

PUBLIC UTILITIES COMMISSION

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To: Southern California Gas (SoCalGas)

From: Lisa Paulo and Peter Biermayer, California Public Utilities Commission (CPUC)

Cc: R.25-04-010 Service Lists

Subject: 2024 EX ANTE REVIEW (EAR) SCORING AND EVALUATION  
PERFORMANCE

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## I. Summary of 2024 EAR Scores - Custom Projects and Measure Packages

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 (EAR) scoring is a part of the EAR awards.<sup>1</sup>

D.20-11-013 placed a moratorium on EAR awards but directed that EAR scoring shall continue. CPUC staff and consultants completed the 2024 EAR 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 EAR 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 SoCalGas’ 2024 EAR performance score of 77.46/100 for measure packages<sup>2</sup> and custom projects is shown below in Table 1. SoCalGas’ 2024 total points is an 3.76 point decrease from its 2023 total points of 81.22. Scores for 2023 are provided in Table 2 on the following page.

Table 1: SoCalGas 2024 EAR Scoring for Measure Packages and Custom Projects<sup>3</sup>

SoCalGas 2024 EAR Review Performance Scores and Points		Measure Packages				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	3.63	10%	3.63	5	5.00	10%	5.00	5
2	Content, Completeness, and Quality of Submittals	3.89	30%	11.67	15	4.08	30%	12.25	15
3	Proactive Initiative of Collaboration	4.83	10%	4.83	5	4.00	10%	4.00	5
4	Due Diligence and QA/QC Effectiveness	2.78	25%	6.95	12.5	3.90	25%	9.75	12.5
5	Responsiveness to Needs for Process/Program Improvements	4.00	25%	9.99	12.5	3.75	25%	9.38	12.5
<b>Total</b>				<b>37.07</b>	<b>50</b>			<b>40.38</b>	<b>50</b>

<sup>1</sup> The EAR awards were part of the Efficiency Savings and Performance Incentive (ESPI) awards.

<sup>2</sup> A measure package documents the data, methodologies, and rationale used to develop values for deemed measures. A measure package is prepared and submitted by program administrators and approved by the CPUC.

<sup>3</sup> A metric score is the rating from assigned to each ESPI performance category, reflecting the IOU’s performance based on CPUC evaluation. Points are the weighted contribution of each metric score to the final ESPI score. They are calculated using the formula: **Points = Metric Score × Metric Weight**

Table 2: SoCalGas 2023 EAR Scoring for Measure Packages and Custom Projects

SoCalGas 2023 EAR Review Performance Scores and Points		Measure Packages				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	3.37	10%	3.37	5	5.00	10%	5.00	5
2	Content, Completeness, and Quality of Submittals	2.50	30%	7.50	15	4.24	30%	12.71	15
3	Proactive Initiative of Collaboration	4.22	10%	4.22	5	3.60	10%	3.60	5
4	Due Diligence and QA/QC Effectiveness	5.00	25%	12.50	12.5	4.43	25%	11.07	12.5
5	Responsiveness to Needs for Process/Program Improvements	5.00	25%	12.50	12.5	3.50	25%	8.75	12.5
Total				40.09	50			41.13	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 2024 Activities

### A. Custom Projects Review Overview

From the period beginning January 2024 to the end of December 2024, CPUC staff issued four scored dispositions for SoCalGas.<sup>4</sup>

A review of the project dispositions and the Review Process Score Enhancements points<sup>5</sup> resulted in SoCalGas's custom project score decreasing by 0.75 points from 2023 scores (41.13 in 2023 vs. 40.38 in 2024 as shown in Tables 1 and 2 above). This is a slight decrease over last year's performance indicating SoCalGas has continued its efforts in maintaining status quo regarding custom projects review performance.

### 1. Summary of 2024 Achievements

CPUC staff observed SoCalGas to have improved in:

- **Timing and timeliness of submittals.** SoCalGas continued submitting project documentation for review for all 4 of these custom projects on time with 2 projects (50 percent) earlier than required by 5 or more days.
- **Issues related to program influence.** SoCalGas is improving efforts to ensure compliance with CPUC program influence policy and documenting program influence in project submissions.

<sup>4</sup> Some of the dispositions are for projects submitted at the end of 2023. Some projects that were selected in 2023 had dispositions issued in 2024. The memo is for dispositions issued in 2024.

<sup>5</sup> Section IV.E provides details on the score enhancement methodology.

- **Early Opinion collaboration.** SoCalGas showed more proactive collaboration with the steam trap early opinion submittal.

## 2. Summary of Areas Requiring Improvement

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

- **The proportion of gross savings impact issues remains high.** In 2023, SoCalGas had 50 percent of all issues related to gross savings impacts. In 2024, the number of issues related to gross savings impacts decreased to 36 percent of total issues, but is still considerable. In addition, this issue was part of the one rejection in 2024. CPR 906 was rejected due to CPUC policy issues related to a 2016 steam trap memo issued by CPUC. SoCalGas needs to improve analysis assumptions and calculation methodology to reduce the impact of deficiencies within project submissions.
- **Issues related to process, policy, and program rules increased.** In 2023 issues related to process, policy, and program rules comprised 13 percent of total issues. In 2024, the number of process, policy, and program related issues has increased to 27 percent, indicating that SoCalGas still has improvement to be made in collaborating on process, policy, and program rules during project discussions and submissions.
- **The number of issues related to documentation increased.** In 2023, issues related to documentation only comprised of 2 notes and did not result in any disposition actions. In 2024, documentation issues comprised of 27% of total issues. SoCalGas should apply increased focus in 2025 on document uploads to ensure that all project files are submitted.

## B. Measure Packages Review Overview

SoCalGas' measure packages score decreased compared to last year by 3.02 points (from 40.09 in 2023 to 37.07 for 2024 as shown in Tables 1 and 2 above) which indicates that SoCalGas has generally maintained status quo for their practices for measure package submittals.

### 1. Summary of 2023 Achievements

CPUC staff observed improvements in SoCalGas' development and management of measure package submissions in the following areas:

- **SoCalGas continues to work closely with the CPUC staff and with the other PAs to manage measure package submittals.** They generally met or exceeded the expectations.
- **SoCalGas has continued exceeding expectations on timeliness.** SoCalGas met or exceeded their submission timeline for all measure packages.

### 2. Summary of Areas Requiring Improvement

CPUC staff highlights the following recommendations for improvement:

- **There is room for improvement in the QA/QC process for measure packages.** SoCalGas should continue to focus on measure package QC before submitting to CPUC staff for review as there are still review comments that hold up measure package approval.

### 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 measure packages.

#### A. Custom Projects Performance Review

Each year, CPUC staff reviews a selected sample of energy efficiency programs custom project applications. The review findings and directions to the PA are presented in documents referred to as “dispositions”.

**From the period beginning January 2024 to the end of December 2024, 4 SoCalGas projects received dispositions.** The comments below are organized by the five metric areas of scoring prescribed in D.16-08-019 with metric scores shown prior to any enhancement points. CPUC staff may award enhancement points, at their discretion, to recognize exceptional efforts or innovative practices that go beyond standard ESPI metric expectations and contribute to improved program performance or evaluation outcomes. A summary table of all submitted dispositions 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 reviewer.

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

Table 3: 2024 SoCalGas Custom Disposition Points Awarded by Metric

Metric	Metric Area of Scoring	Weight Factor	Custom Disposition Points		Max Points
			With Enhance Pts <sup>6</sup>	w/o Enhance Pts	
1	Timeliness of Submittals	10%	5.00	5.00	5
2	Content, Completeness, and Quality of Submittals	30%	12.25	12.25	15
3	Proactive Initiative of Collaboration	10%	4.00	4.00	5
4	PA's Due Diligence and QA/QC	25%	9.75	9.75	12.5
5	PA's Responsiveness	25%	9.38	8.13	12.5
<b>Total</b>			<b>40.38</b>	<b>39.13</b>	<b>50</b>

#### 1. Timeliness of Submittals

In 2024, SoCalGas received a custom disposition score of 5.0 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 4 SoCalGas custom projects reviews completed in 2024. In 2024, SoCalGas submitted project documentation for review for all 4 of these custom projects on time with two projects (50 percent) earlier than required.<sup>7</sup> SoCalGas's timely submissions continue to demonstrate SoCalGas' effort to improve timeliness.

<sup>6</sup> Section IV.E provides details on the score enhancement methodology.

<sup>7</sup> “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”.

## 2. Content, Completeness, and Quality of Submissions

In 2024, SoCalGas received a custom disposition score of 12.25 out of 15.0 for Metric 2 (Content, Completeness and Quality of Submissions) prior to the addition of any enhancement points. Although this score was a decrease from the score by 0.46 in 2023, it indicates that SoCalGas is continuing to meet expectations. Scoring was based on the completeness of the 4 SoCalGas custom project reviews. Of the 4 dispositions issued, 1 project was rejected, 1 project was marked Advisory, and 2 projects were approved with noted deficiencies which resulted in a loss of points under this metric.<sup>8</sup>

Table 4 below summarizes the 11 action items identified across the 4 scored dispositions<sup>9</sup> issued in 2024. These action items illustrate errors that impacted the project's eligibility, documentation, and efficiency savings estimate calculations.

Table 4: Summary of Categorized Action Items for Custom Projects

Issue Area	Action Categories	Summary of CPUC Staff Required Action by the PA <sup>10</sup> :	Summary of CPUC Staff Notes or Instructions <sup>11</sup> :	Percent of Total Actions
<b>Issues Related to Gross Savings Impacts</b>	Analysis assumptions	2	1	18%
	Calculation method	0	2	0%
	M&V plan	2	1	18%
	<b>Subtotals</b>	<b>4</b>	<b>4</b>	<b>36%</b>
<b>Process, Policy, Program Rules</b>	CPUC Policy	1	0	9%
	Eligibility	1	0	9%
	Measure cost	1	0	9%
	<b>Subtotals</b>	<b>3</b>	<b>0</b>	<b>27%</b>
<b>Documentation Issues</b>	Continue Document Upload	2	2	18%
	Missing documents	1	0	9%
	<b>Subtotals</b>	<b>3</b>	<b>2</b>	<b>27%</b>
<b>Issues Related to Net Impacts</b>	Program influence	1	0	9%
	<b>Subtotals</b>	<b>1</b>	<b>0</b>	<b>9%</b>

<sup>8</sup> The objective of Advisory reviews is not to approve project savings claims, but to provide early feedback for implementation and to inform CPUC staff-led evaluation. NMEC project reviews are Advisory. The guidance for Prospective reviews applies to future projects that are not already in the PA's pipeline of projects. CPUC staff use Prospective reviews to provide feedback on new programs.

<sup>9</sup> This table includes action items issued on two Advisory dispositions.

<sup>10</sup> For Action items, the PA must make revisions or changes as noted in CPUC Staff's review comments before signed agreement with customer.

<sup>11</sup> Notes or Instructions are informational observations that do not require revision by the PA but should be considered for similar projects moving forward. They may also include documentation of pre-installation items to inform possible post-installation review(s). They are typically minor suggestions or clarifications that should not affect ESPI scoring.

Issue Area	Action Categories	Summary of CPUC Staff Required Action by the PA <sup>10</sup> :	Summary of CPUC Staff Notes or Instructions <sup>11</sup> :	Percent of Total Actions
Other Issues	Other 1 - Populate estimated savings and cost for measures in OR	0	1	0%
	Subtotals	0	1	0%
	Grand Total	11	7	100%

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

- **Analysis assumptions and M&V issues** occurred on two projects (950 and 954) and resulted in a loss of EAR points due to the significance of these discrepancies. Deficiencies noted include cooling degree day calculation clarifications, directives to use deemed electric impact factors, and M&V Plan comments on measurement of key parameters.
- **Process, Policy, and Program Rules issues** occurred on three projects (906, 943 and 954) and resulted in a loss of EAR points due to the significance of these discrepancies. Deficiencies noted include excluding vendor quotes to determine labor cost estimates, compliance with past steam trap memos and guidance, and measure application type definition comments.
- **Program influence and other issues** improved in 2024 and contributed to offsetting lost EAR points due to analysis assumptions and process, policy, and program rules issues. The one noted deficiency questioned the effect of the incentive and program influence on the customer's simple payback.

### 3. Proactive Initiative of Collaboration

In 2024, SoCalGas received a custom disposition score of 4.00 out of 5.00 for Metric 3 (Proactive Initiative of Collaboration) prior to the addition of any enhancement points. CPUC staff found that SoCalGas made some effort to bring measures, projects, or studies forward for discussion during the bi-weekly meetings, and in general met proactive collaboration expectations. SoCalGas did submit one Early Opinion in 2024 and provided collaboration on the existing stream trap replacement memo, which is still in progress. SoCalGas was active in statewide meetings, working groups, and stakeholder communications contributing to a slightly increased score compared to 2023.

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

In 2024, SoCalGas received a custom disposition score of 9.75 out of 12.50 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 occurring by the PA. The number of dispositions proceeding without exception was weighed against those that required resubmissions or resulted in rejections. Of the 4 projects receiving dispositions, 1 project was rejected, 1 project was marked Advisory, and 2 projects were approved with noted deficiencies. The one project rejection was resubmitted and re-reviewed

as a different CPR Project ID, as such, both projects were scored as one even though they had two reviews and two project IDs. SCG still has shown effective QC of projects prior to submitting for review with a slight deduction in points mainly due to the one project rejection.

## 5. PA's Responsiveness

In 2024, SoCalGas received a custom disposition score of 8.13 out of 12.50 for Metric 5 (PA's Responsiveness) prior to the addition of any enhancement points. This category earned enhancement points. Please see Section IV below for a more detailed description. When reviewed at the portfolio level, CPUC staff assessed the time series of expectations, the alignment of program policy and procedures with the number of exceptions based on eligibility and attribution, and the adoption to changes in rules over time. The lower performance score in Metric 5 was driven in large part by the substantial number issues documented across all project submissions. In 2023, SoCalGas averaged roughly 1.1 actions per disposition and in 2024, SoCalGas averaged 2.2 actions per disposition including one rejection. CPUC staff determined that SoCalGas has more work that should be done to address issues related to gross savings and policy and program rules, and to bring about substantive process improvements in the future.

## B. Measure Packages Performance Review

SoCalGas had 71 measure packages submitted in 2024 which were reviewed and disposed. This end of year memo provides measure package specific feedback on the 71 which were reviewed and disposed.

The comments below are organized by the five scoring metric areas created in D.16-08-019.<sup>12</sup> The narrative includes observations common to multiple measure packages and feedback related to the measure package development process. Specific measure package feedback is provided in [Attachment C](#) at the end of this document. The measure package Review Table provides feedback on specific measure packages. The Measure Package Submissions Table lists all measure packages submitted by SoCalGas during the review period. Measure packages were selected for feedback from those that were led by SoCalGas and were either disposed or reached approval status during the review period. CPUC staff acknowledges that measure package 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 measure packages 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 measure package disposition points given to SoCalGas for each metric both with and without the addition of any enhancement points.

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<sup>12</sup> See [D.16-08-019](#) at 87.



Table 5: SoCalGas Measure Package Disposition Points Awarded by Metric

Metric	Metric Area of Scoring	Weight Factor	Measure Package Disposition Points		Max Points
			With Enhance Pts <sup>13</sup>	w/o Enhance Pts	
1	Timeliness of Submittals	10%	3.63	3.63	5
2	Content, Completeness, and Quality of Submittals	30%	11.67	7.92	15
3	Proactive Initiative of Collaboration	10%	4.83	2.96	5
4	PA's Due Diligence and QA/QC	25%	6.95	6.95	12.5
5	PA's Responsiveness	25%	9.99	6.87	12.5
Total			37.07	28.33	50

## 1. Timeliness of Submittals

In 2024, SoCalGas received a measure package disposition score of 3.63 out of 5.0 for Metric 1. SoCalGas has consistently met deadlines for submission of statewide measure packages. SoCalGas developed one new measure package in 2024. Thirty-two additional measure packages received high ratings for timeliness.

## 2. Content, Completeness, and Quality of Submissions

In 2024, SoCalGas received a measure package disposition score of 7.92 out of 15.0 for Metric 2 prior to the addition of any enhancement points.

SoCalGas has continued to show high quality submittals in 2024 with most measure packages meeting expectations. Most measure packages consisted of minor edits and clarifications rather than corrections and errors. Six measure packages received high marks with high quality submittals and approval without comment.

SoCalGas received a minus “-” on two measure package submittals. This was due to the number of comments and corrections on Intermittent Pilot Lights and Steam Traps.

## 3. Proactive Initiative of Collaboration

In 2024, SoCalGas received a measure package disposition score of 2.96 out of 5.0 for Metric 3 prior to the addition of any enhancement points. Measure packages met the minimum expectations of collaboration which was required to ensure each measure package met all PA's needs and minimally received a “Yes” with 13 measure packages exceeding minimum expectations. In December of 2023, SoCalGas took over as the lead for the all-IOU monthly ex-ante coordination call.

SoCalGas has been proactive with providing the CPUC staff with updates and preliminary work products on upcoming measure packages via the Measure Package Plan process. In addition, SoCalGas worked collaboratively with CPUC staff on a variety of measure package specific issues including the Upstream Flag and Net-To-Gross (NTG) IDs.

## 4. PA's Due Diligence, Quality Assurance, and Quality Control

In 2024, SoCalGas received a measure package disposition score of 6.95 out of 12.5 for Metric 4.

<sup>13</sup> Section IV.E provides details on the score enhancement methodology.

The quality of SoCalGas measure packages and their due diligence has continued to be a positive for SoCalGas. No measure packages received “-” scores while eight received “+” scores with approval without comments or with few comments. SoCalGas has proactively coordinated QC issues among the other PAs and the ex ante review team including identifying an error with the DEER NTG table, updating Tech Types for food service measures, and testing the accuracy of the Avoided Costs Calculator 2024 models. For a measure package when there was a code change between submission and CPUC staff review, SoCalGas worked quickly and effectively to incorporate detailed baseline differences that were climate zone specific to ensure the permutations and measure package narrative aligned. These scenarios exceeded minimum expectations.

## 5. PA's Responsiveness

In 2024, SoCalGas received a measure package disposition score of 6.87 out of 12.5 for Metric 5 prior to the addition of any enhancement points.

SoCalGas received high marks on seven of their measure packages. There were no measure packages that received scores below expectations. This type of effort and program improvement approach is appreciated and noted. SoCalGas continues to show responsiveness and initiative when developing new measures.

## IV. The Scoring Methodology

The 2024 performance score was developed using five detailed scoring metrics for each directly reviewed work product (i.e., measure package 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 2023. D.16-08-019 also directed that the custom and measure package scores be weighted together into a final score based on the IOU total claims for custom and deemed activities, respectively.

In accordance with D.13-09-023, the PA's 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 measure packages 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 2023 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 measure package 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 measure packages. Each reviewed utility work product was first determined to have components either applicable or not applicable to a metric.<sup>14</sup> 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 because of a non-applicable metric.

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](#).

## **A. Measure Package Metric 1-5 Scoring Methodology**

For measure packages, 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 measure packages 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 measure package level disposition scoring, as well as related measure package activities, are provided in [Attachment C](#). Note the following approach to scoring individual measure packages by metric:

- Metric 1 Timeliness: The measure package submission schedule was designed to distribute the measure packages throughout the year. Measure packages receive “+” if schedule was followed.
- Metric 2 Content: Straightforward measure package received a “Yes”, complex revisions received a “+”, unless there were errors in the content, which warranted a “-”.
- Metric 3 Collaboration: Straightforward consolidation effort measure package received a “Yes”, initiative to work with other PAs and CPUC receives “+”.

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<sup>14</sup> An example is the No Savings procedural measure package, which does not include any savings, costs, or permutations and therefore would not receive scoring for Metric 2 (“Content, Completeness, and Quality of Submittal”). Another example would be a minor Measure Package which may not require proactive collaboration with CPUC staff and therefore not receive a score for Metric 3 (“Proactive Initiation of Collaboration”).

- Metric 4 Quality Assurance: measure packages that were complete, consistent, and without meaningful errors received a “Yes”. Those measure packages with inconsistencies between the data tables and narrative or where values were left undefined received a “-”.
- Metric 5 Process: Measure package responsiveness to program needs received a “Yes” for straightforward and “+” for complex measure package submissions.

## **B. Custom Metric 1 Scoring Methodology**

This metric is related to the timeliness of submittals and a maximum of five 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 EAR 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. 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 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 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. Like 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. Like 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 measure package work product review scores. Next, utility-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 2024 to positively impact future project reviews. CPUC staff believes it is important to provide EAR “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 decided that SoCalGas’ efforts did rise to the level to be awarded “Enhancement” points.

- Metric 1 Timeliness: There were no adder points for this metric.
- Metric 2 Content: There were no adder points for this metric.
- Metric 3 Collaboration: There were no adder points for this metric.
- Metric 4 Quality Assurance: There were no adder points for this metric.
- Metric 5 Process: SCG has improved responsiveness to process and program needs through proactive engagement with third parties, improved documentation of templates, and other dialogue opportunities that have led to a reduction in supplemental data requests.

Measure package 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 adder points for this metric.
- Metric 2: Content: SCG initiated and took the lead to update the HPWH measure protocols.
- Metric 3: Collaboration: SCG has taken control of the all-IOU monthly ex-ante coordination call as of December 2023.
- Metric 4: There were no adder points for this metric.
- Metric 5: SCG assisted in the review of SoCalREN led measures.

To produce the final measure package scores, the metric scores for the two measure package

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 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 SoCalGas.<sup>15</sup>

[Attachment D](#) contains custom and measure package 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 Lisa Paulo ([lisa.paulo@cpuc.ca.gov](mailto:lisa.paulo@cpuc.ca.gov)) or Peter Biermayer ([peter.biermayer@cpuc.ca.gov](mailto:peter.biermayer@cpuc.ca.gov)). Note that pursuant to D.13-09-023, CPUC staff will schedule a meeting with SoCalGas staff to discuss this memorandum and its final scores by October 30, 2025.

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<sup>15</sup> 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 EAR Performance Scores (without Enhancement Points)

Metric		Measure Packages				Custom			
		Max Points	Max Percent of Total Points	2024 Score	2024 Points	Max Points	Max Percent of Total Points	2024 Score	2024 Points
1	Timing and Timeliness of Submittals	5	10%	3.63	3.63	5	10%	5.00	5.00
	Timely submittals: all lists, inventories, plans, studies, Measure packages 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%	2.64	7.92	15	30%	4.08	12.25
	Completeness, appropriateness, comprehensiveness, accuracy, and clarity of submittals. Submittal adherence to CPUC policies, Decisions, and prior CPUC 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%	2.96	2.96	5	10%	4.00	4.00
	PA efforts to bring either measures, projects, studies, questions, and/or savings calculation methods and 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 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%	2.78	6.95	12.5	25%	3.90	9.75

Metric		Measure Packages				Custom			
		Max Points	Max Percent of Total Points	2024 Score	2024 Points	Max Points	Max Percent of Total Points	2024 Score	2024 Points
	CPUC 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 CPUC staff can evaluate the effectiveness of the PA internal QA/QC processes.								
5	Program Administrator’s Responsiveness to Needs for Process and Program Improvements	12.5	25%	2.75	6.87	12.5	25%	3.25	8.13
	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. CPUC 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 CPUC 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.								
Total		50	100%		28.33	50	100%		39.13



**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 4 2016 Adopted Performance Metrics*

Metric	2016 CPUC Adopted ex ante Metrics	Maximum Points	% of TOTAL POINTS	TOTAL SCORED POINTS	# of Scored Dispositions for SoCalGas	Scoring Notes (Portfolio Level)
Metric 1	<b>Timeliness and Timing of Submittals</b> Timely submittal of all documentation and follow-up utility responses to review disposition action items.	5	10%	5.00	4	SoCalGas complied with SB1131 guidelines for submitting documentation before the 15 business days required. Of the 4 projects with dispositions in 2024, all 4 of these custom projects were submitted on time with two projects (50 percent) submitted earlier than required.
Metric 2	<b>Content, Completeness and Quality of Submittals</b> 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%	12.25	4	Of the 4 dispositions issued, 1 project was rejected, 1 project was marked Advisory, and 2 projects were approved with noted exception. Out of the of the 4 scored dispositions, 11 actions items were identified illustrating deficiencies that impacted the project's eligibility, documentation, and efficiency savings estimate calculations. These deficiencies resulted in the loss of points under this metric.
Metric 3	<b>Proactive Initiation of Collaboration</b> 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%	4.00	4	Commission Staff found that SoCalGas met expectations to bring measures, projects, or studies forward for discussion prior to review and provide proactive collaboration. SoCalGas also continues to meet expectations with participation in statewide working groups, custom coordination meetings, among other stakeholder initiatives. SoCalGas submitted one Early Opinion for steam traps in 2024. CPUC staff notes SoCalGas did initiate detailed conversations around the steam trap early opinion and its impact on the custom project market among further details on the steam trap memorandum review and its impacts. As such, SoCalGas performed slightly above the expectations for demonstrating proactive collaboration and improved their score relative to 2023.
Metric 4	<b>Utility Due Diligence and QA/QC Effectiveness</b> 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	12.5	25%	9.75	4	Project and measure level disposition performance results reviewed under Metric 2 were used as a proxy for the level of QA/QC occurring by the PA. The number of dispositions proceeding without exception was weighed against those that required resubmissions or resulted in rejections. Of the 4 projects receiving dispositions, 1 project was rejected, 1 project was marked Advisory, and 2 projects were approved with noted deficiencies. The one project rejection was resubmitted and re-reviewed as a different

Metric	2016 CPUC Adopted ex ante Metrics	Maximum Points	% of TOTAL POINTS	TOTAL SCORED POINTS	# of Scored Dispositions for SoCalGas	Scoring Notes (Portfolio Level)
	both Core and Third Party programs, are included under this metric.					CPR Project ID, as such, both projects were scored given they had two reviews and two project IDs. SCG still has shown effective QC of projects prior to submitting for review with a slight deduction in points mainly due to the one project rejection.
Metric 5	<b>Utility Responsiveness to Needs for Process &amp; Program Improvements (Course Corrections)</b> This metric reflects the utility's efforts to improve, operationalize, and improve its internal processes that 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%	8.13	4	Commission Staff noted a number of issues related to Gross Savings Impacts as well as Process, Policy, and Program Rules, an increase from 2023. However, actions and issues stemming from program influence have improved relative to 2023. One of the projects reviewed (25 percent) was rejected and two were approved with noted deficiencies (50 percent), contributing to a lower score. As such, CPUC staff notes SoCalGas performance for this metric is not meeting minimum expectations.

Attachment C: Measure Package Scores and Feedback

The table below lists the ID numbers associated with each Measure package submission or disposition and the measure package 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 IOU may refer to the individual dispositions for more detailed descriptions of the specific actions staff required for each measure package. The qualitative EAR 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.

Measure Package Reviews - Scored Measure Packages 2024					EAR Metrics					
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5	
SWFS024	2	Hot Food Holding Bins, Commercial	Mid-cycle measure package update to update NTG ID value to sector default values instead of new technology NTG ID. Measure package approved without comments.	1	yes	+	+	+	yes	

Measure Package Reviews - Scored Measure Packages 2024							EAR Metrics				
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5		
SWFS025	2	Radiant Conveyor Toaster, Commercial	Mid-cycle measure package update to update NTG ID value to sector default values instead of new technology NTG ID. Measure package approved without comments.	1	yes	+	+	+	yes		
SWFS026	2	Cooktop, Commercial	Mid-cycle measure package update to update NTG ID value to sector default values instead of new technology NTG ID. Measure package approved without comments.	1	yes	+	+	+	yes		
SWWH019	5	Faucet Aerator, Commercial	Mid-cycle measure package update to add heat pump water heater and electric water heater offerings. Measure package approved without comments.	1	yes	+	+	yes	+		
SWWH026	3	Water Heater Pipe Wrap, Residential	Mid-cycle measure package update to add heat pump water heater and electric water heater offerings. Measure package approved without comments.	1	yes	+	+	yes	+		

Measure Package Reviews - Scored Measure Packages 2024							EAR Metrics				
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5		
SWWH002	4	Low-Flow Showerhead, Residential	Mid-cycle measure package update to add heat pump water heater offerings. Measure package approved after addressing two minor clarifying comments on MAT applicability and footnote error in the data collection requirements section.	1	+	yes	+	yes	+		
SWWH003	3	TSV with and without an Integrated Low-Flow Showerhead, Residential	Mid-cycle measure package update to add heat pump water heater offerings. Measure package approved after addressing two minor clarifying comments on MAT applicability and footnote error in the data collection requirements section.	1	+	yes	+	yes	+		
SWWH020	5	Low-Flow Showerhead, Commercial	Mid-cycle measure package update to add heat pump water heater and electric water heater offerings. Measure package approved after addressing two minor clarifying comments on MAT applicability and footnote error in the data collection requirements section.	1	+	yes	+	yes	+		
SWWH001	4	Faucet Aerator, Residential	Mid-cycle measure package update to add heat pump water heater offerings. Measure package approved after addressing one minor clarifying comment on footnote error in the data collection requirements section.	1	+	yes	+	yes	+		
SWWH017	5	Hot Water Pipe Insulation, Nonresidential & Multifamily	Mid-cycle measure package update to add heat pump water heater and electric water heater offerings. Measure package approved after addressing one minor clarifying question on adding permutation fields and narrative language on the water heater type per offering.	1	yes	yes	+	yes	+		
SWBE007	4	Wall Insulation, Residential	DEER2026 measure package update to include delivery type updates, measure impact type updates, and data collection requirement updates. Measure package approved after two minor comments on the data collection requirements and use of rWtd HVAC type.	1	+	yes	yes	+	yes		

Measure Package Reviews - Scored Measure Packages 2024							EAR Metrics				
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5		
SWBE006	4	Ceiling Insulation, Residential	DEER2026 measure package update to include delivery type updates, measure impact type updates, and data collection requirement updates. Measure package approved after two minor comments on the data collection requirements and use of rWtd HVAC type.	1	+	yes	yes	+	yes		
SWFS025	3	Radiant Conveyor Toaster, Commercial	DEER2026 measure package update to include delivery type updates and measure impact type updates. Measure package approved after two minor comments on the data collection requirements and to populate Tech IDs in the permutations.	1	+	yes	yes	yes	yes		
SWFS026	3	Cooktop, Commercial	DEER2026 measure package update to include delivery type updates and measure impact type updates. Measure package approved after three minor comments on the data collection requirements, populating Tech IDs in the permutations, and adding general language on viable electric alternative policy.	1	+	yes	yes	yes	yes		
SWFS011	7	Fryer, Commercial	DEER2026 measure package update to include cost updates, delivery type updates, and measure impact type updates. Measure package approved after four minor comments on the data collection requirements, populating Tech IDs in the permutations, adding general language on viable electric alternative policy, and adding additional details to the cover sheet.	1	yes	yes	yes	yes	yes		
SWRE001	4	Pool Cover, Commercial	DEER2026 measure package update to include cost updates, delivery type updates, and measure impact type updates. Measure package approved after clarifying comments on the data collection requirements, populating Tech IDs in the permutations, building type aggregation, and adding referencing the latest code standards.	1	+	yes	yes	yes	yes		
SWAP005	4	Ozone Laundry, Commercial	DEER2026 measure package update to include cost updates, delivery type updates, and measure impact type updates. Measure package approved after clarifying comments on the data collection requirements, populating Tech IDs in the permutations, and correcting typo in measure case labor cost section.	1	yes	yes	yes	yes	yes		
SWFS029	2	Rotisserie, Gas, Commercial	DEER2026 measure package update to update NTG ID value to sector defaults instead of new technology NTG ID, delivery type updates, and measure impact type updates. Measure package approved after clarifying comments on the data collection requirements, populating Tech IDs in the permutations, and adding general language on viable electric alternative policy.	1	+	yes	yes	yes	yes		
SWHC002	4	Intermittent Pilot Light, Residential	DEER2026 measure package update to include cost updates, delivery type updates, EUL updates, and measure impact type updates. Measure package approved after clarifying comments on the data collection requirements, populating	1	+	-	+	yes	yes		

Measure Package Reviews - Scored Measure Packages 2024					EAR Metrics					
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5	
			Tech IDs in the permutations, correcting text and references for cost updates, updating the hourly rate to newer data, and citing the most recent code requirements.							
SWHC031	4	Furnace, Residential	DEER2026 measure package update to include delivery type updates, EUL updates, and measure impact type updates. Measure package approved after clarifying comments on the data collection requirements and citing the most recent code requirements.	1	+	yes	yes	+	yes	
SWHC047	5	Gas Fireplace, Residential	DEER2026 measure package update to include cost updates, delivery type updates, EUL updates, and measure impact type updates. Measure package approved after clarifying comments on the data collection requirements, eligibility language, citing the most recent code requirements, and adding general language on viable electric alternative policy.	1	+	yes	yes	yes	yes	
SWHC057	2	Space Heating Gas Absorption Heat Pump, Multifamily	DEER2026 measure package update to update NTG ID value to sector defaults instead of new technology NTG ID, delivery type updates, and measure impact type updates. Measure package approved after clarifying comments on the data collection requirements, populating Tech IDs in the permutations, and requesting additional cost documentation.	1	+	yes	yes	yes	yes	
SWAP004	4	Clothes Washer, Residential	DEER2026 measure package update to update the data collection requirements, cost data, measure impact types, and delivery types. Measure package approved after clarifying source date of cost data, and data collection requirement applicability.	1	+	yes	yes	yes	yes	
SWHC058	2	Patio Heater, Gas, Commercial and Residential	DEER2026 measure package update to update the NTG ID value to sector defaults instead of new technology NTG ID, delivery type updates, and measure impact type updates. Measure package approved after populating Tech IDs, adding general language on viable electric alternative policy, and a minor comment on the data collection requirements.	1	+	yes	yes	yes	yes	
SWFS017	4	Automatic Conveyor Broiler, Commercial	DEER2026 measure package update to update the cost data, delivery type updates, and measure impact type updates. Measure package approved after adding Tech IDs into permutations, clarifying comment on the data collection requirements, adding general language on viable electric alternative policy, and minor edits to the life cycle section language.	1	yes	yes	yes	yes	yes	
SWFS005	5	Steamer, Commercial	DEER2026 measure package update to update the delivery types, measure impact types, and data collection requirements section. Measure package approved after populating Tech IDs, adding general language on viable electric alternative policy, and a minor edit to the data collection requirements section.	1	yes	yes	yes	yes	yes	
SWFS014	4	Rack Oven, Gas, Commercial	DEER2026 measure package update to update the delivery types, measure impact types, cost data, and operating assumptions. Measure package approved after populating Tech IDs, adding general language on viable electric alternative policy, data collection requirements clarification, and minor edits to the life cycle section language.	1	yes	yes	yes	yes	yes	



Measure Package Reviews - Scored Measure Packages 2024							EAR Metrics				
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5		
SWBE001	5	Greenhouse Heat Curtain	DEER2026 measure package update to update the cost data, add data collection requirements, update measure impact type and delivery type. Measure package approved after populating Tech IDs into permutations, data collection requirements clarification, minor edits to the life cycle section language, and minor language additions to the cost section to clarify the methodology.	1	yes	yes	yes	yes	yes		
SWBE002	5	Greenhouse Infrared Film	DEER2026 measure package update to update the cost data, add data collection requirements, update measure impact type and delivery type, and update tech type from DEER. Measure package approved after populating Tech IDs into permutations, data collection requirements clarification, minor edits to the life cycle section language, and two other minor typos.	1	yes	yes	yes	yes	yes		
SWPR003	3	Steam Trap, Commercial	DEER2026 measure package update to update the cost data, data collection requirements, measure impact type, and delivery types. Measure package approved after populating Tech IDs into permutations, clarifying comment on data collection requirements, updating cost section narrative and cost data reference so they are aligned.	1	yes	-	yes	yes	yes		
SWPR007	2	Steam Boiler Economizer, Industrial	DEER2026 measure package update to update the cost data, data collection requirements, measure impact type, and delivery types. Measure package approved after populating Tech IDs into permutations, clarifying comment on data collection requirements, minor typos in code requirements section, and clarifying comments on cost data reference and narrative.	1	yes	yes	yes	yes	yes		
SWAP012	3	Gas Dryer Modulating Valve, Commercial and Multifamily	DEER2026 measure package update to update the cost data, data collection requirements, measure impact type, delivery types, and energy savings calculations inputs like operating days and number of loads per day. Measure package approved after clarifying comment on data collection requirements, populating Tech IDs, minor revision to life cycle section in narrative, and an update to the static cost table in the narrative.	1	yes	yes	yes	yes	yes		
SWWH021	2	Recirculation Pump Timer, Commercial	DEER2026 measure package update to update the cost data, data collection requirements, measure impact type, delivery types, and energy savings calculations inputs like hours of operation and days of operation with DEER Water Heater Calculator load curve data. Measure package approved after populating Tech IDs, adding reference for material costs, and minor clarifying comment on data collection requirements.	1	yes	yes	yes	yes	yes		
SWWH018	5	Hot Water Tank Insulation, Nonresidential & Multifamily	DEER2026 measure package update to update the cost data, data collection requirements, measure impact type, delivery types, and updating Title 24 reference. Measure package approved after clarifying comments on code reference and data collection requirements, minor typo, and populating Tech IDs.	1	yes	yes	yes	yes	yes		
SWWH032	2	Solar Thermal Water Heating System, Residential	DEER2026 measure package update to update the data collection requirements, measure impact type, and delivery types. Measure package approved after clarifying comment on the cost data and minor typo in the data collection requirements section.	1	yes	yes	yes	yes	yes		
SWWH010	3	Boiler, Multifamily	DEER2026 measure package update to update preponderance of evidence reference, data collection requirements, measure impact type, and delivery types. Measure package approved after minor typo in the data collection requirements section, clarifying the code reference, and adding general language on viable electric alternative policy.	1	+	yes	yes	yes	yes		

Measure Package Reviews - Scored Measure Packages 2024							EAR Metrics				
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5		
SWWH011	3	Central Storage Water Heater, Multifamily	DEER2026 measure package update to update preponderance of evidence reference, data collection requirements, measure impact type, and delivery types. Measure package approved after minor typo in the data collection requirements section and adding general language on viable electric alternative policy.	1	+	yes	yes	yes	yes		
SWFS027	2	Soup Well, Electric, Commercial	DEER2026 measure package update to update NTG ID value to sector defaults instead of new technology NTG ID, delivery type updates, and measure impact type updates. Measure package approved after clarifying comments on the data collection requirements and populating Tech IDs.	1	+	yes	+	+	yes		
SWFS003	5	Combination Oven, Commercial	DEER2026 measure package update to update the operating hours per day and operating days per year, update delivery types, and update the measure impact type. Measure package approved after minor typo in the data collection requirements section, adding Tech IDs into permutations, and adding general language on viable electric alternative policy.	1	+	yes	yes	yes	yes		
SWAP017	4	Oven, Gas, Residential	DEER2026 measure package update to update the measure impact type and delivery types. Measure package approved after clarifying comment on the data collection requirements section, populating Tech IDs into permutations, and adding general language on viable electric alternative policy.	1	+	yes	yes	yes	yes		
SWAP006	5	Dishwasher, Residential	DEER2026 measure package update to update data collection requirements, measure impact type, and delivery types. Measure package approved after one clarifying comment on data collection requirements.	1	+	+	yes	yes	yes		
SWFS013	4	Low-Flow Pre-Rinse Spray Valve	DEER2026 measure package update to update measure impact type and delivery types. Measure package approved after clarifying comment on data collection requirements and populating Tech IDs into the permutations.	1	+	yes	yes	yes	yes		
SWFS018	6	Undercounter Dishwasher, Commercial	DEER2026 measure package update to update measure impact type and delivery types. Measure package approved after clarifying comment on data collection requirements and populating Tech IDs into the permutations.	1	+	yes	yes	yes	yes		
SWFS028	2	Steam Table, Electric, Commercial	DEER2026 measure package update to update NTG ID value to sector defaults instead of new technology NTG ID, delivery type updates, and measure impact type updates. Measure package approved after clarifying comments on the data collection requirements and populating Tech IDs.	1	+	yes	+	+	yes		
SWHC054	2	Heat Recovery Ventilation, Residential	DEER2026 measure package update to update measure impact type and delivery types. Measure package approved after clarifying comments on data collection requirements, populating Tech IDs into permutations, and clarifying the data source behind the cost values.	1	+	yes	yes	yes	yes		
SWRE003	4	Heater for Pool or Spa, Commercial and Multifamily	DEER2026 measure package update to update the cost data, data collection requirements, measure impact type, and delivery types. Measure package approved after clarifying comments on data collection requirements, populating Tech IDs into the permutations, adding general language on viable electric alternative policy, clarifying comment on code reference, and minor language edits in the lifecycle section of the narrative.	1	+	yes	yes	yes	yes		

Measure Package Reviews - Scored Measure Packages 2024							EAR Metrics				
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5		
SWFS024	3	Hot Food Holding Bins, Commercial	DEER2026 measure package update to update measure impact type and delivery types. Measure package approved after clarifying comment on data collection requirements and populating Tech IDs into the permutations.	1	+	yes	yes	yes	yes		
SWRE004	4	Pool Heater, Residential	DEER2026 measure package update to update the cost data, data collection requirements, measure impact type, and delivery types. Measure package approved after clarifying comments on data collection requirements, populating Tech IDs into the permutations, adding general language on viable electric alternative policy, clarifying comment on code reference, and minor language edits in the lifecycle section of the narrative.	1	+	yes	yes	yes	yes		
SWWH033	3	Gas Heat Pump Water Heater, Multifamily	DEER2026 measure package update to update building vintage in permutations, data collection requirements, measure impact type, delivery types, and updated NTG ID to use sector defaults. Measure package approved after populating Tech IDs into permutations, clarifying comments on hot water draw profiles in EnergyPlus and DEER Water Heater Calculator, and adding general language on viable electric alternative policy.	1	+	yes	yes	yes	yes		
SWFS030	1	Pressure Fryer, Commercial	First version of measure package. New measure package approved after a minor typo, clarifying comment on lab test data population, and clarifying comment on methodology used to calculate incremental measure costs.	1	+	yes	yes	yes	yes		
SWWH034	3	Solar Thermal Water Heating System, Commercial and Multifamily	DEER2026 measure package update to update data collection requirements, measure impact type, delivery types, and multifamily building type in permutations. Measure package approved after minor clarifying comment on data collection requirements section, populating Tech IDs into permutations, and clarifying comment on the base case cost methodology.	1	+	yes	yes	yes	yes		
SWWH023	3	Diverting Tub Spout with TSV, Residential	DEER2026 measure package update to add new heat pump water offerings, update calculation to use DEER Water Heater Calculator peak period usage factor, update cost data, update data collection requirements, update delivery types, and update measure impact type. Measure package approved after clarifying comments on data collection requirements section, updating references to use most current version of DEER Water Heater Calculator, and populate Tech IDs into permutations.	1	yes	yes	yes	yes	yes		
SWWH004	4	Laminar Flow Restrictor, Commercial	DEER2026 measure package update to add new heat pump water and electric resistance water heater offerings, update cost data, update delivery types, and update measure impact type. Measure package approved after clarifying comments on data collection requirements section, updating references to use most current version of DEER Water Heater Calculator, clarifying comment on the remaining useful life portion of the lifecycle section, and populate Tech IDs into permutations.	1	yes	yes	yes	yes	yes		
SWWH020	6	Low-Flow Showerhead, Commercial	DEER2026 measure package update to update data collection requirements, update costs data, measure impact type, and delivery types. Measure package approved after minor clarifying comment on data collection requirements section, populating Tech IDs into permutations, and referencing the most current version of the DEER Water Heater Calculator.	1	yes	yes	yes	yes	yes		

Measure Package Reviews - Scored Measure Packages 2024					EAR Metrics				
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5
SWFS008	3	Conveyor Oven, Gas, Commercial	DEER2026 measure package update to update cost data, baseline and measure case tested units, operating hours per day and operating days per year assumptions, delivery type updates, and measure impact type update. Measure package approved after adding general language on viable electric alternative policy, clarifying comment on the data collection requirements section, and clarifying the baseline versus efficient threshold in the cost data spreadsheet.	1	yes	yes	yes	yes	yes
SWFS012	3	Exhaust Hood Demand Controlled Ventilation, Commercial	Updated data collection requirements	1	yes	yes	yes	yes	yes
SWWH006	8	Tankless Water Heater, Commercial	Updated PoE language, data collection requirements, MIT and delivery type updates	1	yes	yes	yes	yes	yes
SWWH007	6	Storage Water Heater, Commercial	Updated PoE language, data collection requirements, MIT and delivery type updates	1	yes	yes	yes	yes	yes
SWWH005	7	Boiler, Commercial	Updated PoE, restricted flag, data collection requirements, MIT, and delivery type	1	yes	yes	yes	yes	yes
SWWH026	4	Water Heater Pipe Wrap, Residential	Updated calculations, cost data, data collection requirements, MIT and delivery type	1	yes	yes	yes	yes	yes
SWFS001	4	Convection Oven, Commercial	Updated MIT and delivery type, minor dependency and mapping changes	1	yes	yes	yes	yes	yes
SWWH017	6	Hot Water Pipe Insulation, Nonresidential & Multifamily	Updated calculations, cost data, data collection requirements, MIT and delivery type	1	yes	yes	yes	yes	yes
SWFS004	3	Griddle, Commercial	Updated costs, procedure update, delivery type and data collection requirements	1	yes	yes	yes	yes	yes
SWWH003	4	TSV with and without an Integrated Low-Flow Showerhead, Residential	Updated PPUF from Water Heater Calculator, updated cost data, data collection requirements, MIT, and delivery type	1	yes	yes	yes	yes	yes

Measure Package Reviews - Scored Measure Packages 2024					EAR Metrics				
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5
SWFS002	5	Door-Type Dishwasher, Commercial	Updated use and sub-use category fields, MIT, and delivery type	1	yes	yes	yes	yes	yes
SWFS019	4	Underfired Broiler, Commercial	Updated operating hours, costs data update, MIT and delivery type updates	1	yes	yes	yes	yes	yes
SWWH001	5	Faucet Aerator, Residential	Updated PPUF from Water Heater Calculator, updated cost data, data collection requirements, MIT, and delivery type	1	yes	yes	yes	yes	yes
SWWH002	5	Low-Flow Showerhead, Residential	Updated PPUF from Water Heater Calculator, updated cost data, data collection requirements, MIT, and delivery type	1	yes	yes	yes	yes	yes
SWFS030	2	Pressure Fryer, Commercial	Updated delivery types and measure impact types, updated NTG, added ET Study	1	yes	yes	yes	yes	yes
SWHC001	5	Wall Furnace, Residential	Updated EnergyPlus prototypes model, updated data collection requirements	1	yes	yes	yes	yes	yes
SWWH019	6	Faucet Aerator, Commercial	DEER2026 measure package update to update cost data, data collection requirements, measure impact type, and delivery types. Measure package approved after clarifying comments on data collection requirements, updating references to use most current version of the DEER Water Heater Calculator, and populating Tech IDs into the permutations.	1	yes	yes	yes	yes	yes

Measure Package Submission Status – All Measure Packages submitted in 2024

MP ID	Rev	Title	Submission Status: EAR Team Comments
SWFS024	2	Hot Food Holding Bins, Commercial	Interim approval.
SWFS025	2	Radiant Conveyor Toaster, Commercial	Interim approval.
SWFS026	2	Cooktop, Commercial	Interim approval.
SWWH019	5	Faucet Aerator, Commercial	Interim approval.
SWWH026	3	Water Heater Pipe Wrap, Residential	Interim approval.
SWWH002	4	Low-Flow Showerhead, Residential	Interim approval.
SWWH003	3	TSV with and without an Integrated Low-Flow Showerhead, Residential	Interim approval.
SWWH020	5	Low-Flow Showerhead, Commercial	Interim approval.
SWWH001	4	Faucet Aerator, Residential	Interim approval.
SWWH017	5	Hot Water Pipe Insulation, Nonresidential & Multifamily	Interim approval.
SWBE007	4	Wall Insulation, Residential	Interim approval.
SWBE006	4	Ceiling Insulation, Residential	Interim approval.
SWFS025	3	Radiant Conveyor Toaster, Commercial	Interim approval.
SWFS026	3	Cooktop, Commercial	Interim approval.
SWFS011	7	Fryer, Commercial	Interim approval.
SWRE001	4	Pool Cover, Commercial	Interim approval.
SWAP005	4	Ozone Laundry, Commercial	Interim approval.
SWFS029	2	Rotisserie, Gas, Commercial	Interim approval.
SWHC002	4	Intermittent Pilot Light, Residential	Interim approval.
SWHC031	4	Furnace, Residential	Interim approval.
SWHC047	5	Gas Fireplace, Residential	Interim approval.
SWHC057	2	Space Heating Gas Absorption Heat Pump, Multifamily	Interim approval.
SWAP004	4	Clothes Washer, Residential	Interim approval.
SWHC058	2	Patio Heater, Gas, Commercial and Residential	Interim approval.
SWFS017	4	Automatic Conveyor Broiler, Commercial	Interim approval.
SWFS005	5	Steamer, Commercial	Interim approval.
SWFS014	4	Rack Oven, Gas, Commercial	Interim approval.

Measure Package Submission Status – All Measure Packages submitted in 2024

MP ID	Rev	Title	Submission Status: EAR Team Comments
SWBE001	5	Greenhouse Heat Curtain	Interim approval.
SWBE002	5	Greenhouse Infrared Film	Interim approval.
SWPR003	3	Steam Trap, Commercial	Interim approval.
SWPR007	2	Steam Boiler Economizer, Industrial	Interim approval.
SWAP012	3	Gas Dryer Modulating Valve, Commercial and Multifamily	Interim approval.
SWWH021	2	Recirculation Pump Timer, Commercial	Interim approval.
SWWH018	5	Hot Water Tank Insulation, Nonresidential & Multifamily	Interim approval.
SWWH032	2	Solar Thermal Water Heating System, Residential	Interim approval.
SWWH010	3	Boiler, Multifamily	Interim approval.
SWWH011	3	Central Storage Water Heater, Multifamily	Interim approval.
SWFS027	2	Soup Well, Electric, Commercial	Interim approval.
SWFS003	5	Combination Oven, Commercial	Interim approval.
SWAP017	4	Oven, Gas, Residential	Interim approval.
SWAP006	5	Dishwasher, Residential	Interim approval.
SWFS013	4	Low-Flow Pre-Rinse Spray Valve	Interim approval.
SWFS018	6	Undercounter Dishwasher, Commercial	Interim approval.
SWFS028	2	Steam Table, Electric, Commercial	Interim approval.
SWHC054	2	Heat Recovery Ventilation, Residential	Interim approval.
SWRE003	4	Heater for Pool or Spa, Commercial and Multifamily	Interim approval.
SWFS024	3	Hot Food Holding Bins, Commercial	Interim approval.
SWRE004	4	Pool Heater, Residential	Interim approval.
SWWH033	3	Gas Heat Pump Water Heater, Multifamily	Interim approval.
SWFS030	1	Pressure Fryer, Commercial	Interim approval.
SWWH034	3	Solar Thermal Water Heating System, Commercial and Multifamily	Interim approval.
SWWH023	3	Diverting Tub Spout with TSV, Residential	Interim approval.
SWWH004	4	Laminar Flow Restrictor, Commercial	Interim approval.
SWWH020	6	Low-Flow Showerhead, Commercial	Interim approval.

Measure Package Submission Status – All Measure Packages submitted in 2024

MP ID	Rev	Title	Submission Status: EAR Team Comments
SWFS008	3	Conveyor Oven, Gas, Commercial	Interim approval.
SWFS012	3	Exhaust Hood Demand Controlled Ventilation, Commercial	Interim approval.
SWWH006	8	Tankless Water Heater, Commercial	Interim approval.
SWWH007	6	Storage Water Heater, Commercial	Interim approval.
SWWH005	7	Boiler, Commercial	Interim approval.
SWWH026	4	Water Heater Pipe Wrap, Residential	Interim approval.
SWFS001	4	Convection Oven, Commercial	Interim approval.
SWWH017	6	Hot Water Pipe Insulation, Nonresidential & Multifamily	Interim approval.
SWFS004	3	Griddle, Commercial	Interim approval.
SWWH003	4	TSV with and without an Integrated Low-Flow Showerhead, Residential	Interim approval.
SWFS002	5	Door-Type Dishwasher, Commercial	Interim approval.
SWFS019	4	Underfired Broiler, Commercial	Interim approval.
SWWH001	5	Faucet Aerator, Residential	Interim approval.
SWWH002	5	Low-Flow Showerhead, Residential	Interim approval.
SWFS030	2	Pressure Fryer, Commercial	Interim approval.
SWHC001	5	Wall Furnace, Residential	Interim approval.
SWWH019	6	Faucet Aerator, Commercial	Interim approval.



Process Adder	EAR Metrics					
	Weight	1	2	3	4	5
SoCalGas assisted in the review of SoCal REN-led measure updates on five low flow domestic hot water measures (SWWH001, SWWH002, SWWH003, SWWH019, SWWH020) and two hot water pipe insulation measures (SWWH017, SWWH026)	1	No	No	No	No	Yes
SoCalGas initiated and took the lead to update HPWH measure protocols.	1	No	No	+	No	No
SoCalGas has taken control of the all-IOU monthly ex-ante coordination call as of December 2023. SoCalGas continued to lead these calls in 2024.	1	No	Yes	No	No	No

Attachment D: 2024 Performance Annual Ratings

Custom Scoring

2024 Annual Custom Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	Total Points
Direct Work Product Review Score	Disposition Score (1-5)	5.00	4.08	4.00	3.90	3.25	
Review Process Score Enhancements	Technical & Policy QC Increase	0.00	0.00	0.00	0.00	0.50	
	Implementation Increase	0.00	0.00	0.00	0.00	0.00	
Total Score	Adjusted Final Metric Score (1-5)	5.00	4.08	4.00	3.90	3.75	
	Adjusted Metric Points	5.00	12.25	4.00	9.75	9.38	40.38

2023 Annual Custom Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	Total Points
Direct Work Product Review Score	Disposition Score (1-5)	5.00	4.24	3.60	4.43	3.50	
Review Process Score Enhancements	Technical & Policy QC Increase	0.00	0.00	0.00	0.00	0.00	
	Implementation Increase	0.00	0.00	0.00	0.00	0.00	
Total Score	Adjusted Final Metric Score (1-5)	5.00	4.24	3.60	4.43	3.50	
	Adjusted Metric Points	5.00	12.71	3.60	11.07	8.75	41.13

Measure Package Scoring

2024 Annual Measure Package Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	Total Points
Direct Workproduct Review Score	SCG "-"	0%	3%	0%	0%	0%	
	SCG "+"	45%	8%	18%	11%	10%	
	SCG "Yes"	55%	89%	82%	89%	90%	
	Dispositions Score %	73%	53%	59%	56%	55%	
	Dispositions Score	3.63	2.64	2.96	2.78	2.75	
Review Process Score Enhancements	SCG "-"		0%	0%		0%	
	SCG "+"		0%	50%		0%	
	SCG "Yes"		100%	50%		100%	
	Process Score %	0%	50%	75%	0%	50%	
	Process Increase Score	0.00	2.50	3.75	0.00	2.50	
	Process Increase Weight	0.50	0.50	0.50	0.50	0.50	
	Process Increase Wtd Score	0.00	1.25	1.88	0.00	1.25	
Total Score	Final Metric Score (1-5)	3.63	3.89	4.83	2.78	4.00	
	Metric Points with Weighting	3.63	11.67	4.83	6.95	9.99	

2023 Annual Measure Package Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	
Direct Workproduct Review Score	SCG "-"	0%	11%	0%	0%	0%	
	SCG "+"	35%	11%	19%	14%	16%	
	SCG "Yes"	65%	78%	81%	86%	84%	
	Dispositions Score %	67%	50%	59%	57%	58%	
	Dispositions Score	3.37	2.50	2.97	2.84	2.91	
Review Process Score Enhancements	SCG "-"			0%	0%	0%	
	SCG "+"			0%	100%	100%	
	SCG "Yes"			100%	0%	0%	
	Process Score %	0%	0%	50%	100%	100%	
	Process Increase Score	0.00	0.00	2.50	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	1.25	2.50	2.50	
Total Score	Final Metric Score (1-5)	3.37	2.50	4.22	5.00	5.00	Total Points
	Metric Points with Weighting	3.37	7.50	4.22	12.50	12.50	40.09

Explanations of scoring tables row entries

- 1. The row labeled with *IOU* “-“lists the percent of measure package reviews undertaken where the CPUC staff evaluation of the materials or information indicated that the IOU performance in this metric for the submission did not meet minimum expectations or requirements relative to the metric.
- 2. The row labeled with *IOU* “+“lists the percent of measure package reviews undertaken where the CPUC staff evaluation of the materials or information indicated that the IOU performance in this metric for the submission exceeded minimum expectations or requirements relative to the metric.
- 3. The rows labeled with *IOU* “Yes“lists the percent of measure package reviews undertaken where the CPUC staff evaluation of the materials or information indicated that the IOU performance in this metric for the submission exceeded met minimum expectations or requirements relative to the metric.
- 4. The “Dispositions Score %” row (and “Process Increase Score” for Measure Packages) 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.
- 5. The “Disposition Score” (and “Process Increase Score” for Measure Packages) row converts the percent score into a numeric value of up to five by directly applying the percent to a value of 5.
- 6. The custom row labeled with “*Technical & Policy QC Increase*” lists CPUC staff points added to the metric based on an evaluation of the overall IOU 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.
7. The custom row labeled with “*Implementation Increase*” lists CPUC staff points added to the metric based on an evaluation of the overall IOU 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.
  8. The measure package rows labeled with “*Review Process Score Enhancements*” lists CPUC staff scoring for each metric based on an evaluation of the overall IOU 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 measure packages. This score is weighted as an increase to the disposition score based on the fractional weight listed in the “Process Increase Weight” row.
  9. 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 measure packages) to provide a final metric score with the final score constrained between a maximum score of 5 and a minimum score of 1.
  10. 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.