

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



Date: July 15, 2015
To: Southern California Edison Company (SCE)
From: CPUC Ex Ante Review Staff
Cc: R.12-01-005 and R.13-11-005 Service Lists
Subject: Mid-Year 2015 Efficiency Savings and Performance Incentive Ex Ante Review Performance Feedback

Pursuant to Decision (D).13-09-023, California Public Utilities Commission (CPUC) staff and consultants are providing mid-year feedback on the investor-owned utilities (IOUs) respective ex ante activities for 2015. Qualitative feedback is provided per each of the metrics identified in Attachment 7 of D.13-09-023. The mid-year feedback focuses on specific issues and concerns identified in dispositions issued so far during 2015 and in ongoing workpaper and custom project ex ante reviews. CPUC staff translated the identified review issues and concerns into qualitative feedback for the specified metric to give the IOUs a sense of how each can improve its respective activities.

Custom Projects

With regard to custom projects and measures, the CPUC staff review dispositions touched five projects in 2015. The CPUC staff identified the below high-level issues of concern from these projects. A summary of these issues, captured from the review findings dispositions issued, as they relate to the particular projects is provided in Attachment B of this memo. This attached document is intended to provide the utility with information as to how the issues may potentially translate to upward or downward scoring movement in the ESPI scoring metric. The qualitative feedbacks are designated as follow:

- ‘+’ indicates a positive scoring impact on a metric,
- ‘-’ indicates a negative scoring impact on a metric
- ‘m’ indicates meeting expectation; no scoring impact on a metric
- ‘n/a’ indicates the review feedback is not applicable to a metric.

Generally, SCE needs to take steps to remedy identified deficiencies and do a better job in the following areas:

- **Determination of Electrical Grid Impacts.**

SCE staff must improve their efforts to identify and examine large customer self-generation and limit energy efficiency energy savings and peak demand reduction claims and financial incentives to the impacts on the electrical grid. The university and college campus projects have been a significant concern in this area. CPUC staff acknowledges that SCE staff has recently started an effort to find a way to systematically approach the issue, after Commission staff findings and requests on the issue.

- **Determination and Documentation of Measure Eligibility and Baselines.**

CPUC staff continues to find issues with measure eligibility and baseline determination in SCE custom projects, in particular projects in the Retro-commissioning (RCx) program. CPUC staff is concerned with the inclusion of measures that are typically associated with the RCx program in other energy efficiency programs lacking appropriate eligibility and baseline assessments. Given the continued issues with project eligibility and baseline determination, SCE staff should consider requesting early opinion discussions with CPUC staff to vet specific project and measure activities. SCE staff needs to proactively review project and measure activities and remove those which simply meet rather than exceed code or industry standard practice (ISP).

- **Demonstrating and Documenting Program Influence.**

Project eligibility and demonstration of program influence remains a significant issue for SCE's Savings By Design (SBD) projects. For these projects, SCE staff is not providing documentation that demonstrates the program influence required for participation by the statewide Savings-By-Design rules and guidelines. The lack of influence issue is not limited to the SBD activities, CPUC staff reviews often find little or no evidence of program influence and often it appears the project would have proceeded as submitted without any ratepayer support. This is particularly troubling in third party implementer projects where CPUC staff would expect third party contractor expertise to assist customers so as to enhance their otherwise planned projects rather than simply "harvesting" already planned projects unchanged into their programs. This problem has been brought to SCE staff attention multiple times over the past three years including specific discussion in D.12-05-015. CPUC staff expects SCE staff to make significant progress in addressing this issue during 2015.

- **Adherence and Incorporation of Prior CPUC Staff Guidance.**

SCE program staff and implementers must pay more attention to ensure adequate incorporation of CPUC Staff guidance from prior review dispositions. SCE's technical reviews often rely too heavily on third party implementer responses and need to be more proactive in challenging questionable assumptions. For example, a recent conference call

discussion with SCE regarding a university campus project (Application 500393980) revealed that the technical reviewer had not taken the Phase I disposition into consideration; that earlier disposition pointed out specific shortcomings with some of the savings calculation methods and assumptions.

On a positive note, SCE staff implemented a process to consistently upload custom project tools to the Custom Tools Archive for CPUC staff review. Providing tools and their documentation for CPUC staff review is an important step to ensuring projects that utilize those tools in the future will not be subject to delay or substantial adjustment in savings due to problems with the tool or its documentation. Also, CPUC staff observed that the SCE Engineering Department staff continues to be improving their efforts to work with CPUC staff to better understand and implement Commission directions and policies. Additionally, SCE staff has been proactive in conducting ISP studies although no studies have been initiated yet during 2015.

Notwithstanding the efforts noted above by the SCE review staff, there are at this time no observable indicators that SCE's program staff, account executives, and third party implementers are applying better due diligence at the project application stage as noted in the 2014 Final ESPI Scoring Memo. Relative to ISP study continuing initiative on the part of SCE staff, CPUC staff observes that SCE does not appear to provide sufficient guidance to its contractors in these studies, and often requires CPUC staff guidance on basic aspects and expectations for ISP studies.

Workpapers

With regard to the workpaper assessment for SCE, the CPUC staff has performed preliminary reviews on seven workpapers and has also reviewed SCE's ex ante data submittals. The following general areas of concern are identified:

- **Ex Ante Database Submittals (improvement compared to 2014)**

While SCE's ex ante database submittals have improved since 2014, there are still areas that need substantial improvement. There is very little descriptive content, which is needed so that the data can be reviewed and understood without having to refer to the workpaper. There are large quantities of duplicate data that seem to be automatically generated without any quality checks for identical records. Sometimes DEER data is renamed and resubmitted, which is not allowed.

- **Comprehensiveness of Submittals (needs improvement)**

On initial review, all reviewed workpapers lacked appropriate program information to support critical ex ante values. In all cases, ex ante data submittals were not correct. Sometimes technical information needed to support the savings calculations is missing. In some workpapers, the narrative describes delivery mechanisms that are inconsistent with the accompanying ex ante data.

- **Incorporation of Previous Direction (improvement compared to 2014, but still needs improvement)**

A particular encouraging point is SCE staff's efforts to provide background information that shows how early retirement claims can be incorporated into direct install delivery programs only. Another area of improvement is SCE staff's effort to provide background information on how it will identify "Hard-to-reach" participants, as directed in D.14-10-04, and thus allow the claim of the much higher HTR-NTG value during the claims process. However, these improvements appear to be inconsistently applied across the several workpapers reviewed. This has been noted in all preliminary reviews and CPUC staff expects SCE staff to develop a consistent approach for addressing CPUC requirements for early retirement within deemed programs. In terms of improvement, CPUC staff is concerned that SCE staff has yet to develop a process of incorporating previous workpaper reviews, CPUC staff direction, and Commission decisions into its workpaper developments. Commission staff has also noted in the past that several workpaper development efforts, particularly for new lighting and package HVAC applications could greatly benefit from data collection from SCE's current customer base, but there is no indication in workpapers or through collaborative workpaper developments that SCE staff has undertaken this work.

In accordance with D.13-09-023, CPUC staff and consultants will schedule a conference call meeting with SCE staff to discuss the mid-year feedback. CPUC staff will send a Doodle Poll to find an available day and time. If you have any questions or comments in the meantime, please contact Peter Lai (Peter.lai@cpuc.ca.gov).

Attachment A: Mid-year ESPI Ex ante Review Metric and Metric Descriptions

Metric No.	Metric Description
1a	Timeliness of action in the implementation of ordered ex ante requirements in the pre-submittal/implementation phase: Timing of disclosure in relation to reporting.
1b	Timeliness of action in the implementation of ordered ex ante requirements in the post-submittal/implementation phase: Timing of responses to requests for additional information.
2	Breadth of response of activities that show an intention to operationalize and streamline the ex ante review process.
3	Comprehensiveness of submittals.
4	Efforts to bring high profile, high impact, or existing (with data gaps) projects and/or measures to Commission staff in the formative stage for collaboration or input.
5	Quality and appropriateness of project documentation (e.g., shows incorporation of Commission policy directives).
6a	Depth of IOU quality control and technical review of ex ante submittals: Third party oversight.
6b	Depth of IOU quality control and technical review of ex ante submittals: Clarity of submittals and change in savings from IOU-proposed values not related to M&V.
7	Use of recent and relevant data sources that reflect current knowledge on a topic for industry standard practice studies and parameter development that reflects professional care, expertise, and experience.
8	Thoughtful consideration, and incorporation, of CPUC comments/inputs. In lieu of incorporation of comments/input, feedback on why comments/input were not incorporated.
9	Professional care and expertise in the use and application of adopted DEER values and DEER methods.
10	Ongoing effort to incorporate cumulative experience from past activities (including prior Commission staff reviews and recommendations) into current and future work products.

2015 Ex Ante Review Interim ESPI Performance Feedback — SCE

Custom Projects

Application ID	CMPA Measure Description	Discussions	Rating Feedback	Metric 1a	Metric 1b	Metric 2	Metric 3	Metric 4	Metric 5	Metric 6a	Metric 6b	Metric 7	Metric 8	Metric 9	Metric 10		
500393980	HVAC Controls Upgrade	PA disregarded CS requests in earlier disposition and retained as Pneumatic to DDC HVAC controls conversion as REA when CS findings indicated NR (the controls conversion represents nearly 40% of the electric and more than 50% of the gas savings claimed). The magnitude of the impact of the EE measures on the electric grid has not been demonstrated as the customer has 19 MW of natural gas cogeneration and 2000 tons of steam-driven chiller plant.	This project is part of the UC/CSU EE Partnership. Project type was inadequate with significant issues.	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	-		
			PA response to prior CS was inadequate with significant issues.	n/a	n/a	-	-	n/a	n/a	n/a	n/a	n/a	n/a	-	n/a	n/a	
			Project Baseline had significant issues.	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	-	n/a	n/a	n/a
			Project Costs had significant issues.	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
			Issue with self-generation and its impact of EE measures the grid seems to be a recurring issue with UC/CSU EE Partnership program.	n/a	n/a	n/a	n/a	n/a	n/a	-	n/a	n/a	n/a	n/a	n/a	n/a	-

Attachment B: Workpaper and Custom Performance Feedback

500408706	Linear Fluorescent, HID, and Integral LED Lamps	Office sample too small to represent 30 offices in the facility and appear targeted to self-selected long HOU area when compared to small office HOU. The final savings omitted the impact of manual dimming controls for certain areas that CS had requested in prior dispositions. HVAC IE factors still applied to some unconditioned spaces. The gift shop areas HOU is not based on the submitted logger data. The PA has provided additional follow-up information via email. Baseline wattages conform to prior CS guidance. Screw-in lamp measures were grandfathered in this project as well as the use of M&V data for lighting HOU for most areas.	Oversight and detail review of 3rd party M&V efforts lacking.	n/a	-	-	-	n/a	-	-	n/a	-	-	-	-		
			PA undertook a separate site visit and implementer took lighting intensity readings as a follow-up to CS concerns.	n/a	+	+	n/a	+	n/a	n/a							
			PA provided logger data as requested but not in a pure on/off timestamp format. Data was processed into 10 minute bins and contains some overestimation due to state transitions.	n/a	+	n/a	-	n/a	-	-	n/a	-	-	n/a	-	n/a	-
			PA has not been uploading follow-up information to the CMPA in a timely manner.	n/a	-	+	n/a										
			PA provided follow-up implementer responses and cost info. Implementer replies were not comprehensive, but indicated that SCE was the one that recommended the 3rd party submit the project as custom.	n/a	+	n/a	-	n/a	n/a	-	n/a	n/a	+	n/a	n/a	n/a	
			PA internal technical review of 3rd party calculations continues to miss items that were pointed out in past review dispositions.	n/a	-	n/a	n/a	n/a	n/a	-	n/a	n/a	-	-	-	-	

Attachment B: Workpaper and Custom Performance Feedback

500605248	HVAC - energy management system (EMS)	SCE did not recognize the impacts of the federal energy efficiency performance standards for this project and the significant amount of self-generation. SCE reviewed neither the billing history nor the construction history of the site. SCE did not question unsupported modeling assumptions. Discussions with SCE staff and their contract technical reviewers has made apparent a lack of a comprehensive approach to evaluating measure eligibility and baselines, and CPUC policy regarding Federal and State code requirements. General assumption that designating a measure as "RCx" automatically categorizes a measure as a Retrofit Add-on. During conference call on 6/8, SCE	Lack of depth in the PA internal technical review of measure eligibility and baselines, i.e., assuming that a RCx designation is an automatic designation that the measure is a Retrofit Add-on type.	n/a	n/a	n/a	-	n/a	n/a	n/a	-	-	-	n/a	-
			Deficient knowledge and research on mandatory federal code requirements, applicability, and recognizing past code trigger events that may set the baseline for currently proposed measures.	-	n/a	-	-	n/a	n/a	n/a	-	-	-	n/a	-
			Lack of recognition of past CS dispositions and ex post evaluations that have explicitly stated that measures are not to be used to solely bring a facility into code compliance, including measures claimed under the RCx program.	-	n/a	-	-	n/a	n/a	n/a	-	-	-	n/a	-
			SCE has not been uploading data to the CMPA recently, just emailing it.	-	n/a										
			Conference call of June 8 with SCE staff and their technical reviewer signaled positive steps to understand the deficiencies and resolve the issues at hand. SCE agreed to undertake	+	n/a	+	n/a	n/a	n/a	n/a	+	n/a	+	n/a	+

Attachment B: Workpaper and Custom Performance Feedback

		indicated that they will use 2014 purchased power as the baseline for the hourly net grid impact analysis, remove the unsupported chiller degradation factor, re-do the baseline code requirements analysis, revise the peak demand reduction using the overall hourly results from the simulation modeling, and submit revised incentive estimates.	corrections and conduct a more through code requirements review.												
			This project review points to some fundamental problems with how and when the measure eligibility and baselines are established for custom projects.	n/a	-	n/a	n/a	n/a	-						
500595319	New Construction - Warehouse LED Lighting	PA needs to provide evidence of its influence in the final system design. PA should provide basis for the baseline selection. Tool used by PA (SimCalc) is not a CS-approved tool. Issue with free ridership due to customer standard practice may be more efficient than Code (T24) or industry standard practice.	Issues with Project Eligibility. PA has not demonstrated influence in the final system design as required by SBD program rules.	n/a	n/a	n/a	-	n/a							
			Issues with energy savings calculation tool used (SimCalc). Tool not yet reviewed or approved by CS.	n/a	n/a	n/a	n/a	n/a	-	n/a	n/a	n/a	n/a	n/a	n/a
			Issues with project baseline. PA used T24 General Commercial and Industrial Work building (LPD = 1 W/SF) instead of T24 Commercial and Industrial Storage building (LPD = 0.6 W/SF).	n/a	-	n/a	n/a	n/a							

Attachment B: Workpaper and Custom Performance Feedback

			Issue with free ridership as EE measure might be standard practice for customer.	n/a	-										
500224290	Compressed air system open blower modifications and air compressor retrofit	The PA documents submitted 12/23/2014 indicated that Phase 1 of the project was completed July 7, 2014 and Phase 2 was completed October 1, 2014. The PA neglected to send the required documentation to CPUC staff after Phase 1 was completed and before Phase 2 began. CPUC Staff noted that the submitted documentation contained an invoice for the VFD driven air compressor dated July 23 2014. This is the invoice for the 25% down payment for the air compressor, with down payment likely required by the vendor before the air compressor was ordered from the factory. CPUC Staff observed that the compressor was ordered by the	the PA reviewer did not consider the 2014 Statewide Compressed Air guidelines when the project was reviewed. CPUC Staff found that the customer had implemented a code complaint system which was ineligible for savings claim. The PA did not follow CPUC Staff guidance for the project and failed to inform CPUC Staff after the completion of Phase I of the project and before the second phase of the project began as had been instructed in a disposition for the project.	n/a	n/a	n/a	m	n/a	-	-	-	-	-	n/a	n/a

Attachment B: Workpaper and Custom Performance Feedback

		<p>customer after the 2013 Title 24 standards became effective (July 1, 2014), and after CPUC Staff had notified the PA that a moratorium was in place for compressed air projects (June 30, 2014) while a uniform statewide compressed air system policy was devised.</p> <p>It appears that the VFD air compressor that has been installed may simply be code compliant and ineligible for incentives under the 2014 Statewide Air Compressor Program Guidelines.</p>													
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Workpapers

	Metric	Benchmarks
1a	<p>Timeliness of action in the implementation of ordered ex ante requirements (e.g., A.08-07-021, D.11-07-030, D.12-05-015, etc.) in the pre-submittal/ implementation phase: Timing of disclosure in relation to reporting</p>	<ol style="list-style-type: none"> 1) Fraction of deemed measures for which workpapers have been submitted to Commission prior to measure being offered in the portfolio; 2) Fraction of workpapers disclosed prior to or during work commencement and submitted upon completion rather than withheld and submitted in large quantity; 3) Fraction of workpaper development projects for new technologies submitted for collaboration versus total number of workpapers for new technologies submitted <p>Noted Progress: SCE continues to provide monthly updates of its workpaper development activities.</p> <p>Needs Improvement: The EAR team has performed preliminary reviews on seven SCE workpapers. At least four of these indicate that measures have been available in programs several months prior to the workpapers being submitted for review. Any non-DEER measures cannot be offered in programs until a workpaper has been approved by CPUC staff.</p> <p>To Be Determined: Through the end of 2015, the EAR team will be examining claims for the following:</p> <ol style="list-style-type: none"> 1) Claims that appear to be deemed measures which were instead claimed as custom measures due to the lack of workpaper submission. 2) High contributions of new technology measures that should have been subject to early review and collaboration. 3) The use of custom measure process and tools for single measure projects such as lighting and package HVAC projects where deemed programs already exist and the custom projects appear to have no significant differences from defined deemed measures.
1b	<p>Timeliness of action in the implementation of ordered ex ante requirements (e.g., A.08-07-021, D.11-07-030, D.12-05-015, etc.) in the post-submittal/ implementation phase: Timing of responses to requests for additional information</p>	<p>Percentage of workpaper reviews which experience significant delay^[3] due to slow response to requests for readily available (or commonly requested)^[4] additional information (higher percentage = lower score)</p> <p>Noted Progress:</p>

Attachment B: Workpaper and Custom Performance Feedback

Metric	Benchmarks
	<p>Needs Improvement: The EAR team performed preliminary reviews on seven workpapers and found that none had all information necessary in order to move on to a detailed review. CPUC staff acknowledges that the ex ante team has increased its efforts to perform preliminary reviews on workpapers, and as a result, a large number of comments and requests for additional information are expected. SCE should use this first group of preliminary reviews to help institute improvements to their workpaper developments and content which would result in more workpapers passing through preliminary review and on to the detailed review stage.</p> <p>To Be Determined: Preliminary reviews will continue throughout the year.</p>
<p>2 Breadth of response of activities that show an intention to operationalize and streamline the ex ante review process</p>	<p>Percentage of workpapers that address all aspects of the Uniform Workpaper Template (as described in A.08-07-021, or any superseding Commission directive)</p> <p>Noted Progress: SCE has encountered some barriers to meeting ex ante data base specifications but has been actively engaged with the EAR team and CPUC staff to implement interim solutions until full integration is accomplished. Incremental improvements are observed with each successive ex ante database submittal.</p> <p>Needs Improvement: As discussed under 3, below, there are several short comings in SCE’s ex ante data, even though their submittal process and content is clearly transitioning to the required format.</p> <p>To Be Determined: The critical deadline for full implementation of the ex ante database is 1/1/2016.</p>
<p>3 Comprehensiveness of submittals (i.e., submittals show that good information exchange and coordination of activities exists, and is maintained, between internal program implementation, engineering, and regulatory staff to ensure common understanding and execution of ex ante processes)</p>	<p>1) Percentage of workpapers that include appropriate program implementation background as well as analysis of how implementation approach influences development of ex ante values;[6]</p> <p>2) Percentage of workpapers which, on initial submission, were found to include all applicable supporting materials or an adequate[7] description of assumptions or calculation methods</p> <p>Noted Progress: SCE appears committed to the transition of including ex ante data with its workpapers that is compatible with the ex ante database accessible via the READI interface. While significant improvements are still needed, both in content and format, the EAR team highlights this improvement and hopes that SCE’s data production will continue to improve.</p>

Attachment B: Workpaper and Custom Performance Feedback

Metric	Benchmarks
	<p>Needs Improvement: As indicated above, ex ante data submittals still have areas of substantial inconsistency with the ex ante database accessible via the READI interface. SCE ex ante data submissions have improved in many aspects but still require improvements in descriptive content and structure. Cost data structure has improved with the specification of full technology costs, location cost adjustments, and installation hours. However, the cost records are not, in general, specified as stand-alone technology costs. Cost records are tied to specific Implementations, causing many technology costs records to be duplicated for every Implementation that references the technology. Measure and Implementation records do not, in general, provide enough descriptive content for a reviewer to understand the details of a how a measure is delivering energy efficiency or how one measure differs from another. Implementation records are often repeated with the same measure and delivery type, with little or no explanation as to why one record is used instead of another.</p> <p>For revised workpapers, it is difficult to determine what the actual revisions are from previous versions and how the ex ante values have changed. There typically is no summary in the workpaper of what the nature and magnitude of the revisions. For workpapers that have undergone review, input or development from the CalTF, workpapers don't typically include any discussion of how the final workpaper values have been influenced by the CalTF process.</p> <p>To Be Determined: Preliminary and detailed reviews will continue throughout the year. Additionally, the EAR team will be continuing to review ex ante database submittals.</p>
<p>4 Efforts to bring high profile, high impact, or existing (with data gaps) projects and/or measures to Commission staff in the formative stage for collaboration or input</p>	<p>Percentage of high profile program, or high impact measure, workpapers submitted for collaboration or flagged for review</p> <p>Noted Progress: The PAs have been jointly developing a workpaper for LED tube replacements of T8 fluorescent lamps. As an outcome of EAR team concerns over quality and proper application, the PAs chose to suspend workpaper development, and SCE proposed a pilot study to investigate concerns and develop guidelines. SCE has sought out early guidance in the development of the pilot study.</p> <p>Needs Improvement: A claims review (see below) is needed to provide more detailed evaluation of this metric.</p> <p>To Be Determined: Similar to 1b, above, the EAR team will be reviewing claims for high contributions of new technology measures that should have been subject to early review and collaboration.</p>
<p>5 Quality and appropriateness of project documentation (e.g., shows incorporation of Commission policy directives)</p>	<p>Frequency of inappropriate or inferior quality at the time of initial Commission staff review (higher frequency = lower score)</p>

Attachment B: Workpaper and Custom Performance Feedback

Metric	Benchmarks
	<p>Noted Progress: SCE is working toward full implementation of the 2013-2014 lighting disposition, which, for SCE, addresses the use of early retirement savings calculations in deemed workpapers. Further review is still needed, but SCE appears to be adding requirements into workpapers that limit early retirement to direct install implementations. SCE appears to be proactive by including similar requirements in non-lighting workpapers (e.g. SCE13WP009r0 for multi-family pool pumps where ER claims are explicitly not allowed in downstream rebates as well as some direct install applications.)</p> <p>Needs Improvement: Reviews show some inconsistencies between workpaper narratives and submitted data indicating a possible need for additional interaction and guidance from the ex ante team. For example, in SCE13LG115r0 the narrative describes how contractors may remove existing lamps, replace with LED lamps, and therefore claim early retirement. It does not include background or discussion of how requirements for documentation of pre-existing technologies or program influence will be met, which were both specifically required by “2015_Lighting_Retrofit_Guidance_mem_Final-2.docx” issued by CPUC staff on January 27, 2015.</p> <p>To Be Determined: The EAR team and CPUC staff have provided several general and project specific documents that should serve as references for all future SCE workpaper development efforts such as:</p> <ul style="list-style-type: none"> • Lighting workpaper guidance memo: “2015_Lighting_Retrofit_Guidance_mem_Final-2.docx” issued by CPUC staff on January 27, 2015 • Feedback on the proposed LED tube replacement workpaper
6a	<p>Depth of IOU quality control and technical review of ex ante submittals: Third party oversight</p> <p>Quality of workpapers prepared by consultants, third parties, and local government partners submitted by IOUs</p> <p>Noted Progress:</p> <p>Needs Improvement:</p> <p>To Be Determined: The EAR team has not reviewed any workpapers developed by SCE contractors, third parties or local government contractors and will continue to review SCE workpapers and include the results of these reviews in determining the final ESPI scores for 2015.</p>
6b	<p>Depth of IOU quality control and technical review of ex ante submittals: Clarity of submittals and change in savings from IOU-proposed values not related to M&V</p> <ol style="list-style-type: none"> 1) Percentage of workpapers which required changes to parameters of more than 10% or required substantial changes to more than two parameters among UES, EUL/RUL, NTG, impact shape, or costs; 2) Percentage change from IOU-proposed values to ED-approved values (higher percentage = lower score) <p>Noted Progress:</p>

Attachment B: Workpaper and Custom Performance Feedback

Metric	Benchmarks
	<p>Needs Improvement: Preliminary reviews show inconsistencies between narrative and submitted ex ante data as discussed above.</p> <p>To Be Determined: The EAR team will continue with preliminary and detailed reviews with respect for the feedback provided in the 2014 final ESPI memo including usage of HTR- and ET-NTG values, development of current costs and consideration for industry standard practice. The EAR team will also be reviewing workpapers and providing feedback to all PAs in terms of how the change documentation for revisions summarizes the basis, nature, and magnitude of changes.</p>
<p>7 Use of recent and relevant data sources that reflect current knowledge on a topic for industry standard practice studies and parameter development that reflects professional care, expertise, and experience</p>	<p>Percentage of workpapers with analysis of existing data and projects that are applicable to technologies covered by workpaper</p> <p>Noted Progress:</p> <p>Needs Improvement: The EAR team has highlighted in the past the need to utilize available data from participants as a way to collect information about technologies offered in the program. For example, the lighting disposition required that measures defined in terms of ranges must use the highest wattage of the range for the measure and the lowest wattage of the range for the baseline. However, the EAR team has also noted that PAs’ own data on participants could be used to determine typical wattages within the ranges and, in turn, propose updates to the measure wattage definition. Another example is the VRF workpaper development effort, where the participant installations may serve as a source of data that could be used to address some of the uncertainty highlighted by the EAR team with respect to typical installed configurations and performance.</p> <p>To Be Determined:</p>
<p>8 Thoughtful consideration, and incorporation, of CPUC comments/inputs. In lieu of incorporation of comments/input, feedback on why comments/input were not incorporated</p>	<p>Frequency of revisions to workpapers in response to (and/or appropriate and well-defended rejection of) CPUC reviewer's recommendations</p> <p>Noted Progress: Additionally, SCE is responding to preliminary reviews and resubmitting workpapers with responses to comments and corrections. While resubmittals may still have shortcomings, SCE is adapting to the increased level of EAR team review. Two workpapers reviewed that allow for early retirement claims (SCE13WP009r0 and SCE13LG115r0) show additional effort to address previously issued EAR team comments on meeting evidence requirements for early retirement claims. These workpapers may still have some shortcomings in addressing these concerns; the EAR team acknowledges improvement in this area.</p> <p>Needs Improvement: It is not clear from food service workpapers submitted by other IOUs that directions from D.11-07-030 requiring ISP analysis has been implemented.</p>

Attachment B: Workpaper and Custom Performance Feedback

Metric	Benchmarks
	<p>To Be Determined: The EAR team will continue to perform additional detailed reviews and compare final workpapers against preliminary review comments as well as direction from previous workpapers reviews and other Commission staff and EAR team directions.</p>
<p>9</p> <p>Professional care and expertise in the use and application of adopted DEER values and DEER methods</p>	<p>Percentage of workpapers, including those covering new or modified existing measures, that appropriately incorporate DEER assumptions and methods</p> <p>Noted Progress: SCE incorporates DEER values directly from READI where technology, measure, or impact definitions match.</p> <p>Needs Improvement: The practice of downloading, renaming, and resubmitting DEER values or IDs obtained from READI is not acceptable. This has been observed in two lighting workpapers (SCE13LG115 and SCE13LG116) where measures have not been defined using scale bases and all new impacts have been generated and resubmitted.</p> <p>To Be Determined: As the EAR team performs additional workpaper reviews, SCE’s submissions are expected to improve.</p>
<p>10</p> <p>Ongoing effort to incorporate cumulative experience from past activities (including prior Commission staff reviews and recommendations) into current and future work products</p>	<p>Percentage of workpapers including analysis of previous activities, reviews and direction[11]</p> <p>Noted Progress: SCE has begun to implement processes for providing data submittals in a format that is compatible with the ex and database accessible using READI. The recent residential LED and multi-family pool pump workpapers show an effort to address EAR team concerns over deemed early retirement claims.</p> <p>Needs Improvement: As with other metrics, the EAR team urges SCE to review previous direction and ESPI memos for improvement opportunities. Examples are the ISP direction for food service measures from D.11-07-030, the lighting workpaper guidance memo, and the cumulative VRF feedback.</p> <p>To Be Determined: The EAR team has not yet completed and detailed reviews. EAR team will continue to perform detailed reviews which will help to establish the final score for this metric.</p>