

Cal TF | 2023 Draft Business Plan - PAC Comments on draft Business Plan v2

This document summarized comments received from PAC members on the draft 2023 Cal TF Business Plan (“v2”) and Cal TF staff responses, including relevant revisions to the draft Business Plan based on the comment.

PAC Member	Comments	Cal TF Staff Response
Alok Singh (SCE)	Confirmed no comments on draft BP (from Ryan Cho)	n/a
Amy Reardon (CPUC)	<p>“I read the business plan several weeks ago and I think it’s very good, ready to go. Can you please remind me if it states something like “ongoing integration with ED resources” because we will have some minor enhancements this year—mostly on my side with CEDARS, but want to make sure it’s clear that CalTF has input. I seem to recall the language was sufficient already.”</p> <p>[After clarifications,] “From Energy Division point of view, the CalTF Business Plan 2023 is ready to go.” (from Amy, 10/14)</p>	n/a – Cal TF provided clarifications to address CPUC comments
Armen Saiyan and David Jacot (LADWP)	<p>10/17 - At a glance, I had no major objections to the changes on the BP as was presented at the last PAC meeting. Overall I thought they were good improvements/progression from this year's. Please give me a few more days to give it a deeper dive if there were additional changes since then that I haven't seen yet.</p> <p>10/31: I read through it and like all the new changes and additions. I have no additional comments to add for the BP. I would likely have commentaries on subsequent workplans as they get presented and detailed out.</p>	n/a
Clark (CEDMC)	Metric 1A - Does there need to be a reference to the stakeholders (including CalTF) who will be providing input? I.e. "...modified by CPUC Staff with input from..."	All eTRM Core stakeholders have input on the enhancement list; modified text slightly to clarify.
	Metric 1A, Tactics (Others) – “For this and all other references to meeting attendance, is it permitted and is it useful to include language that says "Representatives OR THEIR DESIGNEES will..."? I'm only thinking to address/acknowledge potential coverage in the event of an absence?”	<p>Yes, Representatives may delegate tasks based on expertise.</p> <p>Added footnote on “Tactics (Others)” to indicate acceptable use of representatives</p>
	Metric 2A - By EOY? Or other? Allowing for staff time to review if needed?	All activities to be completed in 2023; no edits made.

	Metric 2A, Tactics (Cal TF) - Are these analytics rolled into any of the reporting noted later on? If so, does/should that be acknowledged here?	Cal TF shares analytics findings on ad hoc basis in the eTRM Software Development meeting.
	Metric 6A - What guides the TPP and White Paper? I.e. - principles document? Broader strategy? Is it just the topics and priorities as solicited from PAC, TF members, and stakeholders noted in the next cell to the right?	<p>Topics/work should be consistent with Cal TF mission and goals as determined by the PAC and TF members. Correct that the process starts with solicitation and prioritization of ideas by stakeholders - PAC selects TPP, a position piece; Cal TF staff lead WP (a technical document or proposal) based on TF member input.</p> <p>Added definitions of TPP and White Paper to the Business Plan.</p>
	Metric 6B, Tactics (Cal TF) – “Timely and relevant data access?”	This involves a vision for improving the integration and streamlining of data transfer among EE systems to reduce errors, reduce administrative costs, reduce manual data management, etc. - and to improve overall efficiency and data analysis capabilities. This topic will be refined further is selected for WP development. No edits made.
	Metric 6C, Tactics (Cal TF) – “What is PAC’s role here in review and build out? Beyond laying groundwork for priorities and topics?”	This tactic is a maintenance activity to ensure Cal TF existing documentation remains up to date. Cal TF staff work with TF members her and report updates to PAC. No edits made.
Don Gilligan (NAESCO)	<p>The Business Plan is pretty impressive and very ambitious. My overarching question is who is going to do all of this? How many people do you have in addition to you, Ayad and Annette? How are you able to find the people you need in a market that seems very tight? To what extent is the Plan dependent on new hires, and will some Plan elements suffer more than others if we can’t find the new hires?</p> <p>[Below] are a few questions that I hope are useful.</p>	Cal TF has added staff in key areas, including engineering, emerging technology, and software development/maintenance.
	Goal 1: Do we have agreement to participate from the key stakeholders, or are we going to try to recruit them after approval of the Plan?	This group already exists and has been contributing as described.
	Goal 2 [Ongoing Implementation of the Current eTRM Version]: Do we have sufficient staff, based on prior experience, to handle the expected volume of customer support requests? Is there a contingency the volume is greater than expected? Will the funders kick in more money for more staff?	We have sufficient staff to handle expected needs for 2023. Part of our strategy has been to build expertise within other stakeholders’ companies so that there are internal champions also being developed. The other part of the strategy has been to shift funds from Existing Measure Management (Goal 3) to Ongoing Implementation (Goal 2).

	Goal 3 [Manage Existing Measure Updates]: Same question as for Goal 2. Can we get more money if we need it to handle the volume?	We have enough funding for the expected volume for 2023. If significant expansion is requested (e.g., to develop many new custom measures, to assume responsibility from CPUC on modeled measure savings, etc.) then it would need to be re-evaluated.
	Goals 3 and 4: Are the proposed metrics enhancements or expansions of existing CalTF systems or whole new systems?	Proposed metrics described in Goals 3 and 4 are expansions of the existing system; it should be noted that some cost tracking is dependent upon the PAs ability to share this data, which has not been available in the past. The fallback position will be to report time rather than cost.
	Goal 5 [Custom]: Do we have any indication that the IOUs and the CPUC staff will participate in this plan? Previous experience with the Custom working groups was brutal. The CPUC staff rewrote the first working group report, substantially changing the conclusions from those that were agreed by the group. The IOUs were intransigent in the last iteration of the large project working group. I dropped out of the large projects group after six months because we couldn't get agreement on a two-page statement of principles that emphasized timely, consistent, and transparent communications among the program participants.	The IOUs and CPUC are represented on our PAC and have engaged in the Custom discussions to date, providing valuable feedback about challenges and opportunities. Cal TF staff model the approach based on what worked for deemed portfolio solutions – we gather stakeholder input to understand challenges and potential solutions; we gather technical input to build consensus; and we will use a stage gate approach to establish buy-in at key milestones. (Edits made to clarify stage gate approach.)
	Goal 5: Do the implementers of Custom projects endorse the approach of standardizing measures and adding them to the eTRM? If they do, how many measures do we/they think are subject to this approach and what percentage of the total program savings do these measures represent? My understanding is that several years ago, before the utilities and the staff became disenchanted, the large project Custom program produced 15-20% of total portfolio savings. Do we think that this approach is really applicable to large Custom projects of the type we want to resurrect, or is it more aimed at small projects?	Implementers are lead stakeholders in the effort to develop standardized measures and contributed to the measure selection process based on which measures benefit from standardization. Ensuring the work is “used and useful” is a core value in scoping effort. We are using both anecdotal stakeholder input and analysis of past program data to identify best opportunities for standardization. It is not a goal to standardize all custom measures.
	Goal 6: what are “ongoing white papers?” Are these papers that are subject to continual updating based on new information?	These are existing white papers that we may want to expand. Updated wording to clarify.
Emily Lemei (NCPA)	Confirmed no comments on draft BP	n/a
John Zwick (SDG&E)	10/14: I have attached SDG&E comments on the business plan. Most of these are very consistent with prior discussions. Mostly editorial/clarifying suggestions. I have also suggested	Edits and comments address in the updated draft plan.

	<p>a column that specifies whether a workplan is necessary, which might be helpful to ensure everyone is aligned. [See attachment]</p>	<p>We added a column to indicate when an additional workplan is required; and we added an Endnote to describe the Workplan requirement.</p>
	<p>Metric 1B: “Permutations seem to be expanding drastically, so I would suggest placing a priority here. In my past experience, this area can degrade over time and can create a hole that is very difficult to get out of.”</p>	<p>In past we've discussed developing a TPP on when permutations should be limited because the differences between permutations is not statistically significant. I think it would be helpful to re-visit this project. We can manage performance through monitoring but we can also manage through limiting permutations that don't add value.</p>
	<p>Metric 1C: Added " Track and prioritize reported bugs and work with developer to schedule fixes and associated regression testing, separately or as a part of a scheduled sprint, depending on severity and impact.”</p>	<p>Suggest we also institute an even more QA/QC process before new releases are added to minimize "bugs." The QA/QC process can expand to include not just unit testing, but also Automated and continuous (nightly) integration testing with common data sets and expected outputs. In addition, we should track bugs but also "root cause" of bugs to ensure software development practices minimize bugs.</p>
	<p>Metric 2B: “Suggested placeholder on tactics to consider: <ul style="list-style-type: none"> • Post eTRM Governance Plan publicly to eTRM so registered users can subscribe to updates. • Future plan updates to be posted at least 90 days prior to being adopted. • Governance Plan needs to identify business items triggered by CPUC Energy Division and references. • Business items that are initiated and proposed outside of the CPUC Energy Division regulatory process should involve a stakeholder voting process (akin to new measure screening process).” </p>	<p>These suggested tactics relate to ensuring stakeholders have complete, useful, and timely notifications of measure package changes – including the type and impact of the change. This is not a part of Metric 3B, Governance Plan.</p> <p>We added Metric 3C: “Develop Versioning Rules and Stakeholder Communication for Measure Package Updates” to develop strategies to notify stakeholders of significant updates and impacts of those changes (e.g., measure expiration), distinct from regular/ongoing notifications. This may result in a TPP to define/clarify guidance on MP versioning policy (e.g., what changes, where is the change, when is the change effective)</p>
	<p>Metric 3A: RE: Tracking measure metrics: “The CalTF technical team could talk about this. There may be some way of making this collection mandatory, but there may be some concern on sharing costs etc. But maybe we could create a short mandatory survey that includes ranges. Less precise, but maybe more accessible.”</p> <p>“I do see value for collecting metrics only if the metric can be parsed in to common buckets so the data is meaningful. For example, a metric for 1) cost updates 2) E+ modeling 3) characterization 4) supporting data changes 5) calculations updates”</p>	<p>Agree would be helpful to parse in buckets and provide ranges with explanations. At a minimum, would help CPUC understand cost impacts of updates and perhaps some judgments could be made on which updates really merited given cost. No edits made.</p>

	<p>Goal 3: Added “Develop/identify appropriate communication channels to notify statewide stakeholders (including IOUs, POUs, CCAs RENS and third-party implementers) of measure additions, updates, and retirements.”</p>	<p>Created new Metric 3C to include this.</p>
	<p>Goal 4 – Measure Identification: I totally support his area of focus. When I speak to the program portfolios and 3P implementers and attend statewide policy meetings, I definitely hear the need to develop new measure to increase savings and support state policy objectives. This is a big elephant though and likely a multi-year objective. It would be important to refine the scope through a charter, etc. for the appropriate deliverable for PY2023.”</p>	<p>Agree on importance of New Measure ID. Agree that the area of Measure Identification would benefit from a Work Plan and possibly a Road Map.</p> <p>We created a separate Metric (4A) to separate Measure ID (requires workplan) from the Measure Screening Activities (Core work).</p>
	<p>Goal 4 – Measure ID: “Low Income programs such as ESA have different rules for assigning savings and they don’t necessarily need to use active measure packages. They also have different rules for cost effectiveness Not sure we want to get into the Low Income space</p> <p>However, the EE portfolio allows for equity programs, which could support measure without traditional cost effectiveness constraints. This aspect could be in scope.” ... “Low Income is a whole different world with its own stakeholders and rules. I am suggesting that we keep low income out of scope for CalTF.”</p>	<p>We removed Low Income from the list of potential new measures given the different funding source and savings rules.</p>
	<p>Goal 5, Custom: “This section seems a little broad. I understand the need to develop the roadmap but to the extent that we identify short term deliverables through the business plan process, we should identify them specifically.” ... “Three items that we have been discussing:</p> <ul style="list-style-type: none"> • Custom calculation tools (seems to be included) • Disposition database: migrate to eTRM and implement better governance, standardization search. We also spoke about creating digests or summaries of key items along with a process to incorporate key dispositions into guidance documents (don’t see this explicitly) 	<p>Custom calculation tools is already included in the list based on 2022 BP and TF discussions. The other activities were discussed at the recent charette and will be developed in the Custom Roadmap activities (Metrics 5A and 5B) to determine value, prioritization, and approach.</p> <p>Added the following language to Metric 5A: “Develop plan to improve approach to summarizing and providing clear CPUC guidance on custom projects.”</p>

	<ul style="list-style-type: none"> Standardize reporting codes for custom (claims are assigned to by measure type or category; all IOUs are doing differently)” 	
	Goal 5 - This section will have the most feedback from different stakeholders and there may be different points of view. It may not be possible to reach alignment on the appropriate scope for 2023 in the business plan. However, through the workplan development, we will need to reach that level of alignment”	Updated BP to indicate that each Goal 5 metric requires a Workplan.
Josh Rasin (SMUD)	10/14: No comments (from Olof Bystrom)	n/a
Marc Costa, TEC	No comments and looks good. The only clarification is whether the PAC would review or provide input on the White Paper in Goal 6. Otherwise the document is broad enough that there is lots of room for accommodating what may be a very interesting year or two with CPUC programs. See attached. Between the EE intervenor testimony due at the end of the month and the attached OIR [1], it seems that Cal TF / PAC may want to consider (in Goal 8) how to be positioned to capture a wider net beyond EE.	<p>Re: Goal 6 White Papers: PAC affirms TPP and TF affirms White Papers. White Papers are typically scoping memos and lead by TF members. Added definitions of TPP and White Paper to the Business Plan.</p> <p>Re: “Beyond EE” discussions will fit within the Goal 8, 5-year roadmap Metric.</p>
Martha Garcia (SCG)	11/1: There are no comments from us other than the ones expressed during our CalTF meetings on promoting hybrid measures for the Custom area and focusing on Technical Position Papers that focus on dual fuel gas and electric measures.	<p>Hybrid Measures – the custom subcommittee is working on the measure standardization efforts.</p> <p>TPP – We conduct a stakeholder solicitation, prioritization, and PAC affirmation process for the final TPP topic(s).</p> <p>Added “dual fuel electric and gas measures” to the list of potential topics.</p>
Peter Miller (NRDC)	Confirmed no comments on draft BP	n/a
Scott Fable (PG&E)	No comments received	n/a
Steve Starks (SCPPA)	Confirmed no comments on draft BP	n/a
Will Vicent (CEC)	Confirmed no comments on draft BP	n/a

[1] ORDER INSTITUTING RULEMAKING TO DEVELOP POLICY AND CREATE A CONSISTENT REGULATORY FRAMEWORK FOR DISTRIBUTED ENERGY RESOURCE CUSTOMER PROGRAMS