PG&E Comments to Appendix I: Guidance for Determination of Baseline for Gross Savings

1. The four explanatory paragraphs are very helpful. Can these be created for other boxes in flowchart?
2. Can we get some examples of projects that don't meet program eligibility requirements?
3. Can the "Claimed baselines" boxes be deleted? We're assuming these guidelines will be used for both pre-application and ex post baseline determination.
4. What is meant by natural turnover?
5. Who/how will RUL be determined for each project?
   a. This will be very difficult. May be simpler to use a standard/default RUL for most projects as proposed in the KEMA DEER 2008 EUL-RUL Analysis.
   b. A provision for exceptions could be allowed where meaningful evidence of RULs other than the default exists.
   c. Note that PG&E's current MDSS tracking system does not readily support stepped savings over time, generated by two different baselines.
6. "Compelling evidence replacement is program induced?" has "yes/no" paths.
   a. Not clear how this would function. During the 06-08 impact evaluations we saw this type of attribution question rarely received a yes (100%) or no (0%) answer; partial influence was extremely common. Baselines need to be determined with greater clarity.
   b. Should customer options be considered for determining baselines?
7. How will code or regulation baselines be determined when the code or regulation has multiple options and the customer is not changing technology types?
8. How will code or regulation baseline be determined when the code or regulation has multiple options and the customer is changing technology types? (E.g., converting from a steam to hot water system.)
9. When regulation or codes are required, but compliance rates are low, is code still the appropriate baseline? [Probably yes, but evaluators need to be careful in savings accounting across evaluations.]
10. The "Minimum production/service requirement" would benefit from additional explanation in cases where existing equipment is oversized.
11. Appendix I should recognize that there will exist projects and programs that fall outside the scope of the baseline guidance, e.g., RCx, RNC, NRNC, MBCx.