



### Recommended Changes to the PD

- Local Government Regional Networks
  - Issue: Authorizes local governments to independently administer regional EE pilots
    - o Local governments submit proposals in the form of Program Implementation Plans (PIPs) for review and selection by Commission
    - o Co-managed by Commission and investor-owned utilities (IOUs)
  - Proposed Solution:
    - o Local government regional pilots unnecessarily duplicate existing programs offerings and increase administration costs.
    - o If adopted, a process needs to be established for bid submission, review, contract, and award regional pilots
    - o Currently, PG&E uses the Innovator Pilots Program to solicit ideas from local governments.
    - o Commission should review our administration of contracts, not co-manage
  - Select Parties' Comments:
    - o NRD and NAESC support utility administration of regional pilots
    - o LGSEC, CCSE, and City and County of San Francisco support regional pilots
    - o Sierra Business Council notes that "creating an additional layer of energy efficiency program administration that duplicates the IOU model would not be efficient."
    - o AMBA suggests "expanding and leveraging the AMBA Local Government Partnership in our region instead of creating a new overlay of program management..."
    - o 20 parties had no comments on this topic
  
- Marketing Education and Outreach
  - Issue: Unilaterally awards California Center for Sustainable Energy (CCSE) contract, which is an unprecedented award given CCSE didn't bid or provide qualifications
  - Proposed Solution:
    - o Request for Proposal (RFP) process should be established to review qualifications and select an implementer
    - o Statewide marketing should be used for general awareness and local marketing should drive participation in programs.
  - Select Parties' Comments:
    - o CCSE and CCSF support an implementer for ME&O
    - o IOUs do not support the process for selecting an implementer
    - o 28 parties did not provide comments on this specific point

- Financing

- Issue: Requires the IOUs to propose full program design and rollout in their applications, prior to the consultant or garnering learnings from pilots
- Proposed Solution:
  - o PD should be revised to allow the utilities to propose full financing options of the pilots, the consultant's analysis and additional market research so that the new programs be based on the findings.
- Select Parties' Comments:
  - o IOUs and DR believe schedule is ambitious and more time is needed for pilots
  - o 11 parties commented on various aspects of the finance programs
  - o 21 parties had no comments on this topic

- Energy Savings Goals

- Issue: Goal set at more than 100% of the achievable market potential
  - o With the addition of decay recovery to the goals, PG&E goals are in excess of 100% of achievable market potential as shown below:

	2013	2014
GWh	153%	182%
MW	185%	215%
MM Therms	106%	104%

- Proposed Solution:
  - o Goals should not be set at more than 100% of achievable market potential
  - o Decay should be eliminated for measures installed prior to 2010
  - o Potential Study should be revised consistent with these objectives

### Procedural Changes

- Issue: Additional guidance pending for IOU applications
  - o Additional Assigned Commissioner Ruling
  - o Templates for PIPs
  - o Budget and cost effectiveness table requirements
  - o Application outline including page limit guidelines
- Proposed Solution:
  - o If all guidance is available on May 10, applications can be filed within 75 days
  - o Alternatively, to avoid delaying the applications, the Commissioner could forgo issuing additional guidance and instead direct the utilities to collaborate on common formats, thus allowing application preparation to commence immediately