IOU Data Request on HVAC QM Program Status
March 16, 2011

Applies to: PG&E, SCE, and Sempra

Due Date: march 21, 2011

1. Does the HVAC Energy Efficiency Maintenance Study (HEEMS) indicate that "a redesigned standards-based checklist approach cannot be recommended and is inconclusive at this time and that further studies are necessary in order to ascertain the merits of a redesigned standards-based checklist approach"? If not, what does the HEEMS say regarding the feasibility and appropriateness of a standards-based approach to IOU HVAC quality maintenance (QM) programs? Please provide page citations to the HEEMS study to corroborate your response.

2. Does the HEEMS recommend that Phase 2 EM&V (including data collection and assessment from field work, lab work, and final data analysis) occur "before the ASHRAE/ACCA checklist based approach conclusions can be made"? Please provide page citations to the HEEMS study to corroborate your response.

3. Is the HVAC QM program development and implementation process following the program logic model set forth in the approved SW PIP (at p. 641)? Specifically, have the IOUs completed (or do the IOUs plan to complete) the following components of the logic model, before program launch? If so, what evidence is there to support this?
    - Conduct Research to Quantify Energy Efficiency Benefits Associated with QM (Activities)
    - Publish Research Results (Outputs)
    - Vet Research Results (Outputs)

4. If the IOUs have modified the program logic model (including the specified components above), for whatever reason, what modifications have been made and why?

5. If modifications have been made to the SW PIP, including any modifications to the program logic model, has the SW PIP been updated accordingly? If not, when will that occur and under what Commission-approved procedure?

6. The SW PIP states "the HVAC QM program will use pilots to test the implementation of program concepts (at p. 637)." Have pilots been conducted? If so, what evidence is there to support this? If not, what plans to the IOUs have to conduct and use pilots in the HVAC QM program?

7. The SW PIP states "continuous EM&V will be established to provide timely feedback on the effectiveness of program implementation tactics…At minimum, performance measurements on an appropriate number of units served by the QM program will be evaluated over a minimum 5-year period at intervals of

approximately 1 year, 3 years, and 5 years (at p. 637-638)." When will an evaluation plan be established?

8. What information do the IOUs have on the estimated TRC for the newly designed HVAC QM program?

9. With regard to program design, the SW PIP states "one of the first tasks conducted by the program will be to conduct a comprehensive research study vetted by the HVAC industry to quantify the real energy savings that consumers can expect to achieve through ongoing maintenance of their system (at p. 631)" Do the IOUs represent that the HEEMS (i.e., "Phase 1" study) is the study referenced above in the SW PIP? If not, what study meets this requirement?

10. In a March 14, 2011 email to Simon Baker (Energy Division) (see attached), Mr. Luke Herman (Enalasys) asserts that at the March 8, 2011 EM&V quarterly stakeholder meeting an IOU representative claimed that the HEEMS recommendations and conclusions are *exclusive* of program design. Is Mr. Herman's assertion true? What is the IOUs' response to Mr. Herman's contention that the IOUs' approach to program design, if not aligned with the HEEMS recommendations, is out of compliance with the SW PIP?

11. Mr. Luke Herman (Enalasys) asserts that at the March 8, 2011 EM&V quarterly stakeholder meeting an IOU representative wrongly interpreted a conclusion and recommendation of the HEEMS. Referring to a recommendation to sponsor short-term pilot, the HEEMS states that "an approach could be to fund pilot related overhead separately so the TRC calculations are based on a "mature" program… This pilot could also serve to support the integration of ACCA Standards 4 and 180 into programs (emphasis added, at p. 71)." Mr. Herman asserts that an IOU representative indicated that their interpretation is "This pilot could serve to support the integration of "mature programs" into ACCA Standards 4 and 180 programs. Is Mr. Herman's contention true? What is the IOUs' response to Mr. Herman's contention that this is an inappropriate interpretation of the HEEMS?