

PUBLIC UTILITIES COMMISSION

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To: Pacific Gas and Electric (PG&E)

From: Rashid Mir and Peter Biermayer, California Public Utilities Commission (CPUC)

Cc: R.13-11-005 Service Lists

Subject: 2020 EFFICIENCY SAVINGS AND PERFORMANCE INCENTIVE (ESPI)
PERFORMANCE SCORES

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I. Summary of 2020 ESPI Scores - Custom Projects and Workpapers

Pursuant to Decision (D).13-09-023, D.15-10-028, D.16-08-019, and D.20-11-013, California Public Utilities Commission (CPUC) Staff and consultants score the investor-owned utilities (IOUs) based on their performance during the pre-approval phase (or “ex ante” phase) of developing an energy efficiency project or measure. The ex ante review scoring is a part of the Efficiency Savings and Performance Incentive (ESPI) mechanism. D.20-11-013 placed a moratorium on awards payable under the ESPI but directed that ex ante review scoring shall continue. CPUC Staff and consultants completed the 2020 ESPI performance review scoring as prescribed in Table 3 of D.16-08-019. Decision D.16-08-019 established consolidated metrics to evaluate and further direct the utilities. Ordering Paragraph 19 of this decision states that the ESPI scores “shall be weighted for the utility program administrators based on the proportion of deemed savings and custom measures in each utility’s portfolio”.

A breakdown of PG&E’s 2020 ESPI performance score of 80.98/100 for workpapers¹ and custom projects is shown below in Table 1. PG&E’s 2020 total points is an increase over its 2019 total points of 80.66.² Scores for 2019 are provided in Table 2 on the following page.

Table 1: PG&E 2020 ESPI Scoring for Workpapers and Custom Projects

PG&E 2020 ESPI Performance Scores and Points		Workpapers				Custom			
		Metric Score	Metric Weight Factor	Points	Max Points	Metric Score	Metric Weight Factor	Points	Max Points
1	Timing and Timeliness of Submittals	2.50	10%	2.50	5	5.00	10%	5.00	5
2	Content, Completeness, and Quality of Submittals	3.90	30%	7.50	15	4.28	30%	12.85	15
3	Proactive Initiative of Collaboration	5.00	10%	5.00	5	4.20	10%	4.20	5
4	Due Diligence and QA/QC Effectiveness	3.37	25%	10.80	12.5	4.00	25%	10.00	12.5
5	Responsiveness to Needs for Process/Program Improvements	4.51	25%	12.50	12.5	4.25	25%	10.63	12.5
Total				38.30	50			42.68	50

¹ A workpaper documents the data, methodologies, and rationale used to develop values for deemed measures. A workpaper is prepared and submitted by program administrators and approved by the CPUC.

² 2019 custom project scoring began in July 2019.

Table 2: PG&E 2019 ESPI Scoring for Workpapers and Custom Projects

PG&E 2019 ESPI Performance Scores and Points		Workpapers				Custom			
Metric	Metric Area of Scoring	Metric Score	Metric Weight Factor	Points	Max Points	Metric Score	Metric Weight Factor	Points	Max Points
1	Timing and Timeliness of Submittals	2.50	10%	2.50	5	4.89	10%	4.89	5
2	Content, Completeness, and Quality of Submittals	3.90	30%	11.70	15	3.53	30%	10.59	15
3	Proactive Initiative of Collaboration	5.00	10%	5.00	5	4.40	10%	4.40	5
4	Due Diligence and QA/QC Effectiveness	3.37	25%	8.43	12.5	5.00	25%	12.50	12.5
5	Responsiveness to Needs for Process/Program Improvements	4.51	25%	11.27	12.5	3.75	25%	9.38	12.5
Total				38.90	50			41.76	50

The metric scoring area descriptions are expanded in [Attachment A](#). The final category scores are explained in more detail below as well as in [Attachment B](#) through [Attachment D](#) to this memo.

II. CPUC Staff Findings 2020 Activities

A. Custom Projects Review Overview

1. Summary of 2020 Achievements

From the period beginning January 2020 to the end of December 2020, PG&E submitted 2,256 custom projects to CPUC Staff for review selection. CPUC Staff selected 167 of these projects for review and issued 142 scored dispositions. A total of 20 PG&E projects selected for review in 2020 had dispositions issued in 2021 due to the timing of their selection.³ No review waivers were issued in 2020.⁴

A review of the project dispositions and the Review Process Score Enhancements points resulted in PG&E's custom project score increasing by 0.92 points over 2019 scores (41.76 in 2019 vs. 42.68 in 2020) as shown in Tables 1 and 2 above). PG&E continues to demonstrate efforts to improve its performance.

³ Projects selected by CPUC Staff at the end of 2020 were reviewed and disposed in early 2021 and therefore are not included in the 2020 performance scoring. The remaining 5 projects were withdrawn by the PA.

⁴ Review waivers are issued where CPUC Staff have not conducted an in-depth review of all of the submitted project documentation. CPUC Staff neither approves nor disapproves any aspects of this project. The project application is directed to proceed without further CPUC Staff review.

CPUC Staff's observations include:

- **Improvements in Documentation Submission Timeline.** In 2020 PG&E continued to submit the vast majority of projects (70 percent) earlier than required by Senate Bill (SB) 1131. Furthermore, 47 percent of their submissions were submitted five or more days earlier than required, signaling that PG&E is improving its document submission processes to meet timeline requirements.
- **Increased collaboration** through active participation in statewide initiatives and subgroups, and proactively introducing topics to CPUC staff on bi-weekly calls.

2. Summary of Areas Requiring Improvement

Areas that were most problematic, frequent, and/or need improvement include:

- **Improvements in Program Influence Documentation.** The proportion of issues regarding program influence went up from one percent of actions noted in the second half of 2019 to 5 percent of actions noted in 2020. PG&E continues to experience issues related to Net-to-Gross (NTG) and Program Influence and needs to work on providing sufficient documentation in the future.
- **Improvements in Gross Savings Impact Estimates.** In 2019 there were 24 issues regarding gross savings impacts representing 28 percent of all actions noted. In 2020 the number of issues related to gross savings impacts rose to 70, which represents 35% of all actions noted. While PG&E has shown progress in improving quality control of issues relating to gross impacts in the past, there is more work to ensure analysis assumptions and calculation methodologies are sound prior to document submission.

B. Workpapers Review Overview

1. Summary of 2020 Achievements

PG&E's workpapers scores have slightly decreased compared to last year by 0.6 points (from 38.90 in 2019 to 38.30 in 2020 as shown in Tables 1 and 2 above) which indicates that PG&E has generally maintained their practices for workpaper submittals. CPUC Staff observed improvements in PG&E's development and management of workpaper submissions in the following areas:

- **Leadership and management.** PG&E consistently shows they are effective leaders by managing more complex measures including linear lighting and the two behavioral workpapers for Home Energy Report and Universal Audit Tool. In addition, they lead the annual effort to update the statewide Rulebook.
- **Initiate collaboration and communication.** PG&E has demonstrated their initiative willingness to collaborate with the CPUC and stakeholders when it comes to supporting workpaper development while supporting SCE in the creation of five fuel substitution workpapers.
- **Due diligence and program improvements.** PG&E effectively sunset multiple workpapers due to low TRCs and market adoption and revised the NTG for workpapers

which have been offered by programs for >2 years.

2. Summary of Areas of Improvement

CPUC Staff highlight the following recommendations for improvement which are centered on improved QC and communication in light of the current transition to eTRM:

- PG&E reported that it reorganized its internal ex ante teams and introduced internal tools that are expected to improve the quality of the workpapers. However, workpaper reviews have continued to show errors and inconsistencies between the workpaper narrative and the workpaper data sheets.
- PG&E should be sure that they review the workpaper submittals for completeness. The duct seal measure had not listed the material type in the workpaper which caused multiple resubmittals and delays.
- PG&E should keep CPUC Staff informed of all workpaper development through workpaper plans. Plans should include detailed schedules that are updated in a timely manner as the workpaper development process evolves.

III. Discussion

The following sections of this memorandum provide a detailed description of the findings, including, areas of achievement, areas requiring improvement and scoring for both custom projects and workpapers.

A. Custom Projects Performance Review

Each year, CPUC Staff reviews a selected sample of custom project energy efficiency program applications. The review findings and directions to the PA are presented in documents referred to as “dispositions”. CPUC Staff acknowledges that prior to July of 2019, project applications were not always selected at random, rather selected based upon the type of projects that had past issues or projects where the CPUC expected to find deficiencies for various reasons. In 2020, projects were initially selected at random to adjust for this bias. However, due to the low numbers of projects submitted as ready for review, this became a challenge over the course of the year and CPUC staff had to adjust its selection based on customer incentive amounts, known past issues, measures not selected for review in the past six months, and new calculation methodologies. Projects were also selected to determine whether a utility has corrected issues from similar projects that CPUC Staff identified in the past, such as Savings by Design (SBD) projects using the EnergyPro software.

From the period beginning January 2020 to the end of December 2020, CPUC Staff selected 167 new PG&E projects for review and of those 142 received dispositions and none received a review waiver. A total of 20 projects’ dispositions were issued in early 2021 due to the timing at which they were selected.⁵ The comments below are organized by the five metric areas

⁵ Projects selected by CPUC Staff at the end of 2020 were reviewed and disposed in early 2021 and therefore are not included in the 2020 performance scoring. The remaining 5 projects were withdrawn by the PA.

of scoring prescribed in D.16-08-019 with metric scores shown prior to any enhancement points. A summary table of all issued dispositions, along with the dispositions individual score and feedback from the reviewer, is included in [Attachment B](#). [Attachment D](#) contains an embedded custom scores workbook that includes a tab with details on the individual project level disposition scores and feedback from the project reviewer.

Table 3 below presents the custom disposition points given to PG&E for each metric both with and without the addition of any Enhancement Points.

Table 3: PG&E Custom Disposition Points Awarded by Metric

Metric	Metric Area of Scoring	Weight Factor	Custom Disposition Points		Max Points
			With Enhance Pts	w/o Enhance Pts	
1	Timeliness of Submittals	10%	5.00	4.59	5
2	Content, Completeness, and Quality of Submittals	30%	12.85	12.85	15
3	Proactive Initiative of Collaboration	10%	4.20	4.20	5
4	PA's Due Diligence and QA/QC	25%	10.00	10.00	12.5
5	PA's Responsiveness	25%	10.63	8.13	12.5
Total			42.68	39.77	50

1. Timeliness of Submittals

In 2020, PG&E received a custom disposition score of 4.59 out of 5.0 for Metric 1 (Timeliness of Submittals) prior to the addition of any enhancement points. This disposition score was based on the 142 PG&E custom project reviews completed in 2020. Out of these 142 projects reviewed, 100 projects (70 percent) were submitted early while 20 projects (14 percent) were submitted late. Additionally, 67 of the 142 projects selected for review (47 percent) were submitted five days or earlier than required per the timeline mandated in Senate Bill 1131 and Section 381.2 of the Public Utilities Code⁶ leading to a loss of points under this metric. PG&E continues to meet expectations with regards to timeliness by submitting the large majority of projects on time and ahead of the required due date.

2. Content, Completeness, and Quality of Submissions

In 2020, PG&E received a custom disposition score of 12.85 out of 15.0 for Metric 2 (Content, Completeness, and Quality of Submissions) prior to the addition of any enhancement points. This disposition score was based on the completeness of the 142 PG&E custom project reviews. Of these 142 dispositions issued, 52 projects (37 percent) were approved without exception, 1 project (0.7 percent) was marked Advisory, and 13 projects (9 percent) were marked Prospective. In addition, CPUC staff project reviews exceeding the SB-1131 deadline resulted in 4 projects (3 percent) marked as Late dispositions (advisory only; does not impact the project). However, 18 projects (13 percent) were rejected and 54 projects (38 percent) were approved with noted deficiencies which resulted in a loss of points under this metric.

⁶ "The electrical corporation or gas corporation shall make the project application supporting documentation available to the CPUC for review within 15 business days of the CPUC review selection date".

Table 4 below summarizes the 200 action items identified across the 142 scored dispositions⁷ issued between January 1, 2020 and December 31, 2020. These action items illustrate errors that impacted the project's eligibility, documentation, and efficiency savings estimate calculations.

⁷ This table includes action items issued on 1 Advisory, 4 Late, and 13 Prospective dispositions.

Table 4: Summary of Categorized Action Items for Custom Projects

Issue Area	Action Categories	Summary of CPUC Staff Required Action by the PA:	Summary of CPUC Staff Notes or Instructions:	Total	Percent of Total
Issues Related to Gross Savings Impacts	Analysis assumptions	40	0	40	57%
	Calculation method	15	0	15	21%
	Calculation tool	1	0	1	1%
	M&V plan	14	0	14	20%
	Subtotals	70	0	70	35%
Process, Policy, Program Rules	Baseline	16	0	16	20%
	CPUC Policy	6	0	6	8%
	Did not follow previous CPUC guidance	1	0	1	1%
	Eligibility	17	0	17	22%
	ER preponderance of evidence	1	0	1	1%
	EUL/RUL	20	0	20	25%
	Fuel substitution	1	0	1	1%
	Incentive calculation	4	0	4	5%
	Measure cost	3	0	3	4%
	Measure type	3	0	3	4%
	PA program rules	3	2	5	6%
Self generation	2	0	2	3%	
Subtotals	77	2	79	39%	
Documentation Issues	Missing documents	3	0	3	13%
	Missing required information	18	0	18	75%
	Project scope unclear	3	0	3	13%
	Subtotals	24	0	24	12%
Issues Related to Net Impacts	NTG	4	0	4	40%
	Program influence	6	0	6	60%
	Subtotals	10	0	10	5%
Other Issues	Other 1 - Discrepancy between project documentation and bimonthly upload	12	0	12	63%
	Other 2 - Documentation Discrepancy	4	0	4	21%
	Other 3 - SPB > EUL	1	0	1	5%
	Other 4 - Measure naming	1	0	1	5%
	Other 5 - Installation Verification	1	0	1	5%
	Subtotals	19	0	19	9%
Grand Total		200	2	202	100%

Specific examples of project and measure level deficiencies are provided below.

- **EUL Does Not Exceed Simple Payback** was a deficiency discovered in 2 out of the 142 projects reviewed which resulted in a significant reduction in points for this metric. Sampled projects containing this deficiency were CPUC Project IDs 359 and 396.

- **Fuel Substitution Test Failed** for one sampled project (CPUC Project ID 396), and due to the importance of this test, the project received the minimum points under this metric.
- **Non-IOU Energy Source Not Accounted for** occurred on two projects (CPUC Project IDs 292 and 339) and resulted in the loss of significant ESPI points for this metric due to the importance of accounting for all energy sources included in a project.
- **M&V Plan Not in Compliance** occurred on one project (CPUC Project ID 529) and resulted in meaningful deduction of ESPI points for this project.
- **Measure Performance less than Baseline** for one sampled project (CPUC Project ID 574), and due to the importance of this test, the project received the minimum points under this metric.
- **Incorrect Measure EUL** was found in 11 out of the 142 projects reviewed which resulted in a significant reduction in points for this metric. Sampled projects containing this deficiency were CPUC Project IDs 339, 347, 361, 386, 388, 426, 449, 485, 486, 506, and 513. This was the most prevalent deficiency found across projects.
- **Incomplete Documentation of Program Influence** occurred on three sampled projects (CPUC Project IDs 536, 561, and 580), and due to the importance of this test, the projects received the minimum points under this metric.
- **Issue with Custom ISP Study Used** was found as a deficiency on four projects (CPUC Project IDs 481, 519, 523, and 574) and resulted in the meaningful deduction of points under this metric.
- **Incorrect Baseline Value** was found as a deficiency on four projects (CPUC Project IDs 528, 536, 561, and 580) and due to the importance of this element the projects received the minimum points under this metric.

3. Proactive Initiative of Collaboration

In 2020, PG&E received a custom disposition score of 4.2 out of 5.0 for Metric 3 (Proactive Initiative of Collaboration) prior to the addition of any enhancement points. At the portfolio level, CPUC Staff determined that PG&E made efforts to bring measures, projects, and studies forward for discussion prior to CPUC Staff review. Early Opinions were requested on a water-cooled chiller projects, M&V for agricultural pumping projects, streamlined lighting process, DEER Peak Demand Methodology for Strategic Energy Management (SEM) and Normalized Metered Energy Consumption (NMEC), Horticultural Lighting Baseline, and a Modified Lighting Calculator (MLC) tool review. In bi-weekly calls, PG&E brought forward topics with CPUC staff such as a simplified non-IOU fuel analysis for small lighting projects, compressed air leak repair projects, a university central plant project, and site vs. population NMEC among others.

In addition, PG&E staff took an active and engaged role in statewide collaboration efforts such as the Custom Review Timeline Subgroup, the Supplemental Data Request (SDR) Analysis and Action Plan, the State Wide Custom Project Technical Review Template, and the SBD Technical Review Checklist task group. As such CPUC Staff determined that PG&E exceeded the minimum expectations under this metric and applaud their efforts to proactively collaborate.

4. PA's Due Diligence, Quality Assurance, and Quality Control (QA/QC)

In 2020, PG&E received a custom disposition score of 10.0 out of 12.5 for Metric 4 (PA's Due

Diligence, Quality Assurance, and Quality Control) prior to the addition of any enhancement points. Project and measure level disposition performance results reviewed under Metric 2 were used as a proxy for the level of QA/QC performed by the PA. As such, the number of dispositions proceeding without exception was weighed against those that required resubmissions or resulted in rejections. Of the 142 projects reviewed, 52 projects (37 percent) proceeded without exception, while 54 projects (38 percent) were allowed to proceed with exceptions as noted in the review. Another 18 projects⁸ (13 percent) were rejected, resulting in a rejection rate that was higher than the last half of 2019.

CPUC staff found that PG&E incorporated elements from the statewide documents into their processes (such as the Technical Review template) as well as demonstrated a commitment to improving their QC process through adopting standardized naming conventions and re-starting regular calls with technical reviewer consultants. Overall CPUC Staff believes PG&E made efforts to meet CPUC Staff's expectations for this metric but that improvement is needed with QA/QC processes to reduce the number of rejections from submitted project documentation.

5. PA's Responsiveness

In 2020, PG&E received a custom disposition score of 8.13 out of 12.5 for Metric 5 (PA's Responsiveness) prior to the addition of any enhancement points. When reviewed at the portfolio level, CPUC Staff assessed the time series of rejections and exceptions, the alignment of program policy and procedures with the number of actual rejections and exceptions based on eligibility and attribution, and adaptation to rule changes over time. CPUC Staff found that projects reviewed between January 2020 and December 2020 exhibited a notable downward trend in terms of project performance over time (i.e. project submissions had more issues when submitted later in 2020 compared to earlier in the year). CPUC Staff noted that 77 out of the 200 total comments requiring action (39 percent) were related to Process, Policy, and Program Rules; most of these were focused on Baseline determination, Eligibility, and EUL/RUL reporting. Additionally, there were 10 action items related to Net-to-Gross (NTG) and Program Influence (PI) issues, indicating a need to improve compliance with CPUC policies.

PG&E demonstrated improvement through several program process improvements, including incorporation of the NMEC review process, reviewing 3rd party solicitations for compliance with custom review rules, and developing training modules for custom, NMEC, and On-Bill Financing (OBF) platforms. CPUC staff determined that PG&E complied with elements of this metric but that improvement is warranted to improve project submissions to improve ex-ante savings impacts and potential NTG issues.

B. Workpapers Performance Review

PG&E had 18 workpapers which were submitted in 2020, 12 were reviewed and disposed, and the remaining 6 are still under detailed review. This end of year memo provides workpaper specific feedback on the 12 which were reviewed and disposed.

⁸ There were also 4 Late dispositions, 1 Advisory disposition, and 13 Prospective dispositions issued.

The comments below are organized by the five scoring metric areas created in D.16-08-019.⁹ The narrative includes observations common to multiple workpapers and feedback related to the workpaper development process. Specific workpaper feedback is provided in [Attachment C](#) at the end of this document. The Workpaper Detailed Review Table provides feedback on specific workpapers. The Workpaper Submissions Table lists all workpapers submitted by PG&E or PG&E workpapers that were disposed during the review period. Workpapers were selected for feedback from those that were submitted by PG&E and were either disposed or reached approval status during the review period. CPUC Staff acknowledges that workpaper development may have been supported by multiple PAs; however, at this time, there is no mechanism for apportioning feedback among PAs. Therefore, feedback is only provided for the submitting PA, with the assumption that they are the lead PA. The scoring rubric for workpapers is defined as follows:

- ‘+’ indicates a positive scoring impact which receives 100% of total points for the metric
- ‘-’ indicates a negative scoring impact which receives 0% of total points for the metric
- ‘Yes’ indicates meeting minimum expectation which receives 50% of total points for the metric
- ‘No’ indicates the review feedback is not applicable to a metric and does not impact the average

The assigned percentage scores were averaged across all the reviewed items.

Table 5 below presents the workpaper disposition points given to PG&E for each metric both with and without the addition of any Enhancement Points.

Table 5: PG&E Workpaper Disposition Points Awarded by Metric

Metric	Metric Area of Scoring	Weight Factor	Workpaper Disposition Points		Max Points
			With Enhance Pts	w/o Enhance Pts	
1	Timeliness of Submittals	10%	2.50	2.50	5
2	Content, Completeness, and Quality of Submittals	30%	7.50	7.50	15
3	Proactive Initiative of Collaboration	10%	5.00	3.33	5
4	PA’s Due Diligence and QA/QC	25%	10.80	4.55	12.5
5	PA’s Responsiveness	25%	12.50	9.38	12.5
Total			38.30	27.26	50

1. Timeliness of Submittals

In 2020, PG&E received a workpaper disposition score of 2.50 out of 5.0 for Metric 1 (Timeliness of Submittals) prior to the addition of any enhancement points. PG&E has met deadlines for submission of statewide workpapers in the review period and all workpapers received a Yes, indicating that minimum expectations were met for timeliness.

PG&E submitted three workpaper plans in 2020 for new measure development and have been communicative with their schedule changes and updates to the plan. In addition, PG&E has effectively communicated any delivery changes in the monthly workpaper submission schedule.

⁹ See [D.16-08-019](#) at 87.

2. Content, Completeness, and Quality of Submissions

In 2020, PG&E received a workpaper disposition score of 7.50 out of 15.0 for Metric 2 (Content, Completeness, and Quality of Submissions) prior to the addition of any enhancement points. PG&E's content, completeness, and quality of workpapers has generally met standards.

PG&E submitted complex workpapers such as the behavioral (Universal Audit Tool and Home Energy Report), VFD for Dust Collection Fan and HVAC fan controls, which were relatively complex. The behavioral measure expertise was especially helpful, since behavioral measures are relatively a new type of deemed measure. However, some PG&E workpapers included content errors which required revisions, for example, the Unitary AC Heat Pump, Duct Seal, and supply Fan Controls.

3. Proactive Initiative of Collaboration

In 2020, PG&E received a workpaper disposition score of 3.33 out of 5.0 for Metric 3 (Proactive Initiative of Collaboration) prior to the addition of any enhancement points. Workpapers met or exceeded the minimum expectations of collaboration which was required to ensure each workpaper met all PAs' needs.

PG&E has provided CPUC with updates and preliminary work products on upcoming workpapers via the workpaper plan process for the behavioral and the duct optimization workpapers. PG&E collaborated with the SCE to develop fuel substitution workpapers, worked with other PAs to add implementation codes to existing workpapers and to consolidate the LED lighting workpaper.

4. PA's Due Diligence, Quality Assurance, and Quality Control (QA/QC)

In 2020, PG&E received a workpaper disposition score of 4.55 out of 12.5 for Metric 4 (PA's Due Diligence, Quality Assurance, and Quality Control) prior to the addition of any enhancement points.

PG&E reports that it has reorganized its deemed workpaper team and introduced data quality assurance tools, however, CPUC continues to note that PG&E workpapers lack sufficient quality control. PG&E had multiple workpapers, as noted in [Attachment C](#), with errors or inconsistencies between the workpaper narrative and the associated workpaper data tables, for example, AC Heat Pump and supply Fan Controls.

5. PA's Responsiveness

In 2020, PG&E received a workpaper disposition score of 9.38 out of 12.5 for Metric 5 (PA's Responsiveness) prior to the addition of any enhancement points. PAs have an important responsibility to identify new technologies and delivery methods, and to develop workpapers where a deemed option makes sense. PG&E has been actively engaged in developing new measures including the behavioral measures and duct optimization. In addition, PG&E sunset multiple workpapers due to low TRCs and market adoption and revised the NTG for workpapers which have been offered by programs for >2 years.

IV. The Scoring Methodology

The 2020 performance score was developed using five detailed scoring metrics for each directly reviewed work product (i.e., workpaper and custom project), as well as a scoring of the utility's internal due diligence processes, QA/QC procedures and methods, as well as program implementation enhancements to support improved forecasted values.

[Attachment A](#) summarizes the Metrics adopted in D.16-08-019 as well as the CPUC Staff developed scores and points for 2020. D.16-08-019 also directed that the custom and workpaper scores be weighted together into a final score based on the PA total claims for custom and deemed activities, respectively.

In accordance with D.13-09-023, the PAs' activities are assessed against a set of five metrics on a rating scale of 1 to 5. Once activities are assessed, the ratings for each are converted onto this scale, where 1 is the lowest score assigned and 5 is the highest score assigned. A maximum score on all metrics for both workpapers and custom projects will yield 100 points whereas a minimum score on all metrics would yield 20 points. The 1 to 5 rating scale is distinguished as follows:

1. Consistent underperformer in meeting the basic expectations.
2. Makes a minimal effort to meet CPUC expectations but needs dramatic improvement.
3. Makes effort to meet CPUC expectations, however improvement is required.
4. Sometimes exceeds CPUC expectations while some improvement is expected.
5. Consistently exceeds CPUC expectations.

As with the 2019 performance scores, the final scores were "built-up" from a metric-by-metric assessment of each reviewed work product. It is CPUC Staff's expectation that this detailed scoring approach, along with the detailed qualitative workpaper and custom project level feedback, is consistent with the direction provided in D.13-09-023. We believe this scoring approach provides specific guidance to the utilities on how to improve their due diligence review and scores moving forward.

A "Direct Work Product Review" portion of each metric score was developed based upon the individual scoring of dispositions issued for custom project or workpapers. Each reviewed utility work product was first determined to have components either applicable or not applicable to a metric.¹⁰ If a metric was determined to be not applicable to a given disposition, the metric was identified as not applicable ("N/A") and the metric was assigned a score equal to the average 1 to 5 score from the remaining applicable metrics. Assigning this average score to any "N/A" metrics essentially normalized the final score so that a disposition neither benefitted nor was penalized as a result of a non-applicable metric.

¹⁰ For example, workpapers and custom projects which do not involve measures which in some way are expected to utilize DEER values, assumptions or methods, in the development of new kWh, kW and therm savings values would not receive scoring for Metric 2 ("Content, Completeness, and Quality of Submittals"). Another example would be a minor workpaper which may not require proactive collaboration with CPUC Staff and therefore not receive a score for Metric 3 ("Proactive Initiation of Collaboration").

A. Workpaper Metric 1-5 Scoring Methodology

For workpapers, if an item was determined to have activity applicable to a metric, the item was then assigned a qualitative rating as to the level of due diligence applied to the item. The scoring rubric for workpapers is defined as follows:

- ‘+’ indicates a positive scoring impact which receives 100% of total points for the metric
- ‘-’ indicates a negative scoring impact which receives 0% of total points for the metric
- ‘Yes’ indicates meeting minimum expectation which receives 50% of total points for the metric
- ‘No’ indicates the review feedback is not applicable to a metric and does not impact the average

The assigned percentage scores were averaged across all the reviewed items. Individual workpaper level disposition scoring, as well as related workpaper activities, are provided in [Attachment C](#). Note the following approach to scoring individual workpapers by metric:

- Metric 1 Timeliness: The workpaper submission schedule was designed to distribute the workpapers throughout the year. Workpapers receive “+” if schedule was followed.
- Metric 2 Content: Straightforward workpaper received a “Yes”, complex revisions received a “+”, unless there were errors in the content, which warranted a “-”.
- Metric 3 Collaboration: Straightforward consolidation effort workpaper received a “Yes”, initiative to work with other PAs and CPUC receives “+”.
- Metric 4 Quality Assurance: Workpapers that were complete, consistent, and without meaningful errors received a “Yes”. Those workpapers with inconsistencies between the data tables and narrative or where values were left undefined received a “-” score.
- Metric 5 Process: Workpaper responsiveness to program needs received a “Yes” for straightforward and “+” for complex workpaper submissions.

For custom projects, each applicable metric was directly scored according to the unique metric scoring methodology outlined below. A project by project summary of the custom project scoring is included in a custom tables workbook which has been included as an embedded Excel file in [Attachment D](#).

B. Custom Metric 1 Scoring Methodology

This metric is related to the timeliness of submittals and a maximum of 5 points is allocated to this metric based on the PA’s responsiveness to requests and follow-up documentation required to complete the review. Scoring for this metric occurs at the individual project review stage.

Per Senate Bill (SB) 1131 requirement an allocation of 15 business days is given for the PA to submit materials following the date selected for review. PAs begin with a score of 5 and after 15 business days have passed, 1.0 point is deducted for each day the submittal is late.

C. Custom Metric 2 Scoring Methodology

This metric is related to content and completeness of submittals and a maximum of 15 points is allocated to this metric. Scoring occurs on each custom project during the individual project review stage. On a percentage basis Metric 2 is the single greatest determinant of the overall ESPI score. Scoring for Metric 2 is achieved through numerous areas throughout the custom project review workbook. PA's begin with a full score of 5 for each custom project in the review workbook with each noted deficiency reducing the points accordingly. Deficiencies are not weighted equally, with significant issues such as failure of the fuel substitution test or inadequate documentation of program influence receiving a heavier weighting compared to tests such as incorrect site location information. The scores from all custom projects are then averaged together to arrive at an average disposition score for Metric 2.

D. Custom Metric 3, 4, and 5 Scoring Methodology

Whereas Metrics 1 and 2 are assessed at the project level, Metrics 3, 4, and 5 are assessed at the portfolio level for each PA. As such, no individual custom project receives a unique score for these metrics. Additionally, unlike Metrics 1 and 2 which rely on deductions under each metric, scores for Metrics 3, 4, and 5 are awarded based on the PA's performance as it relates to the components of each metric.

For Metric 3, points are awarded when the PA proactively brought high impact or unique projects forward to CPUC Staff prior to developing a study or project. The final score for Metric 3 is therefore representative of the average performance of custom projects across the portfolio of projects.

Scoring for Metric 4 relies upon disposition results and findings identified under Metric 2 as well as the overall depth and correctness of the technical review team. The PA's performance on dispositions assists in serving as a proxy for quality control under Metric 4. In addition, several project specific elements such as whether changing market practices and updates to DEER were considered, or if a project demonstrated evidence of review activities are used to assess the scoring for this metric. Similar to Metric 3, a final score is representative of the average performance of custom projects across the portfolio of projects.

With Metric 5, a review of process enhancement tools and techniques, tracking improved disposition performance over time, and highlights provided throughout the year by the PA assist in determining an average score related to process and programmatic improvements. Similar to Metrics 3 and 4, a final score is representative of the average performance of custom projects across the portfolio of projects.

E. Score Enhancement Methodology

The above process resulted in custom project and workpaper work product review scores. Next, PA-specific "Review Process Score Enhancements" were developed for each applicable metric based on observed policy and technical reviews or program implementation processes/procedures developed and implemented in 2020 in order to positively impact future project reviews. CPUC

Staff believes it is important to provide ESPI “Enhancement” points for positive due diligence developments to recognize the effort and to provide additional encouragement even before a change in project-level results is observed.

In the custom scoring process CPUC Staff added “Enhancement” points in the area of Policy/Technical QA/QC for Metrics 1 and 5 to reflect PG&E staff’s positive efforts in these metric areas as discussed earlier. Those initiatives included:

- Operationalizing Industry Standard Practice (ISP) Guidance 3.0 to develop a custom Review Protocol tool to enable PAs to recommend project specific NTGRs instead of using program-default values.
- Revising the Statewide Project Feasibility Study (PFS) template to improve timeliness in uploading projects to CMPA
- Updating the Modified Lighting Calculator (MLC) tool to limit eligible savings to a site’s monthly net grid purchases to assist small lighting projects with performing on-site generation analysis.
- Continued active participation and contributions to Statewide efforts, including the Custom Review Timeline Subgroup, the Supplemental Data Request (SDR) Analysis and Action Plan, and the Technical Review Template.
- Development of new online training modules for deemed, custom, NMEC, and financing platforms to improve processes for those who develop or review projects using those platforms.
- Continued effort to submit documentation for project review in a timely manner, with over 47 percent of projects submitted 5 or more days earlier than required.

Although some of these efforts may not yet be reflected in project specific disposition scores, CPUC Staff believes recognition of the efforts of PG&E’s staff is warranted. These activities offer promise to improve the overall PG&E performance in the future.

Workpaper scores also include “Review Process Score Enhancements.” Process issues represent critical deemed measure development topics where CPUC Staff believes improvement is needed or improvement has occurred, but those activities are not necessarily reflected in the areas of direct review. These activities, as discussed above, are noted in the narrative, but are summarized here by metric as:

- Metric 1: Timeliness: There were no added points for this metric.
- Metric 2: Content: There were no added points for this metric.
- Metric 3: Collaboration: PG&E was acknowledged for their collaboration with CPUC and stakeholders with the initiation of their monthly newsletter and with drafting the Preponderance of Evidence Survey.
- Metric 4: Due Diligence: PG&E was acknowledged for their due diligence with the initiation of their monthly newsletter and with Drafting the PoE Survey.
- Metric 5: Process improvements: PG&E was acknowledged for their responsiveness to

process improvements with the initiation of their monthly newsletter.

To produce the final workpaper scores, the metric scores for the two workpaper contributing areas were added together, using a 50 percent weight for the process issues score. The 50 percent weight given to the process review has the effect of being a “score enhancement” or increase to the direct review score. Furthermore, within each contributing area (direct and process review areas), CPUC Staff also assigned weights for individual items as a way to reflect greater importance of different individual review items. The separate process scoring provides an avenue for assessing overall QA/QC processes and procedures put into place by PG&E.¹¹

[Attachment D](#) contains custom and workpaper summary tables showing the components and total scores and points for each metric in each of the two component areas of scoring described above.

Questions or comments about the feedback or final scores should be directed to Rashid Mir (rashid.mir@cpuc.ca.gov) or Peter Biermayer (peter.biermayer@cpuc.ca.gov). Note that pursuant to D.13-09-023, CPUC Staff will schedule a meeting with PG&E staff to discuss this memorandum and its final scores by April 30, 2021.

¹¹ The guidance on scoring approach provided in D.13-09-023, at 74, provides that when only a small number of submissions are available for scoring and the submissions have varying impacts on the portfolio overall, that appropriate weighting should be allied to the submission and observed performance that should carry across multiple metrics. “Low scores for metrics that assess specific and important quantities (e.g., if the utility only uploads a small percentage of custom projects and receives a low score for Metric 1), will have a proportional impact on the total score the utility could receive for later metrics that measure the quality of custom project submittals.” “For example, doing an outstanding job on a large number of very low-impact, standardized projects will not make up for doing a poor job on a few projects that represent a major portion of portfolio dollars.”

Attachment A: Final ESPI Performance Scores (without Enhancement Points)

Metric		Workpapers				Custom			
		Max Points	Max Percent of Total Points	2020 Score	2020 Points	Max Points	Max Percent of Total Points	2020 Score	2020 Points
1	Timing and Timeliness of Submittals	5	10%	2.50	2.50	5	10%	4.59	4.59
	Timely submittals: all lists, inventories, plans, studies, workpapers and project/measure documentation; timing and advanced announcement of submittals (spreading out submission when available rather than holding and turning in large batches); timely follow-up PA responses to review disposition action items including intention to submit/re-submit with proposed schedule.								
2	Content, Completeness, and Quality of Submittals	15	30%	2.5	7.50	15	30%	4.28	12.85
	Completeness, appropriateness, comprehensiveness, accuracy, and clarity of submittals. Submittal adherence to Commission policies, Decisions, and prior Commission staff dispositions and/or guidance. Do the submittals include all materials required to support the submittal proposed values, methods and results. Is the project or measure clearly articulated. Are proposed or utilized methods clearly explained including step-by-step method or procedure descriptions. Will the proposed or utilized approach provide accurate results. Are all relevant related or past activities and submittals appropriately noted or disclosed, analyzed or discussed. Are the pros/cons of alternate possible approaches or conclusions discussed to support that the chosen one is most appropriate.								
3	Proactive Initiative of Collaboration	5	10%	3.33	3.33	5	10%	4.20	4.20
	PA efforts to bring either measures, projects, studies, questions, and/or savings calculation methods and tools to Commission staff for discussion in the early formative stages, before CPUC staff review selection. In the case of tools, before widespread use in the programs. Commission staff expects collaboration among the PAs to develop common or coordinated submissions and for the PAs to undertake joint or coordinated planning activities and study work. The PAs are expected to engage with CPUC staff in early discussions on unique or high profile, high impact measures or projects before program or customer commitments are made. The PAs are expected to engage with CPUC staff on planning and execution of studies that support proposed offerings, tools, or determination of proposed baselines or other programmatic assumption that can impact ex ante values to be utilized.								
4	Program Administrator's Due Diligence and Quality Assurance/Quality Control Effectiveness	12.5	25%	1.82	4.55	12.5	25%	4.00	10.00

<p>Commission staff expects the PA to have effective Quality Control (QC) and Quality Assurance (QA) processes for their programs and measures. The PAs are expected to have a pro-active approach to reviewing existing measure and project assumptions, methods and values and updating those to take into account changes in market offerings, standard practice, updates to DEER methods and assumptions, changes to codes, standards and regulations, and other factors that warrant such updates. The depth and correctness of the PA's technical review of their ex ante parameters and values, for both Core, Local Government and Third Party programs, are included under this metric. The depth and correctness of the PA's technical review of their own staff and subcontractor work related to supporting deemed and custom measure and project submissions are included in this metric. Evidence of review activities is expected to be visible in submissions so that Commission staff can evaluate the effectiveness of the PA internal QA/QC processes.</p>									
5	Program Administrator's Responsiveness to Needs for Process and Program Improvements	12.5	25%	3.75	9.38	12.5	25%	3.25	8.13
<p>This metric reflects the PAs ongoing efforts to improve their internal processes and procedures resulting in increased ex post evaluated gross and net savings impacts. Commission staff looks not only to the PA's internal QC/QA processes, but also whether individual programs and their supporting activities incorporate and comply with CPUC policies and prior Commission staff disposition guidance in their program rules, policies, procedures and reporting. This includes changes to program rules, offerings and internal operations and processes required to improve overall review and evaluation results. A particularly important area for focus is the improvement of net portfolio performance via the removal of measures and or participation with low program attribution (NTG).</p>									
Total		50	100%		27.26	50	100%		39.77

Attachment B Custom Project Scores and Feedback

The table below lists the identification numbers associated with each disposition. All custom projects were scored using new metrics adopted in 2016. The metrics are shown in the Table below.

Table 3 2016 Adopted Performance Metrics

Metric	2016 CPUC Adopted Performance Metrics	Maximum Points	Percent of Total Points
Metric 1	Timeliness and Timing of Submittals Timely submittal of all documentation and follow-up utility responses to review disposition action items.	5.0	10%
Metric 2	Content, Completeness, and Quality of Submittals Completeness, appropriateness, comprehensiveness, accuracy, and clarity of submitted documentation. In addition, this metric is an assessment of the utility's adherence to CPUC policies, Decisions, and prior CPUC Staff disposition guidance.	15.0	30%
Metric 3	Proactive Initiation of Collaboration Utility's efforts to bring either measures, questions, and/or savings calculation tools to CPUC Staff for discussion in the early formative stages, before CPUC Staff review selection. In the case of tools, before widespread use in the programs. CPUC Staff expects collaboration among the utilities and for the program administrators to engage with CPUC Staff in early discussions on high profile, high impact measures well before customer commitments are made.	5.0	10%
Metric 4	Utility Due Diligence and QA/QC Effectiveness CPUC Staff expects the utility to have effective Quality Control (QC) and Quality Assurance (QA) processes for its programs and measures. The depth and correctness of the utility's technical review of its ex ante parameters and values, for both Core and Third Party programs, are included under this metric.	12.5	25%
Metric 5	Utility Responsiveness to Needs for Process & Program Improvements (Course Corrections) This metric reflects the utility's efforts to improve, operationalize, and improve its internal processes which are responsible for the creation and assignment of ex ante parameters and values. CPUC Staff looks not only to the utility's internal QC/QA process, but also whether individual programs incorporate and comply with CPUC policies and prior CPUC Staff disposition guidance in its program rules, policies, and procedures.	12.5	25%

Metric	2016 CPUC Adopted ex ante Metrics	Maximum Points	Percent of Total Points	Total Scored Points	# Scored Dispositions	Scoring Notes (Portfolio Level ¹²)
Metric 1	Timeliness and Timing of Submittals Timely submittal of all documentation and follow-up utility responses to review disposition action items.	5	10%	4.59	142	PG&E complied with SB1131 guidelines for submitting documentation before the 15 business days required. Twenty projects were found to be late and 67 projects (47 percent) were submitted early by 5 or more days.
Metric 2	Content, Completeness, and Quality of Submittals Completeness, appropriateness, comprehensiveness, accuracy, and clarity of submitted documentation. In addition, this metric is an assessment of the utility's adherence to CPUC policies, Decisions, and prior CPUC Staff disposition guidance.	15	30%	12.85	142	In 2020, out of 167 projects submitted and selected for review, 142 projects received dispositions. Out of those, 39 exhibited deficiencies including 11 projects where Incorrect Measure EULs were used which was the most prevalent deficiency. Other deficiencies included projects where the Fuel Substitution Test failed, Non-IOU energy sources were not accounted for, EUL did not exceed the simple payback, issue with a custom ISP study used, and several where savings calculations were not provided, among others. Staff notes that while PG&E has submitted more projects with issues in 2020 compared to the latter half of 2019, the deficiencies are less impactful overall and therefore PG&E is showing improvement with regards to document submission.
Metric 3	Proactive Initiation of Collaboration Utility's efforts to bring either measures, questions, and/or savings calculation tools to CPUC Staff for discussion in the early formative stages, before CPUC Staff review selection. In the case of tools, before widespread use in the programs. CPUC Staff expects collaboration among the utilities and for the program administrators to engage with CPUC Staff in early discussions on high profile, high impact measures well before customer commitments are made.	5	10%	4.20	142	Commission Staff found that PG&E made efforts to bring measures, projects, and studies forward for discussion prior to review. In addition, they took an active and engaged role in statewide collaboration efforts such as the Custom Review Timeline group, the SDR Analysis and Action Plan, and the Technical Review Template. PG&E demonstrated proactive collaboration by submitting early opinion requests on a variety of topics including a streamlined lighting process, DEER Peak Demand Methodology for SEM and NMEC, Horticultural Lighting Baseline, and Modified Lighting Calculator (MLC) tool review. CPUC staff determined that PG&E made efforts to proactively collaborate and applaud their efforts to bring projects and studies before staff prior to review selection.
Metric 4	Utility Due Diligence and QA/QC Effectiveness CPUC Staff expects the utility to have effective Quality Control (QC) and Quality Assurance (QA) processes for its programs and measures. The depth and	12.5	25%	10.00	142	CPUC staff weighted the number of dispositions proceeding without exception against those that required resubmissions or resulted in rejections. Of the 142 projects receiving dispositions in 2020, 52 projects (37 percent) proceeded without exception, 54 projects (38 percent) were

¹² The Metric 1 and 2 scores for each of the individual custom projects are included in the final custom workbook which is embedded in Attachment D.

	<p>correctness of the utility's technical review of its ex ante parameters and values, for both Core and Third Party programs, are included under this metric.</p>					<p>allowed to proceed with exceptions as noted, 4 were marked as Late Dispositions (2.5 percent), 1 was marked Advisory (0.5 percent), 13 were marked as Prospective (9 percent), and 18 projects (13 percent) were rejected. Compared to 2019 when PG&E had 7 percent of submissions rejected, these findings demonstrate that PG&E is performing below expectations with regards to effective QC of projects prior to submitting for review and that improvement is needed. Commission staff found that PG&E incorporated elements from the statewide documents into their processes (such as the Technical Review template) as well as demonstrated a commitment to improving their QC process through adopting standardized naming conventions and re-starting regular calls with technical reviewer consultants.</p>
<p>Metric 5</p>	<p>Utility Responsiveness to Needs for Process & Program Improvements (Course Corrections) This metric reflects the utility's efforts to improve, operationalize, and improve its internal processes which are responsible for the creation and assignment of ex ante parameters and values. CPUC Staff looks not only to the utility's internal QC/QA process, but also whether individual programs incorporate and comply with CPUC policies and prior CPUC Staff disposition guidance in its program rules, policies, and procedures.</p>	<p>12.5</p>	<p>25%</p>	<p>8.13</p>	<p>142</p>	<p>PG&E projects reviewed from January 2020 through December 2020 exhibited a notable downward trend in terms of project performance over time. (i.e. project submissions performed worse over the course of the 2020 review period). PG&E continues to experience issues related to Program Policy, as 39 percent of all issues identified in 2020 were related to this category. Most notable were 33 actions (17 percent) associated with eligibility and baseline estimation issues as well as the 10 actions (5 percent) related to Net-to-Gross and Program Influence issues. These combined actions demonstrate lower-than-expected compliance with CPUC policies. PG&E did demonstrate improvement through incorporation of the NMEC review process, reviewing 3rd party solicitations for compliance with custom review rules, and developing training modules for custom, NMEC and OBF platforms. CPUC staff determined that PG&E complied with elements of this metric but that improvement is warranted.</p>

Attachment C: Workpaper Scores and Feedback

The table below lists the ID numbers associated with each workpaper submission or disposition and the workpaper review process “score enhancements” scoring area. The listed weight is used in the combining all the individual rows together into a single score for all the rows in the two scoring components (“direct review” and “process issues”); then each category total score gets equal weighting in the final total score for the metric. The PA may refer to the individual dispositions for more detailed descriptions of the specific actions staff required for each workpaper. The qualitative ESPI scoring feedbacks are designated as follows:

- ‘+’ indicates a positive (from midpoint) scoring impact on a metric,
- ‘-’ indicates a negative (from midpoint) scoring impact on a metric,
- ‘Yes’ indicates meeting expectation; neutral (midpoint) scoring impact on a metric,
- ‘No’ indicates the review feedback is not applicable to a metric.

Workpaper Reviews – Scored Workpapers					ESPI Metrics				
WP ID	Rev	Title	Comments	Weight	1	2	3	4	5
SWPR005	2	VFD for Dust Collection Fan	Workpaper submitted and reviewed with minimal comment.	1	Yes	Yes	Yes	Yes	Yes
SWLG011	3	LED High or Low Bay	Workpaper to convert measure offering impacts from IOU rolled up values to individual climate zones. Showed initiative in collaborating with other IOUs. However, workpaper lacked QC and needed multiple editorial corrections: errors in EAD tables/reference.	1	Yes	No	+	-	+
SWWH006	2	Tankless Water Heater, Commercial	Workpaper did not clearly state the intent of adding water heater types and did not include extension of agreed upon measures nor were the correct DEER values used. QC was lacking; EAD tables needed to be resubmitted. DEER values were not correct in workpaper.	1	Yes	No	Yes	-	Yes
SWHC009	2	Supply Fan Controls, Commercial	Workpaper submitted on time and addressed CPUC comments in a timely manner. Workpaper lacking QC and needed multiple editorial corrections compounded with miscommunicated.	1	Yes	Yes	Yes	-	Yes
SWHC014	1	Unitary Air-Cooled Ac or Heat Pump, < 65 kBtuh, Commercial	Workpaper submitted on time and addressed CPUC comments in a timely manner. Workpaper lacking QC and needed multiple editorial corrections: WP errors in measure case specification table, incorrect energy impact ID codes, and errors in measure data specification workbook (data spec tab) and EAD table.	1	Yes	No	Yes	-	Yes

SWWB004	1	Home Energy Reports	PG&E worked collaboratively with the CPUC SME to revise and update this procedural workpaper.	1	Yes	Yes	+	Yes	+
SWHC023	2	Enhanced Ventilation for Packaged HVAC	Workpaper to add building type Grocery (Gro) by eQuest modelling. Showed research initiative to include Grocery building types with engagement of CPUC through a workpaper plan. Workpaper quality control was good.	1	Yes	Yes	Yes	+	+
SWLG011	2	LED High or Low Bay	Workpaper to convert measure offering impacts from IOU rolled up values to individual climate zones. Showed initiative in collaborating with other IOUs. However, workpaper lacked QC and needed multiple editorial corrections: errors in EAD tables/reference.	1	Yes	No	+	-	+
SWCR018	2	Reach-In Refrigerator or Freezer, Commercial	Workpaper submitted on time and addressed CPUC comments in a timely manner. Workpaper lacking QC and needed multiple editorial corrections: incorrect source description in EAD table and DataSpec sheet. Also, PA had to upload corrected versions with revised "LastMod" date.	1	Yes	Yes	Yes	-	Yes
SWHC018	2	Variable Speed Drive for HVAC Fan Controls	Workpaper to add building type Grocery (Gro) by eQuest modelling. Showed research initiative to include Grocery building types with engagement of CPUC through a workpaper plan. Workpaper quality control was good.	1	Yes	Yes	Yes	+	+
SWSV001	2	Duct Seal, Residential	Workpaper submitted to revise classification and measure life. Minor errors found during review and additional clarifications regarding the type of materials used for the duct sealing which had been previously requested by CPUC.	1	Yes	No	Yes	No	Yes
SWWB002	1	Universal Audit Tool	PG&E worked collaboratively with the CPUC SME to develop and manage submittal of a new procedural workpaper.	1	Yes	Yes	+	+	+

Workpaper Submission Status – All workpapers submitted in 2020

WP ID	Rev	Title	Comments
SWPR005	2	VFD for Dust Collection Fan	Interim approval.
SWLG011	3	LED High or Low Bay	Interim approval.
SWWH006	2	Tankless Water Heater, Commercial	Interim approval.
SWHC009	2	Supply Fan Controls, Commercial	Interim approval.
SWHC014	1	Unitary Air-Cooled Ac Or Heat Pump, < 65 kBtuh, Commercial	Interim approval.
SWWB004	1	Home Energy Reports	Interim approval.
SWHC023	2	Enhanced Ventilation For Packaged HVAC	Interim approval.
SWLG011	2	LED High or Low Bay	Interim approval.
SWCR018	2	Reach-In Refrigerator Or Freezer, Commercial	Interim approval.
SWHC018	2	Variable Speed Drive for HVAC Fan Controls	Interim approval.
SWSV001	2	Duct Seal, Residential	Interim approval.
SWWB002	1	Universal Audit Tool	Interim approval.
SWSV013	1	Duct Optimization	Detailed review in progress.
SWAP003	3	Clothes Dryer, Residential	Detailed review in progress.
SWWB004	2	Home Energy Reports	Detailed review in progress.
SWPR002	2	VFD for Glycol Pump Motor	Detailed review in progress.
SWWP002	2	VFD on Ag Pump	Detailed review in progress.
SWWP005	2	Enhanced VFD on Irrigation Pump	Detailed review in progress.

Process Adder	ESPI Metrics					
	Weight	1	2	3	4	5
PG&E continued to collaborate with its IOU counterparts, CalTF, and Commission Staff on several common objectives and important updates to the statewide workpaper programs. A monthly newsletter was added to share updates with stakeholders.	1	No	No	+	+	+
Other PG&E contributions in 2020 included the development of a rubric to evaluate the results of a Preponderance of Evidence (POE) survey. This rubric was presented to the other IOUs and to Commission staff for feedback.	1	No	No	+	+	+

Attachment D: 2020 Performance Annual Ratings

Custom Scoring

2020 Annual Custom Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	
Direct Work Product Review Score	Disposition Score (1-5)	4.59	4.28	4.20	4.00	3.25	
Review Process Score Enhancements	Technical & Policy QC Increase	0.50	0.00	0.00	0.00	1.00	
	Implementation Increase	0.00	0.00	0.00	0.00	0.00	
Total Score	Adjusted Final Metric Score (1-5)	5.00	4.28	4.20	4.00	4.25	Total Points
	Adjusted Metric Points	5.00	12.85	4.20	10.00	10.63	42.68

2019 Annual Custom Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	
Direct Work Product Review Score	Disposition Score (1-5)	4.89	3.53	4.40	4.00	3.25	
Review Process Score Enhancements	Technical & Policy QC Increase	0.00	0.00	0.00	2.00	0.50	
	Implementation Increase	0.00	0.00	0.00	0.00	0.00	
Total Score	Adjusted Final Metric Score (1-5)	4.89	3.53	4.40	5.00	3.75	Total Points
	Adjusted Metric Points	4.89	10.59	4.40	12.50	9.38	41.76

This [workbook](#) contains all of the PG&E Custom Scoring tables

Workpaper Scoring

2020 Annual Workpaper Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	
Direct Workproduct Review Score	PG&E "-"	0%	0%	0%	55%	0%	
	PG&E "+"	0%	0%	33%	27%	50%	
	PG&E "Yes"	100%	100%	67%	18%	50%	
	Dispositions Score %	50%	50%	67%	36%	75%	
	Dispositions Score	2.50	2.50	3.33	1.82	3.75	
Review Process Score Enhancements	PG&E "-"			0%	0%	0%	
	PG&E "+"			100%	100%	100%	
	PG&E "Yes"			0%	0%	0%	
	Process Score %	0%	0%	100%	100%	100%	
	Process Increase Score	0.00	0.00	5.00	5.00	5.00	
	Process Increase Weight	0.50	0.50	0.50	0.50	0.50	
	Process Increase Wtd Score	0.00	0.00	2.50	2.50	2.50	
Total Score	Final Metric Score (1-5)	2.50	2.50	5.00	4.32	5.00	Total Points
	Metric Points with Weighting	2.50	7.50	5.00	10.80	12.50	

2019 Annual Workpaper Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5
Direct Workproduct Review Score	PG&E "-"	0%	6%	0%	21%	0%
	PG&E "+"	0%	12%	0%	6%	30%
	PG&E "Yes"	100%	82%	100%	73%	70%
	Dispositions Score %	50%	53%	50%	42%	65%
	Dispositions Score	2.50	2.65	2.50	2.12	3.26
Review Process Score Enhancements	PG&E "-"		0%	0%	0%	0%
	PG&E "+"		0%	100%	0%	0%
	PG&E "Yes"		100%	0%	100%	100%
	Process Score %	0%	50%	100%	50%	50%

	Process Increase Score	0.00	2.50	5.00	2.50	2.50	
	Process Increase Weight	0.50	0.50	0.50	0.50	0.50	
	Process Increase Wtd Score	0.00	1.25	2.50	1.25	1.25	
Total Score	Final Metric Score (1-5)	2.50	3.90	5.00	3.37	4.51	Total Points
	Metric Points with Weighting	2.50	11.70	5.00	8.43	11.27	38.90

Explanations of scoring tables row entries

- The row labeled with PA “-“ lists the percent of workpaper reviews undertaken where the CPUC Staff evaluation of the materials or information indicated that the PA performance in this metric for the submission did not meet minimum expectations or requirements relative to the metric.
- The row labeled with PA “+“ lists the percent of workpaper reviews undertaken where the CPUC Staff evaluation of the materials or information indicated that the PA performance in this metric for the submission exceeded minimum expectations or requirements relative to the metric.
- The rows labeled with PA “Yes“ lists the percent of workpaper reviews undertaken where the CPUC Staff evaluation of the materials or information indicated that the PA performance in this metric for the submission exceeded met minimum expectations or requirements relative to the metric.
- The “Dispositions Score %” row (and “Process Increase Score” for workpapers) indicates how the combination of the three rows of scores (+, -, and yes) sum into a total points multiplier for each metric. Each row contributes to the total based on the row count over the total count for all three rows.
- The “Disposition Score” (and “Process Increase Score” for workpapers) row converts the percent score into a numeric value of up to five by directly applying the percent to a value of 5.
- The custom row labeled with “Technical & Policy QC Increase” lists CPUC Staff points added to the metric based on an evaluation of the overall PA performance in putting into place quality assurance and/or quality control methods, documents and/or training for staff and contractors related to this metric area that are expected to improve the ability of review personnel to identify and cure issues going forward on projects started during 2016 but not yet seen in the custom review activity.
- The custom row labeled with “Implementation Increase” lists CPUC Staff points added to the metric based on an evaluation of the overall PA performance in putting into place new or changed program rules, eligibility criteria, incentive structures, application and implementation contract processes and procedures in 2016 related to this metric area that are expected to improve performance going forward on projects started but not yet seen in the custom review activity.
- The workpaper rows labeled with “Review Process Score Enhancements” lists CPUC Staff scoring for each metric based on an evaluation of the overall PA performance in putting into place quality assurance and/or quality control methods, documents and/or training for staff and contractors that are expected to improve the ability of review personnel to identify and cure issues going forward on workpapers. This score is weighted as an increase to the disposition score based on the fractional weight listed in the “Process Increase Weight” row.
- The “Final Metric Score” row indicates the total score for each metric as a sum of the Direct Work product Review Score plus the Review Process Score Enhancements (either as a simple sum for custom or a weighted value sum for workpapers) to provide a final metric score with the final score constrained between a maximum score of 5 and a minimum score of 1.

- The “Metric Points” row provides the point value derived from the Final Metric Score row. If the maximum point value associated with a metric is greater than 5 then the score is multiplied by the max point value divided by 5 to obtain the metric point value related to the final score.