

Southern California Gas Company



Appendix H:

Second Supplemental Advice Letter Compliance Requirements Review and Associated Updates Summary

SoCalGas Advice Letter 4449-B, Appendix H

Information below sent by the CPUC Energy Division on May 20, 2013; Disposition Provided in "Satisfactory" Column

PIP Modifications Associated with Items Listed Under "ADDITIONAL TO THE INITIAL SPREADSHEET;" New SCG Comments in "IOU Reply" For Those 3 Rows "ED Contact" column / ED staff names removed.

Original filing date	01/14/2013	Effective date:	02/13/2013
Suspension	02/06/2013	End of suspension	06/13/2013
Supplemental filed	04/23/2013	Supplemental Effective	05/23/2013
Protests	NO		

IOU	Issues/Programmatic Areas	Supplemental Request	IOU Reply	Satisfactory	Detailed Instructions for 2nd Supplemental
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IOU	Issues/Programmatic Areas	Supplemental Request	IOU Reply	Satisfactory	Detailed Instructions for 2nd Supplemental
Residential					
RNC					
All (except PG&E)	Update PIP language for RNC re: start date and incentive level	Reference Column C	See Section 4.c. titled "CAHP Incentive Rationale." Also see deletions in Section 6.ii.	OK	N/A
All	Request IOUs to confirm incentives that exceed 10-12 and incentives that provide 50% of IMC at the 20 % savings level and above	Reference Column C	See Section 4.c. titled "CAHP Incentive Rationale." See Section 5.e., Advancing Strategic Plan goals and objectives, Goal #1.	OK	N/A
All	Update Strategic Plan milestones for CAHP Energy Advisor - Home Energy Reports and Behavior Target	Reference Column C		OK	N/A
All (except PG&E)	Request all IOUs show they are meeting 5% behavior program participation target	Reference Column C	Pursuant to conversations with ED staff on March 26 and April 3, and April 19, 2013, see additions to Energy Advisor PIP at Section 5, Program Design to Overcome Barriers and Section 6.e., Pilots / Initiatives. The revised PIP, Attachment 3 (at Table B), demonstrates compliance with the 5% target for residential households employing comparative usage and disclosure, ex-post measurement, and experimental design.	OK	N/A
All	Need better program summaries	Reference Column C	See "Attachment 1 Energy Advisor PIP, Supplemental Filing.xlsx" document for this information.	OK	N/A
All	IOUs add language regarding persistence and evaluating savings	Reference Column C	See additions in Section 8, Program Logic Model. Pursuant to conversation with ED staff on March 26, 2013, no further action required. For SCG this is a non-resource program, so TRC is not applicable.	OK	N/A
SCG	TRCs	Reference Column C		OK	N/A
SCG	Missing summary for HER.	Reference Column C	See Section 6.e., Pilots / Initiatives.	OK	N/A
Plug Load & Appliances (PLA)					
All	Request IOUs refile with more description on PLA pilot projects and related EM&V (referencing EM&V LT Study Plan)	Reference Column C	Pursuant to conversation with ED staff on March 26, 2013, no further action required. SCG did not include a pilot in its PIP.	OK	N/A
All	PLA - Training - "may coordinate with Energy Centers to design and implement" should commit or not	Reference Column C	N/A - Comment specific to PG&E PLA issue list.	OK	N/A
All	PLA- Marketing - need number of specific commitments and budget	Reference Column C	See Section 10.i.vi. added description. Although this item was included under the PG&E issues for PLA, SCG provides information about specific commitments in the PIP.	OK	N/A
All	PLA - Included Measures - compliance letter discusses removal of measures and TRC dropped... need more info	Reference Column C	N/A - Comment specific to SDG&E PLA issue list.	OK	N/A
All	Table 11 - PLA Attachment 3 -out of compliance	Reference Column C	See updated Table 11 in PIP.	OK	N/A
All	Table 3.1 Short Term PPMs - incomplete and out of compliance	Reference Column C	See Table 3.1. SCG believes table is complete and in compliance.	OK	N/A
All	Table 5 - subprogram milestones	Reference Column C	See Table 5; table is N/A as SCG has not identified a pilot.	OK	N/A
All	Tables 1,2 and 8 -	Reference Column C	See updated Tables 1 & 2; no change to Table 8 (SCG believes is complete).	OK	N/A
All	PLA trials - need updated plans for ARP trial/pilot	Reference Column C	Not applicable for SCG	OK	N/A
Commercial					
All	Reducing the split-incentive barrier in commercial multi-tenant buildings;	Explanation of this directive in the PIP is very vague. Revise PIP to include how commercial programs will reduce the split incentive barrier in multi-tenant buildings. The PIP should also include a plan for how IOUs will track against this directive.	See Section 5.c., additional content regarding split incentive barrier.	OK	N/A
All	Focus on Sub-metering and plug load control technologies;	Explanation of this directive in the PIP is very vague. As per the SW Commercial call on February 28, 2013, the IOUs should also be looking into whether the DEER database proposed incentives for these technologies. Please revise PIP to include: (1) numerical targets for how many buildings will integrate sub-metering and plug load control technologies; and (2) how this directive will be tracked throughout the program.	See Section 5.c., additional content regarding sub-metering and plug load control.	OK	N/A
All	Collecting and utilizing performance data	Explanation of this directive in the PIP is very vague. As per the SW Commercial call on February 28, 2013, revise PIP to include where and how this directive will be implemented. Include how this directive will closely coordinate the finance pilot/programs and how IOUs plan collect performance data to inform finance pilots.	See Section 5.c., additional content regarding collecting and utilizing performance data.	OK	N/A
Third Party					
All IOUs	IDEEA365 - Table 5 is useful and should be completed by all IOUs, especially the date to issue their RFP	With the understanding that IDEEA 365 is not a subprogram, ED requests an updated Table 5 to be included in the IDEEA365 revised PIP. Table 5 would allow ED to have a better understanding of the schedule for which ED input is needed/useful for the IOU PRG's with respect to RFAs and RFPs. While PG&E and SCE did not fill out this table, they have both already hosted PRGs. Sempra started to complete Table 5, but left no identified date for when the RFP will be issued. Revise PIP to insert Table 5 with the best available information.	See Section 4, Timelines, modifications to Table 3 (not Table 5).	OK	N/A

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IOU	Issues/Programmatic Areas	Supplemental Request	IOU Reply	Satisfactory	Detailed Instructions for 2nd Supplemental
	Residential				
All IOUs	IDEA 365 Program - language for non-resource to be an option for innovative solicitation	Revise PIP language for IDEEA365 Program to acknowledge that non-resource program designs are eligible under the second solicitation that promotes "innovation".	See additional text in Section 2, Description. Name revised - see PIP Table 1, Appendix C, cell C87 in "Budget Placemat" and cell D88 in "Savings Placemat"; Appendix D, Table 1.9, Table 3.4, and Table 4.1.	OK	N/A
SCG	Clarify placeholder in Budget placemat is IDEA 365	Update Budget Placemat to insert the IDEEA365 Program Name- this is currently labeled placeholder.		OK	N/A
All IOUs	PRG must include ED Correct language re PRG – it must shape the process not only provide feedback after the fact.	Update PIP language that PRG must include Energy Division, and specify that PRG will shape the process not only provide feedback after the fact.	See additional text in Section 2, Description.	OK	N/A
	Finance				
	ARRA Pilots				
All IOUs	Pilot descriptions - general guidance	Please refer to memo From Jean Lamming	Each ARRA Program profile is included in Section 9 (Sub-Program Description, Objectives and Theory) of the ARRA Originated Financing Programs PIP. The ARRA Budget broken out by category is shown in Table 3 in Section 8 (Projected Sub-Program Budget) of the ARRA Originated Financing Programs PIP. The term "incentives" is not referenced in relation to the ARRA Originated Financing Programs. A high level budget that combines all ARRA program budgets is provided in Section 8 (Projected Sub-Program Budget) of the ARRA Originated Financing Programs PIP. SoCalGas has removed descriptions of the ARRA	OK	N/A
All IOUs	1. Customers eligible or targeted, including FICO score range, etc., renters, owners, etc.; 2. Source of private capital. Identify lenders; 3. Credit enhancement. Who will hold these funds, what percent are they of loans, etc.; 4. Relationship to Hub if any; 5. Loan terms – length, interest rate (does it vary by lender or customer?), fees, etc.; 6. Any securitization of loan; 7. Financeable measures? Which IOU or other retrofit programs are involved? Can retrofits be done outside of IOU programs? If solar, DG, water energy measures are included (CHF) explain how they are funded through EE support; 8. Contractor eligibility and any QA; 9. Any project QC, audits before or after, by what percent sample, etc.; 10. Credit checks: based on what? Explain "meets responsible lending criteria." 11. Explain process of how loan transaction begins. Is it contractor or bank driven? What role does the contractor play versus the bank or other lender? How do funds flow: where does capital come from? How is it collected? How is lender paid back? What is the process in case of default or partial payment? Etc.; 12. Targets of number of loans, size of loans, dollars	Revise PIP to include Pilot design elements in Column C, also refer to Jean Lamming's memo	Program Design Elements have been included as part of Section 9 (Sub-Program Description, Objectives and Theory) of the ARRA Originated Financing Programs PIP.	OK	N/A
All IOUs	Logic Models: • PG&E – Empower SBC logic model is not readable; CHF logic model seems to be missing a lot of information (Same in SCE PIP) • SoCalGas & SDG&E – Please provide logic models for ARRA pilots to illustrate how pilot works	Revise PIP to include logic models as described in Column C, also refer to Jean Lamming's memo	Logic Models have been included as part of Section 9 (Sub-Program Description, Objectives and Theory) along with their respective program in the ARRA Originated Financing Programs PIP.	OK	N/A
	OBF			OK	
All IOUs	Relationship to rebate/incentive: (Page 7 of statewide PIP) Please clarify this section across the statewide PIP – what rebate/incentive terms the IOUs will offer in 2013, beginning when, and when they might consider changing them, and how. Refer to the decision section that clarifies the CPUC is not asking the IOUs to stop offering rebates with OBF loans. (I do not think the "finance as a resource" issue figures in here. Please explain how it fits if references to it are kept.)	Revise PIP to include Pilot design elements in Column C, also refer to Jean Lamming's memo	Please refer to Relationship to rebate/incentive in Section 9 (Sub-Program Description, Objectives and Theory) of the OBF PIP.	OK	N/A
All IOUs	Define "site bundling" in the statewide PIP on Page 7	Revise PIP to include Pilot design elements in Column C, also refer to Jean Lamming's memo	Please refer to Site Bundling in Section 9 (Sub-Program Description, Objectives and Theory) of the OBF PIP.	OK	N/A
All IOUs	Update passages that refer to actions IOUs will take to say when (month/year) they will occur, if they haven't already. For example the PIP section on "vendor support" on Page 3 of the SDG&E (statewide) PIP says: "Utilities will adopt vendor support guidelines and standard participation agreements to monitor performance, manage customer expectations, and set clear roles and responsibilities for all parties."	Revise PIP to include Pilot design elements in Column C, also refer to Jean Lamming's memo	Please refer to Section 10 (Program Implementation details) of the OBF PIP.	OK	N/A

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All IOUs	Residential Tables in the PIP template: Where you used a table provided in the PIP template – include it in the body of the PIP, not as an attachment. If you did not use the table, do not attach it and note that in the relevant section of the PIP where the table is referred to. For example, on Page 10 of the SDG&E PIP, Table 9: Contractor Participant Eligibility Requirements (Joint Utility Table) says "See Table 9 in Attachment 2." There is no information in that table. Please note that rather than referring the reader to an empty table. The same is the case with the next table, Table 10, and other tables. If the table says "TBD," then note that in the PIP, not in an attachment.	Revise PIP to include Pilot design elements in Column C, also refer to Jean Lamming's memo	Tables have been embedded within the PIP template and if the table is not available or irrelevant it's been noted as such.	OK	N/A
All IOUs	Where the narrative and text of your PIP (not budget tables) differs from the statewide PIP that the other IOUs are using, please underline that text so the reader can more easily find it. (For example, on Page 138 SCE says: "The Statewide OBF Team has worked closely to align OBF program features and requirements to the maximum extent possible . . ." These two paragraphs are just in the SCE PIP. Similarly, where IOUs provided an estimate of billing system upgrade costs in their PIPs, the projections differ but they are not easy to find without an explanation .)	Revise PIP to include Pilot design elements in Column C, also refer to Jean Lamming's memo	Utility-specific information that deviates from the statewide PIP is underlined and bolded throughout the PIP.	OK	N/A
All IOUs	Budget tables at the front of the PIP section on statewide OBF Programs: SDG&E and SoCalGas – Note in the table the entire funding amount for OBF so that it matches budget decision table; identify non-program funds as the source for the loan pool if necessary	Revise PIP to include Pilot design elements in Column C, also refer to Jean Lamming's memo	Please refer to Table 1 in Section 2 (Total Projected Program Budget and Savings) and Table 1 in Section 8 (Projected Sub-Program Budget).	OK	N/A
All IOUs	SoCalGas & SCE – Please describe in more detail your plans to coordinate joint projects. (This is discussed as a possibility in the decision.)	Revise PIP to include Pilot design elements in Column C, also refer to Jean Lamming's memo	Please refer to Section 13 (Additional information as required by Commission decision or ruling or as needed) of the OBF PIP.	OK	N/A
All	C&S Savings- Gross/Net	Revised PIP tables to illustrate savings Gross/Net with/without interactive effects. PIPs to include savings for C&S in placemats.	Pursuant to conversation with ED staff on March 19, 2013 no further action required. SCG provided information in PIP for both Gross and Net savings. Also agreed because SCG is a single fuel utility that interactive effects are not applicable.	ok	N/A

ADDITIONAL TO THE INITIAL SPREADSHEET (ISSUES THAT WERE DECIDED AFTER THE SPREASHEET WAS SENT)

LGP					
	Review PIP according to Jeremy battis instructions	Revisions agreed via ongoing review of PIP language	SCG Comment - PIPs submitted with Advice Letter 4449-A dated 4/23/13, omitted material added to revised PIPs submitted in AL 4449-B as reviewed by ED Staff.	PIP not submitted	SUBMIT REVISED PIPs: • SCG to work with Jeremy Battis to define the final language for the existing/future partnerships to be included in the second supplemental
	C&S Including savings explanation for CI program	include agreed upon language	SCG Comment - PIP modified to include added language as reviewed by ED staff	Missing	INCLUDE FOLLOWING LANGUAGE on Page 2 of the PIP (see PG&E or SDG&E PIP for guidance) 'Compliance improvement savings are based on allocations from building codes and appliances standards advocacy savings attributable to IOUs: 5% of savings from previously adopted building codes, and 2% of savings from previously adopted state and federal appliance standards.'
	ETP Clarify transfer of TRIP solitation awarded programs	include agreed upon language	SCG Comment - PIP modified to reflect consistent language as reviewed by ED staff.	Inconsistent	Conflicting Language between Action strategy 3.3.1 and Attachment 5 regarding transfer to EE portfolio and Third Party Programs