

From: Fogel, Cathleen A.
Sent: 3/9/2011 5:27:33 PM
To: Franzese, Peter (peter.franzese@cpuc.ca.gov); [Redacted]
[Redacted]
Cc: Ramaiya, Shilpa R (/o=PG&E/ou=Corporate/cn=Recipients/cn=SRRd); Baker, Simon (simon.baker@cpuc.ca.gov); [Redacted]
[Redacted]; [Redacted]
[Redacted]; [Redacted]
[Redacted]; [Redacted]
[Redacted]

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

Brian,

My apologies for the slow response on the HEES program.

Yes, I believe that PG&E's statements below are accurate. After reviewing the Decision and discussing with involved staff, I reached the same conclusion.

Having said that, however, Energy Division staff retain some substantive questions regarding the HEES program, particularly for SCE and possibly also for PG&E.

Attached please find a series of questions that ED staff directed to SCE via a data request recently (response posted on EEGA). To help ED staff better understand PG&E's intent with the HEES in-home survey's, answers to many of the questions attached would be very helpful. Could you and your staff like to review the questions and indicate the ones that seem pertinent to any resumption of the HEES in home survey for PG&E (we understand from the recent posting of PIPs to EEGA that PG&E's HEES in-home surveys may have been suspended)? Please let me know if you feel I should submit these questions formally via data request, or if PG&E prefers a more informal approach to discussing these issues.

The gist of our concerns are the cost per in home visit

(for SCE), coupled with low 'savings' for SCE's dropping off of EE "kits."
The cost for SCE approaches that of a contractor in -home diagnostic assessment typical to that that might be provided for an Energy Upgrade CA contractor. This seems perhaps questionable. On the other hand, the program (for SCE) appears to target non-english speakers. I don't have enough information on PG&E's approach to know if it raises similar concerns or targets a similar customer base.

Once ED has additional information from PG&E, we would like to meet with both SCE and PG&E staff to better understand the intent and value of the HEES program. Perhaps thinking about scheduling that meeting 3-4 weeks from now would be best.

Best,

Cathy Fogel

415-703-1809

From: [Redacted]
Sent: Thursday, February 03, 2011 1:24 PM
To: Fogel, Cathleen A.
Cc: Baker, Simon; [Redacted]; Ramaiya, Shilpa R; [Redacted]
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.”⁶⁵ 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).

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“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