

A.17-01-014
SDG&E 2018-2025 EE Rolling Portfolio Business Plan

TURN Data Request TURN-SDG&E-02

To: Ellen Adler, San Diego Gas & Electric Company (SDG&E)
From: Hayley Goodson, The Utility Reform Network (TURN)
Date Sent: May 16, 2017
Response Due: May 31, 2017 (accounting for Memorial Day)

Please provide electronic responses to the following questions which pertain to SDG&E's Application 17-01-014, requesting approval of SDG&E's 2018-2025 Energy Efficiency Rolling Portfolio Business Plan.

If partial responses are available prior to the requested due date, please forward them as soon as they become available. If any of these requests are unclear or otherwise objectionable, please contact me as soon as possible so that we may attempt to resolve any problems.

Responses should be provided to the following people:

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Statewide Program Administration

1. SDG&E's Response to TURN-SDG&E-01, Q 2(b)(iii), which addresses SDG&E's proposal to serve as lead statewide administrator of the statewide Residential and Commercial Upstream HVAC program, provides in pertinent part: "Key in this progression is the need to ensure that for the upstream and midstream channels, products and programs are developed prior to soliciting for the downstream customers' needs. SDG&E intends to ensure that the downstream programs are fully supported and coordinated with this upstream and midstream program strategy and channel development." Please explain whether SDG&E has identified, or plans to identify, opportunities to expand manufacturer and distributor incentives and promotions to include the nonresidential equipment and appliances that have been largely only promoted through downstream rebates and incentives. Does SDG&E believe there could be additional economies of scale and scope and cost efficiencies through this general approach?

2. Following up on SDG&E's Response to TURN-SDG&E-01, Q 3 addressing the *California Energy Efficiency Strategic Plan (CEESP)* HVAC Goal 1, please confirm that SDG&E considers it within its purview to make HVAC equipment rebates and other incentives contingent upon proof of permit closure, to the extent required by SB 1414 (Wolk).
 - a. If so, explain how SDG&E intends to integrate that requirement into the implementation of programs, including but not limited to the statewide Residential and Commercial Upstream HVAC program.
 - b. Regarding SB 1414, SDG&E explains in its Business Plan: "SDG&E will work with the CEC and other regulatory bodies to determine the best ways to support implementation of these provisions of law." (See A.17-01-014, Exhibit 1("SDG&E Business Plan"), p. 47 (Residential Sector) and p. 79 (Commercial Sector).) Please explain the status of SDG&E's efforts to work with the CEC and other regulatory bodies to determine the best ways to implement the requirements of SB 1414.
3. Following up on SDG&E's Response to TURN-SDG&E-01, Q 3 addressing the CEESP HVAC Goal 2, which references page 21 of SDG&E's Business Plan:
 - a. The referenced section of SDG&E's Business Plan does not mention proof of permit closure as an element of HVAC quality installation. Please explain whether SDG&E considers proof of permit closure to be an important element of promoting HVAC quality installation.
 - b. Has SDG&E considered whether and how the "Compliance Improvement" subprogram of the Statewide Codes and Standards Program could support SDG&E's downstream HVAC quality installation pilot? For instance, could the statewide program test methods of integrating the SB 1414 permit closure requirements into upstream midstream, and downstream interventions? Please explain your responses to this question.
4. Following up on SDG&E's Response to TURN-SDG&E-01, Q 4 addressing SDG&E's proposal to serve as lead administrator of the statewide Plug Load & Appliances (PLA) program, which references the success of the Northwest Energy Efficiency Alliance (NEEA) at administering upstream and midstream statewide EE programs for utilities:
 - a. Please provide any information and/or data within SDG&E's possession demonstrating NEEA's success in administering POS programs.
 - b. In what ways other than having a single statewide participation agreement for large retailers does SDG&E intend to model the statewide PLA program after NEEA's upstream and midstream programs? For instance, has SDG&E considered NEEA's approaches to rebate delivery, streamlining/simplifying retailer participation and reporting requirements, developing platform(s) that provide accurate data reporting on total product sales of both baseline and efficient products, and integrating/coordinating with third party downstream

strategies? Provide any reports or studies informing SDG&E's plans to incorporate NEEA's approaches.

- c. PG&E explained in response to TURN Data Request TURN-PG&E-01, Q 8(c) that, "While RPP [the Retail Products Platform] is still in pilot phase, PG&E shares lessons learned and best practices on RPP with all the IOUs, including SDG&E, as part of ongoing statewide monthly PLA check in meetings." Please describe the RPP lessons learned and best practices identified by PG&E that SDG&E intends to integrate into the statewide PLA program.
 - d. Why has SDG&E elected not to pilot RPP to date? Does SDG&E anticipate participating in the RPP prior to its conversion to a statewide program, assuming the pilot results support statewide rollout?
5. Does SDG&E leverage in any way, or coordinate, the relationships it has with upstream or midstream market actors through the EE portfolio in its procurement of appliances and other measures for the Energy Savings Assistance (ESA) Program? If so, please explain. If not, does SDG&E think there could be additional economies of scale and scope and cost efficiencies for either the EE portfolio or the ESA Program through this general approach?
6. Has SDG&E ever offered incentives based on lifecycle savings, rather than, or in addition to, first year savings? If so, please identify the programs or projects where SDG&E offered incentives based on lifecycle savings and any available EM&V addressing the effectiveness of that incentive structure. Also explain whether SDG&E intends to require or encourage, as a general matter, incentives based on lifecycle savings during the time period covered by the Business Plan. Please explain why or why not.