

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

RESOLUTION E-4385

December 2, 2010

R E S O L U T I O N

Resolution E-4385. Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas and Electric Company request approval of Program Performance Metrics for 2010-2012 statewide energy efficiency programs and subprograms.

PROPOSED OUTCOME: Approves Program Performance Metrics for Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas and Electric Company for 2010-2012 statewide energy efficiency programs and subprograms.

ESTIMATED ANNUAL COSTS: There is no cost or rate impact of this resolution. Costs of tracking and reporting Program Performance Metrics are included in approved budgets for 2010-2012 energy efficiency portfolios and evaluation, monitoring and verification (EM&V) activities as provided for in Decision (D.) 09-09-047 and D. 10-04-029.

By Advice Letter 2476-E (Southern California Edison Company); Advice Letter 3120-G/3675-E (Pacific Gas & Electric Company); Advice Letter 4114 (Southern California Gas Company); and Advice Letter 2172-E/1951-G (San Diego Gas & Electric Company) filed on May 28, 2010.

SUMMARY

This Resolution approves Program Performance Metrics (PPMs) for Pacific Gas and Electric Company, Southern California Edison Company, Southern California Gas Company and San Diego Gas and Electric Company for 2010-2012 statewide energy efficiency programs and subprograms. It also identifies associated program objectives and market transformation indicators, and

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directs further efforts to integrate these into evaluation, monitoring and verification (EM&V) activities.

By Advice Letter (AL) 2476-E, AL 3120-G/3675-E, AL 4114, and AL 2172-E/1951-G filed on May 28, 2010, Southern California Edison Company (SCE), Pacific Gas & Electric Company (PG&E), Southern California Gas Company (SCG) and San Diego Gas & Electric Company (SDG&E) (subsequently referred to as the “Joint Utilities”), sought to comply with Ordering Paragraph (OP) 11 in Decision (D.) 09-09-047 requiring Joint Utility submission, via a single Advice Letter, of PPMs for 2010-2012 statewide energy efficiency programs and subprograms.

This resolution (1) approves modified PPMs for the Joint Utilities 2010-2012 statewide energy efficiency programs and subprograms, (2) identifies associated objectives and long term market transformation indicators (MTIs) and (3) directs the Joint Utilities to work collaboratively with Energy Division staff to select a subset of these market transformation indicators for data collection, tracking and reporting as part of 2010-2012 energy efficiency evaluation, monitoring and verification (EM&V) activities.

There is no cost or rate impact of this resolution. Costs of data collection, tracking and reporting for the PPMs that are not already covered by program budgets may be included in 2010-2012 energy efficiency portfolio and Evaluation, Measurement and Verification (EM&V) budgets as approved in D. 09-09-047 and D. 10-04-029. Any additional costs of data collection, tracking and reporting for long-term market transformation indicators will be reviewed and agreed as part of Energy Division’s and the Joint Utilities’ 2010-2012 EM&V priority setting, and included in EM&V budgets, also as approved in D. 10-04-029.

BACKGROUND

D. 09-09-047 approved programs and budgets for the 2010-2012 energy efficiency portfolios of the Joint Utilities. D. 09-09-047 approved twelve statewide energy efficiency programs and 44 associated subprograms, as well as additional “local” utility programs (operated by just one utility), third party programs, and pilot programs for the Joint Utilities.

D. 08-09-040 approved the California Long Term Energy Efficiency Strategic Plan (CEESP) and directed Energy Division to develop a “process to track progress towards end points for program efforts and progress metrics.” D. 09-09-047 noted that “defined

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end points” in this context refers to the “time-bound and quantitative milestones and targets included in the Strategic Plan, specifically the Big Bold Programmatic Initiatives on zero net energy buildings, as well as the other quantitative targets contained in the Strategic Plan” (D. 09-09-047 at 89).

D. 09-09-047 defined PPMs as “objective, quantitative indicators of the progress of a program toward the short and long-term market transformation goals and objectives in the Strategic Plan” (D. 09-09-047 at 91). It identified PPMs as essential to track the progress of each program towards the Commission’s market transformation goals (D. 09-09-047 at 98).

D. 09-09-047 required the Joint Utilities to jointly file, within 120 days of the decision, a PPM Advice Letter (AL) requesting approval of proposed logic models and program performance metrics for each statewide program and associated subprograms (D. 09-09-047, OP 11). D. 09-09-047 further directed the Joint Utilities to submit completed Program Performance Indicator worksheets and tables (D. 09-09-047, Appendix 2.2 and Appendix 2.3 of the decision) for each of the above programs. D. 09-09-047 at 368 states that the Joint Utilities shall report performance metrics “on an annual basis via the Energy Efficiency Groupware Application (EEGA) or a similar database.” In addition, D. 09-09-047 at 97 requires that the Joint Utilities include in their Joint AL, “key data sources and indicators for which to begin collecting market transformation baseline data.”

Program Performance Metrics (PPMs):

D. 09-09-047 identifies several purposes for PPMs. These are:

1. To track California’s progress towards achievement of Strategic Plan objectives, specifically the Big Bold Programmatic Initiatives and other key Plan goals and objectives (D. 09-09-047 at 98);
2. To inform portfolio development and necessary modifications in future portfolio decisions, including improving program design or eliminating non-performing programs (D. 09-09-047 at 98);
3. To target the next generation of improvements, and thus, continue the cycle of market transformation (D. 09-09-047 at 98); and
4. To evaluate program-specific quantitative and qualitative measures through EM&V activities (D. 09-09-047 at 300).

D. 09-09-047 states that Program Performance Metrics shall comply with the following principles:

1. The metrics shall be designed for simplicity and cost effectiveness when considering data collection and reporting requirements (D. 09-09-047 at 92);
2. Integrated metrics shall be developed for programs that employ more than one technology or approach, such as whole building programs (D. 09-09-047 at 92);
3. The metrics shall link short-term and long-term strategic planning goals and objectives to identified program logic models (D. 09-09-047 at 92);
4. The metrics shall track progress towards Commission-adopted market transformation goals (D. 09-09-047 at 91);
5. The metrics shall allow the Commission to evaluate progress toward market transformation as a factor in determining whether the programs should be continued, modified or eliminated in future portfolios (D. 09-09-047 at 98); and
6. Performance metrics shall be maintained and tracked in the Energy Efficiency Groupware Application (EEGA) database (or a similar database to be determined under the guidance of Energy Division) (D. 09-09-047 at 92).

Market Transformation Indicators:

D. 09-09-047 requires the Joint Utilities to include key data sources and indicators for which to begin collecting market transformation baseline data in their PPM Advice Letter, as noted above. D. 09-09-047 also requires Energy Division to develop recommendations for market transformation indicators and related data collection and tracking processes, and to present these recommendations in a workshop followed by a

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public comment period. D. 09-09-047 requires Energy Division to focus its efforts in this area on a “subset of portfolio programs or measures that have the most impact in terms of their importance, such as the Big Bold Programmatic Initiatives, their savings potential or dollars spent” (D. 09-09-047 at 96). D. 09-09-047 notes that the purpose of the market transformation indicators and associated market transformation tracking framework is that it will “enable the Commission to track progress on implementation of the Strategic Plan and for specific technologies and measures” (D. 09-09-047 at 94).

Chronology:

D. 09-09-047 required the utilities to file the PPM Advice Letter 120 days from the effective date of the decision, originally falling on January 22, 2010. On January 19, 2010, the IOUs jointly requested and were granted by the Commission’s Executive Director, a 120 day extension, thereby establishing a new due date of May 21, 2010. The Joint Utilities subsequently requested an additional extension of one week to allow additional time for internal review of the PPMs, establishing a final due date of May 28, 2010. D. 09-09-047 directed the Joint Utilities to submit completed Program Performance Indicator worksheets and tables (see Appendix 2.2 and 2.3 in D. 09-09-047) for each of the statewide programs and associated subprograms. In their filing the Joint Utilities utilized updated Program Performance Indicator Worksheets as provided by Energy Division on March 15, 2010. D. 09-09-047 acknowledged that overarching metrics may be more appropriate than program-specific metrics and noted no objection to the Joint Utilities applying one set of program metrics to several programs if the metrics are otherwise valid for each program (D. 09-09-047, p. 92).

Beginning in January, 2010, Energy Division staff worked with the Joint Utilities to clarify expectations for the contents of the Joint Utility AL. Between January and May of 2010, Energy Division staff held numerous meetings and exchanged communications with the Joint Utilities, addressed many concerns regarding what the Joint Utilities claimed were unclear, and in some cases contradictory directions being provided by D. 09-09-047 on developing and identifying appropriate PPMs. The Energy Division worked to provide clear, detailed guidance through a series of communications. These communications culminated in a May 11, 2010 guidance communication from Energy Division that confirmed the revised May 28, 2010 filing date and recognized that in view of unresolved interpretations of the Commission’s direction, further conversations would be needed to identify the appropriate PPMs even after the Joint Utility AL was filed. In addition, this

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guidance communication directed the Joint Utilities to proceed with their approach for development of PPMs for the May 2010 advice letter submission.

On May 28, 2010, the Joint Utilities filed Advice Letter 2476-E (SCE), Advice Letter 3120-G/3675-E (PG&E), Advice Letter 4114 (SCG), and Advice Letter 2172-E/1951-G (SDG&E) (hereafter the "Joint Utility AL").

The Joint Utility AL, filed on May 28, 2010, included the following:

- Completed Program Performance Indicator Worksheets (Attachment A);
- Updated program logic models as indicated in the Program Performance Indicator Worksheets (also part of Attachment A);
- A discussion to address the extent to which each program and sub-program plan included an end game for each technology or practice that transforms building, purchasing, and use decisions to become either standard practice, or incorporated into minimum codes and standards (Attachment B);
- Program targets for the Sustainable Communities pilot programs for Southern California Edison Company, Southern California Gas Company, and San Diego Gas & Electric Company (Attachment C);
- Quantitative targets for the Sustainable Portfolios pilot program for Southern California Edison Company (Attachment D);
- A draft template that outlines how the Joint IOUs will develop, organize and transfer information on best practices to the statewide local government program coordinator (Attachment E);
- A description of the integrated program evaluation and management structures put in place to ensure linkages between subprograms to

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minimize lost opportunities for the Direct Install Commercial subprogram (Attachment F);

- A description of an integrated internal management and evaluation structure that will ensure increased coordination and information sharing between the local and the statewide commercial programs, both within utility and between utilities for Southern California Gas Company and San Diego Gas & Electric Company (Attachment G); and
- The IOUs' Program Performance Metric Selection Process Flow and Narrative (Attachment H).

NOTICE

Notice of AL 2476-E, AL 3120-G/3675-E, AL 4114 and AL 2172-E/1951-G was made by publication in the Commission's Daily Calendar. The Joint Utilities state that a copy of the Advice Letter was mailed and distributed in accordance with Section 3.14 of General Order 96-B.

PROTESTS

Advice Letter 2476-E, AL 3120-G/3675-E, AL 4114 and AL 2172-E/1951-G was timely protested by the Division of Ratepayer Advocates (DRA) on June 17, 2010.

Pacific Gas and Electric Company, on behalf of the Joint Utilities, timely responded to the protests of the Division of Ratepayer Advocates on June 24, 2010.

DISCUSSION

Energy Division reviewed the Joint Utility AL and found it to be deficient on several points:

- **The scope of PPMs filed was insufficient to fully meet all D.09-09-047 directives.** Overall, the filing did not meet the purposes for which D.09-09-047 intended PPMs to be developed.¹
- **Program objectives were unspecified and/or did not meet “SMART”² criteria.** Appendix 2 (p. 5) of D. 09-09-047 indicates that program objectives should be specified as and conform to the “SMART” convention. Rather than specify “SMART” program and subprogram objectives, the IOUs’ filing indicated “see [Program Implementation Plans] (PIPs)” in the required field of the PPM worksheet.” Staff’s review of the PIPs rarely turned up program objectives that meet “SMART” criteria.
- **Program logic models associated with the PPMs did not clearly link to Strategic Plan objectives.** OP 11 b of D. 09-09-047 required the Joint Utilities to file updated program and subprogram logic models alongside the completed Program Performance Indicator worksheets. While Strategic Plan objectives were often included in the filed PPM worksheets, the logic flow within the associated program/subprogram logic models from program activities, program outputs and program short term outcomes on the one hand to long-term market transformation outcomes³ and Strategic Plan objectives on the other was faulty.

¹ See Background section above for the list of purposes for PPMs contained in D. 09-09-047.

² Appendix 2 (p. 5) of D. 09-09-047 indicates that program objectives associated with Program Performance Metrics should be specified as and conform to the “SMART” convention as being: Specific, Measurable, Ambitious, Realistic, and Time-Bound

³ The updated Program Performance Indicator Worksheets provided by Energy Division to the Joint Utilities on March 15, 2010 defined these terms as follows: 1) “**Program activities**” refers to performance metrics associated with the critical work activities in the current program cycle that will result in specific program outputs and outcomes.... Activities performance metrics should line up with the "activities" box in the logic model; b) “**Program outputs**” represent what a program actually does; output metrics should be high-quality and efficient, and critical for achieving intended outcomes... [Program] output performance metrics should line up with the "output" box in the logic model; c) “**Program short-term outcomes**” represent the results a program produces; outcomes should measure the effectiveness and success of a program during the current program cycle... Short-term outcomes performance metrics should line up with the

- **The filing did not identify key data sources and market transformation indicators as required in D. 09-09-047.** The IOUs limited their proposed metrics to outcomes within utility control and did not propose PPMs for intermediate or long-term outcomes described in program and subprogram logic models.⁴ The IOUs did not propose long term market transformation objectives for their programs in the Joint Utility AL filing, and suggested that appropriate long term market transformation indicators be determined during the 2010-2012 EM&V planning process between ED and the IOUs.⁵

Energy Division undertook steps to collaborate with utility personnel to organize a compliant document.

On June 25, 2010, Energy Division staff issued a data request to gather information on intermediate work products that Joint Utility statewide program teams had developed in the period leading up to the May 28th Joint Utility AL filing. The Joint Utility response was received on July 14, 2010.

Between July 14, 2010 and September 15, 2010, Energy Division staff used information contained in the July 14, 2010 data request response, the May 28, 2010 Joint Advice Letter filing, and Program Implementation Plans and other guidance as approved in D. 09-09-047 to review and modify the May 28, 2010 Joint Utility AL contents. As part of this process, Energy Division staff sought input from its program performance and

"short-term outcome" box in the logic model; d) "Market Transformation long-term outcomes" represent the results a program(s) produce(s); [market transformation] long-term outcomes should measure the effectiveness and success of a program inclusive of the current program cycle and spanning forthcoming cycles.... Market transformation long-term outcome metrics are understood to indicate changes in the California market caused in part by other IOU programs or influences beyond IOU programs. Market transformation long-term outcome metrics should line up with the "intermediate outcomes" (the period spanning 2013-15) as well as "Long-term outcomes" (the period spanning 2016-2020) in the [IOUs] program logic model.

⁴ The IOUs program logic models included "intermediate outcomes" as well as the "short term" and "long term" outcomes described above. Both intermediate and long term outcomes described in the IOU logic models generally corresponded to outcomes that resulted from changes in the California market caused in part by other IOU programs or influences beyond IOU programs. See Joint Utility AL for examples.

⁵ The IOUs are referring here to the Energy Division and IOU joint EM&V prioritization process described in D. 10-04-029. See June 24, 2010, Joint Utility response to protest of DRA to the Joint Utility AL filing.

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market transformation expert consultants contracted with Energy Division to advise on 2010-2012 energy efficiency program evaluations.

Based on this review, Energy Division transmitted its suggested modifications to the Joint Utilities on September 15, 2010 in an Energy Division “counter-proposal.” In determining necessary modifications, Energy Division staff accepted, rejected or modified the information in the PPM worksheets submitted in the Joint Utility AL or generated new content as necessary to attempt to bring the filing into compliance with D.09-09-047. Energy Division:

1. Identified Strategic Plan goals and strategies addressed by the statewide programs and subprograms;
2. Specified “SMART” short-term program and subprogram objectives;
3. Proposed short-term (2010-2012) program and subprogram Program Performance Metrics;
4. Specified SMART long-term market transformation objectives (primarily linked to the Strategic Plan); and
5. Identified long-term (2013-2030) market transformation indicators.

Table 1 below presents a typology of metrics that staff used to categorize and screen candidate Program Performance Metrics as contained in Energy Division’s counter-proposal. Energy Division developed this typology with the aim of ensuring PPMs would be simple and cost-effective with regard to data collection and reporting requirements as required by D. 09-09-047 at p. 92.

Table 1. Categorization and Screening Typology of PPMs and Market Transformation Indicators

Note: Metric types “2A” and “2B” are what Energy Division suggested the Joint Utilities should report to fulfill the requirements of D. 09-09-047.

Metric	Metric	Description	IOU	Adopted by Resolution	Notes / Purpose
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Name	Type		Reporting	?	
PPMs	1	Short term (2010-2012) <i>program</i> activity or output	N/A (IOUs track, but do <i>not</i> report)	N	Data that could be gathered via data request anyways, since the IOUs should already have.
	2A	Short term (2010-2012) <i>program</i> activity, output or outcome	IOUs report <i>annually</i>	Y	Fulfills D.09-09-047 requirements related to PPM filing, <i>excluding consideration of market transformation indicators</i> . These are key metrics that the Commission, staff and parties need to monitor the performance of programs and subprograms.
	2B	Short term (2010-2012) <i>program</i> output or outcome	IOUs report <i>at the end of the program cycle</i>	Y	
MTIs	3	Long term (2013-2030) <i>market</i> outcome	To be determined*	Y	Fulfills D.09-09-047 requirements to identify "market transformation indicators and key data sources" (p. 97).
<p>* The final number, and determination of who is responsible for reporting, is subject to the MTI workshops, stakeholder comment and the 2010-2012 EM&V work plan process (pursuant to D.10-04-029) and the prioritization and negotiations between Energy Division and the IOUs. This prioritization is bound by EM&V funding constraints established in D. 10-04-029. Market transformation indicator results shall be reported, as available, by Energy Division or the IOUs, depending on who conducts the necessary market studies.</p>					

Energy Division and Joint Utility staff met on September 20-21, 2010 to review, discuss and collaboratively modify Energy Division’s suggested improvements to the Joint Utility AL filing. On September 30, 2010, the Joint Utilities transmitted additional suggested modifications to Energy Division. **The Joint Utilities and Energy Division subsequently met and came to agreement on a final set of PPMs that fulfill the principles identified for PPMs in D. 09-09-047 (as summarized in the background section above).**

We review these principles and how the adopted PPMs correspond to them here:

1.) The metrics shall be designed for simplicity and cost effectiveness when considering data collection and reporting requirements (D. 09-09-047 at 92).

During the PPM development process, wherever possible, PPMs were identified at the statewide (SW) program level (eg. residential SW program). In addition, PPMs were combined across several statewide programs (industrial, commercial and agriculture programs) in order to streamline data collection, tracking and reporting. The PPM development process eliminated many PPMs from the final list to limit data collection, tracking and reporting expenses.

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2.) Integrated metrics shall be developed for programs that employ more than one technology or approach, such as whole building programs (D. 09-09-047 at 92).

Most programs and subprograms employ more than one technology. For these subprograms, the PPMs seek to track utility program performance across the range of technologies supported by the program. For example, the residential whole house program utilizes integrated metrics to track progress across the range of supported technologies.

3. The metrics shall link short-term and long-term strategic planning goals and objectives to identified program logic models (D. 09-09-047 at 92).

The Complete Program Performance (PPM) Worksheets for 2010-2012 Energy Efficiency Programs⁶ identify short and long term strategic planning goals and objectives (milestones) relevant to each statewide program and subprogram. The worksheets, which are based on program logic models, identify program-specific objectives that correspond to these strategic plan goals. PPMs were developed to correspond to short-term program-specific objectives; and MTIs were developed to measure progress on long-term objectives.

4. The metrics shall track progress towards Commission-adopted market transformation goals (D. 09-09-047 at 91).

PPMs are designed to track utility program and subprogram progress against Commission-adopted market transformation goals (e.g. zero net energy goals). Not all utility subprograms are designed to advance a specific goal. But, in every case where such a goal *could* be advanced by a utility program/subprogram, the program/subprogram objectives and related PPMs reflect those market transformation goals and should enable the Commission to track progress against them.

The initial set of market transformation indicators are specifically designed to track progress towards Commission-adopted market transformation goals. It should be noted that the initial set of MTIs represent market-wide market transformation indicators, and not utility program-specific indicators.

⁶ Available at: www.energydataweb.com/cpuc/default.aspx . See document in topic area "Complete Program Performance Metrics (PPM) Worksheets for 2010-2012 Energy Efficiency Programs."

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5. The metrics shall allow the Commission to evaluate progress towards market transformation as a factor in determining whether the programs should be continued, modified, or eliminated in future portfolios.

As noted above, in every case where a utility program/subprogram was designed to or could be reasonably expected to contribute to market transformation goals as outlined in the Strategic Plan, the Complete Program Performance (PPM) Worksheets for 2010-2012 Energy Efficiency Programs identifies program/subprogram specific objectives and related PPMs that advance such goals. D. 09-09-047 notes that “the results of program performance metrics can... be compared with market data to determine the relative success of the programs” (D. 09-09-047 at 94). We believe that the final PPMs adopted and initial MTIs proposed in this resolution, combined with the energy savings information and additional data expected to be produced through the 2010-2012 EM&V activities, will provide ample basis for evaluating progress towards market transformation as a factor in determining whether utility programs should be continued, modified or eliminated in future portfolios.

6. Performance metrics shall be maintained and tracked in the Energy Efficiency Groupware Application (EEGA) database (or a similar database to be determined under the guidance of Energy Division) (D. 09-09-047 at 92).

Guidance regarding utility PPM reporting using the EEGA or a similar database is provided below.

Final Program Performance Metrics for the Joint Utilities 2010-2012 statewide energy efficiency programs and subprograms are presented in Appendix A. Initial market transformation indicators, which satisfy D.09-09-047 OP10 requirements, are presented in Appendix B. For each 2010-2012 statewide energy efficiency program and subprogram there is a complete PPM worksheet that reports a summary of identified Strategic Plan goals, short and long term objectives, program performance metrics and market transformation indicators. **Appendix C gives an example of the information that can be found on-line at the Commission’s Energy Data Website at: www.energydataweb.com/cpuc/default.aspx .⁷ Appendix D provides a summary of party comments on this resolution.**

⁷ See document in topic area “Complete Program Performance Metrics (PPM) Worksheets for 2010-2012 Energy Efficiency Programs.”

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D. 09-09-047 required Energy Division to develop detailed recommendations for market transformation indicators and present their recommendations in a workshop followed by a public comment period. **We believe that the process undertaken by Energy Division working with the Joint Utilities to develop the initial set of market transformation indicators included in Appendix B is the equivalent to what we expected to be developed in a workshop. We therefore requested that Parties provide detailed comments on the initial market transformation indicators shown in Appendix B as part of this resolution comment period.**

Nonetheless, we underscore here the need for Energy Division to present the initial market transformation indicators as contained in Appendix B for further stakeholder comment in a workshop as directed in D. 09-09-047. Energy Division should seek to combine this market transformation indicator workshop, on MTIs that stem from the utilities' 2010-2012 energy efficiency portfolio application, with the market transformation workshop called for in D. 10-10-033, regarding post-2012 EM&V issues. Energy Division should provide a public comment period subsequent to the workshop on the MTI recommendations as provided for in D. 09-09-047.

Subsequent to this workshop, Energy Division shall provide recommendations that select a subset of the initial market transformation indicators ("final market transformation indicators") for data collection, tracking and reporting through 2010-2012 energy efficiency evaluation, monitoring and verification (EM&V) activities. These recommendations shall be provided to the Assigned Commissioner who shall then issue a Ruling containing the final market transformation indicators.

The Joint Utilities and Energy Division together shall post final market transformation indicators, and any available associated baseline data for these indicators, to the Energy Efficiency Groupware Application (EEGA) site, together with the EEGA PPM reporting database no later than September 2011. Subsequent data reporting on progress against these market transformation indicators also shall be posted to the EEGA site starting in January 2012. We urge that collection of baseline data for PPMs and MTIs be initiated as quickly as possible.

The Joint Utilities shall track and report progress against the approved PPMs on an annual basis or as specified in Appendix A. For PPMs requiring annual reporting, utility reporting is due no later than May 1, 2011 and no later than May 1 for all subsequent years during this program cycle. After a grace period of 30 days from this date, we direct the Energy Division to report to the Assigned Administrative Law Judge (ALJ) and Assigned Commissioner (AC) any PPMs for which the utilities have not reported

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data or for which reported data is incomplete. In such a case the AC and/or the assigned ALJ shall then take appropriate action as deemed necessary.

Annual PPM reporting shall post to and be maintained and tracked in the EEGA database, or a similar database to be determined under the guidance of Energy Division.

Commission adoption of these PPMs in this resolution does not prejudice the outcome of the Risk Reward Incentive Mechanism (RRIM) proceeding, in Rulemaking (R.) 09-01-019. R. 09-01-019 is considering changes to the RRIM structure. If the Commission, in that proceeding, contemplates a RRIM structure tied to PPMs or Market Transformation Indicators, there would be no presumption that any specific metric adopted here is valid for that purpose.

Protests:

DRA raised the following issues in its protest letter:

- 1) The Adequacy of Joint Utility-Proposed Program Performance Metrics**
- 2) The Ability of the Joint Utilities to Implement Market Transformation Strategies**
- 3) Omission of Critical Information Describing End Games for Technologies and Practices**
- 4) The Adequacy of the 2010-2012 Utility Energy Efficiency Portfolio to support Strategic Plan objectives and market transformation goals**

1) The Adequacy of Joint Utility-Proposed Program Performance Metrics.

DRA stated that the Joint Utility AL does not contain meaningful performance metrics, that those provided are incomplete, vague and unresponsive to the intent of the Commission's directives, that the Joint Utility AL demonstrates that the IOUs do not have the ability to devise effective PPMs (p. 3), and the Commission should therefore transfer responsibility of developing PPMs to Energy Division.⁸

The Joint Utilities responded by stating that they designed the PPMs in the Joint Utility AL to meet guidance provided by Energy Division and to link directly to program activities and the Strategic Plan goals and objectives. They stated that the PPMs were meaningful and provided an example from the statewide Codes and Standards program

⁸ DRA Protest to Joint Utility AL, June 17, 2000, pgs. 1-3.

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to support this statement. They said that the PPMs provided were designed to track the health of the programs and their alignment with the Strategic Plan.

As is discussed in detail above, Energy Division’s review of the Joint Utility AL found that the proposed PPMs did not meet the intent or specific requirements of D. 09-09-047. Upon receipt and review of the Joint Utility AL, Energy Division staff subsequently used the logic models and PPMs provided in the May 28, 2010 AL filing, Program Implementation Plans and other guidance approved in D. 09-09-047, and advice from evaluation consultants to review and modify what the Joint Utilities submitted. Energy Division transmitted modified PPMs to the Joint Utilities for their consideration in September, 2010. The Joint Utilities subsequently worked constructively with Energy Division staff to agree upon the final set of PPMs being approved in this resolution.

Determining effective Program Performance Metrics is an art more than a science. A process of refinement of Energy Division guidance and effective, iterative communication between Energy Division and the Joint Utilities was necessary to produce PPMs that meet the intent and specific requirements of D. 09-09-047. Therefore, the Commission does not agree that the Joint Utilities *do not have the ability* to devise effective PPMs, despite the significant omissions of their Joint Utility AL, since the process of collaboration outlined above demonstrates to the contrary. DRA’s recommendation that “the Commission should... transfer responsibility of developing PPMs to Energy Division,” was at least partly implemented in the course of Energy Division’s extensive involvement in development of PPMs for the 2010-2012 period as contained in this resolution.

2) The Ability of the Joint Utilities to Implement Market Transformation Strategies and (3) The Omission of Critical Information Describing End Games for Technologies and Practices.

On these points DRA in its protest letter states that the omissions in the Joint Utility AL illustrate that the IOUs are not the appropriate organizations to implement market transformation strategies—“it is not their core expertise and the Utilities apparently view it as too risky”. DRA states that the Joint Utilities failed to provide required information in the filing and ignored the models provided for market transformation data collection such as the Northwest Energy Efficiency Alliance (NEEA).⁹

DRA asserts that the Joint Utilities failed to include “a discussion to specifically address the extent to which each program and sub-program plan included an end-game for each

⁹ DRA Protest to Joint Utility AL, June 17, 2010, p. 4.

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technology or practice that transforms building, purchasing, and use decisions to become either standard practice, or incorporated into minimum codes and standards” as required by D. 09-09-047 at 367.

The Joint Utilities responded by reiterating that their Advice Letter had stated that utility programs are not the sole influencing factor in the market transformation process and that California generally lacks the type of data needed to understand and analyze market transformation. They stated that it was for these reasons that the Joint Utility AL did not provide information on each program or subprogram’s “end game.” The Joint Utilities explained that energy efficiency programs generally follow traditional market adoption curves and that technologies typically exit programs “... when they are no longer cost-effective from a program implementation perspective, when they are integrated into codes and standards or become industry standard.”¹⁰ They offered to “continue to work with the EM&V process to plan, perform, and analyze further studies to identify end games for specific technologies or practices of specific interest or concern.”¹¹ The Joint Utilities noted that their ability to collect the data needed for end-game analysis will depend on Energy Division and utility collaborative decisions about EM&V, that investor owned utilities (IOUs) have thirty years experience implementing successful energy efficiency programs and are therefore integral to the market transformation process, and that the IOUs will continue to work with Energy Division and other stakeholders to understand and effect market transformation.¹²

It is premature and outside of the scope of this resolution to determine herein the IOUs long-term roles in energy efficiency market transformation efforts. This AL was filed with regards to the 2010-2012 energy efficiency portfolios and their specific programs. Both utility programs and market activities are sure to evolve in later years. Data to analyze market transformation within specific markets or technologies is indeed often lacking in both California and other states. Through the efforts of Energy Division subsequent to the Joint Utility AL filing, and with input from the Joint Utilities, this resolution now identifies potential market transformation indicators for each of the statewide energy efficiency 2010-2012 programs and subprograms. We request Party comments on these market transformation indicators as part of this resolution comment period. Once a final set of market transformation indicators exists, the EM&V planning process can help inform the means for obtaining data and tracking progress towards desired end games.

¹⁰ Joint Utility reply to DRA protest, p. 4.

¹¹ Joint Utility reply to DRA protest, p. 4.

¹² Joint Utility reply to DRA protest, p. 4.

Further, D. 09-09-047 directs that:

“in future applications, the utilities shall provide rationale for continuing the measure and supporting material for each significant portfolio-level efficiency measure that they believe has not yet achieved market transformation... For any program that the utilities propose to continue but which has failed to achieve established benchmarks for market transformation in previous cycles, the utilities must provide additional rationale for continuing these programs despite non-performance. The utilities shall work with the Energy Division to agree on the format by which such information shall be provided” (D. 09-09-047 at 99).¹³

We reiterate here our expectation that the above directive will indeed be implemented by the Joint Utilities and will be based on program experience and market data collected during the 2010-2012 period.

4) The Adequacy of the 2010-2012 Utility Energy Efficiency Portfolio to support Strategic Plan objectives and market transformation goals

DRA states that there is little difference between 2010-2012 and 2006-2008 portfolios and that this indicates a lack of utility capacity or intent to support Strategic Plan objectives and/or market transformation goals.

The Joint Utilities respond that many features distinguish the two portfolios and that they do have the capacity and intent to support Strategic Plan objectives and market transformation goals. The Joint Utilities note that twelve aligned statewide programs now exist that did not before. The portfolios are aligned with the Strategic Plan and advance integrated demand side management to create offerings of greatest benefit to customers. They state that the portfolios focus on educating customers about the benefits of holistic, rather than piecemeal, energy renovations.¹⁴

We do not agree that little distinguishes the IOUs 2010-2012 and 2006-2008 energy efficiency portfolios which would indicate that the Joint Utilities have no capacity or intent to support Strategic Plan objectives or market transformation goals. In addition to the points mentioned by the IOUs in their response to DRA’s protest on this

¹³ See also D. 09-09-047 OP 9.

¹⁴ Joint Utility reply to DRA protest, p. 5.

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point, for example, we note the following significant changes to the 2010-2012 IOU energy efficiency portfolios:

- The creation of a new statewide marketing, education and outreach brand and web portal;
- Strict budget caps placed on IOU incentives for medium-screw base CFLs;
- Significant increase in funding for Advanced Lighting Programs;
- The creation of a statewide Lighting Market Transformation program;
- The approval of \$100 million in funding for a new comprehensive whole house energy improvement program for single and multi-family dwellings;
- Inclusion of numerous pilot projects, including:
 - Continuous Energy Improvement Pilots;
 - Zero Net Energy and Sustainable Communities Pilots;
 - Several local government partnership pilots, including that of Green Communities, Middle Income Direct Install programs, and program support for local governments implementing Strategic Plan or other innovative programs; and,
- Required benchmarking of commercial and institutional buildings “touched” by IOU programs.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g)(2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day comment period for the draft of this resolution was neither waived or reduced. Accordingly, this draft resolution was mailed to parties for comments, and will be placed on the Commission's agenda no earlier than 30 days from today.

Comments were due by November 22, 2010. Reply comments were due by November 26, 2010, a State holiday. At the request of Southern California Edison Company, Energy Division extended the reply comment deadline to November 29, 2010.

We received comments on this resolution from DRA, the Utility Reform Network (TURN), the Natural Resources Defense Council (NRDC) and the Joint Utilities. The comments and our responses are summarized below.

1) Need for opportunity for stakeholder input and further Commission review of PPMs (TURN).

Referring to PPMs, TURN cites D. 09-09-047 p. 91 that "input from stakeholders and further Commission review is necessary."

D. 09-09-047 does not require workshops to be held on PPMs. Workshops were only required to solicit stakeholder input on market transformation indicators. Stakeholders had opportunities to provide input on the PPMs through a protest to the Joint Utility AL filing and/or this resolution comment period. While TURN chose to not provide comment on any proposed PPMs, several other Parties did, and the Commission has seriously considered this input. TURN also chose not to protest the Joint Utility AL filing.

2) This resolution inappropriately modifies Commission direction in D. 09-09-047 that Energy Division should "ensure appropriate involvement and input of market actors during their development of recommendations for market transformation indicators" by stating that it "believes the process undertaken by Energy Division working with the Joint Utilities to develop the initial set of market transformation indicators... is equivalent to what we expected to be developed in a workshop." (TURN)

TURN requests that language be added to the Findings and Conclusions section.

TURN inaccurately states in its suggested Findings and Conclusion language that the only opportunity for public input on what are described as initial MTIs was the utilities initial advice letter, i.e., the advice letter filed in May, 2010. An opportunity for stakeholder comment also occurred with the issuing of the draft resolution. While TURN did not submit comments on the initial MTIs included in Appendix B in this resolution, several other Parties did, and the Commission has seriously considered their input.

As noted herein, the MTIs included in Appendix B are "initial," and subject to further review, refinement and prioritization. We affirm that workshops on MTIs should be held as directed by D. 09-09-047. We suggest that Energy Division hold the market

ransformation indicator workshops as directed in D. 09-09-047 in conjunction with those directed to occur on market transformation models in D. 10-10-033.

3) PPMs developed through this resolution process should have no presumptive value for purposes of any Risk Reward Incentive Mechanism the Commission may consider in the future (DRA and TURN)

TURN and DRA request that the Finding and Conclusion section be modified to indicate that "there would be no presumption that any specific metric adopted here is valid for [RRIM] purpose[s]."

We agree that this is an appropriate modification of Finding and Conclusion #9¹⁵ as it more clearly indicates the Commission's intent. We have modified Finding and Conclusion #9 as suggested.

4) The resolution should be modified to sufficiently explain how the proposed metrics meet the criteria laid out in D. 09-09-047 (TURN)

TURN cites criteria such as "the absence of clear linkages between the PPMs and Strategic Plan objectives" and the "failure to include 'key data sources and market transformation indicators'" and states that TURN does not understand how the material presented in Appendices A and B meet these criteria.

It is unclear from their comments whether TURN reviewed the full set of Strategic Plan goals, short- and long-term objectives, mission statement, PPMs and MTIs for each subprogram as contained in the full summary of information developed for each subprogram in the document entitled "Complete Program Performance Metrics (PPM) Worksheets for 2010-2012 Energy Efficiency Programs" referenced in the draft resolution and accessible to all Parties online. This document makes clear the linkages between PPMs and Strategic Plan objectives, and addresses the other criteria as set forth in D. 09-09-047. For completeness, a summary of how the criteria were addressed has been added to the final resolution.

¹⁵ TURN incorrectly stated that this comment pertained to Finding and Conclusion #4. The comment in fact pertains to Finding and Conclusion #9.

5) Program budgets do not account for tracking all PPMs (Joint Utilities)

The Joint Utilities state that existing utility program budgets and data tracking plans do not in all cases include plans to gather data to track proposed PPMs. They offer one example, that of HVAC residential Energy Star Quality Installation subprogram, noting that information for this PPM would have to be collected manually until the program database system can be updated. They note that PPMs add administrative cost burdens. The Joint IOUs recommendation to address this issue is that "Energy Division prioritize and limit MTIs to what is important and necessary to track program progress."

We agree that the Energy Division recommendations for final MTIs, further stakeholder comments on MTIs, and the EM&V prioritization and planning process should prioritize and limit MTIs to what is important and necessary to track program progress. We also agree that tracking additional data within subprograms may incur some costs, but we maintain that the expected benefits of the information to assessing the progress of program implementation most likely will warrant this expenditure.

6) EM&V timeframes and budgets are limited and could present challenges for PPM baseline studies and MTI analyses in the 2010-2012 period (Joint Utilities)

The Joint Utilities express concern that insufficient EM&V funds exist for all envisioned EM&V work, including PPM and MTI data collection and analyses. In addition, the Joint Utilities are concerned that there is insufficient time remaining in the program cycle to establish baselines against which to measure the success of the proposed PPMs in the current cycle. They recommend that Energy Division prioritize and limit MTIs to what is important and necessary to track program progress.

We agree that the Energy Division's recommendations for final MTIs, further stakeholder comments on MTIs, and the EM&V prioritization and planning process should prioritize and limit MTIs to what is important and necessary to track program progress. We recommend that the same joint EM&V prioritization and planning process launch data collection work to establish baselines as quickly as possible.

7) Draft resolution's chronology of events is lacking some information (Joint Utilities)

The Joint Utilities request that the resolution's chronology of the PPM process be revised to more accurately reflect the underlying details of this effort.

We agree that some additions to the chronology of this resolution are warranted, and have added additional information on the chronology of PPM development, as contained in the Joint Utilities' comments, to the body of this resolution. We have also removed the first Joint Utility AL deficiency noted in the draft resolution as this was found to be inaccurate upon further review and correction of the chronology.

8) The PPMs may not achieve the intended goals given the absence of baseline and target numbers for measuring success (DRA).

a) DRA asserts that baseline and target numbers against which to measure the success of PPMs are not provided, and that establishing such items one-third of the way through programs is not ideal.

We note that baseline and target information for most subprograms was provided in the document entitled "Complete Program Performance Metrics (PPM) Worksheets for 2010-2012 Energy Efficiency Programs" referenced in the draft resolution and accessible to all Parties online. We agree that establishing baseline information one-third of the way through a program cycle is not ideal and have added language to this resolution to encourage a quick launch to baseline data gathering activities.

b) DRA raises concern that basic information requested in PPMs may be too general to assist in determining whether a program is successful and should be continued or closed.

We believe that the PPM development process was thorough in its attempt to identify data that would assist the Commission in determining whether a program should be discontinued or modified. Stakeholder comments to this resolution have added to this effort. Extensive additional information will be gathered on utility energy efficiency programs as part of the EM&V work for 2010-2012, and energy efficiency savings information will be reported and available for consideration for all sub-programs. In

sum, we expect this information to be sufficient for us to determine whether specific programs should be modified or discontinued.

c) DRA provides examples of a PPM that appears to not consider what is going on in the marketplace at large.

We clarify that PPMs are specific to utility program objectives. The initial MTIs are designed to reflect what is occurring in the larger marketplace and to assist in assessing the contributions of utility programs towards market transformation.

d) DRA notes that the resolution is silent on any consequences to the Joint Utilities if PPM data is not reported on time, is missing critical information or is not verifiable. DRA suggests that the Commission should identify next steps in the event that utilities fail to submit timely, complete information on PPMs that can be verified, as experience with development of ex-ante values has suggested that identification of such a process in advance is needed.

We agree with DRA and have added a process to address their concern. This language states that the annual PPM report will be submitted no later May 1st, 2011 and no later than the same date for all subsequent years during this program cycle. After a grace period of 30 days from this date, we direct the Energy Division to report to the Assigned Administrative Law Judge (ALJ) and Assigned Commissioner (AC) any PPMs for which the utilities have not reported data or for which reported data is incomplete. The AC and/or the assigned ALJ shall then take appropriate action as deemed necessary.

9) The preliminary list of MTIs for statewide programs and subprograms may not capture the information needed to measure market transformation (DRA)

DRA uses the initial MTIs for basic CFLs as an example and notes that additional information appropriate to gauge market transformation is gathered by the Northwest Energy Efficiency Alliance (NEEA), and includes shelf space, number of products, and information about consumer attitudes. DRA also notes that the initial MTI for the appliance recycle subprogram does not include criteria to assess what is happening in the marketplace with major "Big Box" stores.

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We appreciate DRA's comments and expect the Energy Division to consider this as it develops recommendations for final MTIs. As noted elsewhere, the Commission intends that there will be workshops convened for the purpose of gathering stakeholder comment on the initial MTIs and that these workshops are able to consider approaches taken by other entities such as NEEA.

10) The CPUC should outline the expected use of the information collected for the market transformation indicators (NRDC)

NRDC supports the use of MTIs to track progress of products and services and to use knowledge to improve programs. They note that it is important to determine the expected use of the information collected for metrics prior to finalization of the metrics. NRDC urges the Commission to establish the intended use of the collected information and whether there are thresholds the utilities are expected to meet, as well as outline related expectations for program modification and related activities. They suggest that these questions should be vetted in a public workshop with opportunity to comment as soon as possible.

D. 09-09-047 and this resolution made clear the intended purposes of the PPMs, and we will not repeat them here. D. 09-09-047 also made clear the intended purpose of MTIs and a related market transformation tracking process to "enable the Commission to track progress on implementation of the Strategic Plan and for specific technologies and measures" (D. 09-09-047 , p. 99). In addition, the initial MTIs included in this resolution pertain to the entire marketplace, not to just utility programs. Therefore, there are at this time no specified thresholds the utilities are expected to meet with regard to the MTIs. Moreover, we intend the existence of data on progress toward market transformation ends will be used in a variety of venues regarding plans for future programs and market strategies, including the deliberations of this Commission, the California Energy Commission, and by entities active in the energy efficiency market.

11) The Commission should determine the process for the needed baseline studies as soon as possible to develop robust information to which the MTIs can be compared (NRDC)

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NRDC states that the CPUC and IOUs should develop a strategy for determining the needed baseline data and determine how to account for situations when programs have already been implemented and therefore have already likely altered the market baseline.

A similar comment, focusing on PPMs, was made by DRA. We agree that gathering of baseline data should begin as soon as possible and have added language to that effect in the final resolution. MTIs pertain to the entire marketplace, not just utility programs. D. 09-09-047 envisions that MTIs are intended to track progress on implementation of the Strategic Plan and for specific technologies and measures. It does not state that MTIs will be used as a proxy for utility programs' success in market transformation, although it does note that "the results of the program performance metrics can ... be compared with the market data to determine the relative success of the programs" (D. 09-09-047, p. 94). D. 09-09-047 does not state a timeframe within which this comparison should occur. Therefore, in our view it is inconsequential if the baseline data for MTIs is collected after the launch of the utilities' 2010-2012 programs.

12) Additions or changes to PPMs are suggested (NRDC and Joint Utilities).

NRDC's comments on PPMs focus on ensuring the standardization of data collection on participation rates. The Joint Utilities provide comments and suggest some minor changes to the PPMs such as the addition of footnotes .

Parties' detailed comments on PPMs for subprograms have been considered at the subprogram level. See Appendix D to this resolution for a full summary of detailed party PPM comments and Commission reply by subprogram.

13) Recommendations for additional or modified MTIs (NRDC and Joint Utilities)

NRDC's comments on MTIs focus on: 1) adding information collected for non-residential audit market indicators; 2) adding a complete list of barriers to participation within the whole home retrofit program; 3) caution regarding use of sales data as a MTI; 4) adding availability of advanced technologies at retailers as a MTI; and, 5) monitoring statewide program consistency. The Joint Utilities provide extensive comment on the initial MTIs provided in this resolution, but do not recommend the addition of any MTIs for consideration and proposed only a limited number of changes to the initial MTIs.

All additional MTIs suggested by parties have been added to Appendix B, and we have noted which party suggested each additional MTI. These suggested MTI changes shall be considered in the aforementioned MTI workshop to be held in conjunction with the market transformation workshop directed in D. 10-10-033. Party comments on the MTIs shall be considered at this same workshop and as part of the EM&V prioritization and planning process. It is premature to address parties' comments on MTIs at this time, so we take no position on MTI comments in Appendix D

FINDINGS AND CONCLUSIONS

1. Commission Decision (D.) 09-09-047 OP 11 directs Southern California Edison Company (SCE), Pacific Gas & Electric Company (PG&E), Southern California Gas Company (SCG) and San Diego Gas & Electric Company (SDG&E) (the "Joint Utilities") to jointly file a "Program Performance Metrics" Advice Letter within 120 days of the effective date of the decision.
2. The Joint Utilities formally petitioned and were granted permission to extend the filing date to May 21, 2010 and subsequently to May 28, 2010. Advice Letter (AL) 2476-E (SCE), AL 3120-G/3675-E (PG&E), AL 4114 (SCG), and AL 2172-E/1951-G (SDG&E) (the "Joint Utility AL") was filed on May 28, 2010.
3. The Joint Utility AL was deficient on several counts: (a) the scope of PPMs filed was insufficient to fully meet all D.09-09-047 directives; (b) program objectives were unspecified and/or did not meet "SMART"¹⁶ criteria; (c) program logic models associated with the PPMs did not clearly link to Strategic Plan objectives; and (d), the filing did not identify key data sources and market transformation indicators as required in D. 09-09-047.
4. Energy Division and the Joint Utilities collaborated to develop the final set of Program Performance Metrics presented in Appendix A and the initial market transformation indicators presented in Appendix B.

¹⁶ Appendix 2 (p. 5) of D. 09-09-047 indicates that program objectives associated with Program Performance Metrics should be specified as and conform to the "SMART" convention as being: Specific, Measurable, Ambitious, Realistic, and Time-Bound

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5. In accordance with D. 09-09-047, we find that:
 - a. The final set of PPMs have been designed for simplicity and cost effectiveness when considering data collection and reporting requirements;
 - b. Integrated PPMs for subprograms that employ more than one technology or approach and integrated PPMs that span associated subprograms were developed to the extent possible;
 - c. The final set of PPMs and initial market transformation indicators link short-term and long-term strategic planning goals and objectives to identified program logic models;
 - d. The final set of PPMs and initial market transformation indicators track progress towards Commission-adopted market transformation goals; and,
 - e. The PPMs appear to allow the Commission to evaluate progress toward market transformation as a factor in determining whether the programs should be continued, modified or eliminated in future portfolios.
6. The Commission finds the Program Performance Metrics contained in Appendix A to be reasonable and in compliance with D. 09-09-047.
7. The initial market transformation indicators identified in Appendix B satisfy D. 09-09-047 OP 10 requirements to identify key data sources and indicators for which to begin collecting baseline information for market transformation tracking purposes.
8. Strategic Plan goals and strategies, and short and long term objectives associated with the PPMs adopted in this resolution are specified in the completed PPM worksheets located at the Commission's Energy Data Website at: www.energydataweb.com/cpuc/default.aspx and illustrated by the example in Appendix C.
9. Commission adoption of these PPMs in this resolution does not prejudice the outcome of the Risk Reward Incentive Mechanism (RRIM) proceeding, Rulemaking (R.) 09-01-019. If R. 09-01-019 adopts a RRIM structure tied to PPMs or Market Transformation Indicators, there would be no presumption that any specific metric adopted here is valid for that purpose.

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THEREFORE IT IS ORDERED THAT:

1. Advice Letters 2476-E (Southern California Edison Company); Advice Letter 3120-G/3675-E (Pacific Gas & Electric Company), Advice Letter 4114 (Southern California Gas Company), and Advice Letter 2172-E/1951-G (San Diego Gas & Electric Company) are approved as modified in this order.
2. Program Performance Metrics for the Joint Utilities 2010-2012 statewide energy efficiency programs and subprograms are approved as specified in Appendix A.
3. An initial set of long-term market transformation indicators associated with the Joint Utility 2010-2012 statewide energy efficiency programs and subprograms are identified in Appendix B as modified.
4. Energy Division shall provide an opportunity for further stakeholder comment on the initial list of market transformation indicators as contained in Appendix B at an MTI workshop to be convened in conjunction with the market transformation models workshop identified in D. 10-10-033, and shall provide an opportunity for public comment on these initial indicators subsequent to that workshop. Subsequent to this, Energy Division shall provide recommendations that identify a subset of these market transformation indicators for subsequent data collection, tracking and reporting as part of 2010-2012 energy efficiency evaluation, monitoring and verification (EM&V) activities. These recommendations shall be provided to the Assigned Commissioner who shall then issue a Ruling containing the final market transformation indicators.
5. The Joint Utilities and Energy Division together shall post final market transformation indicators, and any available associated baseline data for these indicators, to the Energy Efficiency Groupware Application (EEGA) site together with the EEGA PPM reporting database no later than September 2011. Subsequent data reporting on progress against these market transformation indicators also shall be posted to the EEGA site starting in January 2012. We urge that collection of baseline data for PPMs and MTIs be initiated as quickly as possible.
6. The Joint Utilities are directed to track and report progress against the approved Program Performance Metrics on an annual basis or as specified in Appendix A. For PPMs requiring annual reporting, utility reporting is due no later than May 1, 2011 and no later than May 1 for all subsequent years during this program cycle. After a

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grace period of 30 days from this date, we direct the Energy Division to report to the Assigned Administrative Law Judge (ALJ) and Assigned Commissioner (AC) any PPMs for which the utilities have not reported data or for which reported data is incomplete. The AC and/or the assigned ALJ shall then take appropriate action as deemed necessary. Annual PPM reporting shall occur to and be maintained and tracked in the EEGA database, or a similar database to be determined under the guidance of Energy Division.

7. This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on December 2, 2010; the following Commissioners voting favorably thereon:

/s/ Paul Clanon

Paul Clanon
Executive Director

MICHAEL R. PEEVEY
PRESIDENT
DIAN M. GRUENEICH
JOHN A. BOHN
TIMOTHY ALAN SIMON
NANCY E. RYAN
Commissioners

APPENDIX A

PROGRAM PERFORMANCE METRICS for STATEWIDE PROGRAMS and SUBPROGRAMS

Legend for Metric Type and Reporting Frequency:

Metric Type	Description	IOU Reporting Frequency
2a	Short term (2010-2012) program activity, output or outcome	IOUs report <i>annually</i>
2b		IOUs report <i>at the end of the program cycle</i>

Note: "Y/N" indicates a Yes/No metric. These are binary metrics based on whether the condition is or is not satisfied.

SW PROGRAM / Sub-Program	PROGRAM PERFORMANCE METRIC (PPM)	Metric Type
COMMERCIAL / INDUSTRIAL / AGRICULTURAL COMBINED		
* Data to be reported in disaggregate form by SW program (commercial, industrial, and agricultural)		
	*1. Number and percent (relative to all eligible customers) of commercial, industrial and agricultural customers participating in sub-programs (NRA, Deemed, Calculated, and CEI) by NAICS code, by size (+/- 200 kW per yr or +/- 50K therms per yr), and by Hard to Reach (HTR)** ** "HTR" is as defined in the EE Policy Manual	2a
Continuous Energy Improvement (CEI)	*1. Number and percent of commercial, industrial, and agricultural CEI participants that meet short-term (2010-2012) milestones as identified by their long term energy plans.	2a
	*2. Lessons learned, best practices, and plan to ramp up the CEI program are developed. (Y/N)	2b
	*3. Number and percent of commercial, industrial and agricultural customers that created an energy plan via CEI will be tracked by program.	2a
Non-Residential Audit Program (NRA)	*1. Number and percent of commercial, industrial, and agricultural customers receiving non-residential audits by NAICS and SIC code.	2b
	*2. For commercial, industrial, and agricultural customers who received audits, the number and percent of adopted audit-recommended technologies, processes and practices, (Report disaggregated data by type of audit - Basic, Integrated, and Retro-commissioning audit).** ⁽¹⁾ **Data sources for reporting will come from (a) program tracking databases and (b) process evaluation to refine estimates.	2b

	(1) – An audit completed in one portfolio may have measures implemented over several years and portfolios.	
Deemed Incentives	*1. Number and percent of new, improved, or ETP measures** installed in the commercial, industrial and agricultural programs. ** “ETP measure” defined as ET measures first introduced into the EE portfolio since January 1, 2006	2a
Calculated Incentives	*1. Number and percent of new, improved, or ETP measures installed in completed calculated projects.	2a
	*2. Number, percent, and ex-ante savings from commercial, industrial and agricultural sector of projects with ETP measures** included. (Report disaggregated savings by measure and number of installations by measure.) ** “ETP measure” defined as ET measures first introduced into the EE portfolio since January 1, 2006	2b

COMMERCIAL		
Deemed Incentives (Commercial only)	1. Number and percent of participating commercial customers receiving the “Integrated Bonus.”** ** “Integration Bonus” is an incentive mechanism to promote greater integration of DSM resources, available to customers who (a) sign up or are already signed up for a DSM program, and (b) purchase, install, and/are eligible to receive a rebate for an energy saving device.	2b
Direct Install	1. Number and percent of Direct Install participants that participate in other resource programs or OBF.	2a
	2. Number of and percent of participants that are hard to reach (HTR).** ** “HTR” is as defined in the EE Policy Manual	2a

INDUSTRIAL		
	1. The number and percent of first time** participants in energy efficiency programs. (Report disaggregate data by sub-program) **“First time” means customer has not participated in energy efficiency programs since December 31, 2005.	2a

AGRICULTURE		
	1. Number and percent of first-time** participants in energy efficiency programs. (Report disaggregate data by sub-program) **“First time” means customer has not participated in energy efficiency programs since December 31, 2005.	2b
Pump and Test	1. Percent of agricultural pump tests that lead to a repair or replacement.	2b

<i>Repair</i>		
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RESIDENTIAL		
	1. By targeted populations (homeowners, renters, property owners/managers), percent increase in the level of: (a) EE awareness (b) EE knowledge (c) EE attitude...("AKA")	2b
Home Energy Efficiency Survey (HEES)	1. Percentage of HEES participants that enroll in (a) whole house and (b) other resource programs	2b
Home Energy Efficiency Rebate	1. Percentage of program rebates made through the point-of-sale mode relative to all rebates	2a
	2. Percentage of participating stores located in hard-to-reach (HTR)** zip-codes relative to all program participating stores. ** "HTR" is as defined in the EE Policy Manual	2a
Multi-Family Energy Efficiency Rebate (MFEER)	1. Percentage of non-lighting measure savings as compared to the total EE measures adopted in the MFEER program. (KWh for single-commodity IOU and BTU for mixed-commodity IOU.)	2a
Business Consumer Electronics (BCE)	1a: Number of participating retailers, and number of retail store locations by retailer, and other resellers receiving training. 1b: Number of participating retailers receiving detailing.	2a
	2. The numbers and names of specific types of market actors (retailers, buying groups, manufacturers, and distributors) participating in the program and the approximate percent of all potential market actors that this represents (Reported as specified in reporting template include at the end of this Appendix.)	2b
Advanced Lighting	1. Percent kW/kWh/Quantity of incented products under the Advanced Lighting program as compared to the Basic Lighting program, by product type.	2a
	2. Percent of products incented under the Advanced Lighting Program by distribution channel* and by hard-to-reach (HTR)** zip-codes. *Distribution channels" are as defined in 06-08 Upstream Lighting Study **"HTR" is as defined in the EE Policy Manual	2a
Basic CFL	1. During 2010-2012, implement marketing efforts and/or campaign to encourage prompt installation of CFLs as required in D.09-09-047. (Y/N)	2b
	2. Percent of products incented under the Basic Lighting Program by distribution channel* and by hard-to-reach (HTR)** zip-codes.	2a

	*Distribution channels” are as defined in 06-08 Upstream Lighting Study	
	**“HTR” is as defined in the EE Policy Manual	
	3. Percent kW/kWh/Quantity of incented products under the Basic CFL program as compared to the Advanced Lighting program	2b
Appliance Recycling	1. Level of program participants’ AKA (“Awareness, Knowledge, Attitude”) toward the appliance recycling subprogram.	2b
	2. Number of program appliance units by year, appliance type, model # (as available), age (estimated), and size.	2a
Whole House Retrofit	1. Number of homes treated in the program for 2010-2012. (Report by prescriptive and performance program.)	2a
	2. Number of enrolled contracting firms participating in the program	2a
	3. Average Ex-ante savings per home as reported (average kWh, therms, kW) for both performance and prescriptive programs by climate zone	2a
	4. Average and range of evaluated energy savings per home (prescriptive and performance programs)	2b
	5. Number and percentage of homes not passing Quality Assurance/Quality Control review, by IOU	2a

LIGHTING MARKET TRANSFORMATION (LMT)		
	1. Develop a lighting technology roadmap (i.e., what’s new and available by when (MM/YY), using available information from all IOU and external parties) by January 2011 and to be reported twice in 2011 and annually thereafter.. (Y/N)	2a* *semi-annually in 2011 and annually thereafter
	2. Develop a communication plan, by March 2011, to make the lighting technology roadmap, pipeline plans, and technology resource information from this program available on the statewide marketing, education and outreach (ME&O) web portal by July 2011, and update annually. (Y/N)	2b
	3. Number of recommended projects initiated and completed, with findings and recommendations (i.e., this is a tracking of lighting related projects for ET, Advanced Lighting and 3 rd parties), by project type: (a) work papers, (b) white paper, (c) pilot project (d) strategy document.	2b
	4. Number of EE lighting measures added, removed, or updated as a result of LMT activities and influence, and reported in annual LMT June Report	2a

NEW CONSTRUCTION		
California Advanced Homes Program (CAHP)	1. Number and percentage of committed CAHP participant homes (applied and accepted) with modeled, <i>ex-ante</i> savings exceeding 2008 T24 units (Single family (SF) and multi-family (MF)) by 15%-19%, by 20%-29%, 30%-39%, and 40+%.	2a
	2a. Percentage of (current year SF CAHP program paid units)/ (SF building permits within service territories from the previous year)	2a
	2b. Percentage of (current year MF CAHP program paid units)/ (MF building permits within service territories from the previous year)	2a
Residential ENERGY STAR® Manufactured Housing	3. Number and percentage of CAHP participant new homes verified* by IOUs' HERS which exceed Title 24 (T24) building standards (SF and MF) by 15%-19%, 20%-29%, 30%-39%, 40%-70%.	2b
	* The IOUs use the existing HERS Rater infrastructure to verify HERS measures and other building characteristics as required by CA Title 24 and the CEC. The IOUs do not perform the verification inspections and do not certify HERS raters. Note: HERS inspection protocol for production builders does not require inspection of 100% of homes; there is a sampling protocol. For more information on HERS inspection please see http://www.energy.ca.gov/HERS/index.html	
Commercial Savings by Design	1. Number of manufactured housing units sold in IOU service territories (via retailers and/or manufacturers) participating in program	2a
	2. Number and percentage of participating projects utilizing: (a) whole house incentive for gas heat; (b) whole house incentive for electric heat	2a
Commercial Savings by Design	1. Average site energy install, <i>ex-ante</i> (kBtu/sq ft-yr and demand (kW/sq ft) for participating commercial new construction by building type and climate zone	2b
	2. Percentage of committed participating Whole Building Approach projects that are expected to reach a minimum of 40% less energy than 2008 T24 codes requirements	2b

CODES AND STANDARDS		
Building Standards Advocacy	1. Number of Residential and Commercial CASE studies, as defined in Building Standards Objectives 1 & 2 for which adoption by the CEC is anticipated by the IOUs, targeting efficient technologies practices and design in each of the following areas: lighting; HVAC; envelope; water heating; and cross-cutting measures in support of the following: (a) Integrated Design, including data management and automated diagnostic systems, with emphasis on HVAC aspects of Whole Building, (b) ZNE technologies, practices, and design in Residential Sector,	2b

	(c) Peak efficient technologies including plug loads and HVAC technologies, (d) Advanced Lighting Technologies	
Appliance Standards Advocacy	1. Number of draft CASE Studies, as defined in Appliance Standards Objective 1, developed as mutually agreed upon by the CEC and IOUs in support of plug loads, refrigeration, advanced lighting, and/or other technologies that are adopted by the CEC, within authorized budget.	2b
Compliance Enhancement	1. Number of role-based, Title 24, training sessions delivered.	2a
Reach Codes (RC)	1. Number of jurisdictions in IOU Service territories with CEC approved Reach Codes in residential and/or commercial sectors as a result of the RC sub-program activities.	2b

RESIDENTIAL and COMMERCIAL HVAC		
Upstream HVAC	1. (a) kW/ton incentivized in the program. (Note: Decrease in metric indicates positive progress), combined with (b) the number of units that are incentivized in the program vs. (c) number of units over 5.4 tons shipped to California as tracked through AHRI shipment data. (Assuming the availability of AHRI data.) ¹ ¹ As is indicated within this PPM, the availability of item (c) in this PPM is not yet confirmed, since it is closely-held, proprietary third-party information. The IOU team is in discussions with AHRI about obtaining this data and to ascertain the statistical validity of what data would be provided; the IOU team will communicate with the ED about any issues regarding this data element before the first reporting period in Q1 2011 for 2010 information.	2a
	2. The distributor stocking percentage of units eligible for program. (Note: Assumes availability of individual distributor data and/or aggregated data from HARDI.) ¹ ¹ The availability of this data is not yet confirmed, since it is closely-held, proprietary third-party information. The IOU team is in discussions with AHRI about obtaining this data and to ascertain the statistical validity of what data would be provided; the IOU team will communicate with the ED about any issues regarding this data element before the first reporting period in Q1 2011 for 2010 information.	2b
Residential Energy Star Quality Installation	1. Percentage of HVAC contracting companies that are participating in statewide residential QI program as a share of the targeted market* * "Target market" defined as C20 licensed HVAC contracting companies in CA.	2a
	2. Average percentage of "certified" HVAC technicians within each contracting company that participates in the residential QI program.	2b
Commercial Quality Installation	1. Percentage of HVAC contracting companies that are participating in statewide commercial QI program as a share of the targeted market* * "Target market" defined as C20 licensed HVAC contracting companies in CA.	2a
	2. Average percentage of "certified" HVAC technicians within each contracting	2b

	company that participates in the commercial QI program.	
Quality Maintenance Development	1. Measured progress towards specific milestones provided in the project GANTT chart indicating the development/finalization of this IOU program based on Quality Maintenance standards.	2a
Technologies and System Diagnostics	1. Status of progress towards completion of roadmap (i.e., plan and recommendations) to support the development of a national standard diagnostic protocol (activities, concrete actions taken).	2a
Workforce Education & Training	1. Status of progress towards completion (activities, concrete actions taken) of detailed WE&T roadmap (plans, goals, timelines and recommendations).	2a

EMERGING TECHNOLOGIES (ET)		
	1. The number of new "proven" ET measures adopted* into the EE Portfolio. * "Adoption" means measure is available to end-use customers through IOU programs. Adoption of a measure may be attributed to one or more ET sub-programs	2b
	2. Potential energy impacts* (energy savings and demand reduction) of the adopted ET measures into the EE portfolio. * Potential energy impacts to be reported based on ET project findings and estimated market potential (reported through quarterly ET database updates)	2b
Technology Assessment (TA)	1. Number of ETP measures which have undergone TA that are adopted* into the EE portfolio, including but not limited to each of the following: (a) Advance HVAC technologies (b) High efficiency plug loads and appliances (c) Advanced lighting technologies * "Adoption" means measure is available to end-use customers through IOU programs.	2b
Scaled Field Placement (SFP)	1. Number of ETP measures that have undergone SFP and are adopted* into the EE portfolio. * "Adoption" means measure is available to end-use customers through IOU programs.	2b
Demonstration Showcases (DS)	1. Self-reported increase in knowledge by randomly selected sample of targeted stakeholders who either 1) visited the DS or 2) were informed about the DS in a workshop about benefits of the DS.	2b
Market and Behavioral	1. Self-reported increased in knowledge among internal ET stakeholders about the technologies targeted by the M&B studies.	2b

(M&B) Studies		
Technology Development Support (TDS)	1. Number of new performance specifications and/or Use Cases* produced as a result of TDS sub-program. * "Use Cases" describe the need for a technology or application.	2b
	2. Number of new performance specifications and/or Use Cases presented to manufacturers/private industry for possible action.* * "Possible action" means that the manufacturer/private industry considered TDS results in their product development efforts.	2b
Technology Resource Incubation and Outreach	1. Percent of attendees who voluntarily respond and self-report increased understanding on how to do business with utilities.	2b
Technology and Testing Center (TTC)	1. Number of ETP measures evaluated at the TTCs in support of ET Assessments Sub-Program that are adopted* into the EE portfolio (and/or available in the market). * "Adoption" means measure is available to end-use customers through IOU programs.	2b

INTEGRATED DEMAND-SIDE MANAGEMENT (IDSM)		
	1. Awareness and knowledge among relevant IOU program staff (to be specified – e.g. account reps, engineers that administer the audit (3 rd party); program designers and managers) regarding how IDSM relates to and impacts their efforts and programs	2b
	2. Complete and make available integrated audit or survey tools (on line and on-site) to residential and non-residential customers in all IOU programs that provide audits / surveys (and include EE, Demand Response (DR), and Distributed Generation (DG) recommendations). (Y/N)	2b
	3. Number and percentage of integrated audits provided to each customer class and NAICS code.	2b
	4. A status report that identifies how well "integrated" (EE, DR, DG) all IOU demand-side energy program offerings and components are (e.g., CEI, Commercial, Agricultural, Industrial, Residential, Audits) including lessons learned, best practices, improvement plans, and how the program portfolio is addressing strategic planning goals / objectives and D.09-09-047 directives regarding integration, as well as the IDSM program objectives specified in the PPM Worksheet. The report will review how the IOUs have developed internal and external frameworks that support integration of IDSM programs and technologies. (Y/N)	2b
	5. Number and percent of integrated audit participants (identify NRA participants) in all customer classes (Residential, Commercial, Industrial, Agriculture) that implement recommended DSM measures / participate in other DSM programs (EE, DR, DG – Track which categories implemented / participated in) or other recommended technical process and practice	2b

	improvements. (If possible, identify whether participants received incentives or not.)* *Data sources for reporting will come from (a) program tracking databases and (b) process evaluation to refine estimates.	
	6. Program participant awareness of IDSM practices in each of the market sector subprograms.	2b

MARKETING, EDUCATION AND OUTREACH (ME&O)		
	1. Awareness and knowledge of key elements of the Engage360 brand among customer groups specifically targeted by grassroots and social networking phase of the program.	2a
	2. Awareness and knowledge of energy efficient actions promoted by the ME&O program among customer groups specifically targeted by grassroots and social networking phase of the program.	2b
	3. The number and type of energy efficient actions self-reported by customer groups specifically targeted by grassroots and social networking phase of the program.	2b

WORKFORCE EDUCATION AND TRAINING (WE&T)		
Centergies	1. Percent increase in educational collaboration with partners from 2011 baseline. (Tracked and reported by educational level, and by number of partners operating in Title-1 communities.) * Educational "collaboration" is defined as seminars, outreach events and consultations as needed. These collaborations include exchanges of monetary or in-kind support and services (i.e., sharing meeting facilities, marketing/promotional services, etc.).	2b
	2. Percent increase in educational collaboration with organizations serving disadvantaged communities * Educational "collaboration" is defined as seminars, outreach events and consultations as needed. These collaborations include exchanges of monetary or in-kind support and services (i.e., sharing meeting facilities, marketing/promotional services, etc.).	2b
	3. Number of IDSM educational classes with substantial IDSM (EE, DR, and DG) content. * "Substantial" is defined as approximately 50% or more of class content must address IDSM subject matter	2b
Connections	1. Percent increase in educational collaboration with partners. (Tracked and reported by educational level, and by number of partners operating in Title-1 communities.) * Educational "collaboration" is defined as seminars, outreach events and consultations as needed. These collaborations include exchanges of monetary or in-kind support and services (i.e., sharing meeting facilities, marketing/promotional services, etc.).	2b
	2. Percent of K-12 WET Connection program participants that are from Title-1	2a

Resolution E-4385
 SCE AL 2476E, PG&E AL 3120G|3675E
 SoCal Gas AL 4114, SDG&E AL 2172E|1951G/cf1
12/06/10

December 2, 2010

DATE OF ISSUANCE:

	schools	
	3a. Complete baseline study to determine the current number of partnerships. (Y/N)	2a*
	3b: Number of high school continuing education outreach partnerships in WET Connection	* Starting 2011.

Reporting Matrix of Market Actors Participating in the Business and Consumer Electronics Program (each IOU to complete individually)

Category of Market Actors (entity engaged in some aspect of the supply chain for electronics)	Market Actor Category Definition	Market Actor	Number (and percent) of stores within Service Territory	Number (and percent) of stores detailed	Training materials distributed (yes/no)*	Television		Desktop Computers		Computer Monitors		How "double dipping" is avoided	
						Business	Consumers	Business	Consumers	Business	Consumers		
Retailers	An entity which sells goods to the consumer. Retailers include large businesses such as Wal-Mart, and also smaller, non-chain locations run independently.					x	x	x	x	x	x	Only incent products sold directly to the end-customers	
							x		x		x		
								x		x			x
								x					x
								x					
Buying Groups	An entity that is created to leverage the purchasing power of a group of businesses to obtain discounts from vendors based on the collective buying power of the members. This is a subset of Retailers.						x					Do not incent products sold by the Buying Group to any retailers participating in another portion of the program.	
Manufacturers	An entity that makes a good through a process involving raw materials, components, or assemblies, usually on a large scale. Manufacturers (e.g., H-P, Dell, Sony) sell through many channels, including: direct to end customers (business and consumer), to Distributors, to Value Added Resellers and to Retailers.		n/a	n/a		x	x	x	x	x	x	Only incent on products sold to the end customer online, through phone sales or in-person sales (disallow any sales to retailers, distributors or other market actors)	
			n/a	n/a					x		x		
Distributors	An entity that buys non-competing products or product-lines, warehouses them, and resells them to retailers, value added resellers (VARs) or direct to the end user. Examples include Ingram Micro, SYNEX and Comcast.											Only incent on products sold to VARs or end customers. Currently, there are no VARs targeted for participation in the program. If VARs are ever included in the incentive program, then sales to VARs would be disallowed.	

Note: This matrix will be constantly evolving. New products will be added, some may be taken off once market transformation has occurred. Additionally, the Market Actor categories identified may be expanded. For example, when set-top boxes are added to the program, a different set of market actors will need to be engaged (e.g. Comcast).

* Training materials will be compiled into a portfolio. Materials range from presentations, one-pagers handed to sales associates, on-line training modules, etc.

APPENDIX B

PRELIMINARY LIST OF MARKET TRANSFORMATION INDICATORS for STATEWIDE PROGRAMS and SUBPROGRAMS

Legend for Metric Type and IOU Reporting Frequency:

Metric Type	Description	IOU Reporting Frequency
3	Long term (2013-2030) <i>market</i> outcome	To be Determined *

* The final number, and determination of who is responsible for reporting, is subject to the MTI workshops, stakeholder comments and the 2010-2012 EM&V work plan process (pursuant to D.10-04-029) and the prioritization and negotiations between Energy Division and the IOUs. This prioritization is bound by EM&V funding constraints established in D. 10-04-029. Market transformation indicator results shall be reported, as available, by Energy Division or the IOUs, depending on who conducts the necessary market studies.

Note: "Y/N" indicates a Yes/No metric. These are binary metrics based on whether the condition is or is not satisfied.

SW Program/ Sub-Program	MARKET TRANSFORMATION INDICATOR	Metric Type
COMMERCIAL / INDUSTRIAL / AGRICULTURAL COMBINED		
* Data to be reported in disaggregate form by SW program (commercial, industrial, and agricultural)		
Continuous Energy Improvement (CEI)	*1. Number and percent of Calculated Incentive participants who go on to implement a long-term energy plan under the Continuous Energy Improvement program.	3
	*2. Number and percent of CEI participants who developed a long-term energy plan <u>before the end of 2012</u> and are implementing their plan without CEI specific IOU support (Joint IOUs, pg. 17).	3
	*3. Number and percent of CEI Participants who achieve all scheduled milestones, as identified in their long-term energy plans.	3
	*3. Number and percent of CEI Participants who achieve scheduled milestones, (and what milestones) as identified in their long-term energy plans. (Joint IOUs, pg. 17.)	3
	*4a. Number and percent of California corporations that include greenhouse gas reduction measurement, monitoring, and reduction strategies in their long-term energy plans. *4b. Number and percent of CEI Participants that include greenhouse gas reduction measurement, monitoring and reduction strategies in their long-term energy plans. (Joint IOUs, pg. 17).	3
	*5. Number and percentage of eligible customers participating in the CEI Program (NRDC, pg. 6).	3
Non-Residential Audit Program	*1. Percent of NRA participants that implement recommended measures without receiving an IOU Incentive (NRDC, pg. 6).	3

(NRA)	2. Percent of NRA participants that implement X, Y, Z measures without receiving an IOU incentive (NRDC, pg 6).	3
	3. Percent of NRA participants that implement recommended measures that cost \$X or more without receiving an IOU incentive (NRDC, pg. 6)	3
	4. Percent of NRA participants that implement recommended measures that save X amount or more without receiving an IOU incentive (NRDC, pg. 6)	3
Deemed Incentives	*1. All measures determined to be “standard practice” are phased out at various levels of the program (depending on the technology within the customer class) and replaced by new, improved or ETP measures. (Y/N) Note: IOUs to define ‘standard practice’ by the end of 2011.	3
Calculated Incentives	*1. All measures determined to be “standard practice” are phased out at various levels of the program (depending on the technology within the customer class and replaced by ETP or “Advanced Technology” measures. (Y/N) Note: IOUs to define “standard practice” and “advanced technology” by the end of 2011.	3
Direct Install (DI)	*1. Measures determined to be “standard practice” are phased out at various levels of the program (depending on the technology within the customer class) and replaced by new, improved or ETP measures. (Y/N)	3
	*2. Percent of DI participants that routinely consider energy efficiency when making capital purchases.	3

COMMERCIAL		
	1a. Square footage of existing commercial space in California retrofitted X % beyond current Title 24 building standard (2011). Note: “X” to be determined by study and defined by the end of 2012.	3
	1b. Total square footage and percentage of overall square footage of existing commercial space in California retrofitted X% beyond current Title 24 building standard (2011) (NRDC, pg. 6.)	
	2. Percentage of commercial participants, tracked by NRA, Calculated and Deemed subprogram, who go on to implement a long-term energy plan	3

INDUSTRIAL		
		3
	1. Energy intensity (per gross dollar of production value) for industrial entities.	3
	2. The percentage of large customers (businesses that are responsible for 80% of sectoral energy usage) that adopt energy efficiency certification and/or	3

	benchmarking.	
AGRICULTURE		
	1. Percentage of participants in the Agricultural program who go on to implement a long-term energy plan.	3
<i>Pump and Test Repair</i>	1. Percent of Ag customers renovating and/or maintaining their pump after receiving a pump test that shows OPE is above the baseline OPE level determined through the Market Characterization Study.	3

RESIDENTIAL		
	1. Average energy use/ft2 in existing homes (kwh, therms, KW), reported by single-family and multi-family.	3
	2. Percentage and number of homes where the purchased energy is reduced by 20%, 40% or 70% by 2013, 2017 and 2020 from 2008 baseline	3
<i>Business Consumer Electronics (bce)</i>	1. Percent decrease in average plug load attributable to electronic products that are in the BCE program. 2. The number and percentage of products meeting minimum program specifications (by product type) that are sold compared to total sales (NRDC, p. 7).	3
<i>Advanced Lighting</i>	1. The average lighting power density of residential and commercial lighting applications. 2. The number and percentage of newly incentivized advanced lighting practices or products sold and installed above baseline (NRDC, p. 7) 3. The availability on retailer shelves of additional lighting technologies that address longstanding concerns with the current efficient options on the market (e.g. super CFLs, halogenas, etc) (NRDC, p. 7).	3
<i>Appliance Recycling</i>	1. Saturation levels of "inefficient, older refrigerators and freezers" in California homes as demonstrated through appliance: age, size and efficiency. Note: "Inefficient, older refrigerators and freezers" needs to be defined.	3
<i>Basic CFL</i>	1. Number of basic CFLs sold annually in California and percentage of overall bulb sales (NRDC, p. 7). Note: For entire market, not IOU-rebated CFLs	3
	2. Price of non-discounted MSB CFLs	3
	3. Saturation of eligible sockets (MSB, non-dimming, interior) with CFLs or better	3
<i>Home Energy</i>	NONE PROPOSED	

Efficiency Survey		
Home Energy Efficiency Rebate	1. Statewide market penetration of ENERGY STAR appliances sold at retail level across various store sizes.	3
	2. Median age of in-home appliances statewide in single-family (SF) and multi-family (MF) homes	3
	3. Changes in the Energy Star energy saving level of incentivized measures over time (NRDC, pg. 7)	
Multi-Family Energy Efficiency Rebate	1. Percentage of multi-family buildings achieving purchased energy reduction by 10%, or 20% or 30% or 40% and above.	3
	2. Average efficiency of common area fixtures and appliances in MF properties	3
	3. Percentage of eligible MF buildings participating in MFEER (NRDC, pg. 7)	
Whole House Retrofit	1. Costs to customers of whole house retrofits, including costs of materials, equipment and labor (NRDC, p. 7).	3
	2. The proportion (%) of households that elect not to perform comprehensive energy upgrades due to various barriers such as lack of available financing, lack of qualified contractors, undesirable payback period, lack of urgency, "hassle" of upgrade, or uncertainty that the upgrades will provide appreciable benefit (NRDC, p 7).	3
	4. The number and percent of audits performed compared to the number of customers signed up for an audit (NRDC, p. 7).	

LIGHTING MARKET TRANSFORMATION (LMT)

	1. Percentage of total lighting sales comprised of Best Practice technologies (by sector)	3
	2. Number of technologies (by sector) for which market transformation is achieved (as defined by the program)	3
	3. Number of technologies by sector that no longer require IOU program interventions	3

NEW CONSTRUCTION

California Advanced Homes Program	1. Total number/percentage of California-wide, new homes of all production types (SF, MF), modeled 15-19%, 20-29%, 30-39%,40+% above T24 building code (2008 and subsequent code updates). Includes participants and non-participants; for all indicators suggested, baseline year would be years from which data for baseline study is drawn.	3
	2. Number/percentage of zero net energy (ZNE), and zero peak new homes of all production types (SF, MF) in California (includes participants and non-	3

	participants)	
	3. Average incremental cost of new homes more efficient than Title 24 (2008) (and subsequent code levels) by: 15%-19%; 20%-29%; 30-39%, 40+%; ZNE and zero peak homes	3
	4. Average electricity and energy use levels of California new residential units (KW/ft2; KBTU/ft2/year)	3
Residential ENERGY STAR® Manufactured Housing	1. Penetration rates of ENERGY STAR® manufactured homes in California as compared to homes meeting HUD specifications	3
	2. Incremental cost to customer of ENERGY STAR® manufactured as compared to homes meeting HUD specifications	3
	3. Average energy savings of ENERGY STAR® manufactured homes as compared to baseline (homes meeting HUD specifications in X year)	3
	4. Percentage and number of retailers that market ENERGY STAR® homes as their “standard home” (defined as ENERGY STAR homes comprise 50% or more of a retailers sales)	3
Commercial Savings by Design (SBD)	1. Percentage decrease in average site energy* use (kBtu/sq ft-yr) and demand reduction (kW/sq ft) for commercial new construction by building type in California. 2. Percentage of all eligible projects that participate in commercial SBD (NRDC, p. 8). * “Total site energy” comprises building site energy and exterior lighting, architectural lighting/signage, all non-building energy use (fountains, irrigation, vehicle charging stations) non-occupied space (garages, walkways), and building end-uses unregulated by T24 (plug loads, process loads, appliances, occupancy, etc)	3
	3. Percentage of completed commercial new construction buildings in California implementing Integrated Design/Whole Building Approaches (ID/WBA)* * “Integrated Design/WBA” is as defined in SBD program: <ul style="list-style-type: none"> • If project is >50% Design Development, it is too late for ID/WBA: then becomes a Systems project in SBD. • A complete building model is still done for systems projects • A complete building model looks at interactive affects, day lighting, etc. • Most likely non-participant ID/WBA will be identified by % > T24. For example, if project is 15% > T24, project most likely utilized ID/WBA. 	3

CODES AND STANDARDS		
	1. Percent of (a) residential (b) commercial buildings in California that are built to comply with code targeting ZNE technologies, practices and design	3
	2. Number of utility incentivized EE measures that become part of the following	3

	code cycle (e.g. measures incentivized in 2006-2008 would be part of 2011 or 2014 code) targeting the following: <ul style="list-style-type: none"> a. advanced climate-appropriate HVAC technologies (equipment controls, including system diagnostics) b. Whole Building approaches in Commercial buildings c. Whole House approaches in Residential homes d. Advanced Lighting e. High efficient peak reduction technologies including plug loads f. Other categories 	
	3. Compliance rates of T24 in (a) existing homes and (b) commercial buildings in California.	3
	4. Compliance rates of T24 in (a) new homes (b) new commercial buildings in California.	3
	5. Percent of building departments (jurisdictions) that adopt and use tools identified as industry best practices to improve permit application, tracking, and inspection processes and increase regional consistency	3
	6. Number of measures from Voluntary beyond code standards and rating systems (LEED, CHPS, 189) that are incorporated into mandatory T24 Standards in the Residential and Commercial Sectors.	3
	7. Number of Jurisdictions in California implementing Reach Codes in the Residential and Commercial Buildings.	3
Building Standards Advocacy	NONE PROPOSED	
Appliance Standards Advocacy	NONE PROPOSED	
Compliance Enhancement	NONE PROPOSED 1. Number and percent of eligible jurisdictions participating in the compliance enhancement program (NRDC, p. 8) 2. Number and percent of jurisdictions that report improvements* in code compliance processes (NRDC, p. 8). * "Improvement" needs to be defined.	
Reach Codes	NONE PROPOSED	

COMMERCIAL and RESIDENTIAL HVAC		
Upstream HVAC	1. Market penetration of climate appropriate HVAC equipment.	3
Residential Energy Star	1. Identify the percentage change in the use of Quality Installation guidelines among all California Residential HVAC installation contractors.	3

Quality Installation		
Commercial Quality Installation	1. Percentage change in the use of Quality Installation guidelines among all California Commercial HVAC installation contractors.	3
Quality Maintenance Development	1. Percent change in the employment of Quality Maintenance practices among all California HVAC contractors and technicians.	3
Technologies and System Diagnostics	1. Code adoption of diagnostic standards (Y/N)	3
Workforce Education & Training	1. Percentage of California HVAC-training institutions offering courses using Quality Installation and Quality Maintenance standards.	3

EMERGING TECHNOLOGIES (ET)

	1. Market penetration (percent of buildings/percent of homes) of new climate-appropriate HVAC technologies (equipment and controls, including system diagnostics) resulting from ETP: (a) Existing Residential (b) Residential New Construction (c) Existing Commercial (d) Commercial New Construction	3
	2. Number of ETP measures adopted* into building codes and/or appliance standards by CEC * "Adoption" means measure is available to end-use customers through IOU programs. Adoption of a measure may be attributed to one or more ET sub-programs	3
Technology Assessment	NONE PROPOSED	
Scaled Field Placement (SFP)	1. Number of new or existing underutilized ETP measures addressed in the SFP that are adopted* that show an increase in the number of rebates in the EE portfolio * "Adoption" means measure is available to end-use customers through IOU programs. Adoption of a measure may be attributed to one or more ET sub-programs	3
Demonstration Showcases	NONE PROPOSED	
Market and Behavioral Studies	NONE PROPOSED	
Technology Development Support	NONE PROPOSED	
Technology Research Incubation and	1. Number of TRIO measures assessed by ET program.	3
	2. Number of TRIO measures adopted* by EE programs.	3

Outreach (TRIO)	* "Adoption" means measure is available to end-use customers through programs. Adoption of a measure may be attributed to one or more ET sub-programs	
Technology and Testing Center	NONE PROPOSED	

INTEGRATED DEMAND-SIDE MANAGEMENT (IDSM)

	1. Percent of customers who are aware of online and onsite integrated audits	3
	2. Percent of customers in each customer class who have received an integrated audit and percent of these customers (by audit type) who have implemented one or more of the audit recommendations (indicate how many incentivized vs. non-incentivized)	3
	3. Percent of customers in each customer classes who are aware of integrated programs or incentive opportunities as a result of local integrated marketing collateral (indicate how many of these customers have participated in an integrated program (one that promotes EE, Demand Response (DR) and Distributed Generation (DG))	3
	4. A process evaluation that identifies how well "integrated" (EE, DR, DG) all IOU demand side energy program offerings and components are (ex: CEI, Commercial, Industrial, Agricultural, Residential, audits) including estimated savings of integrated programs and projects, lessons learned, improvement plans, and how the program portfolio is addressing strategic planning goals and objectives / Decision directives with regard to integration. Evaluation will include water conservation, GHG and waste reduction strategies (Y/N)	3
	5. Water conservation, GHG, and waste reduction strategies are incorporated into integrated program offerings. (Y/N)	3

MARKETING, EDUCATION & OUTREACH (ME&O)

	NONE PROPOSED	
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WORKFORCE EDUCATION & TRAINING (WE&T)

Centergies	1. Percent of program participants stating an interest in pursuing green careers as a result of program participation.	3
	2. Percent of program participants reporting utilization of knowledge and skills received from the program.	3
	3. Percent of past Centergies participants that attribute the program as a significant reason they are currently working in a clean energy job. (Identify figures for low-income participants)	3

Connections	1. Percent of prior program cycle participating schools that have continued the WE&T Connection training activities without program support.	3
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APPENDIX C

EXAMPLE PPM WORKSHEET FOR RESIDENTIAL ADVANCED LIGHTING SUBPROGRAM

RESIDENTIAL – ADVANCED CONSUMER LIGHTING SUBPROGRAM

	Mission
SW Program: Residential	The Advanced Consumer Lighting Program: The Residential Lighting Incentive Program that has run successfully for several years has been separated into two programs: the Basic CFL program, and the Advanced Consumer Lighting Products program. The Advanced Consumer Lighting program provides participating retailers with up-stream incentives in the form of buy-downs that reduce the cost of energy-efficient lighting products. The program introduces new and advanced energy-efficient lighting products to the market and strives to influence future purchasing behaviors of customers. The definition of advanced lighting is all lighting products excluding bare spiral, non-dimmable CFLs of less than 30 watts.
SW <u>Sub-program</u> : Advanced Consumer Lighting Program	

California Long-Term Energy Efficiency Strategic Plan (CLTEESP) Goals/Strategies Addressed by SW <u>Sub-program</u>:	CLTEESP Ref. pp. #
<u>Goal 4</u> : The residential lighting industry will undergo substantial transformation through the deployment of high-efficiency and high-performance lighting technologies, supported by state and national codes and standards. <u>Strategy 4-1</u> : Drive continual advances in lighting technology through research programs and competitions (near-term objectives)	p. 11
<u>Strategy 4-2</u> : Create demand for improved lighting products through demonstration projects, marketing efforts, and utility programs. (near-term objectives)	p. 24
<u>Strategy 4-3</u> : Continuously strengthen standards. (near-term objectives)	p. 24
<u>Strategy 4-4</u> : Coordinated phase out of Utility promotions for purchase of CFLs. (near-term objectives)	p. 24

<p><u>Strategy 4-5</u>: Ensure environmental safety of CFLs and other emerging lighting solutions. (near-term objectives)</p>	<p>p. 24</p>
<p><u>Goal 3 (commercial)</u>: The commercial lighting industry will undergo substantial transformation through the deployment of high-efficiency and high-performance lighting technologies, spurred by state, national codes and standards and leading-edge incentive strategies.</p>	<p>p. 24</p>
<p><u>Strategy 3-1</u>: Drive continual advances in lighting technology through research programs and competitions (near-term objectives)</p>	<p>p. 31</p>
<p><u>Strategy 3-2</u>: Create demand for improved lighting products through demonstration projects, marketing efforts, and utility programs. (near-term objectives)</p>	<p>p. 41</p>
<p><u>Strategy 3-3</u>: Coordinated phase out of Utility promotions for purchase of CFLs. (near-term objectives)</p>	<p>p. 41</p>
<p><i>Note: CA EESP Goals/Strategies section needs to be updated to final adopted Strategic Lighting Plan</i></p>	

<p>Short-term (2010-2012) “SMART” Sub-program Objectives:</p>
<p><u>ST Objective 1</u>: During 2010-2012, increase lighting program results that are attributed to advanced lighting program activities as compared to 2006-2008 and as compared to bare spiral CFL bulbs of less than 30 watts (non-dimmable) incended in 2010-2012, while optimizing energy savings.</p>
<p><u>ST Objective 2</u>: By 2012, increase the number of participating partners in the Advanced Consumer Lighting Program, particularly those that serve lower-income and hard-to-reach** populations, and increase the percentage of all primary lighting retail outlets within IOU service territories that this represents while further enhancing distribution channel mix as needed and optimizing program net-to-gross ratios.</p>
<p>** HTR is as defined in the EE Policy Manual.</p>

Short-term <u>Sub-program</u> PPMs:	Metric Type (2a or 2b)**	Baseline Study Required (Y/N)
PPM 1: Percent kW/kWh/Qty of incented products under the Advanced Lighting program as compared to the Basic Lighting program, by product type	2a	N
PPM 2: Percent of products incented under the Advanced Lighting Program by distribution channel,* and by hard-to-reach (HTR)** zip codes. *Distribution channels are as defined in 06-08 Upstream Lighting Study ** HTR is as defined in the EE Policy Manual.	2a	N

**Metric type: 2a = reported annually, 2b = reported by end of cycle.

Long-Term (2013-2020) “SMART” <u>Sub-program</u> Objectives:
LT Objective 1: By 2015, double the sales of LED products in the state of California, over 2010 baseline
LT Objective 2: By 2015, double the sales of small, tapered and dimmable CFLs over 2010 baseline.
LT Objective 3: By 2015, reduce the lighting power density for the average residential and commercial application from the 2010 level to meet the Strategic Plan Lighting Chapter best practices retrofit objectives (p. 23 of Strategic Lighting Chapter).

Long-Term <u>Sub-program</u> MT Indicators:	Metric Type (3)**	Baseline Study Required (Y/N)
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<p>MT Indicator 1: The average lighting power density of residential and commercial lighting applications.</p>	<p>3</p>	<p>Y</p> <p>Note: Residential Appliance Saturation Survey (RASS) is a possible source</p>
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***Metric type: 3 = data collection, tracking, and reporting by IOUs or CPUC staff to be determined.*

Strategic Plan goals and strategies, and short and long term objectives associated with all of the PPMs adopted in this resolution are specified in the completed PPM worksheets located at the Commission’s Energy Data Website at: www.energydataweb.com/cpuc/default.aspx. See document in topic area “Complete Program Performance Metrics (PPM) Worksheets for 2010-2012 Energy Efficiency Programs.”

APPENDIX D

PARTY COMMENTS, REPLY COMMENTS, AND ENERGY DIVISION RESPONSES

Statewide Program/Sub-Program(s) PPMs	Party	Comment	Reply
Commercial/Industrial/Agricultural Combined			
Statewide			
<i>Continuous Energy Improvement (CEI)</i>	Joint Utilities	The joint utilities ask for confirmation that this should be a 2b metric (was originally listed as 2a).	We agree, this metric should be 2b.
<i>Non-Residential Audit Program (NRA)</i>	Joint Utilities	The joint utilities ask to add a footnote that states, "An audit completed in one/portfolio may have measures implemented over several years and portfolios."	We agree to include this footnote as written.
Residential			
Statewide			
<i>Business Consumer Electronics (BCE)</i>	NRDC	Suggests adding a new PPM: "the number and percentage of products meeting minimum program specifications (by product type) that are sold compared to total sales.	We suggest that Energy Division and the joint utilities consider this as an MTI as part of their further review process, and add it now to the initial MTI list in Appendix B.
	Joint Utilities	Suggest modifying PPM #1a: "Number of participating retailers and other resellers receiving	The suggested modification would indicate the number of retail outlets where incented

		<p>training (<u>total number of retail store locations</u>)”</p>	<p>products will be available, and so we accept the suggested modification.</p>
<p><i>Basic CFL</i></p>	<p>DRA</p>	<p>Basic information seems too general to assist in determining whether a program is successful and should be continued or closed. The 3 basic CFL PPMs may not provide the level the information needed to determine whether subsidies can be discontinued, especially given the absence of baseline and target information for the second and third PPMs.</p>	<p>These PPMs alone are not intended to provide the basis on which to decide whether subsidies can be discontinued. Other information such as the MTIs, program savings, cost-effectiveness, and NTG will contribute to this assessment. The purpose of these PPMs is to measure progress against the objectives set for the program. PPMs are proximate indicators of success on a short term basis while the MTIs are the metrics be which to measure long term success, and will be discussed in subsequent workshops. In</p>

			regards to baseline and target information for the second and third PPMs, we believe that an additional baseline study is not needed, as sufficient data exists from prior evaluations to be used comparatively to 2010-12 program achievements reported through EEGA.
	DRA	These PPMs fail to consider what is going on in the marketplace at large, which would allow the Commission to better evaluate whether adequate progress is being made in achieving market transformation.	The Commission acknowledges that the basic lighting market in CA is going through rapid change, and believes that the market transformation indicators are the best way to track progress towards the goals in the Strategic Plan.
Whole House Retrofit Program	NRDC	Suggests adding "percentage of total possible homes" to Whole House Retrofit PPM	We decline to add this language at this time as we expect that decisively determining the total percentage of possible homes annually would be difficult and expensive. We agree with the Joint Utilities' reply comments that this suggestion be considered during the MTI workshop

			and Energy Division's recommendations regarding final MTIs.
Lighting Market Transformation			
Statewide	Joint Utilities	PPM 1: The January deadline for the technology roadmap will be difficult to meet due to the template and technology criteria being developed in December. The IOUs ask that this deadline be amended to Q1 2011, to be reported twice in 2011 and annually thereafter	As the utilities mention in their comments, these PPMs were agreed to by consensus at the October 14, 2010 meeting between the Energy Division and the IOUs. As such, we do not see a compelling reason to make a change to the submittal date. We do however, modify the metric from a 2b to 2a as the utilities appear to have clarified that the term "bi-annually" was intended to mean semi-annually or twice a year, at least for 2011.
	Joint Utilities	PPM 2: The March deadline for the communication plan will be difficult to meet due to the template and technology criteria being developed in December. The IOUs ask that this deadline be amended to June 2011.	We believe meeting a March 2011 deadline is necessary to ensure this program moves forward in a timely manner. As this plan calls only for a schedule for making the lighting technology roadmap, pipeline plans, and technology resource information

			available on the statewide ME&O portal, we believe the Joint Utilities should be able to meet this deadline.
New Construction			
Statewide			
<i>California Advanced Homes Program (CAHP)</i>	Joint Utilities	<p>Suggest modifying PPM #2 as shown: Number and percentage of CAHP participant new homes: (a) <u>verified¹ by IOUs HERS Raters</u> which exceed as built exceeding Title 24 (T24) building standards (SF and MF) by 15%-19%, 20%-29%, 30%-39%, 40%-70%.</p> <p>Comments: Also add footnote as follows: ¹The IOUs use the existing HERS Rater infrastructure to verify HERS measures and other building characteristics as required by CA Title 24 and the CEC. The IOUs do not perform the verification inspections and do not certify HERS Raters. *Note: HERS Rater inspection protocol for production builders does not</p>	The suggested change is more accurate and we accept it.

		<p>require inspection of 100% of homes; there is a sampling protocol. For more information on HERS inspections please see: http://www.energy.ca.gov/HERS/index.html</p>	
<p><i>Residential Energy Start Manufactured Housing</i></p>	<p>NRDC</p>	<p>Suggests adding "percentage" of manufactured housing units sold in IOU service territories to PPM</p>	<p>We decline to add the requirement for this PPM to collect data on the percentage that the total number of manufactured housing units sold in IOU service territories participating in the program represents. This is because this PPM is a "2a" PPM, meaning that it is reported annually and can be based on information that will already be collected by the IOUs. Collecting manufactured homes sales data, as suggested, on an annual basis would be difficult and expensive. A proxy for the requested addition is represented in one of the MTIs for this</p>

			program (i.e. penetration rates of ENERGY STAR® manufactured homes in California).
Codes and Standards			
<i>Reach Codes</i>	Joint Utilities	<p>1". Number of jurisdictions in IOU Service territories <u>with CEC approved-implementing</u> Reach Codes in residential and/or commercial sectors as a result of the RC sub-program activities."</p> <p>Comment: Joint Utilities also request that the Short-term (2010-2012) Objectives 4 & 6 currently listed in the document titled "Complete Program Performance Metrics (PPM) Worksheets for 2010-2012 Energy Efficiency Programs" on the CPUC website energydataweb.com be clarified as follows: ST Objective 4: By end of 2012, IOUs conduct outreach to 20% of local governments (or 100% of local jurisdictions included in Government</p>	<p>We agree with the Joint Utilities' edits to this PPM.</p> <p>We agree in part with the Joint Utilities' comments regarding the short-term objectives. For Objective 4, we agree with removing specific targets for the number of advocacy sessions, and with the expanded language to clarify types of activities involved. We prefer to retain language affirming that the purpose of these activities is to optimize compliance with existing codes. For Objective 6, we clarify our initial language that was removed by the Joint Utilities in their comments and present the objective, as clarified, below.</p> <p>We further modify the Short-term (2010-12) Objectives 4 & 6</p>

		<p>Partnership Program) by providing presentations statewide for the purpose of discussing compliance. These may be conducted through various means, including outreach related to reach code development, participation in public meetings, and through various local government partnerships communications.</p> <p>ST Objective 6: By 2012, 32 local jurisdictions will implement reach codes in residential and/or commercial sectors as a result of residential and/or commercial sub program activities, subject to local jurisdiction and CEC discretion.</p> <p>Note: *“ Adoption” is defined as approval by a city council or county board of supervisors and approved by the CEC. **The number of local jurisdictions is a Statewide C&S Program objective.</p>	<p>currently listed in the document titled “Complete Program Performance Metrics (PPM) Worksheets for 2010-2012 Energy Efficiency Programs” on the CPUC website energydataweb.com as follows:</p> <p>ST Objective 4: By end of 2012, IOUs conduct outreach to 20% of local governments (or 100% of local jurisdictions included in Government Partnership Program) by providing presentations/training statewide for the purpose of optimizing compliance with existing codes discussing compliance. These may be conducted through various means, including outreach related to reach code development, participation in public meetings, and through various local government partnerships communications.</p>
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			<p>ST Objective 6: By 2012, 32 local jurisdictions will implement reach codes in residential and/or commercial sectors as a result of Reach Codes residential and/or commercial sub program activities, subject to local jurisdiction and CEC discretion. Note: *"Adoption" is defined as approval by a city council or county board of supervisors and approved by the CEC. **The number of local jurisdictions is a Statewide C&S Program objective.</p>
<p>Residential and Commercial HVAC</p>			
<p><i>Upstream HVAC</i></p>	<p>Joint Utilities</p>	<p>The Joint Utilities propose to itemize the metric (a., b., c.) and add "number of" in front of units and add the following footnote: "As is indicated within this PPM, the availability of the item (c) make up this PPM is not yet confirmed, since it is closely-held, proprietary third party information.</p>	<p>We agree with the proposed edits as well as the footnote as proposed.</p>

		<p>The IOU team is in discussions with AHRI about obtaining and this data and to ascertain the statistical validity of what data would be provided; the IOU team will communicate with the ED about any issues regarding this data element before the first reporting period in Q1, 2011 for 2010 information."</p>	
	<p>Joint Utilities</p>	<p>The Joint Utilities propose to add the following footnote: "The availability of this data is not yet confirmed, since it is closely-held, proprietary third party information. The IOU team is in discussions with AHRI about obtaining and this data and to ascertain the statistical validity of what data would be provided; the IOU team will communicate with the ED about any issues regarding this data element before the first reporting period in Q1, 2011 for 2010 information."</p>	<p>We agree with the proposed edits as well as the footnote as proposed.</p>

Integrated Demand-Side Management (IDSM)			
Statewide	Joint Utilities	<p>Comments on PPM #5 for IDSM: Large integrated onsite audits are very different from online audits. With the large audits, there are usually fewer done in each year and IOUs can track measures that customers implement. However, an audit completed in one year of a given portfolio may have measures implemented over several years and portfolios. The Joint Utilities are in the process of developing improved online audit tools that will have improved ability to track what customers implement. However, the tools will not be completed until later in this portfolio period. In addition, the Joint Utilities claim that, if a customer using online tools implements efforts that are not attached to programs or incentives, it will be</p>	<p>We affirm PPM #5 will apply to the interim audit tool to be completed by the end of 2010. We acknowledge the comments and suggest that they be discussed at the MTI workshop along with similar comments on MTIs.</p>

		<p>a significant challenge to track these "process and practice improvements". The Joint Utilities recommend that the initial tracking of this metric begin Q1 2013 with the large audits and state that the cost impact of this evaluation is still unknown. Tracking of online audit related actions should not begin until after the IOUs have completed development of the improved online audit tools. IOUs estimate the cost for the online effort to be in the \$100,000 range.</p>	
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