CAEECC Meeting with Energy Division to Review Proposed Decision on Energy Efficiency (EE) Portfolio Filing - **Q&A Session and Chat Log**

**4.29.2021**

# Meeting Background:

On April 16th the Commission issued a Proposed Decision: ASSESSMENT OF ENERGY EFFICIENCY POTENTIAL AND GOALS AND MODIFICATION OF PORTFOLIO APPROVAL AND OVERSIGHT PROCESS. This PD addresses, among other things, CAEECC’s recommendations on a new energy efficiency filing process.

# Document Overview

This document provides a record of questions asked by members of the Public via the WebEx Q&A and Chat boxes. The Q&A log begins on page 1; the Chat log begins on page 8. The Q&A Session questions were responded to by ED mainly during the meeting, but in some cases after the meeting as noted below.

This document does not include the questions asked by the CAEECC Members during the meeting which were answered in real-time and can be heard on the WebEx audio tape on the meeting page: <https://www.caeecc.org/4-29-21-ee-portfolio-filing-process>

# Q&A Session

Questioner: Elaine Allyn­ (SDG&E)­ - 12:50­ pm

Q: ­Are the values of the TSB available to us within the current CET? Is it using the Elec Ben and Gas Ben produced in this?­

 Responder‑ ­Jessica Allison­­­­ (CPUC) - 12:54­ pm

 *Answer: The total avoided cost benefits, or TSB, would be the electric benefits plus the gas benefits. For fuel substitution the supply costs would need to be removed from that value.*

­Questioner: Elaine Allyn ­(SDG&E)­ - 12:55­ pm

Q: ­Thank you Jessica! How are the supply costs calculated? Is this value also in the CET run?­

 Responder‑­Jessica Allison (CPUC)­­­­ - 12:57­ pm

 *Answer: ­The supply costs are currently calculated by applying the increased load of the measure to its specific load shape. In the CET that value is added to the "cost" section, or denominator of the equation. It’s a bit different for TSB and the cost effectiveness equation, so we may need to make that output more apparent, so stakeholders don't have to work backwards to see it.­*

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Questioner: Grey Staples ­(Mendota Group­)­ - 12:53­ pm

Q: ­question for Coby. Market Potential studies generally really on CE metrics (TRC) to state what is the market potential. Coby says MP study was "metrics neutral". How does one do that?­

 Responder – CPUC (after the meeting concluded)

*Answer: By metrics, we’re referring to our energy efficiency goals metrics that IOUs are required to achieve (this is different than our cost effectiveness requirements). Current goals metrics are first-year GWh, MW, MMTherms. Our Energy Efficiency Potential and Goals study does use cost effectiveness tests as measure-level thresholds that determine which measures are modeled in each study scenario (the draft 2021 study’s scenarios use both 0.85 TRC and 1.0 TRC). The outcome of that modeling is a measure mix that is unique for each scenario and produces various forecasted outputs including savings, portfolio-level cost effectiveness, and Total System Benefit. Since Total System Benefit is an output, adopting it as the new goals metric does not change the measure mix forecasted in each scenario.*

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Questioner: RICHARD ESTEVES­ (QCSCA)­ - 1:00­ pm

Q: ­Will the avoided costs be adjusted for T&D line losses and TD avoided costs? What about other non-avoided cost benefits (environmental? Any other Non-energy Benefits (NEB) to be considered?­

Responder ‑­Jessica Allison (CPUC)­­­­ - 1:02­ pm

 *Answer: ­The avoided costs include TD benefits net any line losses.*

Responder ‑­Jen Kalafut­­­­ (CPUC) - 1:03­ pm

 *Answer: ­As Jessica said, the T&D line losses and avoided costs are included. Some environmental benefits, including avoided GHG, refrigerants and some air pollutants (I believe) are also included - but we can follow up. ­*

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Questioner: Kelvin Valenzuela­ (SDG&E)­ - 1:02­ pm

Q: ­Will the user guide for the CET/CEDARS be updated to incorporate the TSB calcs?­

Responder‑­Jessica Allison­­­­ (CPUC) - 1:06­ pm

 *Answer: ­When a decision is final, we plan to take a look at the CET and its guidance to make sure stakeholders have what they need based on the changes.­*

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Questioner: Jeffrey Guild ­(Enovity­)­ - 1:02­ pm

Q: ­The TSB sounds good. Are there other jurisdictions using TSB as a P&G metric? Please share the genesis for this approach. Please also confirm that the TSB does/does not include participant costs?­

Responder ‑­Jen Kalafut (CPUC)­­­­ - 1:09­ pm

 *Answer: ­The TSB proposal is based on comments we received on the ruling we issued in 2020. At least one stakeholder, I believe, proposed a very similar metric to TSB.­‑*

Responder ‑­Coby Rudolph­­­­ (CPUC) - 1:20­ pm

 *Answer: ­TSB itself does not include participant costs -- though IOU portfolios are required to meet a TRC threshold at a portfolio-level (the Proposed Decision proposes 1.0 TRC for resource portfolios), and the TRC does factor in participant costs. Total System Benefit doesn't replace the TRC cost effectiveness test -- rather, it replaces the current set of 1st-yr savings goals.­*

Responder‑­Coby Rudolph­­­­ (CPUC)­ - 1:20­ pm

*Answer: ­NRDC proposed this type of metric in their comments last year, which they called Total Economic Benefit*.­

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Questioner: Jeffrey Guild­ (Enovity­)­ - 1:13­ pm

Q: ­Thanks, Jen, for your prior response at 10:09. Would you mind clarifying the second part of my question regarding participant costs?­

Responder‑­Jen Kalafut (CPUC)­­­­ - 1:20­

*Answer: ­Jeffrey - Coby will try to respond to this. Otherwise, we may need to follow up with you.*

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­Questioner: Tamara Dzubay­ (Ecobee­)­ - 1:14­ pm

Q: ­Will the IOUs be able to act on the informational TSB metric starting next year to make program changes or do they need to wait until 2024?­

 Responder – CPUC (after the meeting concluded)

*Answer: It would be great to understand more about what the questioner is suggesting here. If the question is asking can the PAs make portfolio decisions in their 2022 and 2023 ABALs based on the informational TSB metric, the answer to that is that we would encourage them to do that. However, they will still be responsible for achieving their kWh, kW and therm goals as a priority. As we are transitioning to the new goals metric, it may be helpful for the PAs to consider the TSB values of their programs so big programmatic shifts are less necessary come 2024, but their ABALs will need to comply with the current kWh, kW and Therm goals.*

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Questioner: ­RICHARD ESTEVES­ (QCSCA)­ - 1:16­ pm

Q: ­How will segmentation see EE programs that are both Resource and Equity based, in whole or in part? For example, an EE program that delivers cost-effective energy savings, but is directed 100% to Disadvantaged Communities (DACs)? What if only 25% were directed to DACs?­

Responder ‑­Alison LaBonte­­­­ (CPUC) - 1:45­ pm

*Answer: ­This question was answered in the presentation. Put in segment per the program's primary purpose, and all savings from any segment will be counted in the PA achievement to TSB Goal.*

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Questioner: Jonathan Budner­ (Franklin Energy­)­ - 1:17­ pm

Q: ­How do REN PAs operate in a regulatory scheme with a 30% cap on Market Support and Equity programs, when their primary area of focus is moderate income and HTR/DAC customers?­

Responder ‑ Nils Strindberg­­­­ (CPUC) - 1:26­ pm

*Answer: ­Jonathan, good to hear from you and there is no cap on the RENs Market Support or Equity program like for the other PAs.­*

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Questioner: Tamara Dzubay ­(Ecobee­)­ - 1:21­ pm

Q: ­ Will the IOUs be able to act on the informational TSB metric starting next year to make program changes or do they need to wait until 2024?­

Responder ‑ Coby Rudolph­­­­ (CPUC) - 1:37­ pm

 *Answer: ­Hi Tamara -- can you give an example of what you're thinking? The Proposed Decision says that the next two years "will allow adequate time to realign portfolios towards the new TSB metric beginning in 2024".­*

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Carmen Best­ (Recurve­)­ - 1:23­ pm

Q: ­If there are incentives in a market transformation program; can they be used in a resource acquisition program to amplify the success of both program types? –

 Responder – CPUC (after the meeting concluded)

*Answer: We are not clear on what the question is asking and are happy to follow up as needed.*

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RICHARD ESTEVES­ (QCSCA)­ - 1:23­ pm

Q: ­While ESA itself is not included, can we propose EE programs that provide ESA-eligible customers with ESA measures, but perhaps more cost-effectively?­

Responder‑­Jessica Allison­­­­ (CPUC) - 1:37­ pm

 *Answer: ­As currently, there is no rule that customers who qualify for ESA aren't allowed to benefit from other programs in the portfolio. That will continue, so ESA customers could benefit from the programs in any of the buckets.­*

Responder ‑­Alison LaBonte­­­­ (CPUC) – 1:52­ pm

 *Answer: ­At the same time, we will be careful to review program administrator applications for their coordination with ESA programs such that customers are directed to the program that is of best benefit from their lens. If ESA offers the same set of measures for free through ESA program (as compared to an EE main program that has a cost to customer), we will work with PA to ensure the EE main program implementation plan is structured to watch out for customers' best interest.*

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Questioner‑­Richard Sperberg­ (Willdan­)­ - 1:23­ pm

Q: ­The PD seems to require that any program needs to be categorized as only one of the 3 segments. For the new 3P programs, they meet multiple functions, including market support and equity. How will these programs be divide/allocated to the 3 segments?­

Responder‑­Jessica Allison (CPUC)­­­­ - 1:39­ pm

 *Answer: ­The segments are based on primary purpose, while we acknowledge that programs can have many purposes. We are just looking for the main goal of the program. So, a program that delivers energy benefits as a primary goal can also serve an equity function, etc.­*

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Questioner: Jeffrey Guild­ (Enovity)­ - 1:25­ pm

Q: ­Thanks for the responses, Jen and Coby. Notwithstanding the current status of TRC, if I understand the "net" aspect of the TSB, achieving positive TSB would inherently be cost effective, correct? ­

Responder ‑­Coby Rudolph­­­­ (CPUC) - 1:31­ pm

 *Answer: ­Hi Jeff -- no, that's not correct. For TSB, there is no denominator. Only the increased supply costs (due to fuel substitution or interactive effects) are netted out of the TSB number. Otherwise, TSB is just the benefits.­‑*

*­For example, your program could achieve $10mil Total System Benefit. But if the TRC costs are $15mil, your TRC would be 0.67*

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Questioner: Grey Staples­ (Mendota Group)­ - 1:27­ pm

Q: ­how does the segmented portfolio affect third party contracts that, for the most part, have already been developed based on the previous framework (and Business Plans)? ­

Responder ‑­Alison LaBonte­­­­ (CPUC)- 1:39­ pm

 *Answer: ­We welcome comments on this, but the Program Administrator (PA) is held to goal across all programs it runs, including third-parties' programs­*

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Questioner: Kaylee D'Amico­(­kaylee.damico@treasurer.ca.gov­)­ - 1:34­ pm

Q: ­Will the PUC require consistency between PAs as to which program types are categorized into which segment, or is there a possibility that programs with similar purposes/deployment strategies could be categorized in one segment for one PA and another segment elsewhere, thus holding the same type of program to different standards in different territories?­

 Responder – CPUC (after the meeting concluded)

*Answer: This may need to be fleshed out further during the application process. The PAs are currently responsible for categorizing and justifying their programs and stakeholders will review. We have acknowledged that programs can serve multiple purposes, so a program with a similar design may have a different primary purpose depending on the PAs goals for including it in their portfolio.*

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Questioner: John Zwick­ (SDG&E)­ - 1:35­ pm

Q: ­Appreciate the work and effort for developing this new framework. Once approved and begin to implement, what are the opportunities to course correct based on what we learn?­

Responder‑­Jen Kalafut­­­­ (CPUC) - 1:40­ pm

 *Answer: ­John, the expectation is that many of these new policy proposals will not be fully implemented until the PAs file their new EE applications, those applications are litigated (so there is an opportunity to fully vet these policies in the context of the EE portfolios), and then the new portfolios start in Jan 2024.­*

Responder‑­Jen Kalafut­­­­ (CPUC) - 1:41­ pm

 *Answer: ­That said, we have asked PAs to show us what the new TSB and segmented portfolios look like for the 2022 and 2023 years*

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­Questioner: Jeffrey Guild­ (Enovity­)­ - 1:42­ pm

Q: ­Coby, For the TSB (not TRC) I'm not clear why ratepayer costs (i.e., program costs) wouldn't be netted out of the benefits.­

Responder‑­Coby Rudolph­­­­ (CPUC) - 1:57­ pm

 *Answer: ­Hi Jeff -- There are a few reasons for that... among them: In some categories of savings, there could be LOTS of cost-effective savings potential but it's overall cost effectiveness could be barely over 1.0. In that case, subtracting out all the costs (or just program costs, in the case of the PAC), would result in a TSB of near-zero so the contribution to a TSB goal would be near-zero.*

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­Questioner: Kelvin Valenzuela ­(SDG&E)­ - 1:45­ pm

Q: ­EM&V activities help feed the DEER scoping memo/Resolution and is currently done annually. Since the PD has EM&V activities stay annually but DEER/Engineering/Workpapers are biennial and DEER values are frozen, what happens to the EM&V activities on the odd years, since DEER is updated even years? Do EM&V/odd updates stay on hold?­

Responder‑­Paula Gruendling­­­­ (CPUC) - 1:49­ pm

 *Answer: ­Not necessarily - we can spread out the focus of the EM&V studies.*

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Questioner: Elaine Allyn­ (SDG&E)­ - 1:46­ pm

Q: ­How are the Program Costs (Admin and Incentive) calculated and based on? Will these be goals or targets that are set?­

Responder‑­Jessica Allison­­­­ (CPUC)- 1:49­ pm

*Answer: ­The PD does not adjust the caps on things like program admin costs, if that is the question. The calculation methodology is the same, but the PD adopted CAEECCs definitions for implementation and admin costs.*

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Questioner ‑­Mark Wallenrod­ (Mark Wallenrod Consulting)­ - 1:48­ pm

Q: ­Understanding that PA's will ultimately be responsible for achieving the new goals - what is the expectation for the PA's for modifying newly executed 3rd party contracts to achieve new goals resulting from the new metrics? Are you advocating contract amendments or canceling contracts and issuing new ones? a simple solution may be to postpone the effective date of the new metrics until after 5 years of contract expiration. ­

Responder‑­Jen Kalafut­­­­ (CPUC)- 1:55­ pm

 *Answer: ­Great comment. We will work with the PAs on how to address this issue.*

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­Questioner: Nick Brod­ (DNV)­ –1:51­ pm

Q: ­Some programs might generate a wildly different TSB based on whether there is concurrent equity/market support for the resource program. Applications should allow for this variability particularly if 3Ps cannot propose and deliver programs that may not include any market support (e.g., the workforce dev elements mentioned by Randy). Appreciate Jen K's comments on how to hash this out over coming year.­

*[Note: no answer provided in Q&A during meeting]*

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Questioner: Kelvin Valenzuela ­(SDG&E)­ –1:53­ pm

Q: ­Thanks Paula, could we add more clarity where we would spread out the focus?­

Responder – CPUC (after the meeting concluded)

*Answer: This is something we can follow-up on and have more discussion.*

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Questioner: Elizabeth Chi­ (ICF)­ –1:57­ pm

Q: ­Will the business plan filing need to include TSB goals?­

Responder – CPUC (after the meeting concluded)

 *Answer: Yes – for 2024 and beyond.*

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Questioner: John Zwick­ (SDG&E)­ – 2:00 pm

Q: The way that I read the PD, ABAL cost criteria­ for 2022 and 2023 are different than prior ABALs. I thought I heard something that it was essentially similar. Am I missing something?­

Responder – CPUC (after the meeting concluded)

*Answer: The 2022 and 2023 ABAL review criteria is different from previous years. The budgets will still be required to be under the cap authorized by D.18-05-041, but there will not be a portfolio cost effectiveness screen. Only the resource acquisition segment will be required to be cost effective at a TRC threshold of 1.0. The market support and equity segment budgets will need to be at or below 30% of the full portfolio budget.*

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Questioner: Jeffrey Guild­ (Enovity­)­ - 2:03­ pm

Q: ­Thanks Coby, a near-zero TSB achievement wouldn't be worth the risk/investment, would it? It seems like the P&G targets assume a certain level of cost effectiveness is attainable to achieve the goal, why not let the net be the actual net? It would be clarifying for the IOUs to maximize this net benefit, inclusive of program costs. Looking forward to discussing more with you in the future... thanks for your engagement!­

Responder – CPUC (after the meeting concluded)

*Answer: TSB is not itself a cost effectiveness assessment, rather it is a calculation of the benefits that an energy efficiency (or program, etc) provides, net of any increased supply costs (from fuel substitution or interactive effective).*

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Questioner: Cody Coeckelenbergh­ (Lincus­)­ - 2:04­ pm

Q: ­can you include the Q&A in the notes? I was not able to read all of the questions while listening.­

# Chat Log

12:48:06 PM from Erin Brooks (SDG&E) to Everyone:

Hi Coby, is TSB calculated on gross energy savings or net energy savings?

12:49:17 PM from Grey Staples (Mendota Group) to Host (privately):

Question for Coby. Market Potential studies generally really on CE metrics (TRC) to state what is the market potential. Coby says MP study was "metrics neutral". How does one do that?

Follow up. Usually, the MP study takes a TRC = to some value (1.0, .9, 1.25) to define the "market potential".

12:53:05 PM from Tamara Dzubay (Ecobee) to Host (privately):

Will the IOUs be able to act on the informational TSB metric starting next year to make program changes or do they need to wait until 2024?

13:12:13 PM from James Dodenhoff, Silent Running, to All Panelists:

What is the Ruling # for the Market Potential and Goals Study issued on April 23?

13:15:08 PM from Coby Rudolph (CPUC) to Everyone:

Here's the link to the ruling that issued the Draft 2021 Energy Efficiency Potential and Goals Study and posed questions for party comments:

<https://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=378738180>

13:16:09 PM from Coby Rudolph (CPUC) to Everyone:

Also, the complete Draft Potential and Goals Study, and lots of supporting materials, can be found on our website: <https://www.cpuc.ca.gov/General.aspx?id=6442464362>

13:17:47 PM from Richard Sperberg (Willdan) to Host (privately):

The PD requires each program to be categorized into one of the 3 segments. For many of the new 3P programs, they meet multiple objectives, including Equity and Market Support. How will these programs be divided/allocated into their respective segments?

13:34:14 PM from Beth Kelly (EMK Law) to All Panelists:

That portion is incorrect. The PD states that RENs have to have a TSB and have metrics but are not held to a cost effectiveness standard

14:02:02 PM from Beth Kelly (EMK Law) to All Panelists:

Carrying on to Lucy's question, how does the Testimony referenced in the PD fit in?