2023 BP METRIC 5X: CUSTOM INITIATIVE

DRAFT FOR STAKEHOLDER REVIEW

Send comments to arlis.reynolds@futee.biz by April 10, 2023

Goal 5 in the 2023 Cal TF Business Plan (BP) includes five metrics related to custom measures:

* Task 5A. Gather, Organize, and Prioritize existing custom guidelines, tools, and resources being used by POUs, IOUs, and Implementers
* Task 5B. Finalize High-Level Custom Roadmap by 2023 Q2
* Task 5C. Develop and Implement Statewide Methods for three Custom Measures
* Task 5D. Update eTRM Documentation
* Task 5E. Implement select POU and statewide TRM tools/calculators in the eTRM

Collectively, these metrics are referred to as BP Metric 5X and make up the Cal TF Custom Initiative. This workplan describes the scope, approach, schedule, and resource needs for the Cal TF Custom Initiative.

In addition to this workplan, the Cal TF is developing a While Paper focused on recommendations to improve the Industry Standard Practice (ISP) process.[[1]](#footnote-1) The ISP White Paper has several objectives related to custom measures and projects, including: 1) streamlining the ISP process, 2) making ISP more accessible, transparent, information, and up-to-date, and 3) supporting clarifications where needed in the ISP guidance.

# Problem Statement

Over the past decade, custom stakeholders have invested significant resources towards streamlining custom processes and improving outcomes. The CPUC has implemented strategies to improve Custom Project Review (CPR). CPUC, IOU, and implementer staff have participated in working groups to increase statewide standardization, develop documentation to clarify CPUC and program policy, and implement other program improvements. Similarly, each IOU is investing in internal systems and tools to improve custom project review processes, cost-effectiveness, and quality. Stakeholders maintain multiple standing meetings to provide regulatory, program, and project updates and to communicate and coordinate information and improvement initiatives. Despite these efforts, custom project stakeholders continue to report challenges and participation and savings in the custom program continues to decline. These challenges include:

* Challenges accessing, understanding, and staying up to date with current regulatory policy and guidance
* Uncertainty and perceived inconsistencies in the data and documentation requirements for custom measures
* Long time periods and associated costs to develop and review a custom project
* Lost and limited opportunities, especially for small custom measures and projects, due to the high cost of developing custom projects
* Different systems, tools, and processes across PAs such that implementers working statewide may have different experiences depending on the PA

Many of the reported challenges are similar to those experienced with deemed measures and programs and addressed through successful Cal TF efforts such as workpaper consolidation, regulatory reviews, and eTRM development and implementation. This Custom Initiative aims to apply successful Cal TF strategies and tools to address key challenges and achieve broad benefits for all custom stakeholders.

# Goals, Metrics, and Objectives

The Table below shows the target objectives for each task in this initiative.

|  |  |
| --- | --- |
| **Task** | **Goals, Metrics, and Objectives** |
| 5A – Gather, organize, and prioritize existing custom guidelines, tools, and resources being used by POUs, IOUs, and implementers | * Improve stakeholder awareness, access, and understanding of custom regulatory guidance and policy
* Improve ability for new stakeholders to understand custom policies and processes
* Establish a statewide Measure ID structure for custom measures
* Identify and prioritize custom measures that are good candidates for standard methods and tools and/or hybrid methods
* Identify and make accessible tools to support custom measure development
* Prioritize identified custom improvement recommendations
 |
| 5B – Finalize High-Level Custom Roadmap by 2023 Q2 | * Establish high-level scope, priorities, and schedule for future Cal TF activities to support the custom portfolio
* Develop framework for Custom Initiative tactics in future Business Plans
 |
| 5C – Develop and implement statewide methods for at least three (3) custom measures | * Develop statewide standard methods and tools that clarify requirements, improve consistency, and reduce time and costs to develop custom measures
* Establish a formal process for development, review, updates, and approval of statewide custom measure packages and tools
 |
| 5D – Update eTRM documentation as needed | * Develop user-friendly eTRM documentation to support any eTRM development for Custom
 |
| 5E – Implement select POU and statewide TRM tools/calculators in the eTRM | * Develop functional specifications to host custom measures and resources in the eTRM
* Implement custom measures and resources in the eTRM
* Develop a stakeholder-supported vision for how the eTRM can support the custom portfolio
* Define eTRM Custom Modules to support the eTRM Custom vision
 |

## Stakeholder Benefits

Cal TF anticipates the following benefits:

* **Transparency**, by compiling, organizing, and improving access to custom resources
* **Statewide consistency and standardization**, by developing statewide Measure ID structures, measure-specific calculation methods and tools, and processes for future statewide measure methods
* **Time and cost savings,** by centralizing and improving access to key resources, supporting clarification of regulatory policies, providing tools and resources that support measure development
* **Stakeholder engagement**, by collaborating with stakeholders to understand challenges and prioritize the most impactful improvements, and by building on past and current stakeholder efforts to streamline and improve custom program activities and outcomes
* **Increased participation and savings**, by improving access to statewide guidance and tools, improving certainty in outcomes, and reducing the cost of developing eligible custom projects.

# Scope

This section describes the objectives, approach, and deliverables for each task in the Custom Initiative.

## Task 5A. Gather, Organize, and Prioritize existing custom guidelines, tools, and resources being used by POUs, IOUs, and Implementers

This task involves multiple activities related to gathering, organizing, and reviewing custom resources and data to inform streamlining opportunities. Across the following activities, Cal TF will identify opportunities to improve statewide standardization; stakeholder access and transparency; clarity, consistency, and accuracy of stakeholder resources; and other streamlining goals. Cal TF will then facilitate stakeholder input to prioritize implementation of identified improvements.

### 5A-1. Custom Regulatory Summary and Review

Challenge: Regulatory policy and guidance stems from different sources (e.g., decisions and resolutions, clarifying memoranda, project-specific early-opinions and dispositions), resides in different locations (e.g., CPUC website, separate PA-managed websites, public disposition database, limited-access database, project-specific documentation files), and is not consistently announced or accessible to all custom stakeholders. The different sources, formats, locations, and accessibility of rules and guidance makes it difficult for existing stakeholders to stay up-to-date on current guidance and for new stakeholders to understand the guidance; and stakeholders expend significant resources to track and communicate guidance updates.

Objective: Summarize the sources and scope of existing custom regulatory guidance and develop recommendations to improve access and clarity for all stakeholders.

Approach:

* Cal TF Staff will gather and summarize existing resources for custom regulatory policy and guidance information. Cal TF Staff will work with stakeholders to characterize these resources in terms such as scope, ownership, accessibility, update status, update frequency, clarity, and usefulness.
* Cal TF Staff will review materials and solicit stakeholder input to identify areas of overlap, conflict or inconsistency, out-of-date information, or that require clarification.
* Cal TF Staff will work with stakeholders to identify and prioritize recommendations to improve access, accuracy, and clarity of regulatory policy and guidance information.

***Deliverables***:

* Summary of custom regulatory resources, policy, and guidance resources, including ownership and accessibility levels
* Proposal to improve approach to summarizing and providing clear guidance on custom projects

### *5A-2. Statewide Custom Measure ID*

Challenge: There is no statewide measure code list or common structure for custom measures. Each PA has its own set of measure codes that use different structures and levels of granularity, making it difficult to identify similar measures across PAs and analyze statewide custom measure activity.

Objective: Establish a Statewide Measure ID structure for custom measures

Approach:

* Cal TF Staff is reviewing existing PA-specific custom measure code data to identify ways to characterize and group custom measures in a consistent way.
* Cal TF Staff will facilitate stakeholder input on proposed measure code structures that (1) enable consistent measure identification across the statewide custom portfolio, (2) follow a similar structure as the SW deemed measure codes, and (3) support implementation of custom measures in the eTRM.
* Cal TF Staff will develop a final Custom Measure ID proposal based on stakeholder input and present for TF affirmation.
* Cal TF Staff will provide stakeholders with a final mapping table to map existing PA-specific measure codes to the appropriate SW Measure ID.

***Deliverables***:

* Proposed Statewide Measure ID Convention for Custom Measures
* Table to map existing PA-specific measure codes to proposed SW Measure ID

### 5A-3. List of Measures for Statewide Custom Measure Packages

Challenge: There is no central, up-to-date source of measure-specific guidance on common custom measures[[2]](#footnote-2) for which there are common approaches to estimating and validating energy savings. This leaves requirements unclear and up to the discretion of a project reviewer, and stakeholders have shared that requirements for similar measures have differed based on the project reviewer.

Objective: Identify and prioritize the list of custom measures that are good candidates for developing statewide calculation methods and/or tools, including candidates for hybrid measure development

Approach:

* Cal TF will use the following approaches to identify common custom measures:
	+ Collect custom measure activity and claims data (for the past five years if possible) to identify the frequency and savings from common custom measures that appear in the custom program and solicit input from stakeholders including project developers and reviewers, regarding which measures are appropriate (i.e., a standard method/tool can be developed) and would most benefit (e.g., increase measure frequency) from a standardized method and/or calculation tool.
	+ Review existing measure-specific calculation guidance documents and tools (e.g., Custom Calculated Savings Guidelines) and solicit stakeholder input on which measures and methods are relevant for the current custom program.
	+ Solicit input from stakeholders, especially project developers and implementers, regarding measures not currently seen (e.g., because they are too small to develop a project) that may become common if a standard calculation method was available.
* Cal TF will compile the list of common custom measures that are good candidates for standard methods and/or tools and will:
	+ identify which measures could be candidates for a simplified “hybrid” calculation approach
	+ identify which measures could be supported by an existing custom calculation tool and which measures would benefit from a custom tool
	+ prioritize the list for statewide standardization efforts based on a combination of level of effort required for standardization and potential savings impact.

***Deliverable***: List of custom measures recommended for SW standard and/or hybrid methods.

### 5A-4. List of Custom Tools

Challenge: The Custom Tool Archive (CTA) provides a list of tools that can be used for custom measures, but the list has not been maintained up-to-date and is not accessible to implementers and project developers. PAs and implementers have developed their own tools and often share those tools with stakeholders; but stakeholders may not be aware of or be able to access the full list of available and relevant tools.

Objective: Identify and characterize existing custom tools that stakeholders may use to develop custom projects.

Approach:

* Identify and gather tools have that been used develop custom measures. Cal TF Staff work with stakeholders to identify and request available tools. Sources include: the CTA, CPUC team, IOU and POU Staff, implementers and project developers.
* Characterize the tool use, status, and potential for statewide use. Cal TF will develop a framework to characterize relevant tool information (e.g., type of measure(s) the tool supports, whether the tool is up to date with policy and data, whether the tool has supported approved projects) and solicit input from stakeholders, including the CPUC team, regarding the use, quality, and any update needs for the tool.
* Compile selected tools into a public Custom Library with relevant summary information (e.g., recommended use and status).
* Identify and prioritize needs to improve the library of useful tools (e.g., tool updates, expansion, CPUC review/approval, and/or new tools).

***Deliverables***:

* List of characterized custom tools submitted to CPUC, used by POUs, and/or used by implementers and project developers over past five years
* Public Custom Library of custom tools with summary information
* Prioritized list of needs to update, seek approval, and/or develop custom tools

## Task 5B. Finalize High-Level Custom Roadmap by 2023 Q2

Challenge: Previous working groups, studies, and Cal TF discussions have identified goals and activities, including potential multi-year efforts, to address challenges and support streamlining and other custom improvements. Activities in this Custom Initiative will identify additional improvement activities. There is need to aggregate improvement needs and opportunities, assess which areas Cal TF can provide support, and prioritize and plan selected improvements to achieve custom stakeholder benefits.

Objective: The Cal TF Custom Roadmap will outline the high-level scope, priorities, and schedule for future Cal TF activities supporting the custom portfolio and provide a framework for Custom Initiative activities in the annual Cal TF Business Plan. Cal TF will develop the Roadmap based on ongoing stakeholder input, findings from the 2023 custom activities (i.e., this workplan), and analysis of the relative impact of each activity.

Approach:

* Compile target outcomes and potential activities to achieve those outcomes collected from previous working groups efforts, studies, the Custom Charette and other Cal TF meetings, and stakeholder input.
* Work with stakeholders to characterize the outcomes and activities based on relative impact, level of effort, stakeholder benefits, and timing considerations, and other factors to support prioritization efforts.
* Solicit input from the CPUC team on feasibility and priorities among potential activities.
* Facilitate a Custom Charette to review, prioritize, scope, sequence custom improvement efforts and goals for a 5-year timeline.
* Develop draft Custom Roadmap for review by the Custom Subcommittee and TF.
* Submit the revised Custom Roadmap to the Custom Subcommittee and TF for affirmation.
* Submit the Custom Roadmap to the PAC for affirmation.

#### Deliverables

* Summary of characterized custom improvement goals and activities
* Draft Custom Roadmap
* Final Custom Roadmap

## Task 5C. Develop and Implement Statewide Measure Packages for three Custom Measures

Objective: The goal of a Custom Measure Package is to provide a central, statewide, and Cal TF-approved resource for developing custom measures. The Custom Measure Package supports measure development by describing relevant eligibility and policy considerations, providing a common approach and tools for estimating and validating energy savings, and describing data collection requirements.

Approach: This task includes two parts: (1) developing statewide custom measure packages (e.g., methods and tools), and (2) establishing the development, review, and affirmation process for future custom measure standardization efforts.

### 5C-1. Statewide Custom Measure Packages

In 2022, the Custom Subcommittee formed working groups to develop statewide measure packages for the following selected custom measures:

* Boilers and Boiler Add-On Equipment
* Chiller System Upgrades
* Retrocommissioning
* Pump Systems
* VFD for HVAC Fans

The working groups will continue working to complete the measure package, including includes a definition of the measure and eligibility requirements, description of savings calculation approach, data collection and M&V requirements, and any associated references and calculation tools.

Cal TF will seek input and support from the CPUC on the draft statewide measure package, with the goal of gaining CPUC approval of statewide methods and tools.

Working groups will present completed measure packages to the Custom Subcommittee for review and affirmation.

#### Deliverables

* Completed Measure Package for at least three measures, presented to Custom Subcommittee for affirmation.

### 5C-2. Custom Measure Package and Tool Development and Update Workflow

The ongoing efforts to develop statewide custom measure packages (Activity 5C-1) highlighted the need and benefits for a formalized approach to developing, reviewing, and updating statewide custom measure package and a desire to solicit CPUC approval of developed measure packages, similar to the development workflow for deemed measure packages. Stakeholders want to know that the methods and tools be useful, accepted by IOU and CPUC reviewers, and maintained up to date.

Objective: Cal TF will develop a proposed workflow for the development, review, affirmation/approval, and update of future custom measure packages and tools.

Approach: This effort will leverage the existing deemed measure package development process, adapting the approach to the custom program and leveraging lessons from the initial custom measure standardization efforts. Cal TF Staff will:

* Draft a workflow for development, review, approval, and update of statewide custom measure packages, using the existing deemed measure package workflow as a base, considering streamlining opportunities and options to use eTRM tools to support workflow, documentation, transparency, and statewide consistency.
* Solicit input from custom stakeholders, including the CPUC Ex Ante Review team, on the proposed workflow.
* Develop a draft workflow proposal for Custom Subcommittee and TF review and affirmation.

#### Deliverables

* Custom Measure Package Development and Update Workflow, presented to TF for affirmation
* Assessment of potential to implement approved workflow in eTRM

## Task 5D. Update eTRM Documentation (as needed)c

As Cal TF incorporates custom resources and measures into the eTRM, Cal TF Staff will develop and/or update eTRM documentation as needed. Initial documentation will be a final custom measure version of the eTRM Measure Characterization template.

Cal TF Staff will identify additional eTRM materials needed based on the selected implementation efforts and will develop draft materials for stakeholder review.

#### Deliverables

* eTRM Custom Measure Characterization Template
* (Additional documentation depends on selected eTRM enhancements)

## Task 5E. Implement select POU and statewide TRM tools/calculators in the eTRM

In 2022, Cal TF Staff presented [a memo](http://www.caltf.org/s/Custom-eTRM-Memo_FINAL2_2022-05-18-jmhp.pdf) exploring potential uses and benefits of the eTRM to support the custom portfolio. This initial analysis included options to centralize custom resources, standardize measure information and development, improve consistency between deemed and custom measures and methods, support QA/QC efforts for measure and project development, facilitate project review workflows, and centralize data tracking and reporting.

### 5E-1: eTRM Custom Phase 1

Phase 1 involves leveraging the existing eTRM features to host custom measure information, tools, and resources; it does not involve any project/customer-specific information in the eTRM.

Starting in 2022, Cal TF Staff worked with the Custom Subcommittee to develop business requirements to create custom measures, complete custom measure characterizations, create a custom library to host custom tools and resources, and link custom tools to custom measures.

Cal TF Staff then worked with the eTRM Software Developer to develop functional requirements and wireframes to define and demonstrate the proposed eTRM screens and functions and has revised these documents after several rounds of Custom stakeholder input.

Cal TF Staff will submit final wireframes and functional requirements for affirmation by the Custom Subcommittee and eTRM Development Team.

Cal TF Stakeholders will determine the implementation schedule for this initial Custom Module through the 2023 eTRM Enhancement process.

#### Deliverables

* Final eTRM Custom Phase 1 Functional Specifications and Wireframes
* Implementation of eTRM Custom Phase 1 (TBD)

### 5E-2: Additional eTRM Custom Modules

Cal TF will continue working with stakeholders and the eTRM Software Developer to examine the feasibility, costs, and value of distinct modules to develop eTRM development recommendations. These additional modules may include:

* Data intake module (savings parameter and calculated savings values)
* Measure calculations
* POU tools
* Developing custom projects
* Coordinating measure and project review workflows

Cal TF Staff will present and discuss additional module concepts to custom stakeholders for input and consideration and will work with stakeholders to develop the business requirements and functional specifications for prioritized custom modules. These discussions will help share the Custom Roadmap and inform potential eTRM development in future years.

#### Deliverables

* Custom eTRM Visioning Charette
* Draft business requirements and functional specifications for eTRM Custom modules

## Cal TF Custom Subcommittee

Cal TF will coordinate all activities through the Cal TF Custom Subcommittee, with topic-specific subgroups as needed, and will share updates at monthly TF meetings. The Custom Subcommittee meets monthly on the first Wednesday and is open to all stakeholders, and Custom Subcommittee meeting materials are posted on the Cal TF website.

Cal TF Staff also maintains a Custom Subcommittee SharePoint site to host resources and working materials for the activities within the Custom Initiative. This SharePoint site is access-controlled, and stakeholders may request access through Cal TF Staff.

Final deliverables developed through the Custom Subcommittee will be presented to the TF for input and affirmation.

#### Deliverables

* Custom Subcommittee materials maintained on Cal TF website

## Potential Obstacles and Preliminary Solutions

**Data Access**. Several activities in this initiative rely on materials and data that are not publicly accessible and/or that contain confidential information. Cal TF Staff will work with stakeholders to identify the most efficient methods of accessing these resources.

Anticipated data requests include:

* Non-public regulatory guidance resources (e.g., hosted on CMPA, IOU sources, and provided through project-specific dispositions and communications)
* Population data for custom measure activity (not including customer information)
* Data and documentation from the CAEnergyGuidance.com resource
* Custom Tool Archive (CTA) and other tools used to develop custom measures
* Selected project- or measure-specific standard practice research and determinations

**CPUC Engagement and Support**. A core tenant of Cal TF initiatives is to provide work products that are “used and useful” and to create tangible stakeholder benefits. The CPUC Custom Review team is a key stakeholder in this effort, especially since several of the activities in this initiative address regulatory guidance and processes (e.g., custom project review). It will be critical to solicit and incorporate CPUC input early and throughout the process, and to establish checkpoints at key milestones to ensure buy-in on recommendations and tools. Cal TF Staff will establish regular check-ins with the CPUC Custom team to provide progress updates and schedule key milestones for CPUC input. Cal TF Staff is also exploring ways to measure stakeholder benefits to demonstrate anticipated time and cost savings and alignment with CPUC goals for savings activity, cost-efficiency, and market participation.

# Schedule

The following are key milestones for the Custom Initiative in 2023. Cal TF Staff will provide monthly updates on the status and progress of each activity at the monthly Custom Subcommittee and TF meetings.

|  |  |
| --- | --- |
| **Task** | **Key Milestones** |
| 5A – Gather, organize, and prioritize existing custom guidelines, tools, and resources being used by POUs, IOUs, and implementers | * Summary of Custom Regulatory Guidance Resources – **April 2023**
* Draft Custom Measure ID Structure and Mapping for Stakeholder Review – **May 2023**
* Affirmation of Custom Measure ID Structure – **TBD**
* List of statewide measures and tools – **July 2023**
 |
| 5B – Finalize High-Level Custom Roadmap by 2023 Q2 | * Draft Custom Roadmap for Stakeholder Review – **July 2023** [2]
* Affirmation of Custom Roadmap – **October 2023**
 |
| 5C – Develop and implement statewide methods for at least three (3) custom measures | * Custom Measure Characterizations for Review – **June 2023** [1]
* Proposed Custom Measure Development, Review, and Approval Process – **July 2023**
* Affirmed Custom Measure Characterizations – **TBD**
 |
| 5D – Update eTRM documentation as needed | * TBD based on 5E implementation schedule
 |
| 5E – Implement select POU and statewide TRM tools/calculators in the eTRM | * Final Custom eTRM Phase 1 Functional Specifications – **March 2023**
* eTRM Custom Visioning Charette – **July 2023**
* Draft Vision for Custom eTRM Modules – **September 2023**
* Implementation of eTRM Phase 1 – **TBD** [3]
 |

[1] Schedule varies for measure subgroups and depends on concurrent tool updates

[2] Incorporates findings and recommendations from previous Cal TF activities

[3] Implementation timing depends on the 2023 eTRM enhancement schedule

# Stakeholders and Team Members

Cal TF Staff will lead this initiative with support, input, and engagement from key stakeholders, including Custom Subcommittee members and custom program stakeholders, TF members, Cal TF stakeholders, and CPUC Staff and consultants.

**Cal TF Staff**

* Cal TF Staff Lead: Arlis Reynolds
* Additional Cal TF Staff and Subcontractors will provide technical and task support key areas, including regulatory review, SW custom measure ID, statewide custom methods and tools, and eTRM design and development.

**Custom Subcommittee Members and Champions**: All Custom Initiative activities will engage the Cal TF Custom Subcommittee; Cal TF Staff will recruit TF Champions for specific tasks and coordinate subgroups and ad hoc meetings as needed for focused stakeholder input. Current and anticipated subgroups include:

* Measure Package Subgroups (Activity 5C-1)
* Custom eTRM Modules (Activity 5E)
* ISP White Paper (Activity 6B)

**TF Members.** Cal TF Staff and Custom Champions will provide updates to the TF, solicit input from TF members, and submit key deliverables to the TF for review. All TF members are welcome to participate the monthly Custom Subcommittee meetings.

**CPUC Staff and Consultants.** Cal TF Staff will coordinate monthly check-ins with the CPUC Custom team and provide regular updates to keep the CPUC team informed of progress, findings, and key milestones for CPUC input.

**CPUC/IOU Statewide Coordination.** Cal TF Staff will attend the monthly SW Custom Coordination meeting to provide updates and stay informed of relevant discussion and efforts that may inform or benefit from the Cal TF Custom Initiative.

**Cal TF Funder and Stakeholder resource needs**: Several of the tasks in this custom initiative rely on materials and/or data that is not publicly available or that may contain confidential information. This includes current and historical data on the population of custom measures and projects; tools and resources hosted on the CMPA or non-public IOU sites; and project-specific materials and dispositions. Cal TF Staff will work with stakeholders to gain access to these materials and/or prepare data requests where appropriate. Cal TF Staff will coordinate across tasks to minimize data requests.

# Budget

Cal TF Staff will conduct this activity within the approved Cal TF budget.

# Affirmation

This workplan requires TF affirmation.

1. The TF affirmed this White Paper topic in the January TF meeting. [↑](#footnote-ref-1)
2. Common custom measures refers to measures for which similar engineering principles apply and for which similar savings estimation methods and/or tools can be developed. [↑](#footnote-ref-2)