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Bcc:

Subject: Re: Enalasis Data Request from ED - PG&E EEGA 1448 et al - Approved with conditions

Hi Sandy,

I am OK with extending until 3/23 on one two conditions:

(1) Please respond to the additional questions below from Cynthia Mitchell (consultant to TURN) by 3/23 (can be in the same data request response). (For context, Ms. Mitchell is inquiring in response to her review of the SCE's 3/16 presentation to the WHPA); and

(2) Please make arrangements to brief Energy Division, TURN, DRA, and any other non-market participants of the Peer Review Group (PRG) who may be interested, on the new SW HVAC QM program. The briefing should address:

(a) a recap of the 2006-2008 evaluation findings (including TRC, NTG, relevant qualitative data, etc.);

(b) the "value proposition," given that TRC for the new program is less than 1.0, in terms of (i) serving as a platform for the entire SW HVAC program, (ii) prospects for improving TRC over time, (iii) opportunities to "selling up" QI, and (iv) incorporation of "premium measures" down the road; and

(c) direct response to the questions posed by TURN, as well as Enalasis.

I suggest the briefing be done in person at CPUC or PG+E headquarters, but webinar would also be acceptable.

Please let me know if you agree that these are reasonable requests, and when you think the IOUs can be ready to provide the briefing.

Best,
Simon Baker
Supervisor, EE Planning
CPUC Energy Division

Questions from TURN as supplement to data request:

1. What does "launch" (for SCE, by April 2011; for PG+E by June/July 2011; and for SDG+E by Q3 2011)? Is this program roll-out or the release of RFPs?
2. What is (a) the market strategy, (b) program design, and (c) prospective TRC?
3. For SCE-only, does SCE already has a program implementer or SCE rolling out a multiple VSP/Implementer program with pre-determined incentives like the last program?
4. What do the SCE Field Study results indicate
5. How are the apparent commercial field results applicable to residential HVAC QM?
6. TURN understands that most systems are maintained on a run-to-fail basis, so most systems will require the 3 hour checklist inspection. Is this true? If yes, does it make sense from a cost-effectiveness perspective to require a 3 hour inspection?
7. Is a 3-hour inspection the assumption that the program design and TRC is based upon?
8. How did the field study lead to the program design / market strategy of having contractors sell maintenance agreements upfront and in order to conduct QM work? How do we know that is the right or best approach?
9. (Similar question from Enalaysys) Where is the opportunity for the contracting community and other M&V contractors to comment on the design, approach, and work paper evaluation?
10. TURN understands that SDG&E's Third Party Program has already incorporated 26 points of the ASHREA/ACCA Checklist into their program, where the contractor has been allowed to incorporate the process into their business model at their discretion as opposed to the mandated process being apparently promoted by SCE and possibly picked up by PG&E. Is this true? If not, what needs to be clarified.
11. TURN asserts that the "stair step approach" of the SDG&E program may be the best mass market approach. Has that process been evaluated?

-End Supplemental Data Request-

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Hello Simon,

Thank you for your email letting TURN know that the utilities apparently have launch dates to reinstate some sort of HVAC QM programs.

This raises a number questions that TURN very much would like a public forum to discuss and explore. For instance, what does “launch” mean? Is this program roll-out or the release of RFPs? Also, what is the market strategy, program design, AND prospective TRC, etc.?

TURN has not heard that there are any RFPs for the SCE programs on the street so it seems unlikely that any programs will be launched on April 1st. It seems more likely that could be the target date for RFPs unless SCE already has an administrator or is rolling out a multiple VSP/Implementer program with pre-determined incentives like the last program. TURN urges ED to call for a vetting of the upcoming programs.

SCE’s presentation Wednesday March 16th [to WHPA] on their HVAC QM field work was so high level and devoid of details that I was left with close to zero useful information. For instance, what do the field results indicate? How are the apparent commercial field results applicable to residential HVAC QM? Does it make sense from a cost-effectiveness perspective to require a 3 hour inspection? We understand that most systems are maintained on a run-to-fail basis so most systems will require the 3 hour checklist inspection. Is that the assumption that the program design and TRC is based upon? (I have to say that it seems a “no brainer” that a 3 hour checklist inspection while possibly “analytically superior” will absolutely fail on a program implementation basis.)

Also, it sounded like SCE’s program design was leaning toward contractors selling maintenance agreements upfront and in order to conduct QM work. How did the field study lead to this study design / market strategy? How do we know that the right or best approach? Where is the opportunity for the contracting community and other M&V contractors to comment on the design, approach, and work paper evaluation? (I have to say that I am an “old enough dog” in this process to recall the utilities trying some sort of EE program maintenance agreements in years past that were far from successful. Again, how did we get to this proposed program design!?!)

TURN generally understands that the SDG&E Third Party Program has already incorporated 26 points of the ASHREA/ACCA Checklist into the program where the contractor has been allowed to incorporate the process into their business model at their discretion as opposed to the mandated process being apparently promoted by SCE and possibly picked up by PG&E. The stair step approach of the SDG&E program may be the best mass market approach. Has that process been evaluated? What do you mean by the “new HVAC” measures?

Simon, we appreciate that a tremendous amount of ED time and effort is going into the upcoming HVAC strategic plan update workshop on March 30th. While TURN very much supports HVAC as a “big and bold” component of the strategic plan (as a matter of fact TURN has spearheaded HVAC early on back to at least 2000-2001), first order attention should go to whether there will be viable HVAC resource programs on the street this summer. The opportunity for interested parties to stay abreast of this critical component of the existing portfolios is extremely limited.

In closing, on behalf of TURN I reiterate our request that ED call for vetting of the upcoming

HVAC QM programs. In advance, thank you for your time and consideration of this matter.

Cynthia Mitchell

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From: [Redacted]
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Subject: Enalays Data Request from ED - PG&E EEGA 1448 et al

Dear Simon and Cathy,

The IOUs are working on a joint response to the ED data request on the HVAC QM program that we received on 3/16/11. The requested due date is Monday, 3/21. Due to the short requested turn around time and the fact that several key contributors are out of the office until Monday, I am seeking an extension on behalf of the IOUs until Wednesday, 3/23, to submit the response. This will allow time for the IOU staffs to complete the joint response and for management review prior to submittal.

Thank you for your consideration of this request.

[Redacted]

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