

Instructions: Please make comments specific, reference pages where appropriate, and be focused on Business Plan level strategies.

Commenter: Please Fill In This Part Of The Form				For PA Use	
Comment #	Sector	Page #	Comment	Integrated (Y/N)	Rationale for Y/N
ORA-1	Public Sector	23/32	<ul style="list-style-type: none"> <li><b>Budgets do not align with 10-year vision for the sector</b> <ul style="list-style-type: none"> <li>SCE states on p. 23 that “with the exception of complex or novel projects, public sector customers should no longer be reliant on incentive to develop and implement EE projects.”</li> <li>However, the budget table on p. 32 shows stable budgets through 2027, which is inconsistent with incentives declining to near zero.</li> <li>The long-term goal is either not credible or the budget in out-years should decline substantially</li> </ul> </li> </ul>		
ORA-2	Public Sector	34	<ul style="list-style-type: none"> <li><b>Metrics do not align with the 10-year vision for the sector</b> <ul style="list-style-type: none"> <li>SCE’s success metrics are all based on participation levels; however, the 10-year vision is that customers will no longer be participating in incentive programs.</li> <li>Fundamental disconnect between a metric of “number of projects that receive on incentive” increasing through year 10 and a vision of declining incentives to zero by year 10.</li> </ul> </li> </ul>		
ORA – 3	Public Sector		<ul style="list-style-type: none"> <li><b>Metrics do not align with the problem statement or intervention strategy</b> <ul style="list-style-type: none"> <li>Problem statement of lack of visibility for building performance data and intervention strategies around increasing customer access to data do not match a sector outcome metric of the number of projects receiving an incentive</li> <li>Metric must measure something meaningful that represents success/failure of the intervention strategy</li> </ul> </li> </ul>		
ORA – 4	Public Sector	33	<ul style="list-style-type: none"> <li><b>Metrics must be credible and stable in order for BPs to represent a plan whose success/failure can be accurately assessed</b> <ul style="list-style-type: none"> <li>BPs cannot be approved with caveats such as that on p. 33 that “SCE plans to refine [the metrics] once more analyses are completed....if historical data on these sectors does not exist or is too sparse, then SCE will update these metrics targets after sector-specific evaluations have been completed.”</li> <li>If metrics are constantly moving targets, then the accountability mechanism is destroyed and there is no marker to judge whether or not progress is being made, whether strategies are producing results, and whether the administrator is succeeding.</li> </ul> </li> </ul>		

ORA-5	Public Sector		<ul style="list-style-type: none"> <li>• <b>Fails to address sector-specific market opportunities/advantages in addition to market barriers</b> <ul style="list-style-type: none"> <li>○ Many public buildings are have stable, long-term ownership and can have longer time horizons for capital investment</li> </ul> </li> </ul>		
ORA-6	Public Sector	28-29	<ul style="list-style-type: none"> <li>• <b>Intervention strategies should address specific market barriers and focus on the most important barriers first</b> <ul style="list-style-type: none"> <li>○ Example: SCE intervention strategies (on pp. 28-29) are just a list of current programs. “Core program” is not an intervention strategy, it is an administrative category</li> </ul> </li> </ul>		
ORA-7	Public Sector	16-22	<ul style="list-style-type: none"> <li>• <b>Contains lengthy sections that do not ‘push the narrative forward’ (</b> <ul style="list-style-type: none"> <li>○ Items included in the early sections should set up the actual intervention strategies, rather than a catalogue that is largely unused in the actual planning sections</li> <li>○ Example: MT discussion on pp. 16-22 develops a laundry list of possible market barriers, but only three are included in the actual intervention plan discussion and these are vague/high level and do not actually use the insights in the preceding discussion</li> </ul> </li> </ul>		
ORA-8	Public Sector	4, 12	<ul style="list-style-type: none"> <li>• <b>Assertions of fact or policy need to be fully supported by evidence and citation, not simply opinion</b> <ul style="list-style-type: none"> <li>○ Example: assertion on p.4 that Industry Standard Practice should rarely apply to the public sector has no citation or evidence to support</li> <li>○ Example: assertion on p. 12 that the vast majority of low-hanging fruit has been captured “as seen in recent impact evaluations and CPUC dispositions” fails to cite a single study</li> <li>○ Example: assertion on p. 12 that spillover is not quantified ignores an ED evaluation study in progress that aims to quantify spillover</li> <li>○ Example: assertion on p. 12 that public sector GHG or sustainability mandates reduce PA attribution for program influence fails to cite any evidence that this is current practice</li> </ul> </li> </ul>		

ORA-9	Public Sector	15-22	<ul style="list-style-type: none"><li>Studies that are referenced should be cited accurately and use best available recent information<ul style="list-style-type: none"><li>Example: reference to Navigant IP study on p. 15 says the study had “very few recommendations for areas under SCE control” is factually inaccurate; the study had many recommendations that are pertinent to SCE territory</li><li>Example: in discussion of market transformation on pp. 16-22, SCE cites a 1996 paper on market transformation produced under an entirely different regulatory structure but fails to cite and discuss the 2013 ED MT white paper written by some of the same authors</li></ul></li></ul>		
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