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PUBLIC UTILITIES COMMISSION

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Date: March 30, 2021

To: Southern California Gas (SoCalGas)

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

Cc: R.13-11-005 Service Lists

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

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

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

A breakdown of SoCalGas' 2020 ESPI performance score of 78.74/100 for workpapers[1] and custom projects is shown below in Table 1. SoCalGas' 2020 total points is an increase over its 2019 total points of 72.46.[2] Scores for 2019 are provided in Table 2 on the following page.

Table 1: SoCalGas 2020 ESPI Scoring for Workpapers and Custom Projects

SoCalGas 2020 ESPI Review Performance Scores and Points		Workpapers				Custom			
Metric	**Metric Area of Scoring**	**Metric Score**	**Metric Weight Factor**	**Points**	**Max Points**	**Metric Score**	**Metric Weight Factor**	**Points**	**Max Points**
1	Timing and Timeliness of Submittals	2.50	10%	2.50	5	5.00	10%	5.00	5
2	Content, Completeness, and Quality of Submittals	5.00	30%	8.30	15	2.33	30%	13.86	15
3	Proactive Initiative of Collaboration	5.00	10%	4.77	5	1.00	10%	4.60	5
4	Due Diligence and QA/QC Effectiveness	4.06	25%	12.08	12.5	3.50	25%	9.00	12.5
5	Responsiveness to Needs for Process/Program Improvements	3.48	25%	11.13	12.5	3.5	25%	7.50	12.5
Total				**38.78**	**50**			**39.96**	**50**

[1] A workpaper documents the data, methodologies, and rational used to develop values for deemed measures. A workpaper is prepared and submitted by program administrators and approved by the CPUC.
[2] 2019 custom projects scoring began in July 2019.

Table 2: SoCalGas 2019 ESPI Scoring for Workpapers and Custom Projects

SoCalGas 2019 ESPI Review Performance Scores and Points		Workpapers				Custom			
Metric	Metric Area of Scoring	Metric Score	Metric Weight Factor	Points	Max Points	Metric Score	Metric Weight Factor	Points	Max Points
1	Timing and Timeliness of Submittals	2.50	10%	2.50	5	5.00	10%	5.00	5
2	Content, Completeness, and Quality of Submittals	5.00	30%	15.00	15	2.33	30%	7.00	15
3	Proactive Initiative of Collaboration	5.00	10%	5.00	5	1.00	10%	1.00	5
4	Due Diligence and QA/QC Effectiveness	4.06	25%	10.14	12.5	3.50	25%	8.75	12.5
5	Responsiveness to Needs for Process/Program Improvements	3.48	25%	8.70	12.5	3.5	25%	9.38	12.5
Total				**41.33**	**50**			**31.13**	**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 2020 Activities

A. Custom Projects Review Overview

1. Summary of 2020 Achievements

From the period beginning January 2020 to the end of December 2020, SoCalGas submitted 89 custom projects to CPUC Staff for review selection. CPUC Staff selected 40 of these projects for review and issued 23 scored dispositions. CPUC staff waived 13 projects,[3] and 4 projects selected for review in 2020 had dispositions issued in 2021 due to timing of its selection.[4]

A review of the project dispositions and the Review Process Score Enhancements points resulted in SoCalGas's custom project score increasing by 8.83 points from 2019 scores[5] (31.13 in 2019 vs. 39.96 in 2020 as shown in Tables 1 and 2 above). Unlike the previous ESPI cycle, SoCalGas demonstrated notable efforts to improve its documentation and processes and as a result their performance has increased significantly this cycle. We applaud SoCalGas' improvements in the custom projects reviews.

[3] Review waivers are issued where CPUC Staff have not conducted an in-depth review of all of the submitted project documentation. CPUC staff neither approves nor disapproves any aspects of this project. The project application is directed to proceed without further CPUC Staff review.
[4] Projects selected by CPUC Staff at the end of 2020 were reviewed and disposed in early 2021 and therefore are not included in the 2020 performance scoring.
[5] 2019 custom projects scoring began in July 2019.

CPUC Staff's observations include:

- **The proportion of gross savings impact issues decreased significantly.** In 2019 SoCalGas had 80 percent of all issues related to gross savings impacts. In 2020, the number of issues related to gross savings impacts decreased to 32 percent of total issues. SoCalGas is showing improvement though the methods used to estimate gross savings impacts still result in deficiencies across a large number of total project submissions.
- **The number of issues regarding fuel substitution has dropped.** Custom Project Review found no eligibility related deficiencies in 2020 compared to the single instance in 2019.
- **SoCalGas took steps to improve internal processes** and implement past CPUC guidance regarding savings adjustments.
- **SoCalGas made significant efforts to bring measures and projects forward prior to review,** as well as bringing project related topics to bi-weekly meetings.
- **SoCalGas continues to actively participate in Statewide efforts,** including active participation in the Stakeholders Timing Subgroup.

2. Summary of Areas Requiring Improvement

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

- **The proportion of Process, Policy and Program rule issues increased.** In 2019 the number of deficiencies noted in this area was 20 percent of total issues identified, whereas in 2020 the number of deficiencies increased to 25 percent of total. This demonstrates that SoCalGas still has room for improvement with regards to conformance with CPUC policy and program rules.
- **The number of projects rejected increased** from 1 project in 2019 to 5 projects in 2020. There was a small sample size of projects reviewed in both years. SoCalGas must continue to improve its internal QA/QC processes to submit projects that have been thoroughly reviewed and found to comply with CPUC policy.

B. Workpapers Review Overview

1. Summary of 2020 Achievements

SoCalGas's workpapers scores have slightly decreased compared to last year by 2.55 points (from 41.33 in 2019 to 38.78 as shown in Tables 1 and 2 above) which indicates that SoCalGas has generally maintained their practices for workpaper submittals. CPUC Staff observed improvements in SoCalGas's development and management of workpaper submissions in the following areas:

- **Collaboration**. SoCalGas has contributed significantly to the development and review of the water heater calculator by researching new technologies to include and by contributing to a QC review. In addition, SoCalGas has shown worked with CPUC to identify missing parameters or values that should be updated in DEER.
- **Effective workpaper leadership**. SoCalGas has demonstrated effective workpaper leadership, managing the submissions for more complex measures including food services and smart communicating thermostats. In addition, they have worked with 3Ps to address

their program needs when it comes to including multifamily water heater measures in existing workpapers.

2. Summary of Areas of Improvement

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

- **SCG should work to improve internal QC processes** with workpaper database tables and coordinate effectively with CalTF to assure errors are addressed prior to submittal to CPUC for review.
- **SCG should adhere to workpaper submittal schedules** and communicate quickly with CPUC when there are delays.
- **SCG should complete due diligence with respect to proposed new measures** by assuring that the technologies are viable and that they are adhering to CPUC policies.

III. Discussion

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

A. Custom Projects Performance Review

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

From the period beginning January 2020 to the end of December 2020, CPUC Staff selected 40 SoCalGas projects for review and of those 23 received dispositions, 13 received review waivers, and 4 projects' dispositions were issued in early 2021 due to the timing which they were selected.[6] 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. 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

[6] Projects selected by CPUC Staff at the end of 2020 were reviewed and disposed in early 2021 and therefore are not included in the 2020 performance scoring.

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: SoCalGas Custom Disposition Points Awarded by Metric

Metric	Metric Area of Scoring	Weight Factor	Custom Disposition Points		Max Points
			With Enhance Pts	w/o Enhance Pts	
1	Timeliness of Submittals	10%	5.00	4.96	5
2	Content, Completeness, and Quality of Submittals	30%	13.86	13.86	15
3	Proactive Initiative of Collaboration	10%	4.60	3.60	5
4	PA's Due Diligence and QA/QC	25%	9.00	9.00	12.5
5	PA's Responsiveness	25%	7.50	7.50	12.5
Total			**39.96**	**38.92**	**50**

1. Timeliness of Submittals

In 2020, SoCalGas received a custom disposition score of 4.96 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 23 SoCalGas custom projects reviews completed in 2020. In 2020, SoCalGas submitted project documentation for review for 22 of these custom projects on time and 1 project was submitted late. Additionally, 19 of the 23 projects (83 percent) were submitted five days or earlier than required per timeline mandated in Senate Bill (SB) 1131 and Section 381.2 of the Public Utilities Code.[7] SoCalGas continues to exceed expectations with regards to timeliness by submitting projects on time and ahead of the required due date in many cases.

2. Content, Completeness, and Quality of Submissions

In 2020, SoCalGas received a custom disposition score of 13.86 out of 15.0 for Metric 2 (Content, Completeness and Quality of Submissions) prior to the addition of any enhancement points. This score was based on the completeness of the 23 SoCalGas custom project reviews. Of these 23 dispositions issued, 7 projects (30 percent) were approved without exception. However, 5 projects (22 percent) were rejected and 9 projects (39 percent) were approved with noted deficiencies which resulted in a loss of points under this metric.

Table 4 below summarizes the 22 action items identified across the 23 scored dispositions[8] issued between January 1, 2020 and December 31, 2020. These action items illustrate errors that impacted the project's eligibility, documentation, and efficiency savings estimate calculations.

[7] "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".
[8] This table includes action items issued on 2 Prospective dispositions.

Table 4: Summary of Categorized Action Items for Custom Projects

Issue Area	Action Categories	Summary of CPUC Staff Required Action by the PA:	Summary of CPUC Staff Notes or Instructions:	Total	Percent of Total
Issues Related to Gross Savings Impacts	Analysis assumptions	4	0	4	44%
	Calculation method	2	0	2	22%
	Calculation tool	1	0	1	11%
	M&V plan	2	0	2	22%
	Subtotals	**9**	**0**	**9**	**32%**
Process, Policy, Program Rules	Baseline	1	0	1	14%
	CPUC Policy	1	0	1	14%
	Eligibility	1	0	1	14%
	ER preponderance of evidence	1	0	1	14%
	EUL/RUL	0	2	2	29%
	Measure type	1	0	1	14%
	Subtotals	**5**	**2**	**7**	**25%**
Documentation Issues	Missing required information	1	0	1	100%
	Subtotals	**1**	**0**	**1**	**4%**
Issues Related to Net Impacts	Program influence	1	2	3	100%
	Subtotals	**1**	**2**	**3**	**11%**
Other Issues	Other 1 - Discrepancy between documentation and bi-monthly upload	1	0	1	13%
	Other 2 - Measure Persistence	1	0	1	13%
	Other 3 - Simple Payback Not Provided	0	2	2	25%
	Other 4 - Continue Document Upload	4	0	4	50%
	Subtotals	**6**	**2**	**8**	**29%**
	Grand Total	**22**	**6**	**28**	**100%**

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

- **Issue with Calculation Method** occurred on only one project (CPUC Project ID 539) which resulted in significant ESPI point reductions for this metric due to the importance of this deficiency.
- **Missing savings calculations** and **Incorrect Measure EUL** both occurred at the measure level on one project (CPUC Project ID 527) and resulted in a complete loss of ESPI points for this project due to the numerous deficiencies noted.
- **Incorrect Measure Application Type** occurred on two projects (CPUC Project IDs 317 and 527) and resulted in significant loss of ESPI points on Project 317 due to the deficiency

at the project level, and minor point deduction on Project 527 due to a deficiency at the measure level.

- **Incorrect Measure EUL** occurred on multiple measures within one project (CPUC Project ID 527) and resulted in a significant loss of ESPI points due to the multiple instances of this deficiency within a project.

3. Proactive Initiative of Collaboration

In 2020, SoCalGas received a custom disposition score of 3.6 out of 5.0 for Metric 3 (Proactive Initiative of Collaboration) prior to the addition of any enhancement points. At the portfolio level, SoCalGas made a significant effort to bring measures, projects, and studies forward for discussion prior to CPUC Staff review. CPUC staff noted that topics reviewed during bi-weekly calls such as SBD modeling errors, High Opportunity Programs or Projects (HOPPs) scopes, M&V approaches on large projects, and Measure Application Type (MAT) clarifications demonstrated SoCalGas's efforts for proactive collaboration.

For statewide initiatives, SoCalGas actively participated in the Stakeholders Timing subgroup, as well as actively participated in other statewide initiatives including the Technical Training, Statewide Guidance Documents Updates Protocol and the Small Project subgroups. As such CPUC Staff determined that SoCalGas performed above the minimum expectations with regards to proactive collaboration under this metric.

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

In 2020, SoCalGas received a custom disposition score of 9.0 out of 12.5 for Metric 4 (PA's Due Diligence, Quality Assurance, and Quality Control) prior to the addition of any enhancement points. Project and measure level disposition performance results reviewed under Metric 2 were used as a proxy for the level of QA/QC occurring by the PA. As such, the number of dispositions proceeding without exception was weighed against those that required resubmissions or resulted in rejections. Of the projects reviewed, 7 projects (30 percent) proceeded without exception, 9 projects (39 percent) were allowed to proceed with exceptions noted, and 5 projects (22 percent) were rejected. Due to the number of project rejections and staff actions needed, staff determined SoCalGas resulted in lower-than-expected performance for this metric as it pertains to effective QC of projects prior to submitting for review.

SoCalGas did undertake initiatives to improve internal QC practices, including hosting internal Normalized Metered Energy Consumption (NMEC) trainings to their engineering, programs, and increasing their technical review work with 3rd party implementors to create more reliable project packages. Overall CPUC Staff determined that SoCalGas made efforts to meet minimum expectations for this metric, however updates to QC practices that result in no rejections and fewer issues related to gross savings would be beneficial to improving this score in the future.

5. PA's Responsiveness

In 2020, SoCalGas received a custom disposition score of 7.5 out of 12.5 for Metric 5 (PA's Responsiveness) prior to the addition of any enhancement points. When reviewed at the portfolio level, CPUC Staff assessed the time series of rejections and expectations, the alignment of program policy and procedures with the number of actual rejections and exceptions based on eligibility and

attribution, and the adaption to changes in rules over time. CPUC Staff found that projects reviewed from January 2020 through December 2020 exhibited a notable downward trend in terms of project performance over time (i.e., project submissions had more issues when submitted later in 2020 compared to earlier in the year). The lower performance score in Metric 5 was driven in large part by the substantial number of policy related issues documented across all project submissions. For this Metric SoCalGas scored poorly in the policy component (there they scored a 2 out of 5). For this component staff noted that at the portfolio level, 25 percent of all actions on projects were policy related indicating a need for improvement. Additionally, CPUC staff noted that 11 percent of actions noted on dispositions were related to issues with free-ridership, potentially impacting future net to gross (NTG) values for the program.

CPUC staff recognized the effort SoCalGas made to add the NMEC technical review guidance to their program processes, and make other internal process improvements such as bringing internal engineering report templates and review forms in line with statewide documents. However, staff determined that SoCalGas demonstrated minimal compliance with regards to this metric and that more work can be done to address program policy issues and bring about substantive process improvements in the future.

B. Workpapers Performance Review

SoCalGas had 39 workpapers which were submitted in 2020, 32 were reviewed and disposed, and the remaining 7 are still under detailed review. This end of year memo provides workpaper specific feedback on the 32 which were reviewed and disposed.

The comments below are organized by the five scoring metric areas created in D.16-08-019.[9] The narrative includes observations common to multiple workpapers and feedback related to the workpaper development process. Specific workpaper feedback is provided in Attachment C at the end of this document. The Workpaper Detailed Review Table provides feedback on specific workpapers. The Workpaper Submissions Table lists all workpapers submitted by SoCalGas during the review period. Workpapers 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 workpaper development may have been supported by multiple PAs; however, at this time, there is no mechanism for apportioning feedback among PAs. Therefore, feedback is only provided for the submitting PA, with the assumption that they are the lead PA. The scoring rubric for workpapers is defined as follows:

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

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

Table 5 below presents the workpaper disposition points given to SoCalGas for each metric both with and without the addition of any enhancement points.

[9] See D.16-08-019 at 87.

Table 5: SoCalGas Workpaper Disposition Points Awarded by Metric

Metric	Metric Area of Scoring	Weight Factor	Workpaper Disposition Points		Max Points
			With Enhance Pts	w/o Enhance Pts	
1	Timeliness of Submittals	10%	2.50	2.50	5
2	Content, Completeness, and Quality of Submittals	30%	8.30	8.30	15
3	Proactive Initiative of Collaboration	10%	4.77	2.89	5
4	PA's Due Diligence and QA/QC	25%	12.08	5.83	12.5
5	PA's Responsiveness	25%	11.13	7.23	12.5
Total			**38.78**	**26.75**	**50**

1. Timeliness of Submittals

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

SoCalGas submitted five workpaper plans for new measure development. Though not every plan reached workpaper submittal status, SoCalGas was timely with their schedule and communication of changes to workpaper development milestones.

2. Content, Completeness, and Quality of Submissions

In 2020, SoCalGas received a workpaper disposition score of 8.30 out of 15.0 for Metric 2 (Content, Completeness and Quality of Submissions) prior to the addition of any enhancement points. The content, completeness, and quality of workpapers has generally met standards.

SoCalGas received a "No" or "-" on six workpaper submittals. This was due to incorrectly applying TechIDs for water heater workpapers, including errors or omissions in EAD tables, or using incorrect baseline assumptions. However, SoCalGas did submit three workpapers with more complex content and data collection requirements including commercial food service workpapers, residential oven and domestic hot water controls.

3. Proactive Initiative of Collaboration

In 2020, SoCalGas received a workpaper disposition score of 2.89 out of 5.0 for Metric 3 (Proactive Initiative of Collaboration) prior to the addition of any enhancement points. Workpapers met the minimum expectations of collaboration which was required to ensure each workpaper met all PA's needs and minimally received a "Yes" with five workpapers exceeding minimum expectations.

SoCalGas has been very proactive with providing the CPUC Staff with updates and preliminary work products on upcoming workpapers via the workpaper plan process. For example, SoCalGas arranged for conference calls regarding the new approved Residential Oven workpaper and worked closely with the subject matter expert to review appliance data. In addition, even though the workpapers were not approved, SoCalGas was proactive in engaging with CPUC on the proposed electric to gas fuel substitution workpapers.

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

In 2020, SoCalGas received a workpaper disposition score of 5.83 out of 12.5 for Metric 4 (PA's Due Diligence, Quality Assurance, and Quality Control) prior to the addition of any enhancement points.

The quality of SoCalGas workpapers was usually acceptable. SoCalGas continues to lead efforts in identifying the need for new EUL IDs and has identified areas missing DEER impact data for certain climate zones. However, there were cases where the workpapers were submitted with quality control deficiencies that resulted in lower scores. For example, two water heater workpapers were submitted with custom calculations to support larger sizes. SoCalGas submitted with incorrect TechIDs which resulted in multiple back and forth meeting with CPUC and resubmittal of the workpaper. In addition, SoCalGas submitted two electric to gas fuel substitution workpapers which were rejected due to lack of due diligence on SoCalGas's part when it came to proper use of the fuel substitution calculator.

5. PA's Responsiveness

In 2020, SoCalGas received a workpaper disposition score of 7.23 out of 12.5 for Metric 5 (PA's Responsiveness) prior to the addition of any enhancement points. CPUC Staff and consultants have regularly and productively engaged with SoCalGas and continue to rely on them to provide answers for the gas measure workpapers. In addition, SoCalGas continues to show innovation in thinking outside of the box to develop new workpapers. As the workpaper process transitions to eTRM, SoCalGas will need to be responsive to process improvements to ensure CPUC procedures and requirements are upheld.

IV. The Scoring Methodology

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

Attachment A summarizes the Metrics adopted in D.16-08-019 as well as the CPUC Staff developed scores and points for 2020. D.16-08-019 also directed that the custom and workpaper scores be weighted together into a final score based on the 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 workpapers and custom projects will yield 100 points whereas a minimum score on all metrics would yield 20 points. The 1 to 5 rating scale is distinguished as follows:

1. Consistent underperformer in meeting the basic expectations.
2. Makes a minimal effort to meet CPUC expectations but needs dramatic improvement.

3. Makes effort to meet CPUC expectations, however improvement is required.
4. Sometimes exceeds CPUC expectations while some improvement is expected.
5. Consistently exceeds CPUC expectations.

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

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

A. Workpaper Metric 1-5 Scoring Methodology

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

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

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

- Metric 1 Timeliness: The workpaper submission schedule was designed to distribute the workpapers throughout the year. Workpapers receive "+" if schedule was followed.
- Metric 2 Content: Straightforward workpaper received a "Yes", complex revisions received a "+", unless there were errors in the content, which warranted a "-".
- Metric 3 Collaboration: Straightforward consolidation effort workpaper received a "Yes",

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

initiative to work with other PAs and CPUC receives "+".

- Metric 4 Quality Assurance: Workpapers that were complete, consistent, and without meaningful errors received a "Yes". Those workpapers with inconsistencies between the data tables and narrative or where values were left undefined received a "-" score.
- Metric 5 Process: Workpaper responsiveness to program needs received a "Yes" for straightforward and "+" for complex workpaper submissions.

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

B. Custom Metric 1 Scoring Methodology

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

D. Custom Metric 3, 4 and 5 Scoring Methodology

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

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

projects.

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

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

E. Score Enhancement Methodology

The above process resulted in custom project and workpaper work product review scores. Next, 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 2020 in order to positively impact future project reviews. CPUC Staff believes it is important to provide ESPI "Enhancement" points for positive due diligence developments to recognize the effort and to provide additional encouragement even before a change in project-level results is observed.

In the custom scoring process CPUC Staff added "Enhancement" points in the area of Policy/Technical QA/QC for Metrics 1 and 3 to reflect SoCalGas staff's positive efforts to submit project documentation on time and lead stakeholder subgroups. Specifically, this included:

- Submitted 87 percent of projects early with only one late project submitted when CMPA was down. Furthermore, 83 percent of project submissions were submitted five days or more early, indicating that SoCalGas exceeded expectations with regards to timeliness.
- Led CPUC Stakeholder Engagement Subgroups #1 and #2 to provide technical training and discuss streamlining small projects.
- Created and finalized a Custom Project Review (CPR) process timeline and continued to work on developing procedures and strategies to implement this internally.

Although these efforts may not yet be reflected in project specific disposition scores, CPUC Staff believes recognition of the efforts of SoCalGas' technical and policy review staff is warranted. These activities offer promise to improve SoCalGas' overall performance in the future.

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

metric as:

- Metric 1: Timeliness: There were no adder points for this metric.
- Metric 2: Content. There were no adder points for this metric.
- Metric 3: Collaboration: SoCalGas was acknowledged for the collaboration shown in the last year in their efforts to consolidate all the EAD table for existing statewide workpapers and for collaborating with 3Ps to incorporate their program needs.
- Metric 4: Management: SoCalGas was further acknowledged for its due diligence is consolidating statewide EAD tables and for identifying missing parameters in DEER.
- Metric 5: Process improvements: SoCalGas was acknowledged for consistent effort to develop new measures and methods for workpapers.

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

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

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

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

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

Metric		Workpapers				Custom			
		Max Points	Max Percent of Total Points	2020 Score	2020 Points	Max Points	Max Percent of Total Points	2020 Score	2020 Points
1	**Timing and Timeliness of Submittals**	5	10%	2.50	2.50	5	10%	4.96	4.96
	Timely submittals: all lists, inventories, plans, studies, workpapers and project/measure documentation; timing and advanced announcement of submittals (spreading out submission when available rather than holding and turning in large batches); timely follow-up PA responses to review disposition action items including intention to submit/re-submit with proposed schedule.								
2	**Content, Completeness, and Quality of Submittals**	15	30%	2.77	8.30	15	30%	4.62	13.86
	Completeness, appropriateness, comprehensiveness, accuracy, and clarity of submittals. Submittal adherence to Commission policies, Decisions, and prior Commission staff dispositions and/or guidance. Do the submittals include all materials required to support the submittal proposed values, methods and results. Is the project or measure clearly articulated. Are proposed or utilized methods clearly explained including step-by-step method or procedure descriptions. Will the proposed or utilized approach provide accurate results. Are all relevant related or past activities and submittals appropriately noted or disclosed, analyzed or discussed. Are the pros/cons of alternate possible approaches or conclusions discussed to support that the chosen one is most appropriate.								
3	**Proactive Initiative of Collaboration**	5	10%	2.89	2.89	5	10%	3.60	3.60
	PA efforts to bring either measures, projects, studies, questions, and/or savings calculation methods and tools to Commission staff for discussion in the early formative stages, before CPUC staff review selection. In the case of tools, before widespread use in the programs. Commission staff expects collaboration among the PAs to develop common or coordinated submissions and for the PAs to undertake joint or coordinated planning activities and study work. The PAs are expected to engage with CPUC staff in early discussions on unique or high profile, high impact measures or projects before program or customer commitments are made. The PAs are expected to engage with CPUC staff on planning and execution of studies that support proposed offerings, tools, or determination of proposed baselines or other programmatic assumption that can impact ex ante values to be utilized.								
4	**Program Administrator's Due Diligence and Quality Assurance/Quality Control Effectiveness**	12.5	25%	2.33	5.83	12.5	25%	3.60	9.00

	Commission staff expects the PA to have effective Quality Control (QC) and Quality Assurance (QA) processes for their programs and measures. The PAs are expected to have a pro-active approach to reviewing existing measure and project assumptions, methods and values and updating those to take into account changes in market offerings, standard practice, updates to DEER methods and assumptions, changes to codes, standards and regulations, and other factors that warrant such updates. The depth and correctness of the PA's technical review of their ex ante parameters and values, for both Core, Local Government and Third Party programs, are included under this metric. The depth and correctness of the PA's technical review of their own staff and subcontractor work related to supporting deemed and custom measure and project submissions are included in this metric. Evidence of review activities is expected to be visible in submissions so that Commission staff can evaluate the effectiveness of the PA internal QA/QC processes.								
5	**Program Administrator's Responsiveness to Needs for Process and Program Improvements** This metric reflects the PAs ongoing efforts to improve their internal processes and procedures resulting in increased ex post evaluated gross and net savings impacts. Commission staff looks not only to the PA's internal QC/QA processes, but also whether individual programs and their supporting activities incorporate and comply with CPUC policies and prior Commission staff disposition guidance in their program rules, policies, procedures and reporting. This includes changes to program rules, offerings and internal operations and processes required to improve overall review and evaluation results. A particularly important area for focus is the improvement of net portfolio performance via the removal of measures and or participation with low program attribution (NTG).	**12.5**	**25%**	**2.89**	**7.23**	**12.5**	**25%**	**3.00**	**7.50**
Total		**50**	**100%**		**26.75**	**50**	**100%**		**38.92**

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

Metric	2016 CPUC Adopted ex ante Metrics	Maximum Points	% of TOTAL POINTS	TOTAL SCORED POINTS	# of Scored Dispositions	Scoring Notes (Portfolio Level)
Metric 1	**Timeliness and Timing of Submittals** Timely submittal of all documentation and follow-up utility responses to review disposition action items.	**5**	**10%**	**4.96**	**23**	SoCalGas complied with SB1131 guidelines for submitting documentation before the 15 business days required. Only one project was found to be late and 19 projects (83 percent) were submitted early by 5 or more days.
Metric 2	**Content, Completeness and Quality of Submittals** Completeness, appropriateness, comprehensiveness, accuracy, and clarity of submitted documentation. In addition, this metric is an assessment of the utility's adherence to CPUC policies, Decisions, and prior CPUC Staff disposition guidance.	**15**	**30%**	**13.86**	**23**	In 2020, out of 40 projects submitted and selected for review, 23 projects received dispositions. Out of those, 5 exhibited deficiencies including a project where there was an issue with the calculation method, savings calculations were not provided, there was a lack of clarity in the methodology description, and an incorrect Measure EUL or Measure Application type was specified. Staff notes that SoCalGas has submitted projects with significantly fewer issues in 2020 in contrast to 2019 and is showing improvement with regards to document submission.
Metric 3	**Proactive Initiation of Collaboration** Utility's efforts to bring either measures, questions, and/or savings calculation tools to CPUC Staff for discussion in the early formative stages, before CPUC Staff review selection. In the case of tools, before widespread use in the programs. CPUC Staff expects collaboration among the utilities and for the program administrators to engage with CPUC Staff in early discussions on high profile, high impact measures well before customer commitments are made.	**5**	**10%**	**3.60**	**23**	CPUC Staff found that SoCalGas made significant efforts to bring measures, projects, and studies forward for discussion prior to review. In addition, they took an active and engaged lead in statewide collaboration efforts such as the IOU timing subgroup, and were participants in several statewide initiatives including the custom project streamlining group and the small project subgroup. SoCalGas met expectations in this category by continuing its participation in these groups as well as by bringing up SBD modeling errors, HOPP project scopes, an M&V approach for a large industrial project, and MAT clarifications on bi-weekly calls.
Metric 4	**Utility Due Diligence and QA/QC Effectiveness** CPUC Staff expects the utility to have effective Quality Control (QC) and Quality Assurance (QA) processes for its programs and measures. The depth and correctness of the utility's technical review of its ex ante parameters and values, for	**12.5**	**25%**	**9.00**	**23**	CPUC staff weighted the number of dispositions proceeding without exception against those that required resubmissions or resulted in rejections. Of the 23 projects receiving dispositions in 2020, 7 projects (30 percent) proceeded without exception, 9 projects (39 percent) were allowed to proceed with exceptions as noted, and 5 projects (22 percent) were rejected. Compared to 2019 when SoCalGas had only 6 percent of submissions rejected, these findings demonstrate that

	both Core and Third Party programs, are included under this metric.					SoCalGas is performing lower-than-expected with regards to effective QC of projects prior to submitting for review. Commission staff found that SoCalGas had made improvements to streamline QC processes, including hosting internal NMEC training and incorporating CPUC staff guidance to adjust therm savings up or down based on project specifics, but that there is still room for improvement to show evidence of QA/QC activities in submissions for CPUC staff to evaluate its effectiveness.
Metric 5	**Utility Responsiveness to Needs for Process & Program Improvements (Course Corrections)** This metric reflects the utility's efforts to improve, operationalize, and improve its internal processes 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%**	**7.50**	**23**	SoCalGas projects reviewed from January 2020 through December 2020 exhibited a definitive downward trend in terms of project performance over time. (i.e. project submissions performed worse over the course of the 2020 review period). SoCalGas did demonstrate improvement by developing and updating internal record keeping and communications to better recognize short falls, incorporating the NMEC review process, and discussing enhancements to better streamline the custom processes. However similar to the previous ESPI cycle, SoCalGas continues to experience project issues related to Program Policy, as 25 percent of all issues identified in 2020 were related to this category compared with 20 percent of projects in 2019. These efforts demonstrate minimal compliance with CPUC policies and a need for improvement.

Attachment C: Workpaper Scores and Feedback

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

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

Workpaper Reviews – Scored Workpapers					ESPI Metrics				
WP ID	**Rev**	**Title**	**Comments**	**Weight**	**1**	**2**	**3**	**4**	**5**
SWAP017	1	Residential Oven	SCG submitted workpaper plan and worked closely with CPUC to address concern regarding appropriate equipment and efficiencies.	1	Yes	+	+	Yes	Yes
SWAP018	1	Clothes Dryer, Fuel Substitution, Gas, Residential	Gas fuel substitution workpaper. Fuel substitution guidance stipulates, for calculation of source energy savings, program developers must use the Fuel Substitution Calculator. This submitted workpaper modified the fuel substitution calculator's Annual Factors Emissions Intensity Values as supplied in the 2019 Avoided Cost Calculator (ACC). After multiple discussions between CPUC and SCG to review methodology this workpaper was rejected.	1	Yes	No	+	-	Yes
SWBE006	1	Residential Ceiling Insulation	Workpaper submitted with minimal comment.	1	Yes	Yes	Yes	Yes	Yes
SWBE007	1	Residential Blow-In Wall Insulation	Workpaper submitted with minimal comment.	1	Yes	Yes	Yes	Yes	Yes
SWFS001	2	Commercial Convection Oven – Electric & Gas	SCG was very responsive to follow-up items, rework and uploading/ communication with the CPUC team. The resulting workpaper product was acceptable.	1	Yes	+	Yes	Yes	+

SWFS005	2	Commercial Steam Cooker	Workpaper was updated based on ISP research completed in 2019 and was submitted and approved in 2020. The CPUC team discovered errors and ommissions that were important to product accuracy; internal PA procedures should better address that area in the future.	1	Yes	-	Yes	-	Yes
SWFS008	1	Conveyor Oven, Gas, Commercial	Workpaper was updated based on ISP research completed in 2019 and was submitted and approved in 2020. The PAs were asked to: formulate and update the workpaper assumptions for baseline & measure case Conveyor Ovens based on available test data. No major issues found in the content.	1	Yes	Yes	Yes	Yes	Yes
SWFS011	2	Fryer, Commercial	The CPUC team had plenty of opportunity to provide feedback and SCG worked effectively with the CPUC team to address input and make changes.	1	Yes	+	Yes	Yes	+
SWFS014	2	Rack Oven	Baseline values for Single Rack ovens were updated to include Energy Star units for consistency. Measure case values for Double Rack ovens were revised based on rebated models from January 2017 – May 2019. The Ex Ante team's review suggested updates to the measure case, base case as well as calculation assumptions. The PAs checked a sample of project invoices to confirm the oven size rebated and the tracking based on the Ex Ante team's recommendation; updates based upon Ex Ante team's review appear correct. The parameter derivation made reproducible and more transparent. The collaboration was effective and the revised WP.	1	Yes	+	Yes	Yes	+
SWFS017	1	Automated Conveyor Broiler, Commercial	Test data were provided for review by the PAs which expedited the review of this WP. Workpaper was approved with minimal comment.	1	Yes	Yes	Yes	+	Yes
SWHC047	1	Gas Fireplace, Residential	No major issues found in the workpaper content, timeliness was sufficient.	1	Yes	Yes	Yes	Yes	Yes
SWHC048	1	Packaged Air Conditioner Heat Recovery, Commercial	No major issues found in the workpaper content, timeliness was sufficient.	1	Yes	Yes	Yes	Yes	Yes
SWPR007	1	Steam Boiler Economizer, Industrial	PA developed a workpaper plan and addressed all issues brought up by the CPUC team in the workpaper. In the EAD tables, no distinction is made between NC and AOE measure offerings when it comes to measure life (EUL, RUL). EUL of 20 years is applied to all measure offerings. This would be true for the NC measures, but not the AOE for existing boilers. AOE measures should use the lesser of RUL of host equipment (boiler) and EUL of add-on-equipment (feedwater economizer). Measure life is appropriatly applied in the final workpaper document.	1	Yes	-	Yes	Yes	+
SWRE004	1	Pool Or Spa Heater, Residential	No major issues found in the workpaper content, timeliness was sufficient.	1	Yes	Yes	Yes	Yes	Yes

SWWH004	2	Laminar Flow Restrictor, Commercial	Workpaper has minor errors that were noted, such as listing all sectors (Ag, Com, Ind) as eligible, when eligible building type is limited to health care facilities.	1	Yes	Yes	Yes	Yes	Yes
SWWH005	3	Boiler, Commercial	Workpaper submitted to address new tech IDs not included in WH calculator v4.2. SCG incorrectly applied new Tech IDs.	1	Yes	Yes	Yes	Yes	Yes
SWWH005	2	Boiler, Commercial	Workpaper submitted due to revised WH calculator. Additional errors in calculator noted during review triggered need for additional revisions and submittal. Workpaper was reviewed but never became effective.	1	Yes	No	Yes	No	Yes
SWWH006	3	Tankless Water Heater, Commercial	Workpaper submitted due to revised WH calculator. Additional errors in calculator noted during review triggered need for additional revisions and submittal. Workpaper was reviewed but never became effective.	1	Yes	Yes	Yes	Yes	Yes
SWWH006	5	Tankless Water Heater, Commercial	Workpaper submitted to address new tech IDs not included in WH calculator v4.2. SCG incorrectly applied new Tech IDs.	1	Yes	No	Yes	No	Yes
SWWH006	4	Tankless Water Heater, Commercial	Workpaper submitted to address new tech IDs not included in WH calculator v4.2. Workpaper was reviewed but never became effective.	1	Yes	Yes	Yes	Yes	Yes
SWWH007	2	Storage Water Heater, Commercial	Workpaper submitted due to revised WH calculator v4.1. Workpaper approved with minimal comment.	1	Yes	Yes	Yes	Yes	Yes
SWWH007	4	Storage Water Heater, Commercial	Workpaper submitted due to revised WH calculator v4.2. Workpaper approved with minimal comment.	1	Yes	Yes	Yes	Yes	Yes
SWWH007	3	Storage Water Heater, Commercial	Workpaper submitted due to revised WH calculator v4.2. Additional errors in calculator noted during review triggered need for additional revisions and submittal. Workpaper was reviewed but never became effective.	1	Yes	Yes	Yes	Yes	Yes
SWWH012	2	Storage Water Heater, Residential	Participated in conversations regarding revisions to water heater calculator and took the lead on gathering water heater input data.	1	Yes	Yes	Yes	Yes	Yes
SWWH013	2	Tankless Water Heater, Residential	Participated in conversations regarding revisions to water heater calculator and took the lead on gathering water heater input data.	1	Yes	Yes	Yes	Yes	+
SWWH015	2	Demand Control For Centralized Water Heater Recirculation Pump, Multifamily & Commercial	SCG submitted workpaper plan and collaborated with CPUC to workthrough confusion on appropriate measure application type.	1	Yes	+	Yes	Yes	Yes
SWWH016	2	Domestic Hot Water Loop Temperature Controller, Multifamily & Commercial	No major issues found in the workpaper content.	1	Yes	+	Yes	Yes	Yes

SWWH019	3	Faucet Aerator, Commercial	SCG worked closely with the CPUC to align the EUL of the faucet aerator based on the host equipment.	1	Yes	Yes	+	Yes	Yes
SWWH020	3	Low-Flow Showerhead, Commercial	Water savings values were some of the measure offerings were incorrectly calculated using a basleine of 2 gpm instead of 2.25 gpm (AR first base) or 1.8 gpm (NR, NC, AR second base). Added, flow control valves as an AOE measure. Savings is accurate, based on existing baseline of 2.25 gpm. However, EUL=RUL of host equipment was not described in the WP for this measure.	1	Yes	-	Yes	Yes	Yes
SWWH026	1	Pipe Wrap, Residential	New. PA developed a workpaper plan and worked with CPUC team during the pre-review session. Workpaper addressed the questions and comments brought up during the pre-review session. A couple of additional questions during the workpaper review such as: Are the outdoor pipe measure offerings intended for unconditioned garage spaces? If this is the case, is 30% of weather station measured wind speed still an overestimate for garage spaces?	1	Yes	Yes	Yes	Yes	Yes
SWWH029	1	Tankless Water Heater Fuel Sub Gas Res	Gas fuel substitution workpaper. Fuel substitution guidance stipulates, for calculation of source energy savings, program developers must use the Fuel Substitution Calculator. This submitted workpaper modified the fuel substitution calculator's Annual Factors Emissions Intensity Values as supplied in the 2019 Avoided Cost Calculator (ACC). After multiple discussions between CPUC and SCG to review methodology this workpaper was rejected.	1	Yes	No	+	-	Yes
SWWH030	1	Tankless Combination Space and Water Heater, Residential	Workpaper was submitted and approved with minimal comment.	1	Yes	Yes	+	Yes	Yes

Workpaper Submission Status – All workpapers submitted in 2020

WP ID	Rev	Title	Submission Status: EAR Team Comments
SWWH006	3	Tankless Water Heater, Commercial	Interim approval.
SWWH007	2	Storage Water Heater, Commercial	Interim approval.
SWWH012	2	Storage Water Heater, Residential	Interim approval.
SWWH013	2	Tankless Water Heater, Residential	Interim approval.
SWBE006	1	Residential Ceiling Insulation	Interim approval.
SWBE007	1	Residential Blow-In Wall Insulation	Interim approval.
SWAP017	1	Residential Oven	Interim approval.
SWWH030	1	Tankless Combination Space and Water Heater, Residential	Interim approval.
SWAP018	1	Clothes Dryer, Fuel Substitution, Gas, Residential	Rejected
SWWH029	1	Tankless Water Heater Fuel Sub Gas Res	Rejected
SWWH015	2	Demand Control For Centralized Water Heater Recirculation Pump, Multifamily & Commercial	Interim approval.
SWHC048	1	Packaged Air Conditioner Heat Recovery, Commercial	Interim approval.
SWPR007	1	Steam Boiler Economizer, Industrial	Interim approval.
SWFS001	2	Commercial Convection Oven – Electric & Gas	Interim approval.
SWFS005	2	Commercial Steam Cooker	Interim approval.
SWFS011	2	Fryer, Commercial	Interim approval.
SWFS014	2	Rack Oven	Interim approval.
SWWH026	1	Pipe Wrap, Residential	Interim approval.
SWWH007	4	Storage Water Heater, Commercial	Interim approval.
SWWH005	3	Boiler, Commercial	Interim approval.
SWWH006	5	Tankless Water Heater, Commercial	Interim approval.
SWWH004	2	Laminar Flow Restrictor, Commercial	Interim approval.
SWWH019	3	Faucet Aerator, Commercial	Interim approval.
SWWH020	3	Low-Flow Showerhead, Commercial	Interim approval.
SWWH016	2	Domestic Hot Water Loop Temperature Controller, Multifamily & Commercial	Interim approval.

SWWH005	2	Boiler, Commercial	Interim approval.
SWWH006	4	Tankless Water Heater, Commercial	Interim approval.
SWWH007	3	Storage Water Heater, Commercial	Interim approval.
SWFS008	1	Conveyor Oven, Gas, Commercial	Interim approval.
SWFS017	1	Automated Conveyor Broiler, Commercial	Interim approval.
SWHC047	1	Gas Fireplace, Residential	Interim approval.
SWRE004	1	Pool Or Spa Heater, Residential	Interim approval.
SWAP019	1	Infrared BBQ Grill, Residential	Detailed review in process.
SWHC001	2	Wall Furnace, Residential	Detailed review in process.
SWHC031	2	High-Efficiency Furnace, Residential	Detailed review in process.
SWAP006	2	Dishwasher, Residential	Detailed review in process.
SWFS011	3	Fryer, Commercial	Detailed review in process.
SWWH018	2	Hot Water Tank Insulation, Nonresidential and Multifamily	Detailed review in process.
SWWH017	2	Hot Water Pipe Insulation, Nonresidential and Multifamily	Detailed review in process.

Process Adder	ESPI Metrics					
	Weight	1	2	3	4	5
In response to CPUC request, SoCalGas took the lead again in 2020 to consolidate the EAD tables from all statewide workpapers in one file and flag measures that adopted DEER impacts.	1	No	No	+	+	Yes
SoCalGas has continued the search for new measures and technologies to add value to the energy efficiency programs. Five new workpapers were developed, including two fuel substitution workpapers for CPUC's consideration on the use of alternate heat rates, resulting in rejections.	1	No	No	Yes	No	+
SoCalGas also contributed in identifying areas for improvement on approved measures such as adoption of non-PA specific savings and missing DEER impact data for certain climate zones or building types. SoCalGas also identified the need for new EUL IDs to be added in DEER and provided necessary information to the DEER team for adoption. Following the DEER updates, SoCalGas identified and updated workpapers that are impacted both directly and indirectly in effort to keep the approved savings in alignment with the DEER data.	1	No	No	Yes	+	Yes
Third-party program solicitation has been a major part of 2020 work, and SoCalGas is responsible for offering the state-wide midstream commercial programs in food service and water heating in addition to PA-specific programs. We have been working closely with third-party implementers to assist with their program needs. Water heater measures were revised to finalize third-party program negotiations, and the central water heating workpapers were updated to add multi-family implementations for multi-family common areas.	1	No	No	+	No	Yes

Attachment D: 2020 Performance Annual Ratings

Custom Scoring

2020 Annual Custom Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	
Direct Work Product Review Score	Disposition Score (1-5)	4.96	4.62	3.60	3.60	3.00	
Review Process Score Enhancements	Technical & Policy QC Increase	0.50	0.00	1.00	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	4.62	4.60	3.60	3.00	Total Points
	Adjusted Metric Points	5.00	13.86	4.60	9.00	7.50	39.96

2019 Annual Custom Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	
Direct Work Product Review Score	Disposition Score (1-5)	5.00	2.33	1.00	3.00	3.25	
Review Process Score Enhancements	Technical & Policy QC Increase	0.00	0.00	0.00	0.50	0.50	
	Implementation Increase	0.00	0.00	0.00	0.00	0.00	
Total Score	Adjusted Final Metric Score (1-5)	5.00	2.33	1.00	3.50	3.75	Total Points
	Adjusted Metric Points	5.00	7.00	1.00	8.75	9.38	31.13

This workbook contains all of the SoCalGas Custom Scoring tables.

Workpaper Scoring

2020 Annual Workpaper Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	
Direct Workproduct Review Score	SCG "-"	0%	11%	0%	10%	0%	
	SCG "+"	0%	21%	16%	3%	16%	
	SCG "Yes"	100%	68%	84%	87%	84%	
	Dispositions Score %	50%	55%	58%	47%	58%	
	Dispositions Score	2.50	2.77	2.89	2.33	2.89	
Review Process Score Enhancements	SCG "-"			0%	0%	0%	
	SCG "+"			50%	100%	25%	
	SCG "Yes"			50%	0%	75%	
	Process Score %	0%	0%	75%	100%	63%	
	Process Increase Score	0.00	0.00	3.75	5.00	3.13	
	Process Increase Weight	0.50	0.50	0.50	0.50	0.50	
	Process Increase Wtd Score	0.00	0.00	1.88	2.50	1.56	
Total Score	Final Metric Score (1-5)	2.50	2.77	4.77	4.83	4.45	Total Points
	Metric Points with Weighting	2.50	8.30	4.77	12.08	11.13	38.78

2019 Annual Workpaper Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	
Direct Workproduct Review Score	SCG "-"	0%	13%	0%	9%	0%	
	SCG "+"	0%	18%	0%	4%	39%	
	SCG "Yes"	100%	69%	100%	87%	61%	
	Dispositions Score %	**50%**	**52%**	**50%**	**48%**	**70%**	
	Dispositions Score	**2.50**	**2.61**	**2.50**	**2.39**	**3.48**	
Review Process Score Enhancements	SCG "-"		0%	0%	0%		
	SCG "+"		100%	100%	33%		
	SCG "Yes"		0%	0%	67%		
	Process Score %	**0%**	**100%**	**100%**	**67%**	**0%**	
	Process Increase Score	**0.00**	**5.00**	**5.00**	**3.33**	**0.00**	
	Process Increase Weight	**0.50**	**0.50**	**0.50**	**0.50**	**0.50**	
	Process Increase Wtd Score	**0.00**	**2.50**	**2.50**	**1.67**	**0.00**	
Total Score	**Final Metric Score (1-5)**	**2.50**	**5.00**	**5.00**	**4.06**	**3.48**	**Total Points**
	Metric Points with Weighting	**2.50**	**15.00**	**5.00**	**10.14**	**8.70**	**41.33**

Explanations of scoring tables row entries

1. The row labeled with *IOU "-"* lists the percent of workpaper 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 workpaper 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 workpaper 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 workpapers) indicates how the combination of the three rows of scores (+, -, and yes) sum into a total points multiplier for each metric. Each row contributes to the total based on the row count over the total count for all three rows.

5. The "Disposition Score" (and "Process Increase Score" for workpapers) row converts the percent score into a numeric value of up to five by directly applying the percent to a value of 5.
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 workpaper 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 workpapers. 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 workpapers) 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.