**From:** "Tagnipes, Jeorge S." <[jeorge.tagnipes@cpuc.ca.gov](mailto:jeorge.tagnipes@cpuc.ca.gov)>  
**Date:** May 20, 2016 at 5:07:55 PM PDT  
**To:** "Best, Carmen" <[carmen.best@cpuc.ca.gov](mailto:carmen.best@cpuc.ca.gov)>  
**Cc:** "Skala, Pete" <[pete.skala@cpuc.ca.gov](mailto:pete.skala@cpuc.ca.gov)>  
**Subject:** **R0901019 RRIM Energy Division Data Response #6**

# Risk Reward Incentive Mechanism Rehearing – R.09-01-019

Energy Division Data Response 06

Updated:  5/20/2016

Intro:  PG&E, SCE, SDG&E/SCG, and ORA submitted data requests to the Energy Division for the 2006-2008 Risk Reward Incentive Mechanism Rehearing.  In an effort to ensure all parties have equal access to both the requested information and the responses, Energy Division requests the parties to post these responses on their respective web sites and distribute the link to all parties in R. 09-01-019.

| # | Requesting Party | Question | Response |
| --- | --- | --- | --- |
| 1 | PGE | Follow up to PG&E Question 2.3.1 on CFL Interactive Effects  The above description and links do not provide the detailed assumptions nor the model that would be needed to develop the estimate of the negative therm interactive effects.  PG&E recognizes that an “ERT Interactive Effects Results Viewer” has been provided that contains some negative therm interactive effect information.  In this data request we are seeking the assumptions, data, input sheets, and model(s) used to develop the estimates provided in the “ERT Interactive Effects Results Viewer.”  The data requested should be sufficient to recreate the values shown in the “ERT Interactive Effects Results Viewer.”  As a clarification, material that would meet the above request would include:  a) The building energy simulation model input files that were used to determine negative therm interactive effects.  The material would also note which input parameters are employed to model CFL installations and provide the data supporting the choice of input parameter values employed.  b) A description of the data weighting structure and values employed to derive the final negative therm interactive effect values identified in the “ERT Interactive Effects Results Viewer.”  c) A spreadsheet or table that was used to organize the modeling that includes a summary of the input parameters for the full set of model input files used to calculate the results in the “ERT Interactive Effects Results Viewer.” | This additional information would require paying for additional consultant resources to perform the work requested.  Currently there is no funding mechanism or budget to perform this work. |
| 2 | PGE | Follow up to PG&E Question 2.3.2 on Preliminary Results to 2013-2014 Study  The status for this project on the public Evaluation Project Status site (PSR; <https://www.emvpsr.com/Projects/>) suggests that a draft report has been completed. “Submitted draft report. Awaiting Comments to finalize report.”  However, there is no draft report available for review on the Public Document Area. PG&E requests public release of the draft report, which would include preliminary results from this ongoing 2013-2014 interactive effects study, managed by Energy Division. As a clarification, preliminary results would also include spreadsheet analysis to support the preliminary conclusions of the draft report. In the event that the Energy Division is not willing to release the draft report immediately for public review, then PG&E requests the draft be provided to the parties to this proceeding confidentially. | The internal draft has been submitted.  Once Commission Staff have reviewed the report, there will be a public comment process. |
| 3 | PGE | Follow up to PG&E Question 2.1.1 on Supplemental Details on Methodology Used to Derive NTG for CFLs    As a clarification, PG&E provides the following additional details to clarify what would meet the needs of the original request:  a) the data weights for each method  used to derive the final IOU-specific NTG values for the Upstream CFL program, b) the individual evaluator’s notes/reasoning on the selection of weights used to derive the final NTG values, and c) for econometrically-derived, channel-specific NTG values used in the determination of the final NTG values, the standard errors of the final estimates and the results of alternative models that were reviewed prior to the final specifications. | This additional information would require paying for additional consultant resources to perform the work requested.  Currently there is no funding mechanism or budget to perform this work. |
| 4 | PGE | Follow up to PG&E Question 3.1 Strata for Evaluated Projects and Application of Gross Results to Full Population for *2006-2008 PG&E Fabrication, Process and Manufacturing Projects (henceforth known as “FAB”)*  The above links to Final Site Reports (FSR) do not provide a full answer to the request. We assume that the terms “tier” and “strata” are used in the FAB report interchangeably. If this is incorrect, please clarify the distinction. Assuming that “tier” and “strata” are synonymous, we refer to both as tiers below. Most of the project FSRs, which were developed for projects with a gross ex-post assessment, do identify a tier. However, this data does not meet our needs for the following reasons.  1) The tier is not available in some of the FSRs (e.g. projects B053, B073, B077, B089 and B135). 2) There is a lack of transparency on how the criteria for tier assignments were set. There are unexpected overlaps in the strata identified in the FSRs, as shown in Table A below. For example, the minimum kWh for Tier 1 (626,641 kWh) is smaller than the maximum in Tier 2 (2,299,921). This overlap occurs in all tiers, except Tier 5. Due to the above reasons, there is a continuing need to answer the original request.    Table A: kWh and Therm Ranges in Each Tier per Table 4.1 and FSRs of FAB report.     |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | | **Range of Values in each Tier** | | |  | | | | **Tier 1** | **kWh** | **Therms** |  | | | | Min | 626,641 | 1,264,741 |  | | | | Max | 14,966,829 | 4,919,708 |  | | | | **Tier 2** | **kWh** | **Therms** |  | | | | Min | 1,618,033 |  |  | | | | Max | 2,299,921 |  |  | | | | **Tier 3** | **kWh** | **Therms** |  | | | | Min | 487,263 | 581,275 |  | | | | Max | 2,483,163 | 1,037,385 |  | | | | **Tier 4** | **kWh** | **Therms** |  | | | | Min | 152,008 | 477,292 |  | | | | Max | 3,696,381 | 623,988 |  | | | | **Tier 5** | **kWh** | **Therms** |  |  |  | | Min | 14,362 | 33,489 |  |  |  | | Max | 77,070 | 260,000 |  |  |  | | This additional information would require paying for additional consultant resources to perform the work requested.  Currently there is no funding mechanism or budget to perform this work. |
| 5 | PGE | Follow up to **PG&E Question 3.2:** Description of the Derivation of the NTGR Score for Projects without a Final Site Report (FSR); NTG Descriptions and Application of NTGR to Full Population for *2006-2008 PG&E Fabrication, Process and Manufacturing (FAB) Projects*  The CPUC response points us to publicly available reports, but does not address the process of NTG score derivation for projects without an accompanying FSR. For context, the evaluation of the Fab program includes 127 fully evaluated projects with a Final Site Report (FSR) for each. In most cases the FSR included a brief description of the reasoning for the NTGR score. An additional 179 projects were evaluated from a NTGR perspective; however, no written description of the reasoning for these 179 NTGR scores was provided. Appendix C.3 showed key scores used to derive the final NTGR score for these but lacked an explanation for the sub-scores and the final score, as was done in the FSRs.  We seek a written description of the reasoning for the NTG scores for the 179 projects without an FSR that were assigned a specific NTGR score. | This additional information would require paying for additional consultant resources to perform the work requested.  Currently there is no funding mechanism or budget to perform this work. |
| 6 | PGE | Follow up to **PG&E  Question 3.1:** Strata for Evaluated Projects and Application of Gross Results to Full Population for *PG&E Agricultural and Food Processing Program Gross Evaluation Results (henceforth “Ag/FP”)*  The CPUC response does not provide a response with regard to the Ag/FP program.  To clarify, material that would be responsive to the request would include the following:   * Identifying the strata for each of the projects identified in Tables 14, 25, 37, and 49 in the Ag/FP report, as used to derive the GRR results identified in Tables 1, 2, 3, 4, 25, 37, and 49. If, (as happened with the FAB report), there is overlap across the Strata, we need explanations and related documentation supporting the rationale used to develop each strata and how projects were assigned to each strata. * A confirmation that the Tiers indicated in the FSRs are indeed equivalent to the 3 or 4 strata used to represent the entire population as shown in Tables 9 to 12 on pages 14-15 of the Ag/FP report, and * Finally, a table that shows the final values for ex-ante and ex-post gross savings that were used for each project that had a gross savings assessment done (typically, those with an FSR), including which Tier they were in. This requires adding a column to Tables 25, 37 and 49, that indicates what Strata (Tier) each project (Site ID) falls under. | This additional information would require paying for additional consultant resources to perform the work requested.  Currently there is no funding mechanism or budget to perform this work. |
| 7 | ORA | cid:image001.jpg@01D1B2BA.25C69ED0  1(a) Did PG&E raise the alleged transcription error in 2004-2005 Savings prior to the July 2010 publication of the *2006-2008 Energy Efficiency Evaluation Report*?     (b) Did PG&E have the opportunity to raise the alleged transcription error in 2004-2005 Savings prior to the July 2010 publication of the *2006-2008 Energy Efficiency Evaluation Report*?  Please explain.  (c) Does the Energy Division agree that the alleged transcription error in 2004-2005 Savings is an error as opposed to a disagreement regarding the application of the Commission’s 2006-2008 policies regarding evaluation, measurement and savings (EM&V) of energy efficiency savings?  Please explain. | 1(a).  Commission staff reviewed the comment/response matrix (<ftp://ftp.cpuc.ca.gov/gopher-data/energy%20efficiency/Appendix%20O.%202006-2008%20EE%20Evaluation%20Report%20Comment%20Responses.pdf>) to the 2006-2008 Energy Efficiency Evaluation report and searched for the term “2004” and did not find a comment related to the transcription error. (b)  PG&E had the opportunity to comment on the 2006-2008 Energy Efficiency Evaluation Report.  Comments are posted on the Public Document Area for the report. <http://www.energydataweb.com/cpuc/comment.aspx?did=564>  (c) The other utility numbers in the spreadsheet match exactly with the table in the scenario analysis report, so it is curious why PG&E’s numbers do not match exactly.  Commission staff would have to trace the documentation to determine if there is a discrepancy or not. |
| 8 | ORA | 2(a) Did PG&E raise the alleged omission of 2008 C&S Programmatic Activity prior to the July 2010 publication of the *2006-2008 Energy Efficiency Evaluation Report*?  (b) Did PG&E have the opportunity to raise the alleged omission of 2008 C&S Programmatic Activity prior to the July 2010 publication of the *2006-2008 Energy Efficiency Evaluation Report*?  Please explain.  (c) Does the Energy Division agree that the alleged omission of 2008 C&S Programmatic Activity is an error as opposed to a disagreement regarding the application of the Commission’s 2006-2008 policies regarding EM&V of energy efficiency savings?  Please explain. | 2(a) PG&E raised this issue in their comments to the 2006-2008 Energy Efficiency Evaluation Report, see page 74 of <ftp://ftp.cpuc.ca.gov/gopher-data/energy%20efficiency/Appendix%20O.%202006-2008%20EE%20Evaluation%20Report%20Comment%20Responses.pdf> ( b) PG&E had the opportunity to comment on the 2006-2008 Energy Efficiency Evaluation Report.  Comments are posted on the Public Document Area for the report. <http://www.energydataweb.com/cpuc/comment.aspx?did=564> (c)  Commission staff provided the following response in 2010:  D.05-09-043, OP 14(f), states that “savings from pre-2006 codes and standards advocacy work shall not be counted when calculating net resource benefits (“performance basis”) or cost-effectiveness associated with portfolios plans for 2006 and beyond, either on a prospective or ex-post basis. OP 14(e) of the said decision also states that, “On a forward looking basis, savings from codes and standards advocacy work undertaken in 2006 and beyond shall be counted when calculating either net resource benefits (“performance basis”) or cost effectiveness (TRC or PAC tests).” The original analysis in the codes and standards program evaluation report treated savings of a couple of standards that went into effect after 2006 but before 2009 the same as the standards effective as of Jan 1, 2006. The logic was that these were basically Tier 2 of standards developed prior to 2006 or modifications to the pre-2006 standards that resulted from mostly from IOU efforts prior to 2006. One standard went into effect in April 2006, for example, and it seemed most of the effort must have occurred prior to  2006 to get it adopted. We will refer the issue of verifying and counting savings that result from post-2006 Codes and Standards program efforts to the EMV effort of the next program cycle. Savings related to  post-2005 C&S support efforts are beyond the assigned scope of the codes and standards evaluation conducted for the 2006-2008 program cycle. As noted in D.07-09-043. Section 9.3.2, the scope of the evaluation efforts was to estimate the “bonus savings” for the 2006- 2008 program cycle: "All parties commenting on this issue recommend that 50% of the savings attributed to pre-2006 C&S advocacy work count towards establishing whether the MPS has been met for the 2006-2008 cycle. They also recommend excluding these savings from the calculation of PEB. We find these recommendations to be fully consistent with our determinations in D.05-09-043, as discussed above, and will adopt them. As stated in that decision, for this purpose the C&S savings are to be verified (as opposed to ex ante estimates used for planning purposes). Energy Division's EM&V contractors are in the process of verifying those savings estimates, and Energy Division will be including the verified numbers in its Annual Verification Reports.” |
| 9 | ORA | 3(a) Did PG&E raise the alleged transcription and calculation errors in low income energy efficiency savings prior to the July 2010 publication of the *2006-2008 Energy Efficiency Evaluation Report*?  (b) Did PG&E have the opportunity to raise the alleged transcription error and calculation errors in low income energy efficiency savings prior to the July 2010 publication of the *2006-2008 Energy Efficiency Evaluation Report*?  Please explain.  (c) Does the Energy Division agree that the alleged transcription error and calculation errors in low income energy efficiency savings are errors as opposed to a disagreement regarding the application of the Commission’s 2006-2008 policies regarding EM&V of energy efficiency savings?  Please explain. | 1(a).  Commission staff reviewed the comment/response matrix (<ftp://ftp.cpuc.ca.gov/gopher-data/energy%20efficiency/Appendix%20O.%202006-2008%20EE%20Evaluation%20Report%20Comment%20Responses.pdf>) to the 2006-2008 Energy Efficiency Evaluation report and searched for the term “LIEE” and did not find a comment related to the transcription error. (b)  PG&E had the opportunity to comment on the 2006-2008 Energy Efficiency Evaluation Report.  Comments are posted on the Public Document Area for the report.  Commission staff notes there PG&E and SCE filed joint comments to the Draft Scenario Analysis report on May 28, 2010 in R.09-01-019:  <http://docs.cpuc.ca.gov/PublishedDocs/EFILE/CM/118720.PDF>.   Commission staff did a search for the terms “LIEE”, “transcription,” and low-income and did not find a comment mentioning a transcription error. (c) Commission staff looked up the PY2008 LIEE annual report and it does look like the number used in the Scenario Analysis report spreadsheets is different from PGE’s PY2008 LIEE annual report. |
| 10 | ORA | 4(a) Did PG&E raise the alleged Misapplication of Percent of 2008 Sales deferred to 2009 prior to the July 2010 publication of the *2006-2008 Energy Efficiency Evaluation Report*?  (b) Did PG&E have the opportunity to raise the alleged Misapplication of Percent of 2008 Sales deferred to 2009 prior to the July 2010 publication of the *2006-2008 Energy Efficiency Evaluation Report*?  Please explain. (c) Does the Energy Division agree that the alleged Misapplication of Percent of 2008 Sales deferred to 2009 is an error as opposed to a disagreement regarding the application of the Commission’s 2006-2008 policies regarding EM&V of energy efficiency savings?  Please explain. | (a) Commission staff searched for the terms “2009” and “sales” and “installations” and did not find this specific issue in the comments to the 2006-2008 Energy Efficiency Evaluation Report.  However, SCE did raise a comment:  “The Draft Report makes a determination that a substantial percentage of CFLs delivered upstream were either purchased and not installed or not purchased at all. SCE disagrees with the methodologies used by the measurement study to reach its conclusions. The Draft Report acknowledges that ‘bulbs sold at a later date may still result in future energy savings.’ A customer is expected to eventually install all of the purchased CFLs.” (b) PG&E had the opportunity to comment on the 2006-2008 Energy Efficiency Evaluation Report.  Comments are posted on the Public Document Area for the report.  (c)  PG&E appears to recalculate the numbers in Table 12 on page 34 and Table 14 on page 39 of the upstream lighting report, rather than identify an error:  <http://www.energydataweb.com/cpucFiles/18/FinalUpstreamLightingEvaluationReport_2.pdf> |
| 11 | ORA | 5(a) Did PG&E raise the alleged omission of Workforce Education and Training program savings prior to the July 2010 publication of the 2006-2008 Energy Efficiency Evaluation Report?  (b) Did PG&E have the opportunity to raise the alleged omission of Workforce Education and Training program savings prior to the July 2010 publication of the *2006-2008 Energy Efficiency Evaluation Report*?  Please explain.  (c) Does the Energy Division agree that the alleged omission of Workforce Education and Training program savings is an error as opposed to a disagreement regarding the application of the Commission’s 2006-2008 policies regarding EM&V of energy efficiency savings?  Please explain. | (a) Commission staff searched for the terms “WE&T” and “workforce” and “training” and did not find this specific issue of missing Workforce, Education and Training program savings in the comments to the 2006-2008 Energy Efficiency Evaluation Report.  However, PG&E did comment that “non-resource programs were not included for PG&E”.  Commission staff responded that “PGE was missing costs for C&S, Education and  Training, Marketing and Outreach, canceled programs and EM&V expenditures. SCE was missing costs for C&S and EM&V expenditures. SDGE and SCG were missing costs for C&S. For all utilities, EMV expenditures should remove EMV costs from Emerging Technology programs” and adjusted the IOU\_E3\_CostQ408 table in the ERT (see page 88 of the comment/response matrix (<ftp://ftp.cpuc.ca.gov/gopher-data/energy%20efficiency/Appendix%20O.%202006-2008%20EE%20Evaluation%20Report%20Comment%20Responses.pdf>) to the 2006-2008 Energy Efficiency Evaluation report).  (b) PG&E had the opportunity to comment on the 2006-2008 Energy Efficiency Evaluation Report.  Comments are posted on the Public Document Area for the report.  (c) Commission staff reviewed the E3 tables in the ERT.  If PG&E claimed savings for a program in 2006-2008, there should have been a corresponding E3 calculator, and those savings should have been captured in the E3 claims table in the ERT. There were no savings for PG&E Workforce, Education and Training program, which at the time was referred to as PGE2010 – Education and Training.  However, Commission Staff tried to review monthly reports from the 2006-2008 period, and it does appear that PG&E reported savings for PGE2010 in the monthly reports.   But it is not clear if PGE2010 had an E3 calculator, which is where the savings would have been captured and transferred over to the ERT. |

Jeorge S. Tagnipes | 415.703.2451 | [jeorge.tagnipes@cpuc.ca.gov](mailto:jeorge.tagnipes@cpuc.ca.gov)  | Energy Division | [www.cpuc.ca.gov/lap](http://www.cpuc.ca.gov/lap)