SCG Reply: Utility-specific information that deviates from the statewide PIP is underlined and bolded throughout the PIP.
  6. Budget tables at the front of the PIP section on statewide OBF Programs: SDG&E and SoCalGas – Note in the table the entire funding amount for OBF so that it matches budget decision table; identify non-program funds as the source for the loan pool if necessary.



- SCG Reply: Please refer to Table 1 in Section 2 (Total Projected Program Budget and Savings) and Table 1 in Section 8 (Projected Sub-Program Budget).
7. SoCalGas & SCE – Please describe in more detail your plans to coordinate joint projects. (This is discussed as a possibility in the decision.)
- SCG Reply: Please refer to Section 13 (Additional information as required by Commission decision or ruling or as needed) of the OBF PIP.

Let me know if you have questions or need clarification.