

From: [Redacted]  
Sent: 2/3/2011 1:24:21 PM  
To: Fogel, Cathleen A. (cathleen.fogel@cpuc.ca.gov)  
Cc: Ramaiya, Shilpa R (/o=PG&E/ou=Corporate/cn=Recipients/cn=SRRd); Baker, Simon (simon.baker@cpuc.ca.gov); [Redacted]  
[Redacted]

Bcc:

Subject: Clarification of Home Energy Efficiency Survey (HEES) Policy

Cathy:

This is to clarify and confirm our understanding of the CPUC's policy for implementation of the Home Energy Efficiency Survey (HEES) subprogram within the residential statewide energy efficiency program approved by the CPUC on September 24, 2009 in D. 09-09-047 [the Statewide Program for Residential Energy Efficiency (SPREE)].

Decision 09-09-047 contains the following text which had been a source of confusion regarding program implementation.

*"For this reason, we direct utilities to eliminate the provision of on-site residential "audits" within the HEES (survey) program. Commercial or industrial on-site audits are not affected by this direction. Most of the utilities already opt for phone, mail, or on-line interactions to provide home energy use survey information due to their lower cost. To enable consumers to better understand these distinctions, we clarify that these remote interactions shall not be referred to as "audits." <sup>65</sup> Audits typically refer to a robust on-site diagnostic study of the unique efficiency opportunities of a building and are expected to be performed by a highly-trained and perhaps certified practitioner. Moreover, given the expense of such on-site analyses, these should be clearly named and distinguished from "surveys" and reserved for programs targeting more comprehensive levels of energy improvements. The HEES program should be structured to convey its survey findings in a way that directs participants toward applicable residential efficiency retrofit, solar, and demand response programs that facilitate consumers taking the more comprehensive actions we seek. (Pages 120-121).*

<sup>65</sup> *“Use of the terms “survey,” “benchmark” or “comparative analysis” is preferred to “audit” for such remote activities. The terms “assessment,” “audit,” or “diagnosis” should be reserved for analyses occurring on-premise, reflecting site-specific physical conditions or characteristics, and thus unique to a single customer.”*

I understand that you have advised PG&E and IOU staff in phone conversations of your interpretation of this language. Based on those conversations, we understand the CPUC (Energy Division) HEES policy allows for in-home, residential energy surveys as part of a portfolio of survey options which also includes online or internet based survey tools. We also understand the CPUC intends that the IOUs refer to any in home assessments for identifying energy efficiency improvement options and/or measures as surveys rather than audits. If this interpretation is not correct, please advise us at your earliest convenience. Otherwise, we will move forward with program implementation based on this interpretation of the CPUC’s directive concerning HEES.

Thank you very much for your time and effort in clarifying the CPUC’s HEES policy. I can be reached at [Redacted] should have additional feedback or if you wish to discuss this issue further.

Sincerely,

[Redacted]

Principal, IDSM Statewide Leads

PG&E