See track changes for updates and next steps from IOU/ED meeting on January 10, 2011
Next meeting: 10 a.m. to 3 p.m. in person meeting on January 19

PG&E Comments on the 2010-12 EM&V Work Plan, Version 1, Dec. 20, 2010

We appreciate the CPUC-ED's continued efforts to develop a comprehensive evaluation plan that provides the backbone to guide the 2010-12 research effort. Below, we have enumerated some issues that surfaced during a limited review of the current plan. We provide these here, to seek further clarity on them. We also suspect many of these will be brought up by other parties at the January 14, 2011 workshop.

1. **Clarifying questions:**
    a. Can you explain table 4-1 functional vs. primary budget columns?
    Can you provide more detailed project descriptions for project #s 8, 17, 22, 28, 41, 42, 47, 66, and 67? For some, it is hard to understand the objectives and work entailed. Many of these also have substantial budgets despite being secondary research efforts.
    b. Where will EUL research be conducted?
    c. There was agreement at the Dec 14th meeting that a sentence would be added stating studies listed may be further aggregated or dis-aggregated during the contracting process. Has that been included somewhere?
2. **Budget Allocation:** As discussed at the Dec 14th meeting, there is a need to further allocate budget line items in tables 4-1, 4-2 and Appendix A to ED, PG&E, SCE, SDG&E, and SCG for accounting and Decision compliance purposes. KEMA will create IOU-specific budgets with projects by January 14th. These will change as projects are scoped and parts of the studies are pulled out, changed, etc.
3. **Impact Evaluation Guidelines**: As discussed in written comments (06-08 impact evaluations) and oral comments (Dec 14th meeting), the Plan must address a process for establishing reasonable and consistent impact evaluation guidelines covering at least:
    a. Guidelines for baseline determination
    b. Guidelines for determination of early replacement versus replacement on burnout
    c. Guidelines for handling measures not found, not operational, or ineligible
    d. Guidelines for savings estimation of short-lived measures
    e. Guidelines for changes to operating conditions/times (permanent or temporary, e.g. recession)
    f. Guidelines for savings that significantly increase or decrease over time
    g. Guidelines for delayed savings reporting, e.g. CFLs in storage

This is a priority for the IOUs. Pierre proposed a task force approach to this. The need was seen for coordination across all projects for consistency, but also to begin with the first projects to launch and continue from there. Lots of people want to be involved, and before final decisions are made. Reference in Work Plan V.1 to "guidance documents" in the Managing EM&V section is a home for whatever is decided.

4. **Process to Initiate Research:** the proposed process (Chapter 10 and 11) in its current state needs further editing/clarification. Some points to consider:
    a. Chapter 10. It appears is no longer necessary. Delete?
    b. **Staged vs. one-time funding.** While we understand the rationale for staged funding, it will create increased administrative costs and time to manage. We propose that we seek full funding on a one-time basis and use the contract to stage the research. Talk more about this next week. Perhaps decide on a case-by-case basis?
    c. **Step 1 and Step 2 (p 11-3).** Can these be consolidated into a single step?
    d. **Step 2 (p 11-3) states**, "*When the IOU is ready to seek approval from ED for an EM&V project it will do so by uploading to basecamp a detailed project description following the format and standards specified by ED.*" These requirements should be available for review and attached to the Plan. Based on input from ED and subsequent discussion,

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PG&E proposes the following elements to combine steps 1 and 2:

i. **Project Title** - Using the same project title as used for basecamp.
ii. **Project Purpose -** Describes the rationale for conducting the evaluation, the needs and/or problems that are expected to be addressed by the evaluation.
iii. **Project Outputs** - Describe the outputs expected from the project (i.e. survey data and a narrative report; process improvement recommendations; performance data of a particular type of equipment)
iv. **Project Use -** Describe how the results of the evaluation or research project will be used.
v. **Project Focus -** List and describe the programs, projects, technologies, and/or markets that will be the subject of the evaluation.
vi. **Estimated Budget -** Provide an estimated project budget or estimated budget range.
vii. **Preferred and Optional Contractor(s) -** Provide the names and contact information of any contractors under consideration for implementing the project, if available.
viii. **Assigned IOU Staff Project Manger -** Provide the name, email and phone number of the IOU project manager directly responsible for the project.
ix. **Supporting Project Documentation** - Upload any additional documentation related to this project such as draft scope of work, RFPs and technical workpapers as appropriate and available.

e. **Timing of projects:** The Plan needs to follow the intent of the Decision to seek a two week turnaround period for CPUC-ED review of projects. Otherwise, research will continue to be delayed.
f. **Project Level Management Responsibility.** The Plan states (p 11-8), "ED and the IOUs will attempt to establish consensus on the project management structure for each project where there is significant common interest and opportunities to coordinate. If consensus cannot be reached, ED will select the project management structure that ED believes will work best." This authority is not granted to ED in D 10-04-029.

Study Management: The Study Manager for several projects is shown as ED or TBD (Table 4-2), where the projects include process evaluations and/or market characterizations. Generally these types of studies would be managed by the IOUs as they directly support changes to program implementation and/or program planning. However, in some cases we recognize the results can also serve ED's needs, such as strategic planning. How can we structure management of these studies such that both the IOU's and ED's needs are met?
Tim will kickoff the discussion on this with bullets of possible ways to co-manage studies where there is strong joint interest. Others come with ideas on how we can do this.

a. 8 - Process Evaluation - Overarching process evaluation of all nonresidential programs
b. 17 - Process Evaluation - Overarching process evaluation of all nonresidential programs
c. 22 - Process Evaluation - Lighting Programs Process Evaluation and Market Characterization
d. 23 - Process Evaluation - HVAC Programs Process Evaluation and Market Characterization
e. 24 - Process Evaluation - Local Government Partnerships Program Process Evaluations
f. 27 - Process Evaluation - ETP Process Evaluation and Market Assessment
g. 28 - Process Evaluation - Omnibus IDSM Program Process Evaluation
h. 29 - Process Evaluation - C&S Market Assessment and Process Evaluation
i. 38 - Integration Strategy Assessment - Overarching Study on Integration Effectiveness

New Question: Where is EUL accomplished? Marian feels strongly that this should be an impact evaluation output primarily, and used by DEER, but not visa versa.

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