

Comment	Commenter	Applicable to section (s)	Response	Category of Comment or question	Notes
<p>On September 20, 2016 at 1:41 PM Sandy Goldberg wrote: "Hello – I have the following comments on the Public Sector Buildings chapter of the Draft Statewide EE Business Plan: 1) Include \$1 million annual funding for a new partnership with Administrative Office of Courts (AOC). AOC owns/operates about 300 office buildings and has requested that IOUs establish a special partnership dedicated to its facilities. CA Department of General Services is not involved in ownership, operation or contracting for the AOC facilities. AOC buildings present huge potential for efficiency retrofits. AOC can act quickly because it does not contract through DGS, it has done many successful direct install retrofits, it has obtained audits at numerous buildings, and has plans to implement ZNE retrofits at as many facilities as possible. (A preliminary proposal for the AOC Partnership is attached.)</p>	<p>Sandy Goldberg, Senior Counsel Governor’s Office of Planning & Research 916-397 0409 (cell) Sandy.Goldberg @opr.ca.gov</p>	<p>Budget, Overview of Phased-in Implementation .</p>	<p>The proposed statewide administration implementation plan will consider the potential for including new projects or partnerships, such as the one suggested by the AOC.</p>	<p>Funding and budgets</p>	<p>Comments not specific to LGSEC, but perhaps useful and applicable anyway</p>
<p>2) Include additional funding for in depth audits. State facility managers have determined that in many cases the energy audits offered by the IOUs are too cursory and not helpful to act on (the exception is when the IOU provides funding for a targeted, more detailed audit). Thank you for considering these requests.</p>	<p>Sandy Goldberg, Senior Counsel Governor’s Office of Planning & Research 916-397 0409 (cell) Sandy.Goldberg @opr.ca.gov</p>	<p>Budget, 1.B. Statewide Performance- Based Model Overview of Phased-In Implementation</p>	<p>The proposed statewide administration implementation plan will consider the potential for including new projects or partnerships, such as the one suggested by the AOC.</p>	<p>Funding and budgets</p>	<p>Comments not specific to LGSEC, but perhaps useful and applicable anyway</p>

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<p>An overarching concern with the proposed changes is the need to address the great variation in existing partnerships in this very large and diverse state. They are not the same size, cover different geographies, are governed differently, and implement projects in different ways. The regulations are different throughout the state – for example living in the Los Angeles Air Basin vs. the Bay Area with their different restrictions creating different opportunities for each area. There are also local tax revenues and local land use restrictions that could make statewide requirements an inhibiting factor to project delivery. In addition, there are local conditions such as the drought in Southern California, population density, etc. which are different than the northern part of the State. Each partnership can't be made the same and be able to address local conditions effectively.</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>	<p>Budget, 1.B. Statewide Performance- Based Model Overview of Phased-In Implementation</p>	<p>We agree with your concerns and opinions. Language in the second draft makes a clearer distinction between the administration of programs and the programs themselves.</p>	<p>Regional variation</p>	
<p>But we would urge caution when proposing to establish statewide guidelines. Maximum flexibility and local variations are important factors that must be accounted for.</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p>We agree with your concerns and opinions. Language in the second draft makes a clearer distinction between the administration of programs and the programs themselves.</p>	<p>Regional variation</p>	
<p>Consistency should focus on common goals and objectives. Partnerships should be able to craft programs to help the State meet goals through their own approach. Statewide administrative guidelines should be as broad and flexible as possible.</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p>We agree with your concerns and opinions. Language in the second draft makes a clearer distinction between the administration of programs and the programs themselves.</p>	<p>Regional variation</p>	
<p>SBCCOG is a joint powers authority (JPA) which is a government agency and not a non-profit. We work as an extension of city staff to generate and deliver projects. There needs to be a role for facilitators such as JPAs. Please add the ability of JPAs such as ours to participate as we currently do as local government partnerships.</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p>We have included language in the second draft document which clarifies the ability of JPAs to participate.</p>	<p>Roles & Responsibilities</p>	
<p>It is not clear to us from our reading of the process that a non-IOU administrator will even be allowed. Please cite where (specific citation) the CPUC has indicated that they want or will allow a non-IOU administrator. If there is no authorization from CPUC for this submittal, what is the assurance that this plan will even be considered?</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p>Please see the reference to ALJ Fitch's ruling. (insert citation here)</p>	<p>Authority/Lega lity</p>	

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<p>In the webinar it was stated that the LGSEC/LGC plan is following the CAEECC protocol but not operating within the CAEECC process. What is your assurance that the LGSEC/LGC plan will be considered in light of the following CPUC ruling? "Local Government Programs may be, but should not be required to be, handled in a statewide manner. We will consider LGSEC's proposal in the context of the business plans, if brought forward through the CAEECC process. Regardless of the LGSEC proposal, all business plans should also include strategies for improving the consistency of LGP administration statewide."</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p>ALJ Fitch's ruling gives us confidence that our proposal will be considered.</p>	<p>Authority/Legality</p>	
<p>We definitely support the goal of eliminating program and funding 'silos' within the IOUs as well as within the other state agencies working on the statewide goals and objectives for energy efficiency and greenhouse gas emission reductions such as the CEC, CARB, Strategic Growth Council, etc. Climate mitigation, adaptation plans and enhanced resiliency in the energy sector should have access to comprehensive funding sources that don't require separate applications to each agency. This process should also include establishing water-energy nexus metrics statewide to encourage synergy between programs.</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p>Thank you. We agree. We look forward to working toward creating those opportunities for local governments.</p>	<p>holistic strategies</p>	
<p>It is not clear in the plan what the role of the IOUs is envisioned to be. How will their current expertise be incorporated into the new partnership model? That must be clarified.</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p>We envision a range of possible roles for the IOUs and their staffs. One role, with one IOU, could be the 'back of the house' accounting, reporting and data management functions (probably via an MOU). Additional roles could include the contracting with IOUs to deploy their existing technical and program staff in the existing established relationships.</p>	<p>Roles & Responsibilities</p>	

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<p>The plan needs to provide more clarity on the funding process. The SBCCOG believes that there should be a baseline/certainty budget for all partnerships and that special programs and pilots would require an application process for augmented funding. The local government partnerships can determine their potential for energy savings and GHG emission reductions based on their Climate Action Plans and/or historical data and the budget can be based on that potential. The baseline/certainty budget should be for a minimum two- to three-year period.</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p><i>The implementation plan can consider that existing partnerships will not be impacted for a period of 2-3(?) years and can consider partnerships under longer term funding certainty, new growth models, economies of scale and other efficiencies.</i></p>	<p>Funding & Budgets</p>	
<p>Partnerships should meet standard performance goals. They can develop pilots, demonstrations, innovations, and other advancements above the regular partnership goals.</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p>We agree with the basic idea. Details may be better placed in a future Implementaion Plan</p>	<p>Performance Goals</p>	
<p>We must ensure that this plan doesn't create its own new bureaucracy that will require multiple meetings and extensive monitoring. Opportunities for input need to be explicit and provide time for feedback. Applications for funding should be user friendly.</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p>Thank you. We agree.</p>	<p>Funding & Budgets</p>	
<p>What is the criteria for forming new partnerships? There is not unlimited funding and the existing partners are having their funding reduced by some of the IOUs this year. Unless the total allocation is increased, how do we retain the existing partnerships' ability to accomplish their mission? It is essential that there be some agreed upon criteria for new partnerships to be established. Ratepayer funds are a limited resource and they are the initial resource that this new organization will have until it is able to consolidate other state funding sources which may take considerable time.</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p>This is a level of detail best saved for the Implementation Plan. <i>We believe economies of scale under Statewide Admin can be achieved thus freeing up additional dollars from the same pot of current funds. We also believe a case can be made to request new funding for new partnerships - or that unrepresented jurisdictions can be part of existing partnerships (or RENs), and that partnership programs can be streamlined to accomplish only objectives important to LGs (and not IOUs), and that other economies of scale in procurement, contracting, implementation, reporting can be found.</i></p>	<p>Funding & Budgets</p>	

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<p>· The chart on Page 12 states: “Convene stakeholders to create a “Map of the World” to identify logical/optimal roles, responsibilities and actions among LGPs, Regional Energy Networks (RENs), Community Choice Aggregators (CCAs), and other non-partnership LG programs (e.g., EmPower) to create an integrated, complementary, and cross-supportive programmatic system”. We have a defined jurisdictional boundary. Does this plan envision mergers to create an optimal partnership size and how would that happen? Does this plan envision a division of roles and responsibilities and actions so that we are working with multiple partnership organizations who have different functions?</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p>We have clarified what we mean by "Map of the World" - which is not (strictly speaking) meant to be a clarification of physical boundaries. Rather, it is intended to be the clarification of the roles, jurisdictions and capacities of the various actors in the energy program space (LGPs, RENs, CCAs, etc. etc). At this time, mergers are not being considered. However, if that were a future course of action that LGPs wished to pursue, we think it should be evaluated, and if effective, supported.</p>	<p>Roles & Responsibilities</p>	
<p>· How will the RENs be working with the local government partnerships? Currently, the RENs don't specifically involve local government in their planning. If they are going to take on an increased role, what is the plan to restructure the RENs to involve the local government partnerships? Also, now local government partnerships deal directly with the IOU administrator. We do not want the REN's to be a 'layer' of bureaucracy between the local government partnerships and the statewide administrator.</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p>Exploring those roles will be part of "mapping the world". We agree. There should not be additional layers of bureaucracy. <i>We believe that the RENs can be an effective, incremental resource to LGPs - if the LGPs had greater autonomy to work with RENs - especially the SoCalREN. And LGP input into the REN programs should always be invited. LGPs, RENs and CCAs (and other LG programs and resources) should all work together.</i></p>	<p>Roles & Responsibilities</p>	
<p>The budget on page 16 for the Competitive Emerging Technologies/IDSM proposal for community based programs run by local government partnerships is very small for all local programs for the entire state. We have developed and implemented some very successful programs such as our Green Building Challenge and our water-energy nexus leak detection analysis. How will local government partnerships be able to implement community based programs at the local level? What will the mechanism be for them to receive funding and how will the criteria be established?</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>	<p>pg 16</p>	<p><i>The Statewide administration proposal does not contemplate replacing local implementation. It does suggest that successful local programs should be expanded out to other regions and jurisdictions.</i></p>	<p>Funding & Budgets</p>	

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<p>· Page 29 – The statewide streamlining of procurement and administration is a good goal, but often local governments have their own procurement rules and procedures, sometimes established by the voters, and they should be allowed to use them. The state can have suggested guidelines and the local agencies should certify what guidelines they have used.</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>	<p>pg 29</p>	<p>Local variation is acknowledged. Joint procurement strategies have been implemented successfully in other settings and are only one tool which can aid local governments. It is envisioned that joint procurements would be voluntary and entered into on the basis of compatibility.</p>	<p>Roles & Responsibilities</p>	
<p>· The chart of Appendix A on Page 35. We are concerned that the goal for the future dilutes the direction and coordination currently taking place which could affect our ability to meet our partnership goals:</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>	<p>App A</p>	<p>We are not sure what specific direction or coordination you are referencing, and how it would detract from your partnership goals. We would like to learn more about this concern. <i>We are suggesting that LGPs might be able to establish more meaningful and locally developed goals under the LGC than under the IOUs.</i></p>	<p>Roles & Responsibilities</p>	
<p>a. List of agencies: Local governments and JPAs should be listed at the bottom. Local government is not just Public Works, Building and Fleet Managers. What about parks and other city agencies? Coordination between departments is important. Also, what about schools, health agencies?</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p><i>Yes, thank you for this point. LGPs can play a role in centralizing these internal needs among multiple LG stakeholders.</i></p>	<p>Roles & Responsibilities</p>	
<p>b. Each of the funding sources listed has its own restrictions through legislation and directive. They aren't unconstrained. We like the Integrated Climate Fund idea and the Integrated Community Resource Market, but the bottom level should be more comprehensive and not reflect the same constraints for who receives the funds as currently exists. Local governments should be listed with all of their departments included and Schools, etc. JPAs should also be listed. Developers should come through these agencies and not have direct access to this funding source for local governments.</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p>The ICCF is a work in progress and we acknowledge the present funding constraints. However, these agencies are also experiencing pressure to improve and streamline their funding processes. The ICCF description is a simplified schematic to illustrate the concept. As the ICCF is developed further, details such as local government departments, and other local government entities such as schools, will be added.</p>	<p>Funding & Budgets</p>	

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<p>· Concerning implementation, it appears that at different times, the LGSEC/LGC has expressed its willingness to be the program administrator or implementer and at other times to leave the administration or implementation to others. Please provide clarification as to who would be the administrator/implementer and how that function would be organized.</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p>Your observation is correct. As envisioned by this proposal, the LGC would act as program administrator. However, we recognize that achieving the goal of establishing an efficient and consistent administrative entity is more important than WHO fulfills this role.</p>	<p>Roles & Responsibilities</p>	
<p>· Can you clarify who will be processing the applications, identifying and paying the incentives, writing the checks, and evaluating the programs? We would like to provide input on these items, but don't understand the plan well enough.</p>	<p>Jacki Bacharach, SBCCOG Executive Director</p>		<p><i>At least initially, using existing LGP and REN models, and other IOU program models, the IOUs would continue to process applications, issue incentive checks, and provide other support services that support energy savings calculations and verification. As long as the IOUs are alone responsible for attribution of savings, they should perform those functions. We believe the proposed administration model can drive more LG-related savings through increased project development, increased LG participation and more enhanced LG projects - in the public and private sectors.</i></p>	<p>Roles & Responsibilities</p>	

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<p>SDG&E does allow for LGPs to coordinate and collaborate on the development of unique and/or tailored scopes of work that better serve the constituency of each LGP, while supporting SDG&E's core programs. It is important to highlight challenges and successes each of the different LGPs are faced with within each of the different Investor Owned Utility (IOU) territories without generalizing so much so that territories are not mischaracterized. Further, the San Diego region, through the San Diego Regional Energy Partnership (SDREP) and the Emerging Cities Program, have a number of cross-jurisdictional opportunities available to interested cities, businesses, and residents. These programs are unique and could be used as a model throughout the state.</p>	<p>Anna Lowe Associate Regional Energy/Climate Planner San Diego Association of Governments Phone: (619) 595-5603 Email: anna.lowe@sandag.org</p>		<p>We recognize that in describing challenges and obstacles, some IOUs or programs may feel unjustly criticised. It is not our intention to chastize, but rather to illustrate examples of obstacles which have been noted one or more times. Perhaps it can be phrased as "None have all, but all have some". We concur, there are unique and effective programs which could be used as state-wide models.</p>	<p>Roles & Responsibilities</p>	<p>The San Diego region has a total of five (5) local government partnerships (LGPS): the cities of Chula Vista and San Diego, County of San Diego, Port of San Diego, and SANDAG. The SANDAG LGP was established in 2010 and provides funding and services to sixteen (16) of the nineteen (19) SANDAG member agencies that don't have direct LGPs with San Diego Gas & Electric (SDG&E) through the Energy Roadmap Program. All sixteen cities have completed Energy Roadmaps or Energy Management Plans and many of them have begun implementing them</p>
<p>The Proposal describes an ideal framework for consistent access to data. One of the current challenges facing all program implementers surrounds the current privacy requirements approved and regulated at the California Public Utility Commission (CPUC). The Proposal should include clarity about what and how the proposed Statewide LGP Program Administrator (PA) will overcome the current regulatory requirements</p>	<p>Anna Lowe Associate Regional Energy/Climate Planner San Diego Association of Governments Phone: (619) 595-5603 Email: anna.lowe@sandag.org</p>		<p>Thank you. We have included clarifying language. <i>We believe Statewide administration of LGPs would lead to greater LG access to data under the CPUC's Data Decision (Decision #?), especially where research institutions (working with LGs) are able to access disaggregated consumption data (like the UCLA-designed Energy Atlas) even under current privacy restrictions.</i></p>	<p>Energy Data</p>	

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<p>As has been mentioned numerous times in multiple forums, the San Diego region, among many others, is not within close proximity to either the CPUC (San Francisco) or the Capitol and LGC (Sacramento). This is cause for concern for a number different reasons: Inability for staff and/or other interested parties to participate in consistent face-to-face meetings and regulatory activities. Lack of familiarity with regional issues, politics, demographics, and other relevant components to effective program design and implementation. Little understanding of local programs, players, and successes. One example of how the San Diego region was overlooked is in the Proposal itself. Appendix B: Administration and Marketing and Outreach Budgets of all LGP Programs, completely omitted any reference of any of the SDG&E LGPs. This error reinforces the concern for fair and equitable representation for all LGPs by a potential Statewide PA. The Proposal should include a discussion about what and/or how the PA will ensure representation will be equitable and fair for all LGPs throughout the state.</p>	<p>Anna Lowe Associate Regional Energy/Climate Planner San Diego Association of Governments Phone: (619) 595-5603 Email: anna.lowe@sandag.org</p>		<p>We appologize for the typographical error and the concern it raised. The ommision of other LGPs from this list was an oversight and we regret that this caused anyone anxiety. We are very aware of the concern on the part of many communities (in particular the rural and hard to reach group, in addition to those more distant from Sacramento or San Francisco) that their interests are represented. We have included clarification in the Business Plan responding to both of these issues: proposing a working agreement with IOUs to continue their role as local representatives and implementing a Governance Committee of LGP members.</p>	<p>Equitable Representation and access to resources</p>	
<p>Ratepayers within each IOU territory have a line item on their bills, the majority of which, less those directed to things like EM&V and the Statewide Energy Efficiency Collaborative (SEEC), fund programs available to said ratepayers. The Proposal should describe where and how the majority of ratepayer funds collected within an IOU territory will be spent. In other words, will funds paid by SDG&E territory ratepayers only be available to SDG&E ratepayers via EE programs or will they be rolled up into a statewide budget and then reallocated based upon criteria developed by the Statewide LGP PA?</p>	<p>Anna Lowe Associate Regional Energy/Climate Planner San Diego Association of Governments Phone: (619) 595-5603 Email: anna.lowe@sandag.org</p>		<p>We have clarified language in the Business Plan to specify the use of IOU funds within IOU territories.</p>	<p>Funding & Budgets</p>	

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<p>SANDAG agrees with the value and relevance of including SB 375 in the list of “State Goals, Strategies and Objectives” (page 25); however, the way with which it was described does not align with the law. A more accurate description should focus on the requirements of what Metropolitan Planning Organizations (MPO) are required to consider when preparing a Sustainable Communities Strategies to achieve per capita greenhouse gas emissions from passenger vehicles through integrated land use and transportation planning. Please consider refining your reference to SB 375 to be consistent with state law.</p>	<p>Anna Lowe Associate Regional Energy/Climate Planner San Diego Association of Governments Phone: (619) 595- 5603 Email: anna.lowe@sand ag.org</p>		<p><i>Thank you for this suggestion.</i></p>	<p>Technical correction</p>	
<p>Governance – SBC expressed concern about the role LGSEC will play in governance as a Program Administrator. SBC’s understanding is that LGC is the actual governing entity and that LGSEC is a project of LGC. The critical question is who governs and how? Both entities (LGC & LGSEC) have an exclusively local government and primarily urban-focused leadership group. As “affiliates” of LGSEC SBC is not a voting member, nor is the Center for Sustainable Energy or Ecology Action, although all three play project implementation roles. Kate suggested that the governance structure is still being defined. Kate understands our concern, and will seek our input in the process to define governance. SBC will be involved in conference calls and meetings with LGC / LGSEC to help this process.</p>	<p>Sierra Business Council on August 26</p>		<p>Governance is more fully described in the revised Business Plan. LGSEC has no role in Statewide Administration governance.</p>	<p>Governance</p>	
<p>LGP consistency—LGSEC’s comments to the CPUC regarding the consideration of a new Program Administration regimen included comments about the lack of consistency between LGP’s (understood by SBC to mean differences in how we include resource versus non-resource programs and project implementation approaches in individual programs.) SBC expressed concern that regional approaches and differences may not be appropriately considerate, particularly as they pertain to Hard to Reach Communities, under LGSEC guidance.</p>	<p>Sierra Business Council on August 26</p>		<p>The earlier and latest Business Plan drafts describe in some detail the inconsistencies in LGPs: among IOUs, from LGP to LGP, and even within IOU LGPs.</p>	<p>Equitable Representation and access to resources</p>	

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· Equity in Funding – SBC expressed concern about the existing disparity in funding to the Sierra Nevada (and other rural regions of California). Kate suggested in the initial year(s), existing funding criteria will be grandfathered in.	Sierra Business Council on August 26		In additional years, LGC will work with implementers (and other stakeholders) to design a transparent and equitable funding structure.	Equitable Representation and access to resources	
Review the BayREN proposal for an effective and clear articulation of purpose.	Susan Davidson, CalCERTS		Good advice. Thank you.	General guidance	Verbal comments / phone calls with Susan @ CalCERTS
Be focused on delivering a few things, really well, really early.	Susan Davidson, CalCERTS		Good advice. Thank you.	General guidance	Verbal comments / phone calls with Susan @ CalCERTS
Describe how the LGC/LGSEC is uniquely well-positioned with regard to state agencies (CARB, CEC, etc) as well as with the IOUs	Susan Davidson, CalCERTS		Good advice. Thank you. Please see the added Appendix E. <i>We just discuss LGC, not LGSEC in this regard.</i>	General guidance	Verbal comments / phone calls with Susan @ CalCERTS
One of the *biggest* potential benefits of our proposal is our idea for connecting the GHG benefits of EE and other energy opportunities - Emphasise this more.	Susan Davidson, CalCERTS		Thank you. We have done as you suggested.	General guidance	Verbal comments / phone calls with Susan @ CalCERTS
Also, another big thing in your favor is that this organization can be a centralizing and unifying voice for local governments	Susan Davidson, CalCERTS		Yes, we agree. We have emphasized that point.	General guidance	Verbal comments / phone calls with Susan @ CalCERTS
A HUGE opportunity exists around data. While it is important to work with the CPUC and the utilities for data access, its not the only opportunity. PACE programs and ESCOs - and anyone doing EE or other work that doesn't get a rebate or get touched by an IOU program somehow - isn't measured. Local governments *could* take credit for the EE savings and the ghg reductions from EE and other energy programs outside the IOU remit in their voluntary CAPs. By creating a statewide database (*drawing on work already done by WRCOG and Sonoma County) we could begin to build an energy program data set in parallel to IOU data that would be complementary to it.	Susan Davidson, CalCERTS		Interesting point. Thank you for raising that potential opportunity. <i>Assuming your reference to WRCOG and Sonoma County is around the savings generated from their PACE programs, yes - this is exactly the type of collaboration between IOU and non-IOU LG programs that can be created that is not being addressed now.</i>	General guidance	Verbal comments / phone calls with Susan @ CalCERTS

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<p>Business Plans (BPs) should discuss all current and anticipated energy efficiency (EE) procurement activities, including those occurring outside of the EE programs funded through the BP application. o The discussion should include potential overlapping activities; safeguards against arbitrage, double payment and double counting; whether additional EE procurements will count towards EE goals, cost-effectiveness requirements, and other metrics; and whether additional EE procurements will conform with Commission guidance in relevant proceedings including R.13- 11-005. o Potential procurement activities relevant to the BP include (but are not limited to) all-source solicitations, Intergrated Distributed Energy Resources (IDER)proceeding procurements, and PG&E’s Diablo Canyon application. o Methods for evaluating and measuring savings for any EE procured should be consistent regardless of whether it is funded through the BP applications or not.Any deviations must be justified.</p>	<p>Dan Buch, ORA</p>		<p>While the details of the process to accomplish these recommendations correctly belong in a possible future Implementation Plan, we believe these issuses will be acknowledged and addressed in the process we are calling "Mapping the World".</p>	<p>Accounting, measurement and justifications</p>	<p>General Comments to all Biz Plans</p>
<p>Solicitation strategies should be robust and sufficiently detailed to allow for meaningful review and oversight. o The solicitation strategies included in the introductory and sector chapters should include a discussion of not only the sectors that will be bid out and the schedule of the anticipated scope, size, structure, and phasing of solicitations and how the proposed solicitation strategy will meet Commission and program administrator (PA) objectives. o Solicitation strategies should provide analysis and rationale for the proposed bidding schedule and associated details.</p>	<p>Dan Buch, ORA</p>		<p>Addressing these recommendations in detail correctly belongs in a possible future Implementation Plan</p>	<p>Solicitation Strategies</p>	

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BP applications should include detailed budget testimony that is sufficient to determine the reasonableness of the budget request. o The budget testimony should include all elements PAs expect to record to the EE balancing account using a General Rate Case-type forecast and explain the basis for that forecastin sufficient detail to demonstrate the costs are reasonable. o PAs should submit their testimony using a common format and common budget categories that are reasonable for EE program activities. o Budget proposals should align with the objectives, vision, and strategies outlined in the BPs.	Dan Buch, ORA		We agree that the use of a common format, and common level of detail and explanation would be very helpful in enabling a rational comparisson of Business Plans. Lacking that information from the IOUs, we have focused on developing a framework from which we can elaborate program budget details at a later time.	Accounting, measurement and justifications	
1. Has LGSEC received firm and/or documented expressions of interest by eligible California Local Governments to have it serve as the Lead Administrator for this program? If so, how many?	Jim Dodenhoff President/Founder Silent Running Office 310-558-4995 Mobile 310-936-9456 e james.dodenhoff@gmail.com		Yes it has. <i>However, this proposal was discussed with the general LGSEC membership and was approved via an LGSEC Board vote to move forward.</i>	General guidance	
Is LGSEC supportive of Statewide Administration of Local Government Programs even if they (LGSEC) are not the Lead Administrator?	Jim Dodenhoff President/Founder Silent Running Office 310-558-4995 Mobile 310-936-9456 e james.dodenhoff@gmail.com		LGSEC will not be the Administrator. That role would the LGC's.	General guidance	
3. What is the exact scope of end use customer segments (e.g. Residential, Industrial, Public Sector, Commercial, etc) covered by the LGSEC proposal?	Jim Dodenhoff President/Founder Silent Running Office 310-558-4995 Mobile 310-936-9456 e james.dodenhoff@gmail.com		LGPs vary in their customer segments. Any and all of these would be withing the scope of any future state wide administration, as LGPs would like wish to continue offering these diverse programs.	Scope/Remit	

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How, if at all, will the LGSEC proposal be made available to Publicly Owned Utilities?	<p>Jim Dodenhoff President/Founder Silent Running Office 310-558-4995 Mobile 310-936-9456 e james.dodenhoff@gmail.com</p>		<p>If by "proposal" you mean the document itself, then any interested person or organization has access to it. If by "proposal" you mean the Statewide LGP Administration, then no, POU's would not have access to these LGP programs and funds because POU rate payers do not contribute to the same funding pools that LGPs utilize. However, other elements of the envisioned ICCF program may serve POU objectives for energy, climate and related work.</p>	General guidance	
How are the REN's and CCA's to interact with LGSEC over the Portfolio Planning period for the Proposed Local Government Statewide Program? Has this been discussed with the respective REN's?	<p>Jim Dodenhoff President/Founder Silent Running Office 310-558-4995 Mobile 310-936-9456 e james.dodenhoff@gmail.com</p>		<p>Exploring those roles will be part of "mapping the world". Yes, these issues have been discussed with the RENs.</p>	Scope/Remit	
6. LGSEC's proposal suggests that it seeks to replace IOU administration for all geographic areas where LGSEC administered Local Government programs---across all sectors? Is this a correct interpretation?	<p>Jim Dodenhoff President/Founder Silent Running Office 310-558-4995 Mobile 310-936-9456 e james.dodenhoff@gmail.com</p>		<p>LGC would, as envisioned, be the single state wide administrator. To the extent that existing LGPs address all sectors, then the yes, across all sectors.</p>	General guidance	

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7. How does LGSEC's proposal and approach differ from and enhance the Administration role that REN's play?	Jim Dodenhoff President/Founder Silent Running Office 310-558-4995 Mobile 310-936-9456 e james.dodenhoff@gmail.com		<i>The Decision authorizing the RENs described specific roles for the RENs: administer programs IOUs cannot provide (or choose not to), serve hard to reach customers, be innovative (?). The Statewide Admin proposal seeks to provide statewide consistency for LGPs and LGs, grow good programs, and eliminate bad programs (please re-word).</i>	Scope/Remit	
8. LGSEC cites development of the California Integrated Climate Fund as a primary driver for its proposal. This fund and the integrated approach to climate change mitigation makes good sense. It is unclear whether allocating and commingling CPUC EE ratepayer funds for this purpose is allowable under existing statute. To what degree is this integration more effectively (and legally) achieved through future enabling legislation?	Jim Dodenhoff President/Founder Silent Running Office 310-558-4995 Mobile 310-936-9456 e james.dodenhoff@gmail.com		Thank you. We hear 'good idea' from many stakeholders. We would not be co-mingling IOU EE / rate-payer funds. We would be seeking to bring additional funds from other sources to benefit and complement local government programs. Future legislation may be needed, but we are envisioning a more collaborative process to begin with. <i>(eliminate previous sentence about legislative need). Simple accounting practices can maintain and account for the requirements of each funding source while combining funds under a single program. The LGs experiences with ARRA funding proved this could be done.</i>	General guidance	
9. Is it LGSEC's understanding that in its proposed Program Administrator role it would be required to contract with a Program Implementer? To what degree does LGSEC intend to contract with implementers as part of its proposed Local Government Statewide Administrative role?	Jim Dodenhoff President/Founder Silent Running Office 310-558-4995 Mobile 310-936-9456 e james.dodenhoff@gmail.com		Yes. The PA would have contracts with each PI. <i>It is also conceivable that RENs, CCAs and LGPs themselves could contract directly with regional and local implementers - depending on the program.</i>	Roles & Responsibilities	

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10. Is it LGSEC's understanding that it would be bound to achievement of energy savings and cost effectiveness goals under its proposal (as are other Program Administrators)?	Jim Dodenhoff President/Founder Silent Running Office 310-558-4995 Mobile 310-936-9456 e james.dodenhoff@gmail.com		Yes. In fact it has been increasingly clear that the PUC is interested in seeing more performance-based programs. The goal of the statewide PA is, among other things, to bring additional capacities and resources to local governments in order to accelerate their local program performance.	Accounting, measurement and justifications	
The LGSEC proposal is opposed by the Rural Hard to Reach Working Group (RHTR). Its members present the following opposition perspective on the LGSEC proposal:	Rural Hard to Reach Working Group Association of Monterey Bay Area Governments Community Development Commission of Mendocino County High Sierra Energy Foundation Kern County Redwood Coast Energy Authority San Luis Obispo County San Joaquin Valley Clean Energy Organization Sierra Business Council Valley Vision		The group's opposition is acknowledged	General guidance	

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1. We believe that the proposal will lead to an unintended consequence of increasing the marginalization of the most rural communities and hardest to serve local governments.	RHTR WG		Without knowing why, it is difficult for us to respond with an acceptable solution. However, we have built into the structure of the PA a Governance Committee which we envision being made up of LGP representatives from all types of communities across all territories. We acknowledge that the RHTR communities face significant challenges. We are committed to responding to and addressing these challenges.	Equitable Representation and access to resources	
2. LGSEC did not adequately capture the complexity of energy savings attribution and influence when determining program effectiveness.	RHTR WG		((did we make any claims about program effectiveness??))	Accounting, measurement and justifications	
3. The proposed logic regarding specific implementation structures limiting Local Government Partnership (LGP) success and the challenges with evaluating LGPs are in conflict.	RHTR WG		We disagree. LGPs have had various barriers which have impeded success. Measuring the extent to which this is true is proving a negative and therefore a waste of time. Imperfect knowledge is still a sufficient basis for action.	Accounting, measurement and justifications	
4. RHTR does not agree that the language in Table 1.1 adequately capture the situation and oversimplifies the presented barriers.	RHTR WG		Given that this business plan is intended to be a high-level overview, we will not be elaborating in detail in this document. We do wish to acknowledge that the RHTR group may have wanted to see more detail. This level of detail correctly belongs in a future Implementation Plan	General guidance	
5. The LGSEC objective statement on page 10 assumes a disaggregated LGP purpose without a consistent framework. RHTR believes that the current PAs are best situated to address LGP implementation challenges.	RHTR WG	page 10	We respectfully disagree. Many LGPs have been struggling to address the obstacles they have faced, but with limited success.	General guidance	

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6. The Public sector pulled from the PAs of commercial, residential, agricultural and industrial will increase the likelihood that services are increasingly less consistent and cost effective.	RHTR WG		We are not clear of the nature of your comment or concern in this statement. We are not proposing a change to the diversity of LGPs.	General guidance	
7. The proposed statewide energy use database may increase the likelihood of significantly reduced data availability.	RHTR WG		Why would this happen?	Energy Data	
8. The challenges noted in section 1.d are relevant. However, the section content does not illustrate why a wholesale change in administration that increases the likelihood of program production setbacks is appropriate.	RHTR WG		It is not clear what "program production setbacks" are being referred to, or why the proposed business plan would result in their occurrence.	Admin vs. Implementation	
9. The LGSEC's focus on Program Administrator costs are not likely to offset the loss of implementation efficiencies within the current models.	RHTR WG		The concern is acknowledged, but we do not understand the concern about implementation efficiencies, as those remain in the pervue of the LGPs.	Admin vs. Implementation	
10. We do not understand how the LGSEC integrated funding concept will break the often-siloed implementation approach internal to local government agencies. In fact, we see the LGSEC as increasing the likelihood of a siloed effect both internal to LGPs and between LGPs and IOUs/PAs	RHTR WG		The ICCF is envisioned as a complementary resource and a framework which also assists agencies in efficiently disbursing funding. Presuming the ICCF is established, local governments are not obligated to avail themselves of the opportunity.	General guidance	
11. We reject that all IOUs across all aspects of LGP programs display persistent tolerance to structural barriers.	RHTR WG		That was never our assertion.	General guidance	
12. The LGSEC suggests that LGPs are not empowered to develop "strategic and holistic intervention strategies." This is not a fair generalization across all IOUs and is not true statewide.	RHTR WG		We have provided illustrative examples of obstacles which have been noted one or more times, rather than go into exhaustive detail. Perhaps it can be phrased as "None have all, but all have some".	General guidance	

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13. The cost effectiveness argument is not compelling compared to the potential risks.	RHTR WG		We acknowledge the concern over risks. However, we think the potential upside is important and significant. We cannot predict exactly what the future holds, but we are making a run at changing things now in ways that help to grow capacity of local governments, commensurate with their responsibilities and opportunities to make significant positive contributions to their residents and to the state's various goals.	Admin vs. Implementation	
14. RHTR does not believe the LGSEC proposal is the answer to multi-IOU LGPs.	RHTR WG		Acknowledged	General guidance	
15. On-Bill financing should be maximized in the current environment and expanded to On-Bill Repayment. Additional financing tools should be encouraged at the local level.	RHTR WG		Good suggestion. OBR and local financing options and tools have been included in the document.	General guidance	
16. Streamlined procurement through Job Order Contracting, the California Uniform Public Construction Accounting Cost Act and Public Resource Code 4217.10 and Utilities Code 388 are currently being used and advanced.	RHTR WG		Acknowledged, but it is not being used consistently Statewide.	Procurement	
17. LGPs already participate in statewide program development and policy. We do not need the LGSEC to increase engagement, we need the CPUC to support LGP engagement by the continued approval of funding through existing PA structures.	RHTR WG		Acknowledged. It is our opinion that the CPUC has given very clear indications that they are seeking significant changes. This proposal seeks to position LGPs so that they are well positioned to adapt to those changes.	Roles & Responsibilities	
18. We do not see the LGSEC's proposal as effectively addressing the challenges tied to Codes and Standards	RHTR WG		We would like to hear more about your concerns regarding challenges tied to Codes and Standards.	Roles & Responsibilities	
19. LGSEC's proposal overly simplifies LGP offerings and inaccurately assumes LGPs do not currently work in a cross-cutting fashion.	RHTR WG		LGPs do not have uniformity of experience	General guidance	
20. The LGSEC proposal did not find consensus through the California Energy Efficiency Coordinating Committee (CAEECC) process.	RHTR WG		That is true.	General guidance	

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We challenge the logic of the following statement: “We assert that LGP performance and effectiveness challenges are grounded in the fundamental structure of LGPs, and not the nature of their programs or the capacity of LGs to implement them.” (pg.9).	RHTR WG	1.A. Page 9	OK.	General guidance	
We see conflict with LGSEC’s statement on page 16 that reads: “Although the studies have provided greater understanding of LGP operations, functionality with other implementers, resource and non-resource characteristics, geographic outcomes, and other matters, the 2016-2017 Draft EM&V Update Plan acknowledges persistent difficulties with fundamental aspects, including but not limited to assessing performance, comparative analyses, and defining the value of LGP processes. We observe that it is difficult to gather a full overview of LGP savings performance and cost effectiveness attributes from the IOU September 1, 20116 Advice Letters for the Proposed 2017 Budgets.”	RHTR WG	1.A. Page 16	We have clarified this language	General guidance	
The LGSEC proposal’s logic is misaligned. The LGSEC presents concrete statements regarding performance limitations based on current LGP structures while later noting that a full understanding of the structures, performance and cost-effectiveness attributes of past activities and future activities are difficult to ascertain.	RHTR WG	1.A.	Complete knowledge is not needed to see a trend	General guidance	
In addition, we do not agree with the language in table 1.1 as it is currently written. We do not think that the LGSEC: x Adequately captures the complexity of implementing programs across diverse geographies and communities. x Adequately captures the regulatory environment’s impact to Program Administrator’s design choices or reactions to negative resource based portfolio findings. x Has a deep understanding of resource based implementation challenges across the diverse set of LGP program offerings. We recommend that existing PAs work towards the creation of consistent key performance metrics while maintaining localized solutions and intervention tactics.	RHTR WG	1.A.	Your disagreement is acknowledged. Please see the updated language to see if we have addressed your concerns.	Accounting, measurement and justifications	

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The proposed phased-implementation model increases the likelihood of significant long term programmatic setbacks. Multiple items throughout the 10-year plan are occurring now. For example, the building of public-private partnerships, PACE, expansion of additional financing apparatuses, the implementation of preferred resource programs and pursuit of additional funding mechanisms. The proposal will introduce uncertainty into the marketplace and slow progress.	RHTR WG	1.B.	Your observation is acknowledged. Yes, those activities are occurring in places. We are not sure how this will introduce uncertainty that is not already present	Admin vs. Implementation	
It is unlikely that high level launch year implementation objectives can be achieved.	RHTR WG	1.B.	We would like to is hear more about your concerns regarding challenges tied to Codes and Standards.	Admin vs. Implementation	
Scaling of resource programs can be achieved much more rapidly through existing PAs.	RHTR WG	1.B.	Scaling would likcaling of hear more about your concernachieved regarding challenges tied to Codes and Standards.	Roles & Responsibilities	
The phasing does not recognize or address the interactions and complexities necessary to deliver solutions to the public sector. Follow-up intervention strategies in section 2 do not adequately address procurement challenges. The LGSEC does not recognize the innovation and advancement of specific procurement solutions already in place tied to job order contracting, the use of the California Uniform Public Construction Accounting Cost Act and Public Resource Code 4217 and Public Utilities Code 388.	RHTR WG	1.B.	Actually, we are aware of those processes - and one of our goals is to spread more awareness and utilization by LGPs and LGs.	Procurement	
Our experience has been that to be effective in delivering program savings, the Public sector, as a long lead opportunity, must be balanced at a portfolio level with sectors that offer more effective and likely to be delivered short and medium term energy efficiency projects.	RHTR WG	1.B.	We agree.	Admin vs. Implementation	
The likelihood that Phase 2 can effectively expand financing as a solution while reducing incentives within 5-7 years and maintaining program effectiveness is low.	RHTR WG	1.B.	Given the PUC's indications that they are interested in changes to incentives, this time horizon may not be negotiable. We believe this proposal - focused on the needs of local governments - provides LGPs the best chance of success in a changing future	General guidance	

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<p>Current On-Bill Financing programs are reasonably effective. We do not believe a wholesale transition away from current solutions is necessary. IOUs have the existing infrastructure to deliver a greater portfolio of financing options in a shorter timeline. We believe that IOUs should be directed to simplify and increase On-bill financing and repayment options.</p>	RHTR WG	1.B.	<p><i>We agree and disagree. Many LGs have indicated that OBF has major flaws. However, keeping and expanding current effective programs is a priority. We think it is likely to be more effective for on statewide PA to negotiate OBF and OBR programs rather than each LGP individually.</i></p>	Admin vs. Implementation	
<p>The vision of effective low/no incentive programs in 8 to 10 years is counter to general experiences related to decision making processes in the public sector within those Governments represented by RHTR. Although this may be interpreted as the beginning to a programmatic/market-based exit strategy, we must question whether this is a realistic expectation over a realistic timeline</p>	RHTR WG	1.B.	<p>Because the CPUC has indicated a cycle of 8 years, we are working toward that milestone. We understand and share your recognition that there is a short time to make many changes and significnat progress at the same time.</p>	General guidance	
<p>The high level phased implementation strategy set forth, including the proposed timelines and content, will increase the likelihood that programs will be set back. We recommend that IOUs are tasked with effectively expanding and exploring innovative, consistent and localized solutions driven by government and community partners.</p>	RHTR WG	1.B.	OK.	Roles & Responsibilities	
<p>The proposed statewide energy use database may increase the likelihood of reduced data availability. Based on experience, we suspect that the scale, complexity and legal ramifications of the proposed database may make this an unattainable short to medium term goal. In addition, this may make data availability even more challenging for LGPs and be counter-productive to addressing the barriers noted. Instead of inconsistent access, all LGPs will be faced with consistent termed limitations to data.</p>	RHTR WG	1.C.	<p>We are not sure how innovative data access programs would reduce data availability. We have added clarifying detail in the document as to the opportunity for partnering with the state's university system to utilize data. <i>Simply engaging statewide the CPUC's existing Data Decision which allows varying degrees of data access by different stakeholders will be an improvement over the status quo.</i></p>	Energy Data	

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<p>The challenges noted in section 1.d are indeed true. However, the section and content does not illustrate why a wholesale change in administration that increases the likelihood of program production setbacks is appropriate. We do not agree with 1.d as the solution to the challenges we face. We encourage CAEECC and the CPUC to direct IOUs to collaboratively develop and implement consistent reporting processes for both regulatory and program related tracking that continue to support localized interventions and associated tactics.</p>	RHTR WG	1.D.	We look forward to seeing your request to the CAEECC and to a positive outcome to that request.	Measurement and reporting	
<p>The LGSEC proposal specific to Cost Effectiveness does not capture the complexity of the situation and focuses too heavily on program administration costs as opposed to implementation costs. In addition, there is a significant logic break between section 1 and 2 in regards to cost effectiveness and LGPs as cross-cutting across all sectors. LGSEC does not present the challenges associated with savings attribution and influence and how resource-based implementation fits into non-resource based activities across regions and partnerships. We do not see the Public sector as “cost-effective” without a balanced portfolio including multiple service channels across multiple sectors.</p>	RHTR WG	1.E.	We appreciate the difference between administrative costs and implementation costs. It is our objective to find ways to offset the higher implementation costs experienced by RHTR communities through improved administrative efficiencies and by coordinating access to non rate-payer funds.	Accounting, measurement and justifications	
<p>Integration Catalyzes; Segregation Inhibits: We do not understand how the LGSEC will break the oftensiloed implementation approach internal to local government agencies. Departmentalization of activities is often a function of normal divisions of labor across specific content areas. Simply stating that an “easy” to access application process will address this barrier does not adequately address the challenges faced by local governments: ranging from staffing and capacity to implement to compartmentalization. In addition, the LGSEC proposal will increase the siloed approach of program implementation where utility-based resources tied to critical infrastructure will be more challenging to access.</p>	RHTR WG	1.F.	Thank you for raising the point. The LGC's vision for an ICCF funding framework is aimed at addressing the silos outside local government structures. It is beyond the scope of this proposal to address internal communications or coordination challenges in all local governments or to offer solutions to that particular problem.	General guidance	

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<p>Barriers to Success Should be Acknowledged and Corrected, not Tolerated: We reject that all IOUs across all aspects of LGP programs display persistent internal tolerance to structural barriers. We acknowledge that a one size fits all model rarely works for anyone yet individualized solutions are complex and expensive. The complexity of program design necessary to satisfy a wide variety of localized needs creates unique administrative challenges. To address IOU administrative challenges, LGPs are moving towards requesting negotiated solutions from the bottom up to ensure local priorities are met while balancing administrative requirements. We reject the assumption that IOUs presume marginal performance across all LGPs. We assert that if LGPs are marginal under current EM&V practices, LGPs would not be considered marginal if effective and consistent performance metrics were used in parallel with current cost effectiveness tests. We see no reason why this particular challenge can't be addressed by IOUs and the CPUC and does not warrant a wholesale rejection of the current model.</p>	<p>RHTR WG</p>	<p>1.F.</p>	<p>Some do not experience all barriers, but all experience some. The difficulty in expressing these barriers in detail is the variation over time, territory and topic. [Under current system, some LGPs enjoy certain preferences; the objective of the Statewide Administration Business Plan is to increase assets and resources and to levelize full and equitable access to and use of those resources and assets by all LGPs.</p>	<p>Accounting, measurement and justifications</p>	

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<p>Develop Strategic and Holistic Intervention Strategies: The LGSEC suggests that LGPs are not empowered to develop “strategic and holistic intervention strategies. This is not a fair generalization across all IOUs. For example, during an 11/09/16 PG&E partner meeting, attended by a CPUC Energy Division representative, PG&E sought feedback on what they were doing well and what they were not doing well. A clear trend emerged that partners in PG&E’s service territory felt that their programs were supported and encouraged to innovate. Support of localized innovation is critical and needs to be nurtured. We are concerned the LGSEC proposal will have an unintended consequence of reducing the ability to innovate at local levels in the pursuit of more robust EM&V and standardized program administration. We are concerned that the LGSEC proposal was not based in comprehensive investigative research into what LGPs are doing and how innovations are being supported by current PAs. IOUs can support and promote localized and standardized innovation strategies in collaboration with LGPs. We recommend not using this particular point to inform the advancement of the proposal as IOUs and existing PAs can be directed to better support LGP innovation within the current implementation structures</p>	RHTR WG	1.F.	Some are more empowered or supported than others. All should have the opportunity to be holistic and innovative.	holistic strategies	

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<p>and Inconsistencies and a Cautionary tale: LGPs operating in multi-IOU territories are facing significant challenges that must be addressed. In the areas where there are multiple PAs, the Energy Division, in theory, could require a single administrator—much like the currently identified statewide programs framework. In addition, a simple grievance process (complaint process) requesting resolution with the Energy Division could be developed to address these challenges. There is no reason to systematically reject the current model to address this challenge. We do not believe that we need to significantly alter program administration to address these identified challenges. These challenges can be addressed by existing PAs. However, we must be clear that the Energy Division should empower the IOUs and the IOUs must work with LGPs as partners and collaborators. In addition, we strongly encourage the Energy Division to understand that regulatory decisions often directly impact LGPs even if they believe they are ensuring an IOU is in compliance—we see many structural challenges emerging because of CPUC regulation not IOU mismanagement. The CPUC must be proactive in engaging LGPs as government partners not sub-contractors of IOUs. We issue caution in that structural challenges abound and they do not all exist solely with IOUs. Issuing comments and engaging the CPUC regarding over-arching program barriers created as a direct result of specific regulatory decisions is not in the CAEECC scope but should not go un-discussed in the context of the Business Plan process and the LGSEC’s specific proposal. We propose that the CPUC work closely with the IOUs and LGPs</p>	RHTR WG	1.F.	In theory, the identified barriers could be addressed by existing Pas, but then have not been.	Roles & Responsibilities	
<p>The leading and concluding sentence suggests that the LGSEC sees the Public sector as encompassing all sectors but does not expand, at a high level, what this means nor how this can be accomplished while not creating a challenging EM&V environment.</p>	RHTR WG	2	We acknowledged that this is, and will be, a challenging EM&V environment. Yes, LGPs represent all sectors.	General guidance	

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<p>Many of the problem statements and intervention strategies are either not a consistent experience, or duplicative to current activities. x Standardized, easy to understand metrics are attractive. However, the proposal and the simplicity of the answer is concerning as program design may be dictated by reporting rather than reporting being dictated by program design. We commend PG&E for trying to find the balance between letting program design dictate reporting as opposed to pursuing standardized reporting at the cost of innovative program design. We assert the pursuit of perfectly consistent reporting increases the likelihood that program innovation will be depressed. Incremental adjustments to key performance metrics by the CPUC and PAs could make reporting and EM&V more effective while acknowledging implementation is a complex web of programs.</p>	RHTR WG	2	We acknowledge the trade-offs between perfection (in reporting or anything else) and viability.	Accounting, measurement and justifications	
<p>Many LGPs may not feel limited to the Public space, code enforcement, and Direct Install projects. Others feel that this space could be easily addressed by the existing PAs through existing administration models.</p>	RHTR WG	2	We agree	General guidance	
<p>On-Bill financing is currently effective and it should be maximized in the current environment and expanded to On-Bill Repayment. Streamlined procurement through Job Order Contracting, the California Uniform Public Construction Accounting Cost Act and Public Resource Code 4217.10 and Utilities Code 388 are being used and advanced.</p>	RHTR WG	2	See earlier response on OBF. We agree. OBF and OBR have been included in the document. Additional improvements in streamlined procurement (or other innovations in procurement) on a broad scale may be possible	Funding & Budgets	
<p>IOUs have become much more sensitive and willing to collaborate on policy and program development. There is room for growth but this challenge and associated interventions could be readily addressed by IOUs and would not warrant a wholesale change in program management.</p>	RHTR WG	2	That may be true. And the CPUC is still signaling their desire for significant changes. Will Local Governments be well positioned to thrive in a future, changed framework?	General guidance	

Comment	Commenter	Applicable to section (s)	Response	Category of Comment or question	Notes
<p>Codes and standards are a problem, but from many perspectives the solution is to fund building officials so they can staff appropriately. So long as local staffing is minimal building officials will have to focus on structural safety, fire life safety and access. Energy efficiency becomes a luxury improvement when compared to human health and safety issues. Specific focus should be put on the unlikely realization of shared enforcement resources. Although this is a reasonable approach from afar, the realities of procurement, contracting and government accountability will create significant barriers. We believe the LGSEC intervention strategies are not appropriate to the specific localized barriers faced by agencies tasked with enforcement. In addition, this is a much more complex solution than simply capitalizing building officials to enforce. To this point, the state could carve out the dollars the LGSEC and SoCal REN could receive for this effort and allocate them directly to building officials in greatest need and most likely realize much more significant gains than pushing dollars through the LGSEC/SoCal REN proposal.</p>	RHTR WG	2	<p>Addressing the issues raised regarding structural and life safety priorities is beyond the scope of this proposal. However, we recognize and agree with the observation and with the issue of the resource constraints that frame this argument. It is also why we are dedicated to pursuing the parallel ICCF framework to better support and fund local governments in their critically important work.</p>	Codes and Standards	
<p>LGSEC does not adequately capture how the regulatory environment has created inherent barriers that are beyond the control of IOUs. The CPUC can systematically remove barriers by reframing their interactions with IOUs and LGPs. CPUC and the IOUs must also immediately stop looking at LGPs as contractors and begin treating them as equal partners in the development and implementation of innovative and localized interventions and associated tactics</p>	RHTR WG	2	<p>Acknowledged. We have added clarifying language in the Business Plan to illustrate how a single entity representing all LGP programs will have more leverage with the CPUC than individual LGPs do acting on their own.</p>	Regulatory Environment	

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<p>First, would energy efficiency ratepayer funds be used to finance moving this visionary concept forward, as currently the Local Government Commission has not indicated any other source of funding to support this effort. The second issue is a serious concern to rural local government partnerships; with this vision of combining the funds of six state agencies into one large pot. The concern is that the requirements to access these funds would by necessity (to comply with all the separate state agency’s qualifications) would be extensive. This will they make it so that only larger, urban jurisdictions will have the capability to access funding because they will be the only jurisdictions that will be able to identify projects that can comply to the bundled requirements of six state agencies simultaneously. In view of the observations and comments above AMBAG recommends the Local Government Commission provide a much more detailed plan of how this visionary plan will be actually implemented, clearly indicating how it will be funded. To resolve the second issue, it is recommended that the Local Government Commission compile the current application processes and materials for each of the six state agencies and conduct a complete comparison and contrast analysis of the application requirements. This chart should be included in any future revisions of the business plan.</p>	<p>Association of Monterey Bay Area Governments</p>	<p>page 35</p>	<p>1. only indirectly. IOU and rate-payer funds must be used according to stipulated contracts/agreement and conditions. However, the ICCF concept will draw upon the leveraging opportunity represented by these LGP funds. 2. The vision of the ICCF is to work with those various state agencies to ensure a LESS complex and LESS onerous application process. These agencies are also motivated to find more efficient and effective mechanisms to distribute funding. 3. creating detailed descriptions of ICCF funding applications is beyond the scope of this proposal.</p>	<p>Funding & Budgets</p>	
<p>· In general, the majority of data barriers that exist for local government partners do not exist because of the behavior of IOU’s but they exist because of prioritization of regulations at the state level. For example data privacy for businesses takes a higher priority in state regulation, then providing accurate energy/GHG data for reporting on the business and industrial sectors of jurisdiction’s GHG inventories. These types of data barriers need to be resolved at the state regulatory level and are not something that an IOU or the LGSEC can resolve themselves.</p>	<p>Association of Monterey Bay Area Governments</p>	<p>page 7</p>	<p>Yes, we agree. And, a state wide orgnaization may have more leverage than individual LGPs to work through these issues with the IOUs and the CPUC</p>	<p>Energy Data</p>	

Comment	Commenter	Applicable to section (s)	Response	Category of Comment or question	Notes
<p>· In reference to data management for actual energy efficiency project management including SMB Commercial, CRI complex projects, integrating 0% OBF financing, the Local Government Commission does not have as a core competency a robust customer relationship management (CRM) software infrastructure for communicating and reporting. · IOU's with this highly developed software infrastructure, do have this as their core competency. PG&E, for example, has developed Energy Insight, a tool that effectively and efficiently manages the customer relationship. Every local government partner works actively in this tool along with all the many staff members at PG&E and can seamlessly advance an energy efficiency project forward through all its steps. It is a very effective tool. It does not make financial sense to have the ratepayers incur the very significant overhead cost of building a similar tool for Local Government Commission from the ground up. It is recommended that the local government partnerships stay in partnership with the IOU's.</p>	<p>Association of Monterey Bay Area Governments</p>	<p>page 7</p>	<p>We agree. We are intent on exploring a partnership or a contract agreement with the relevant IOUs for their ongoing provision of such tools as their CRM and other tools.</p>	<p>Roles & Responsibilities</p>	<p>Pay attention to the comment about Energy Insight</p>
<p><i>It is recommended that an actual survey of Local Government Partnerships be conducted by a neutral third party to determine how many local government partners share the perspective of the Local Government Commission. While there is no doubt that as a standard protocol of business excellence, there can always be continuous improvement in any operational process, it must also be recognized that PG&E and the other IOUs have many local government partnerships that have very strong and effective partnerships that would disagree with being categorized as having these negative factors in their partnership due to the IOU.</i></p>	<p>Association of Monterey Bay Area Governments</p>	<p>pages 9 -10</p>	<p>Not all LGPs experience all of the barriers noted in the Business Plan. Yet these barriers exist often enough to merit being addressed systematically</p>	<p>General guidance</p>	<p>AMBAG asserts that their relationship with PG&E has been perfect since 2006. No complaints about anything, ever.</p>

Comment	Commenter	Applicable to section (s)	Response	Category of Comment or question	Notes
<p>· In the identification of objectives of the over-arching goals it does not seem that the first goal of achieving the highest and best use of ratepayer funds would be achieved by creating a Statewide Local Government Program. The value add of a local government partnership is that it does have the flexibility to shape itself around local needs. Statewide program development by its nature would reduce local government partnerships to the lowest common denominator program elements in order to achieve statewide consistency. • Rigorously develop a table that indicates the negative impacts of moving to a statewide model for local government partnerships and include a sound business analysis of the pros and cons of both options.</p>	<p>Association of Monterey Bay Area Governments</p>	<p>page 11</p>	<p>The proposal seeks to create a statewide administrative framework, not a single homogeneous program.</p>	<p>Scope/Remit</p>	
<p>In California, the acronym “PA” means “program administrator.” However, given the clear direction to move toward third-party design and implementation of programs, and the ever increasing importance of utilities (and others) as administrators, we urge PAs to think of themselves as “portfolio administrators.” No other entities are assigned with the responsibility and task of managing the portfolio of programs and research on behalf of ratepayers. As such, thinking deeply about when and how to acquire the desired resources is a crucial piece of a PA’s performance – yet less than three pages of the business plans address this subject in the thousands that were produced for the draft plans.</p>	<p>Margie Gardner, Executive Director, CEEIC</p>		<p>We recognize that the CPUC's stated vision is this third party implementor system. And, we envision that LGPs have an opportunity to also evolve into that role.</p>	<p>Roles & Responsibilities</p>	<p>Mostly targetted to IOU BPs</p>
<p>IOUs have executed energy efficiency solicitation and contracting for years, but there is no mention in the business plans of how the new solicitations will be conducted over the next three years, what kind of peer or procurement review process will prevail, and an estimate or template of a schedule.</p>	<p>Margie Gardner, Executive Director, CEEIC</p>		<p>We believe those details are important, but best saved for the Implementation Plan. Local governments, and local government agencies - like the LGC - follow strict, open and transparent procurement and contracting processes.</p>	<p>General guidance</p>	<p>Mostly targetted to IOU BPs</p>
<p>Explanation of the overall strategy. For example, is the PA going for big volume/low cost first? How will it fill niches? Replacing oldest programs first or underperforming areas?</p>	<p>Margie Gardner, Executive Director, CEEIC</p>		<p>Those details are more appropriately described in a future Implementation Plan</p>	<p>Admin vs. Implementation</p>	<p>Mostly targetted to IOU BPs</p>

Comment	Commenter	Applicable to section (s)	Response	Category of Comment or question	Notes
A clear schedule of when procurement solicitations will be released in each area, and when the solicitation process is expected to be completed. SDG&E's schedule shown on page 12 is a good start but additional detail is requested to inform the market;	Margie Gardner, Executive Director, CEEIC		Those details are more appropriately described in a future Implementation Plan	Procurement	Mostly targetted to IOU BPs
A description of the types of solicitations planned over the schedule (e.g. open program requests for proposals (RFPs), targeted program RFPs, request for offers RFOs, master-service agreements or other vehicles). This would also include the types of requirements that a bid might contain, such as any guarantees;	Margie Gardner, Executive Director, CEEIC		that is understood, and again, those details are ore appropriately described in the Implementation Plan	Procurement	Mostly targetted to IOU BPs
An estimate of the desired savings and budget (at an appropriate level) for each area over the next three years to achieve at least 60 percent third-party implementation;	Margie Gardner, Executive Director, CEEIC		that is understood, and again, those details are ore appropriately described in the Implementation Plan	Funding & Budgets	Mostly targetted to IOU BPs
An estimate of the cumulative third party program percentage anticipated each year through 2020 as programs and services are contracted to reach more than 60%;	Margie Gardner, Executive Director, CEEIC		that is understood, and again, those details are ore appropriately described in the Implementation Plan	Funding & Budgets	Mostly targetted to IOU BPs
An explanation of which activities will be held internally and why;	Margie Gardner, Executive Director, CEEIC		that is understood, and again, those details are ore appropriately described in the Implementation Plan	Scope/Remit	Mostly targetted to IOU BPs
A description of procurement for emerging technologies and new innovations over time (for example, will funds be reserved for this every year? If so, how much and when will the solicitations happen?); and	Margie Gardner, Executive Director, CEEIC		that is understood, and again, those details are ore appropriately described in the Implementation Plan	Procurement	Mostly targetted to IOU BPs
A commitment that all RFPs will be publicly posted on the "Proposal Evaluation & Proposal Management Application" web site, even if they are also posted elsewhere. There need to be one guaranteed location where all bidders can find the RFPs.	Margie Gardner, Executive Director, CEEIC		We agree. That is a good best practice and would, should this plan reach implementation, be implemented.	Procurement	Mostly targetted to IOU BPs

Comment	Commenter	Applicable to section (s)	Response	Category of Comment or question	Notes
<p>The Efficiency Council is particularly concerned about ensuring a smooth and fair process to move from bids to contracts. While a CAEECC subcommittee is working on this issue, including the role of a peer or procurement review group and an “independent evaluator,” the PA’s business plans should outline how the PAs will move from bids to signed contracts on an expedient schedule with the right level of CPUC and stakeholder oversight. The “bid to contract” schedule as a template and the roles and responsibilities of invested parties is crucial to have settled as soon as possible ahead of business plan approval since it will likely take well over a year to execute the solicitation process after approval. Now is the time to describe the process at a “template” level in the business plans.</p>	<p>Margie Gardner, Executive Director, CEEIC</p>		<p>These are good suggestions and will be included in a presumed future Implementation Plan</p>	<p>Solicitation Strategies</p>	<p>Mostly targetted to IOU BPs</p>
<p>The Efficiency Council greatly appreciates the PAs choice to remove Strategic Energy Management (SEM) from the list of statewide (SW) downstream programs.¹ As we have previously commented² we continue to urge the PAs to develop SEM as a tool or approach that can be used by any implementer to work with customers to deliver savings. We hope that the final business plans reflect this opportunity. We would also urge the PAs to include opportunities for implementers to participate in discussions on how to get SEM off the ground throughout the state, since they will have valuable input on the structure of the approach.</p>	<p>Margie Gardner, Executive Director, CEEIC</p>		<p><i>Noted.</i></p>	<p>General guidance</p>	<p>Mostly targetted to IOU BPs</p>
<p>The current draft plans do not include a description of the SW downstream pilots because the energy efficiency target area and lead PA were identified very late in the process. However, when the downstream pilots are included in the January filings, we encourage the PAs to facilitate a discussion with the CPUC and stakeholders on the purpose of the “pilot.” Our interpretation of D.16-08-019 is that that the intent is to ensure that SW programs are “uniform” and reduce costs, but we suspect there may be other attributes that the pilot is intended to test. It would be helpful to know the hypothesis being tested in piloting downstream programs before they start so that the success of the pilots can be properly evaluated</p>	<p>Margie Gardner, Executive Director, CEEIC</p>		<p><i>Noted.</i></p>	<p>General guidance</p>	<p>Mostly targetted to IOU BPs</p>

Comment	Commenter	Applicable to section (s)	Response	Category of Comment or question	Notes
<p>We think that it is very important for any proposal to clearly identify the successful components that it wants to replicate and ensure that those elements will not be lost. The plan often represents LGP's as one program or group statewide, which is erroneous. In Table 1.1 the plan mentions that LGPs have budgets and contracts that vary year to year and have no local government involvement with program creation but working with our utility partners we were able to address these issues and help craft a long term 5 year contract that provides us stability.</p>	<p>Denis Gakunga, Chief Sustainability Officer, Chula Vista</p>		<p>your observations are correct. And, the 5 year programs that serve Chula Vista could serve as a model for a statewide program</p>	<p>General guidance</p>	
<p>· In our experience, the value of the LGP programs has been the local component and based on participation in other statewide organizations or groups, we have serious concerns about being able to fully participate in a process that is based hundreds of miles away.</p>	<p>Denis Gakunga, Chief Sustainability Officer, Chula Vista</p>		<p>We agree that local programs reflecting local needs and priorities are critical to the success of this proposed business plan. We are also sensitive to the issue of geographic distance and are aiming to build-in structures to address this. <i>This proposal does not contemplate or recommend eliminating local implementation of programs.</i></p>	<p>Equitable Representation and access to resources</p>	
<p>Currently we work with local IOU staff who serve a number of roles to help with reporting, contracting, planning and implementation. We do not think we would be as successful without local assistance and the proposed plan does not mention any potential mechanism to address this issue.</p>	<p>Denis Gakunga, Chief Sustainability Officer, Chula Vista</p>		<p>We agree that local programs reflecting local needs and priorities are critical to the success of this proposed business plan. We are also sensitive to the issue of geographic distance and are aiming to build-in structures to address this.</p>	<p>Equitable Representation and access to resources</p>	

Comment	Commenter	Applicable to section (s)	Response	Category of Comment or question	Notes
<p>· A number of the most promising elements in the proposed plan, such as the Integrated Climate Change Fund (ICCF), improved data access and changes in CPUC savings or cost effectiveness calculations that can lead to seemingly arbitrary changes to other programs run by Program Administrators all rely on non-LGP decisions. Until more information is provided on how the business plan would affect these elements we don't see their applicability to the proposed plan. Additionally, with the introduction of the ICCF it is unclear what metrics would be used to award funds because there will be a combined pot of funds with which to achieve multiple goals (ie GHG, energy, water, waste or VMT reductions). This could lead to less even funding distribution due to the large variety of environments in California, such as the CalEnviroScreen tool has done with Cap and Trade funds.</p>	<p>Denis Gakunga, Chief Sustainability Officer, Chula Vista</p>		<p>We appreciate the comment and have endeavored to clarify the value of the LGC's vision and its complementary benefit to Local Governments.</p>	<p>General guidance</p>	
<p>The current programs' local geographic focus ensure consistent funding and support for programs in our region but there does not seem to be any similar safeguard in the proposed program. Relying on a statewide competitive performance based system could concentrate funding opportunities in select areas of the state.</p>	<p>Denis Gakunga, Chief Sustainability Officer, Chula Vista</p>		<p>We acknowledge your concern. It is important to the LGC/LGSEC to ensure equitable representation, funding, access to technical and administrative support for local governments. The Business Plan strives to describe that. Additional details are better left to the Implementation Plan. <i>We are not proposing reliance on a statewide competitive performance based system.</i></p>	<p>Equitable Representation and access to resources</p>	

Comment	Commenter	Applicable to section (s)	Response	Category of Comment or question	Notes
<p>There is a diversity of partnerships across the state, some with elements like long contract terms that are called out to be replicated, yet our program was not highlighted in section 2.B.(best practices) which leads us to believe that the proposers are not familiar with programs in our region. The proposal also acknowledges that the current LGP administration system has the capacity to create the changes sought by local governments because its references some elements that are found in current programs. We think working to build on those successes and improve the current system would be preferential to creating an entirely new administration system at this point in time</p>	<p>Denis Gakunga, Chief Sustainability Officer, Chula Vista</p>		<p>The first draft of this plan did not include details of the many local programs that could be expanded or replicated. Additional details have been added to this draft. The Implementation Plan is the appropriate venue for program-by-program details.</p>	<p>General guidance</p>	
<p>Observations PG&E supports the Commission decision (D.16-08-019) that “LGP’s would appear to be the essence of a local program, not appropriate for statewide application.” (D.16-08-019, p 60). PG&E would like to note that a 2013 Local Government Partnership Programs Evaluation found that, “The LGP model does not lend itself easily to evaluation metrics of most kinds, including best practices. Paradoxically, it is precisely the attributes that create complexity in measurement that also give LGPs their unique and irreplaceable value.”(Evergreen Economics and Navigant Consulting, Program Assessment Study: Local Government Partnership Programs – Final Report, for Itron, the California Public Utilities Commission and the California Investor-Owned Utilities, July 26, 2013, p. 2) Given this evaluation, how would the proposed statewide approach supersede D.1608-019’s assessment of local government partnership needs?</p>	<p>PG&E</p>		<p><i>There is a difference between statewide <u>administration</u> and statewide <u>applicaiton</u>. We are not proposing the latter (which we assume means statewide homogenization of the programs themselves. That is <u>not</u> proposed. We are proposing that under Statewide Admin, the positive aspects of certain/some LGPs may be more easily spread across LGPs throughout the State. We are also proposing that under Statewide Admin it will be easier to access and coordinate other funding. Making evaluation of LGP metrics more easy is not necessarily a primary goal here.</i></p>	<p>Admin vs. Implementation</p>	
<p>PG&E asks that LGSEC cite their data sources and provide justification for their many assertions of past and present LGP performance, too numerous to enumerate in this forum.</p>	<p>PG&E</p>		<p><i>Too numerous here as well. The ALJ cited the reasons for requesting this BP proposal.</i></p>	<p>General guidance</p>	

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PG&E has concerns with LGSEC's high-level commitment to energy efficiency program administration compliance and, at this point, remains unconvinced that LGSEC has the experience or depth-of-knowledge to deliver energy savings in a costeffective and evaluable manner. Please explain the knowledge and experience in program administration that LGSEC will bring?	PG&E		Please refer to Appendix E	Qualifications	
PG&E notes the ramp-up costs associated with building out this expertise. Please explain what steps LGSEC will take to eliminate ramp up costs? Please explain whether LGSEC would need to build out infrastructure to support program administration.	PG&E		There will of course be ramp up costs. They will be detailed in an Implementation Plan. LGC will build out infrastructure to support program administration - including potentially using IOUs' infrastructure - if available.	Roles & Responsibilities	
What is the vision for the short term? Specifically, could the LGC speak to the challenges currently faced by the LGPs, beyond the core reference to streamlining acquisition of EE/Climate funding from disparate channels?	SF Environment	general	we have described that, in part, in the phases of implementation	Admin vs. Implementation	
How does the LGC foresee being able to offer more favorable terms of cost effectiveness testing, when the current model allows the utility to roll up to an entire portfolio, giving us (LGP PAs and implementers) the benefit of balancing our lower TRCs against the loser cost mass market programs? Please describe how you intend to achieve this.	SF Environment	general	<i>We are not proposing that LGPs would be held to a program cost-effectiveness metric. LGPs, like other 3rd party programs and the RENs, would continue to be part of the IOUs portfolios - until the CPUC dictates otherwise. That said, the effectiveness of this model would have to be evaluated.</i>	Accounting, measurement and justifications	
As a PA, the Commission will apply the same rules and constraints to the LGC. How will this proposal improve our programs thereby allowing us to enhance the constituent/customer experience?	SF Environment	general	<i>It's in the BP.</i>	Scope/Remit	
How does the the LGC plan to increase its staffing capacity required to administer a statewide program?	SF Environment	general	<i>It'll be in the Implementation Plan but LGC will utilize a number of contractors and consultants to administer the Program - as well as utilize LGP and REN resources.</i>	Admin vs. Implementation	

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The LGC provides strong technical assistance to community projects and knows how to engage stakeholders on a myriad of topics. Aside from SEEC, what experience does the LGC have in administering statewide energy efficiency initiatives or programs? Please provide specific references, including market segment(s), total budget(s), program cycle duration, etc.	SF Environment	general	Appointment or procurement of Administrator, and specific calls for additional information, are at the discretion of the CPUC.	Qualifications	
Page #1 of PG&E's "Reply Comments to the Commission's proposed decision indicated strong opposition to this idea. Similarly, Page #3 of AMBAG's "Reply Comments" urged the Commission to reject it. How does the LGC plan to assuage the opposition and to work collaboratively with stakeholders to bring this structural change to market (if indeed there is some momentum to see it come to fruition)? How does the LGC foresee utility engagement should the Commission approve the Business Plan? Please give specific examples.	SF Environment	general	Merging of or integration of existing resources is anticipated under the Business Plan and discussed therein.	General guidance	
How will the LGC deal with the complexity of programs currently operating as LGPs? While some partnerships are straightforward, others, like SF Energy Watch, rely on significant local government staff support and institutional knowledge from PG&E.	SF Environment	general	Merging of or integration of existing resources is anticipated under the Business Plan and discussed therein.	Scope/Remit	
Does the LGC foresee and issues the LGPs contracting with programs covered under PG&E's regional Direct Install programs?	SF Environment	general	No, existing programs and contracts are carried over as part of the transition.	Roles & Responsibilities	
Please explain in more detail LGC's plan to streamline administrative processes. For example, SF Energy Watch currently works directly with PG&E on all matters related to the program, from day-to-day issues to new program cycle negotiations. Will the proposal add an additional barrier to existing communication channels?	SF Environment	general	our objective is NOT to add an additional layer.	Admin vs. Implementation	
If BayREN agrees to co-sponsor the proposal, how will its members have the opportunity to shape and influence the final product? Also, please offer insight on how potential program design, implementation, and related issues of LGTP's vision will be coordinated between LGC, SoCalREN and BayREN.	SF Environment	general	The members of Bay REN would have the opportunity to comment, whether or not BayREN co-sponsors the application	Roles & Responsibilities	

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Can the LGC, as an organization, be a PA for local governments without changing its own governance structure, e.g. becoming a nwe statewide JPA?	SF Environment	general	Yes. That is possible.	Governance	
How does the LGC propose governance would work, How would local governments be represented within the governance structure?	SF Environment	general	We propose a Governance Committee comprised of LGP representatives and other key stakeholders	Governance	
How would that representation structure change once the PC gets funds from out the CPUC, e.g. the Strategic Growth Council per broader vision?	SF Environment	general	The representation structure (governance committee) may expand to include local governments that are not part of an LGP	Governance	
Does the LGC agree that while the new PA will ahve 'statewide local government programs', it does not mean that each program is identifal, and not every local government has to participate in each program?	SF Environment	general	Yes. Your interpretation is correct.	Admin vs Implementation	
Challenges/Areas of Improvement: Some of the issues cited by PAs as current issues under existing program administration may be traceable back to requirements by the CPUC and challenging to the work of LGP's, and not necessarily the result of current PA practices. Recommended Action PAs should work closely with stakeholders and the CPUC to identify and resolve any barriers to successful outcomes.	San Mateo C/CAG LGP	General	Recognized and provided for in the Business Plan - thank you for this comment.	Scope/Remit	
Experience and Technical Knowledge: Significant experience, energy technical expertise, administration, coordination, contracting, and budgeting expertise is required to continue or assume the role as PA for the Public/Commercial sectors and to lead LGPs. Recommended Action Any business plan proposer whose plan does indicate this depth of experience should receive additional scrutiny.	San Mateo C/CAG LGP	General	See comment 132 above.	Qualifications	

Comment	Commenter	Applicable to section (s)	Response	Category of Comment or question	Notes
<p>Launch Time for New Approaches: Any significant changes in how LGPs are administered may require significant ramp up time, which could delay existing work as we try to reach the State goals of reducing greenhouse gas emissions and transition of existing building stock for 2030 and beyond. Recommended Action Any changes in administration of LGPs should be phased in over multiple years, to avoid the start and stop issues for which this business plan process was intended and designed to alleviate.</p>	San Mateo C/CAG LGP	General		Implementation and continuity	
<p>Statewide Consistency: Consistency across the State for LGPs should allow for flexibility in implementation based on local needs, that partnerships may perform best when there is freedom in diversity of approach, yet savings delivery should be required, from almost day one. Recommended Action All business plans that strive for statewide consistency should also build in flexibilities to allow local implementation based on unique local characteristics. Additionally, include efforts to cross-pollinate approaches to program delivery and allow for diversity to fit local needs. Only in cases where effort is not being made to accomplish goals should there be consideration to design the program for the specific LGP. In addition, a forum (which could be the SEEC forum) should be provided by the State to share diverse approaches to program delivery, which come from LGPs sharing their story of how and why their program is implemented.</p>	San Mateo C/CAG LGP	General		Admin vs Implementation	
<p>Market Transformation: Market transformation is key to the success of meeting state goals for energy efficiency of existing buildings. All programs combined are unlikely to serve every energy efficiency opportunity site in the State. Recommended Action All business plans should include a specific section that addresses an approach for connecting building owners to contractors with less or no intervention from State programs. Program implementers should be working on systems that provide incentive education and implementation justification, even before a site is identified by an administrated program in order to drive the market.</p>	San Mateo C/CAG LGP	General		Admin vs Implementation	

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As proposed, neither LGSEC or LGC are operating as PAs, and are more akin to third-parties.	SoCalGas	Page 3		Authority/Legality	
<ul style="list-style-type: none"> Performance Barriers and their consequences Table 1.1: SoCalGas agrees that there can be improvement on consistency and coordination. 	SoCalGas	page 9 - 10			
<ul style="list-style-type: none"> SoCalGas along with the other IOUs addressed Statewide Consistency in their Public Sector Business Plans that were submitted on October 18th. 	SoCalGas		Acknowledged.	Roles & Responsibilities	
<ul style="list-style-type: none"> Please address how the LGSEC's proposal would be more effective than the IOU's stated SW consistency plans. 	SoCalGas		We think there is a good chance that one, non-IOU entity can be more effective at promoting statewide administrative consistency than four IOUs with defined territories and different corporate cultures	Admin vs implementation	
<ul style="list-style-type: none"> Data Challenges and Barriers: LGSEC does not have legal authority to represent IOU obligations under applicable law and regulation, and cannot start giving data to local governments at a level any different than what each IOU can without changes to the EDRP Decision. 	SoCalGas	Page 7	We know this and acknowledge that situation	Energy data	
<ul style="list-style-type: none"> Given the constraints observed, please address how the LGSEC/LGC proposal will solve the data issues LG's are experiencing. 	SoCalGas		One focal point to represent multiple LGPs to four IOUs or one regulatory agency vs multiple IOUs seeking solutions among multiple actors	Energy data	
<ul style="list-style-type: none"> Intervention Strategies: SW Admin Library of ME&O assets, messaging, case studies, presentation material and implementation plan resources. A majority of this is currently available through SEEC and the SW Best Practice EE Coordinator and websites. 	SoCalGas	Page 31	Yes, it does, and SEEC can be both incorporated herein, and improved upon	Roles & Responsibilities	
<ul style="list-style-type: none"> Please explain what the LGSEC/LGC proposal intends to do beyond what is already being done in this (see above) area. 	SoCalGas		Those details are more appropriately described in a future Implementation Plan	Roles & Responsibilities	
<ul style="list-style-type: none"> Appendix D: List of 2017 Local Government Partnerships: The table for SoCalGas is not accurate. Several of the partnerships listed are no longer operating in LGPs or will be rolling into other regional partnerships in 2017. 	SoCalGas	Page 45		Technical corrections	
<ul style="list-style-type: none"> Update Appendix D with current Local Government Partnerships 	SoCalGas			Technical corrections	

Comment	Commenter	Applicable to section (s)	Response	Category of Comment or question	Notes
<ul style="list-style-type: none"> • LGSEC's proposal recommends appointment of Local Government Commission (LGC) as the statewide implementation agency. 	SoCalGas	Page 4		clarification	
<ul style="list-style-type: none"> • Even if this proposal was supported, and was to be implemented, it should not be directly “awarded” to LGC without a fully compliant RFP process first being done. 	SoCalGas		We recognize that is a possible course of action on the part of the CPUC	??	
<ul style="list-style-type: none"> • Update the proposal to reflect requirement for formal solicitation process for the selection of a statewide implementation agency 	SoCalGas		We will let the CPUC determine if this is their preferred course of action	??	
<ul style="list-style-type: none"> • LGSEC's proposal is heavy on conclusions but lack relevant supporting data. 	SoCalGas	General		clarification	
<ul style="list-style-type: none"> • Please cite data sources and provide justification for their conclusions regarding past and present LGP performance. 	SoCalGas			clarification	
<ul style="list-style-type: none"> • There is reference to IOU Core Programs throughout and the proposals intent to continue leveraging these programs 	SoCalGas	Pages 21, 32, 33		clarification	
<ul style="list-style-type: none"> • Please explain what the role of the IOUs would be in relation to LGSEC’s proposal. 	SoCalGas		We recognize and respect the IOUs technical expertise, the strength of their local relationships and the strength of their information systems. In later stages of this process, the LGC would like to explore work agreements with the IOUs to continue their local representatives' work, employ their financial and data systems, and use other resources that would ensure both efficiency and continuity where these clearly add value.	clarification	
<ul style="list-style-type: none"> • In LGSEC’s comments submitted in response to the May 24th, 2016 ALJ Ruling seeking approach for Statewide and Third Party Program, LGSEC's conclusions referenced within the proposal are not the consensus of the local governments that are member or non-member local governments of LGSEC. 	SoCalGas	Page 4		clarification	
<ul style="list-style-type: none"> • The Valley Innovative Energy Watch LGP representative during the October 19, 2016 CAEECC meeting expressed their opposition to the LGSEC proposal. 	SoCalGas		We acknowledge their opposition	no response	

Comment	Commenter	Applicable to section (s)	Response	Category of Comment or question	Notes
<ul style="list-style-type: none"> • Please address the comments made by the Valley Innovative Energy Watch LGP representative and reconcile their position with the LGSEC assertion that local governments reached consensus on the LGSEC proposal 	SoCalGas	Page 11	No one has asserted that consensus was reached, in the CAEECC process or otherwise.	no response	
<ul style="list-style-type: none"> • Overview of Phased-In Implementation approach: The proposal reforms the LGP structure to meet these objectives and these two overarching goals: 	SoCalGas			clarification	
<ul style="list-style-type: none"> o Highest and best use of ratepayer funds through performance 	SoCalGas			clarification	
<ul style="list-style-type: none"> o Fiscal optimization of LGP programs. 	SoCalGas			clarification	
<ul style="list-style-type: none"> • The proposal does not include a budget or cost impact and it is unclear what the cost is to build this new infrastructure. 	SoCalGas		Included. See page 16/17	Accounting, measurement and justifications	
<ul style="list-style-type: none"> • Update proposal with budget and cost impact to build new infrastructure. 	SoCalGas		Included. See page 16/17	Accounting, measurement and justifications	
<ul style="list-style-type: none"> • This proposal highlights several concerns about LGPs to justify the need to be managed by a statewide administration model. While SCE feels that many of the concerns highlighted are unjustified, there is a level of truth to some of the comments. SCE believes that the IOUS are better positioned to quickly address these concerns and intends to continue to work with Partners to overcome these issues. The IOUs have outlined several strategies for greater consistency across the state, while still allowing LGPs the local autonomy to set program priorities. 	SCE	general	We appreciate that the IOUs are the seat of great technical expertise and organizational capacity. The fact remains that obstacles have existed, in some cases for a long time. Further, IOUs may not be the most suitable institutions for creating a single, coherent, statewide administration that is also able to address co-benefits, leverage non rate-payer funding, and do so in a way that is more cost-effective.	no response??	
<ul style="list-style-type: none"> • This proposal seeks to take all funding currently directed to Local Government Partnerships and allocate them to a non-IOU PA that would be responsible for disbursing funds based on state need. It appears that the funds would be disbursed through a grant mechanism. 	SCE	general	The ICCF envisions something like a grant mechanism. The SW PA would likely distribute funds via a different mechanism, which would be detailed in a possible future Implementation Plan.	clarification	

Comment	Commenter	Applicable to section (s)	Response	Category of Comment or question	Notes
<ul style="list-style-type: none"> Please explain process for how funds will be disbursed to Local Governments and how current funding levels would be maintained. 	SCE	general	This level of detail is best left to the implementation plan	clarification	
<ul style="list-style-type: none"> Please explain how you will ensure that rural, disadvantaged, and hard-to-reach communities will receive appropriate levels of support with this model. 	SCE	general		clarification	
<ul style="list-style-type: none"> The goal of "Local Government Partnerships" is to address local needs that arise from unique geographic, political, and economic drivers. This proposal seeks to remove local variations within LGPs and remove many of the unique attributes of the Partnerships program. 	SCE	general	We have further clarified language to ensure our intent is clear. This proposal seeks the efficiency of unified administration, not to establish uniform programs.	clarification	
<ul style="list-style-type: none"> The ICCF model describes the ability to fund sustainability activities outside of the field of energy. 	SCE	general	Yes, it does. As described in the Business Plan, local governments are the point of inflection for many, inter-related actions on climate and sustainability. Holistic funding opportunities, the ability to measure success via ghg metrics as well as kWh savings, and recognizing co-benefits, are all essential to meeting statewide energy, sustainability, climate and adaptation goals.	clarification	
<ul style="list-style-type: none"> Many of the statements made throughout this proposal lack evidence to support the claim. For examples, see pg. 5 (bullets) and pg. 9 (table). 	SCE	pg 9		general guidance	
<ul style="list-style-type: none"> On pg. 8, the proposal states that "IOU local government programs also include institutional partnerships (e.g. university and correctional systems facilities)." This is not true. Institutional Partnerships fall under a different arrangement than LGPs. 	SCE	pg 8	Confusing language has been removed.	general guidance	
<ul style="list-style-type: none"> Also on pg. 8, the proposal states that there are eight new LGPs proposed for launch and funding in 2017. Two of the LGPs stated were the North Orange County Partnership and the San Bernardino Regional Partnership. Both of these partnerships were proposed several years ago and have been active partnerships in 2016. 	SCE	pg 8	Correction made.	Technical correction	

Comment	Commenter	Applicable to section (s)	Response	Category of Comment or question	Notes
<ul style="list-style-type: none"> On pg. 8 & pg. 15, the proposal states that the Community Energy Partnership (CEP) is a supplemental program. This is not true. CEP is a local government partnership serving six cities in southern California. 	SCE	pg 15	Correction made.	technical correction	
<ul style="list-style-type: none"> Appendix B states "Administration and Marketing and Outreach Budgets of all LGP Programs". However, this is just for the PG&E programs. 	SCE	App B	Correction made.	Technical correction	
<ul style="list-style-type: none"> Add citations to justify observations 	SCE	general		general guidance	
<ul style="list-style-type: none"> Remove lines on pg. 8 about IPs and new LGPs. 	SCE	pg 8	Correction made.	technical correction	
<ul style="list-style-type: none"> Remove CEP from the list and budget numbers of supplemental programs. 	SCE	general	Correction made.	technical correction	
<ul style="list-style-type: none"> Change name of Appendix B 	SCE	App B	Correction made.	Technical correction	
<ul style="list-style-type: none"> Proposal is missing annual goals and budgets. Proposal states that it is pending break down of direct and indirect costs. 	SCE	general		Funding and budgets	
<ul style="list-style-type: none"> Add annual budgets base on what you expect it will take to deliver cost-effective programs. 	SCE	general			
<p>1. The assertions of the identified problems were countered by at least two parties. Until NRDC understands the degree of the challenges, which local governments are most impacted, and in which locations those challenges apply, it is difficult to assess how the proposal will address the challenges without undermining partnerships or approaches that are seemingly working.</p>	NRDC - Lara Ettenson	general	We respectfully disagree that proposing action should be predicated on detailed quantification of identified obstacles. For the purposes of this proposal, it is sufficient to know that some LGPs have experienced performance-hindering obstacles, and that these can be overcome.	clarification	
<p>2. You raise important issues on p.9-10 that should be addressed, even if not applicable to all partnerships. However, the proposal does not provide a clear path to how this approach would address the key issues. For example, how would this structure improve the data issues?</p>	NRDC - Lara Ettenson	general	Data issues, among others, are now address on an LGP by LGP basis. The SW Program Admin would be the single point of engagement to resolve issues on behalf of local programs, enabling local programs to focus time and energy on local program implementation.	Energy Data	

Comment	Commenter	Applicable to section (s)	Response	Category of Comment or question	Notes
3. It is not clear in the submission how a statewide lead would be able to maintain the local flare of partnerships	NRDC - Lara Ettenson	general	We have always recognized the value of local priorities and circumstances and that LGP design should reflect these as much as possible.	Regional Variation	
4. If the proposed fund and strategy only has conceptual support at the moment (p.2), what would happen if that support never manifested? How would that impact the proposal's ability to succeed?	NRDC - Lara Ettenson	general	The Statewide administration of LGPs would provide efficiency and consistency to make more effective use of ratepayer funds. The ICCF, in the future realization of this vision, would be an added benefit.	clarification	
5. We're concerned about the implications that co-mingling funding will have on estimation of savings being attributable to the PA programs. If there is an application process, how would this plan ensure that awardees in SCE territory only get SCE funding, which is the current requirement per the CPUC?	NRDC - Lara Ettenson	general	There is no intention to co-mingle IOU funding. The ICCF funding framework could potentially provide 'common pool' funds from other, unrestricted sources.	Accounting, Finance and Budgets	
The first LGP was started on or around 1997 and was between SCE, SoCalGas, City of Irvine and City of Santa Monica	ICF - Craig Perkins	technical correction	Correction made.	technical correction	
The final clarification from the ALJ was that the BPs need to cover 8 years until 2025. So, I would suggest that the sequence be: , Year 1, Phase 1 - years 2 - 3, Phase II - years 4 - 6, Phase III - years 7 - 8	ICF - Craig Perkins	technical correction	Correction made.	technical correction	
On the Integrated Statewide Framework Map, Timing column, all of the dates are either year 1 or Phase I. Is that correct that none of those activities would occur beyond Phase I?	ICF - Craig Perkins	technical correction	Correction made.	clarification	
condensing and streamlining of text that would improve the read	ICF - Craig Perkins	We have edited for clarity and brevity		clarification	
the document needs to be more graphically appealing in its layout	ICF - Craig Perkins	we agree and will work on graphic appeal		clarification	