CPUC Comments on SWWB004-02: Home Energy Reports

Lead PA: PGE

Workpaper Submittal Date: 12/21/2020

CPUC Review Date: 1/20/2021

Please note responses to comments in the table below, revise workpaper, and upload the entire package to the WPA. If needed, please reach out to Workpaper Review Team to set up a call to discuss

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| CPUC Comment | PA Response |
| With regards to pg. 7, “The fourth quarter ex-ante savings claims will be the values to be reported….”: the WPP stated “Each of these subsequent quarterly ex-ante savings claims will overwrite the prior quarter’s claims to avoid double counting of savings, with the fourth quarter ex-ante savings claims being the final ex-ante claim for that program year.” This line has been removed from the WP – if the PA believes double counting actually will not occur, then it’s not necessary to state this explicitly/it is OK that the line from the WPP was removed from the WP. However, is it reasonable for us to presume the double counting will not happen? PA insights are welcome. | The PA does believe double counting continues to be a possibility. In the WP, by adding the statement, “These ex-ante savings claims may include a holdback …” to the end of the bullet, the possibility of double counting is addressed and is taken into account through applying holdbacks when reporting fourth quarter ex-ante savings claims. The final language in the WP seemed to be the most concise. |
| Regarding PA discretion to adjust holdbacks (pg. 9), it is worth noting that joint savings remain present for the EUL of the measure, so, in fact, removing upstream light joint savings may be necessary for a while longer.  This is a bit complicated because each year an earlier year will drop out of contention until those installed in 2019 reach their EUL and the upstream joint savings adjustment goes away completely. Please clarify when upstream joint savings will no longer need to be removed (they last for the EUL of the measure). | The PA agrees with this point and will propose edits to the WP to ensure this point is clear when it comes to “discretion to adjust holdbacks to account for substantial changes in their residential measures that may affect the potential of double counting.” (pg. 9). Language has been drafted and reviewed by the joint IOUs.  Per the Upstream and Residential Downstream Lighting Impact Evaluation Report: Lighting Sector – Program Year 2018 (DNV GL, 2020), the EULs for residential upstream lighting LED measures are 16 years.  As part of a statewide Early M&V study for HER, the joint IOUs will also look into calculations of changes in kWh, therms, kW over time. |
| Regarding the HR equation modification on pg. 10, not sure this is what you want. Unadjusted should remain unchanged but adjusted would be adjusted only for downstream. So it would be (fully adjusted-joint upstream)/unadjusted or downstream adjusted/unadjusted. | The PA agrees. It is clearer to keep the unadjusted savings value unchanged and modify the adjusted savings value in the equation. However, in light of the CPUC’s EUL comment above, the PA will propose to remove this HR equation modification (as an illustration) for simplicity, as it may cause unnecessary confusion. Language has been revised reviewed by the joint IOUs. |