

State of California
MEMORANDUM



Date: February 03, 2022

To: Andres Marquez, Southern California Gas Company (SCG); Ryan Cho, Southern California Edison (SCE); Jay Bhatka, SCE; Andres Fergadiotti, SCE; Danielle Dragon, Pacific Gas and Electric (PG&E); Henry Liu PG&E; Ed Reynoso, San Diego Gas and Electric (SDG&E); John Zwick (SDG&E); Nancy Goddard, PacifiCorp; Kenneth Liljestrom (SDG&E) Jenny Berg (Bay Area Regional Energy Network); Lujana Medina (Southern California Regional Energy Network); Alejandra Tellez (Tri-County Regional Energy Network); Casey Dailey (Inland Regional Energy Network); Nancy Barba (Frontier Energy); Laurel Rothschild (The Energy Coalition); Qua Vallery (MCE); Alice Havenar-Daughton (MCE); Jana Kopyciok-Lande (MCE); Mathew Marshall (Redwood Coast Energy Authority); Aisha Cissna (RCEA); Willie Calvin (San Jose Clean Energy); Julia Allman (San Francisco Public Utilities Commission)

CC: Peter Lai, CPUC; Jennifer Kalafut, CPUC; Nils Strindberg, CPUC

From: Peter Biermayer P.E., Utilities Engineer,
EE Planning & Forecasting Section,
Energy Division, CPUC

Subject: CPUC Guidance on Use of default net-to-gross ratio for hard-to-reach customers

CPUC Energy Division Staff Findings:

CPUC Energy Division staff has reviewed a request for clarification from the Southern California Gas Company on how net-to-gross (NTGs) ratios should be applied to energy efficiency programs, projects and measures that target hard-to-reach (HTR). Staff has determined that the 0.85 NTG ratio for HTR customers in California eTRM (electronic Technical Resource Manual, <https://www.caetrm.com>) only applies to HTR customers as defined in D.18-05-041, Section 2.5.3 and must use a direct install (DI) delivery channel. Program administrators (PA) can still

claim that their programs are targeting or serving HTR customers through delivery channels other than DI, if the customers served meets the criteria in D.18-05-041. For programs, projects or measures that target HTR customers through other delivery channels than DI, the PAs shall use the appropriate NTG ratios in California eTRM. When a NTG ratio for a program, project or measure does not exist in the California eTRM, PAs should consult with the CPUC's Energy Division measure review team.

Should the PAs need further clarification, CPUC Energy staff is willing to meet and discuss this memo and implications with the PAs.