

Update on Measure Review



CALIFORNIA
TECHNICAL FORUM

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Overview



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- Cal TF is not significantly improving measure development and review speed
 - Some measures have benefited: i.e. Retail Product Portfolio
 - ✦ Not enough to justify the value of 35 expert peer reviewer's volunteer work
- Cal TF staff analysis reveals that the vast majority of EAR team feedback has not improved measure quality
 - 45 dispositions comments on 7 of 19 measures reviewed
 - Only one indisputable substantive error
- Process improvement recommendations in “Next Steps” memo would prevent cost inefficiencies moving forward
 - Essential for eTRM success

Measures Reviewed

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- Commercial Condensing Unit Heaters
- LED Recessed/Surface Mounted Panels
- LED Menu Boards
- Tier 2 Advanced Power Strips (Re. and Comm.)
- ENERGY STAR Set Top Boxes
- Residential Products Portfolio
- Commercial Dishwashers
- Commercial Variable Speed Pool Pumps
- Circulating Block Heaters
- Clothes Washer Recycling
- DC Commercial Pool Pumps
- DI LED Retrofit Kits for Prop 39 Schools
- Ductless Mini Splits
- Residential HVAC Quality Installations
- LED Tubes
- Laminar Flow Restrictors for Health Care
- Variable Refrigerant Flow HVAC Systems
- Efficient Pumps

Timeline Analysis: Of 20 Abstracts Submitted to Cal TF



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Abstracts Submitted for Cal TF Review	Abstracts Submitted for Cal TF Review	WPs Approved by Cal TF	WPs Approved by Cal TF
Received Early Feedback from EAR Team	Completed by Developer and Approved by TF	Submitted for Final EAR Team Approval	Measure Accepted with no Comment from EAR Team
5	12	8	1
Average Turnaround Time	Average Turnaround Time	Average Turnaround Time	Average Turnaround Time
-	5 Months	4 Months	-

Disposition Analysis: Of 45 Comments Received on 7 Workpapers



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Type of Disposition Comments

Interpretation of Policy	Interpretation of Best Available Data	Misreading of WP Data or Approach	Conflicting or Unclear Guidance	Database Formatting	WP Error	Other
5	20	12	11	7	1	1

Examples of Disposition Comments



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- **Interpretation of policy**
 - Choice of baseline (PG&E RPP)
 - ✦ Code minimums versus assumption that high efficiency appliances are replaced in pairs
 - Justification for measure costs of zero (PG&E RPP)
 - ✦ No interveners protested after AL was filed
- **Interpretation of “best available data” standard**
 - Inclusion of 9-person “friends and family” study (Tier 2 APS)
 - Dismissal of educated assumption of sound bar power draw without suggesting other available data to use (RPP)
- **Misreading of WP data or approach**
 - Rejection of a Prop 39 retrofit measure because it did not address opportunities for brand new lighting systems (LED Retrofit Kits)
 - Use of DOE data instead of California study (Clothes Washer Recycling)
- **Conflicting or unclear guidance**
 - Should persistence be included in EUL or installation rate? (Tier 2 APS)
 - Application of interactive effects for installations in unconditioned effects (RPP, Clothes Washer Recycling)
- **All could have been prevented or addressed with dialog before dispositions were written during measure review process**

Case Study: Clothes Washer Recycling



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- **Claimed 90% reduction in savings**
 - Only 50% can be explained by logical error missed by Technical Forum review
- **Remaining reductions are attributed to disputable charges/changes from EAR team:**
 - Erroneous claim that WP assumes market viability for all units
 - ✦ WP assumed no viability in two separate instances
 - Rejection of chosen metered base and calculated measure case data in favor of arguably less robust support
 - ✦ Each chosen set represented “best available” data – most recent and reputable
 - Request that use of interactive effects be reduced based on previously unknown DEER assumption
 - ✦ Previously workpapers simply applied interactive effects to all units
 - ✦ Accounting for full effects of new recommended approach would have a more limited reduction in savings than reflected in the disposition
 - Claims erroneous use of coincident demand factor
 - ✦ EAR team had previously requested RPP WP use now rejected source of CDF
 - Unsupported assertions of wrongful use of data – based on study title, not substance
- **Every change made by the disposition picks most conservative available option**
 - Open, transparent discussion is the best way to prevent such systematic bias in the future

Proposed Process Improvements



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- CPUC Staff Identification of Pre-Existing Guidance
- Collaborative Measure Review, with Early and Ongoing Staff Input
 - ❑ Reduce length of written dispositions and focus on dialog
- Establish a Process for Interim Value Approval
- Instead of “More Data” as Condition of Measure Approval, Approve Measure Funds and Develop Clear Process for Early EM&V During Program Implementation
 - ❑ Per Commission, “Perfect should not be the enemy of the good”
- Commission Approval of Final Values
- Develop Shared Collaborative Guidance Principles
 - ❑ Commitment to Full Disclosure
 - ❑ Willingness to Listen, See Value in Other Perspectives, Allow Opinions and Outcomes to Evolve Accordingly
 - ❑ Focus on Objective Fact Based Arguments
 - ❑ Openness to Disagreement

Conclusions

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- Incremental process improvements will not be enough
- Cal TF staff working with CPUC Staff on implementing comprehensive process improvements *and* eTRM
- Success is contingent on *both* being implemented correctly