

Commenter Name: Rural Hard to Reach Working Group

Commenter Affiliation: AMBAG, CDCMC, HSEF, Kern Co., RCEA, SJVCEO, SLO Co., SBC, VV

Program Administrator to receive feedback: All

Date: November 21, 2016

Comment #	PA(s)	Sector	Page #	Comment
<i>Rural Hard to Reach Local Government Partnerships (RHTR LGPs)-1</i>	PG&E	Commercial	<i>Page #3 in PG&amp;E Commercial Sector Chapter</i>	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li>Under PG&amp;E’s vision statement for the commercial sector PG&amp;E seeks to achieve “more persistent energy savings through targeted marketed transformation, and integrated solutions that support customers and grid reliability.” In its vision statement, PG&amp;E equally recognizes the importance of partnering with Local Government Partnerships to achieving targeted market transformation.</li> </ul> <p><b>Recommended Action</b></p> <ul style="list-style-type: none"> <li>The Rural Hard to Reach Local Government Partners recommend that the very solid foundation of these effective partnerships between PG&amp;E and the Local Government Partnerships can be expanded in scope even further to be able to achieve significant market transformation. This will be achieved through our ability to work together, yet apply unique drivers, to cumulatively trigger market transformation at a cost effective rate that could not be achieved with either the Local Governments Partners or the IOUs operating under any other organizational structure that would seek to separate their effective integrated team effort, such as the LGSEC Statewide proposal. Because it is the joint integrated effort, combining the distinct drivers in a united commercial customer development and solicitation strategy is the key to triggering market transformation.</li> </ul>
<i>RHTR LGPs – 2</i>	PG&E	Commercial	<i>Page 18 in PG&amp;E Commercial Sector Chapter</i>	<p><b>Observations</b></p> <ul style="list-style-type: none"> <li>PG&amp;E identifies key barriers for the Commercial Sector and proposes Commercial Sector Interventions. The fifth barrier identified is: “The ZNE market is still in the ‘proof-of-concept’ stage.” PG&amp;E proposes assistance to the Design and Building Communities for the intervention strategy.</li> </ul> <p><b>Recommended Action</b></p> <ul style="list-style-type: none"> <li>RHTR concurs with this intervention, but we also recommend that uptake for ZNE at a transformational rate will require engagement with diverse market players which include jurisdictions’ planning teams as well as local, on the ground building communities that engage with jurisdictions. RHTR Local Government Partnerships recommend they be</li> </ul>

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				<p>engaged as team members with PG&amp;E to directly engage with their local governments to support the development of ZNE from concept to localized implementation. RHTR Local Government Partnerships are already key members of their jurisdictions' GHG reduction planning teams and are recognized as trusted advisors in modeling and in implementing GHG reduction goals for their jurisdictions. In this capacity RHTR is uniquely positioned to facilitate communication around barriers to uptake of ZNE and assist PG&amp;E in accelerating commercial sector ZNE transformation.</p>
<p><i>RHTR LGPs – 3</i></p>	<p>PG&amp;E</p>	<p>Commercial</p>	<p>Page 19 in PG&amp;E Commercial Sector Chapter</p>	<p>PG&amp;E has invested heavily into the development and implementation of an integrated database platform designed to streamline access to data, efficiency measure reporting and invoicing and communication across critical project stakeholders. This database is called Energy Insight (EI) and is built within the Salesforce platform. EI facilitates rapid communication across stakeholders to drive efficiency projects forward much more rapidly compared to previous models. For example, staff from a RHTR local government partner can complete a customized audit/efficiency project application of a commercial customer, enter the audit data into Energy Insight, and share this data with the PG&amp;E team members as applicable to the given project scope. This includes but is not limited to local PG&amp;E customer service representatives, PG&amp;E operations staff that assist with setting up pre and post site visits, and all PG&amp;E back office operations. The use of this tool has the capacity to expedite how RHTR local government partners, and all other external partners work in collaboration, to drive energy efficiency forward with the minimum operational investment. The RHTR Local Government Partners highly recommend that PG&amp;E consider including EI as its eighth intervention strategy. The RHTR Local Government Partners note for the record that this tool is unique to PG&amp;E's territory but should be considered a best practice by other PAs. PG&amp;E's efforts with Energy Insight have created a path towards resolving data availability challenges while increasing LGP/PA real-time coordination. The continued development of EI should be considered an intervention strategy. EI should be held as a model of effective data sharing and project level collaboration. EI shows that IOUs can address data access limitations effectively and that parallel databases such as those proposed by the LGSEC are not necessary and only duplicative to current efforts. The continued development of EI should be considered an intervention strategy.</p>

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<i>RHTR LGP-4</i>	PG&E	Commercial	Page 21 in PG&E Commercial Sector Chapter	<p><b>Observation</b></p> <ul style="list-style-type: none"><li>PG&amp;E identifies the intervention strategy of data analytics for enhanced customer targeting and illustrates a specific example tactic to develop a platform that enables PG&amp;E to target SMB customers based on load and demographic characteristics, and it does not include Local Government Partners as part of the intervention team.</li></ul> <p><b>Recommendation</b></p> <ul style="list-style-type: none"><li>RHTR LGPs effectively target hard to reach small jurisdictions by conducting very targeted campaigns that involve the leadership from the jurisdiction, business associations, and local organizations, along with the LGP Energy Watch program and PG&amp;E staff to deliver energy efficiency cost effectively in these rural communities. Involving RHTR LGPs to be on the team supporting this platform that targets SMB customers based on load and demographics will cost effectively optimize its roll out in the field.</li></ul>
<i>RHTR LGPs -5</i>	PG&E	Commercial	Page 23 in PG&E Commercial Sector Chapter	<p><b>Observation</b></p> <ul style="list-style-type: none"><li>Table Six of PG&amp;E's intervention strategy, RHTR LGPs are often the trusted advisor in their field that assists SMBs to understand the benefits of energy efficiency, but are currently not included as a partner in this effort on the plan document.</li></ul> <p><b>Recommendation</b></p> <ul style="list-style-type: none"><li>Include RHTR LGPs as a partner in connecting SMBs with their energy usage data and understanding how to maximize this data for their business.</li></ul>