STATE OF CALIFORNIA

Gavin Newsom, Governor

PUBLIC UTILITIES COMMISSION

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Date: March 30, 2021

To: Southern California Edison Company (SCE)

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 SCE's 2020 ESPI performance score of 83.66/100 for workpapers[1] and custom projects is shown below in Table 1. SCE's 2020 total points is an 8.06 point decrease from its 2019[2] total points of 91.72. Scores for 2019 are provided in Table 2 on the following page.

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

SCE 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%	3.44	5	5.00	10%	5.00	5
2	Content, Completeness, and Quality of Submittals	5.00	30%	11.25	15	3.88	30%	11.64	15
3	Proactive Initiative of Collaboration	5.00	10%	4.98	5	5.00	10%	5.00	5
4	Due Diligence and QA/QC Effectiveness	3.57	25%	10.94	12.5	4.30	25%	10.75	12.5
5	Responsiveness to Needs for Process/Program Improvements	5.00	25%	10.66	12.5	4.00	25%	10.00	12.5
Total				**41.27**	**50**			**42.39**	**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 scoring began in July 2019.

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

SCE 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	4.81	30%	14.42	15
3	Proactive Initiative of Collaboration	5.00	10%	5.00	5	5.00	10%	5.00	5
4	Due Diligence and QA/QC Effectiveness	3.57	25%	8.92	12.5	4.60	25%	11.50	12.5
5	Responsiveness to Needs for Process/Program Improvements	5.00	25%	12.50	12.5	4.75	25%	11.88	12.5
Total				**43.92**	**50**			**47.80**	**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, SCE submitted 218 custom projects to CPUC Staff for review selection. CPUC Staff selected 65 of these projects for review and issued 54 scored dispositions. CPUC staff waived 1 2020 project,[3] and 7 projects selected for review in 2020 had a disposition issued in 2021 due to timing of their selection.[4]

A review of the project dispositions and the Review Process Score Enhancements points resulted in SCE's custom project score decreasing by 5.41 points from 2019 scores[5] (47.80 in 2019 vs. 42.39 in 2020 as shown in Tables 1 and 2 above). While SCE continues to demonstrate efforts to improve its processes, performance has decreased in 2020.

CPUC Staff's observations include:

- **SCE continues to improve its processes for submitting documentation in a timely manner**. Projects were submitted on the due date, with 23 projects (43 percent) submitted

[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. The remaining 3 projects were withdrawn by the PA.

[5] 2019 scoring began in July 2019.

early by five or more days indicating SCE's processes for reducing the time for custom projects to be submitted with appropriate documentation is continuing to improve.

- **SCE continues to actively participate and take a lead role in Statewide Initiatives.** SCE was instrumental in helping lead the Statewide Coordination team, including managing the collaboration space for materials and dedicating staff resources to subgroup efforts. SCE has continued its lead role in the Statewide Custom Project Stakeholders subgroup and has put policies discussed in these subgroups into practice in their internal reviews.

2. Summary of Areas Requiring Improvement

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

- **The number of issues regarding gross savings impacts increased dramatically.** In 2019 there was only 1 issue related to gross savings impacts for an M&V plan being out of compliance. In 2020 however, there were 70 issues regarding gross savings impacts with 43 of those (61 percent) related to analysis assumptions and another 16 (23 percent) related to the calculation methods utilized. SCE exhibited a decline in the processes and procedures used to estimate gross savings impacts on submitted projects.
- **SCE must ensure that projects are authorized to proceed prior to implementation, which was a similar issue noted on 5 projects**. Though this issue was limited to only 5 projects (9 percent) receiving dispositions, these deficiencies are critical elements of project submissions and significantly impact the overall ESPI score.
- **Savings calculations were not provided on five projects and three projects had deficiencies related to the measure performance being less than the baseline performance**. SCE must increase efforts to submit complete documentation that conforms with program policies and rules.
- **The number of issues in the Process, Policy, and Program rules area increased dramatically.** In 2019 there were 2 issues identified, whereas in 2020 this number increased to 32 issues, including a significant increase in process and policy issues with eligibility and baseline estimation issues.

B. Workpapers Review Overview

1. Summary of 2020 Achievements

SCE's workpapers scores have decreased slightly compared to last year by 2.65 points which indicates that SCE has generally maintained their practices for workpaper submittals. CPUC Staff observed improvements in SCE's development and management of workpaper submissions in the following areas:

- **Effective workpaper leadership**. SCE has demonstrated effective workpaper leadership, managing the submissions for more complex measures including smart communicating thermostat electric savings, fuel substitution, and LED Lighting.
- **Initiative**. SCE has shown initiative by engaging with HVAC equipment manufacturers, to gather data and evaluate high SEER-rated residential heat pumps. This initiative is intended to develop measures for higher efficiency HVAC systems not currently supported in DEER

in an effort to drive the market to adopt higher efficiency HVAC systems. In addition, SCE spearheaded the coordination of resubmittal of workpaper EAD tables to fix errors and to add implementation IDs for non-SCE led workpaper which resulted in an overall improvement to 30 statewide workpapers.

- **Forward thinking and innovation.** PAs have an important responsibility to identify new technologies and delivery methods, and to develop workpapers where a deemed option makes sense. SCE submitted seven new workpapers in 2020 (not including fuel substitution workpapers). CPUC Staff encourages the continued development of new measure workpapers to ensure innovative measures.

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:

- **SCE 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.
- **SCE should adhere to workpaper submittal schedules** and communicate quickly with CPUC when there are delays.
- **SCE should complete due diligence with respect to proposed eligibility requirements, data collection requirements, and appropriate baselines.** These issues caused workpaper review and submittal delays for the following workpapers:
    - SWAP010-01: Smart Power Strips
    - SWAP003-02: Clothes Dryer, Residential
    - SWAP015-01: Induction Cooking with or without Range, Residential
    - SWHC050-01: Ductless Heat Pump, HVAC, Residential

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 65 new SCE projects for review and of those 54 received dispositions, 1 received a review waiver, and 7 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 issued 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 project reviewer.

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

Table 3: SCE Custom Disposition Points Awarded by Metric

Metric	Metric Area of Scoring		Weight Factor		Max Points
			With Enhance Pts	w/o Enhance Pts	
1	Timeliness of Submittals	10%	5.00	5.00	5
2	Content, Completeness, and Quality of Submittals	30%	11.64	11.64	15
3	Proactive Initiative of Collaboration	10%	5.00	4.50	5
4	PA's Due Diligence and QA/QC	25%	10.75	9.50	12.5
5	PA's Responsiveness	25%	10.00	8.75	12.5
Total			**42.39**	**39.39**	**50**

1. Timeliness of Submittals

In 2020, SCE 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 54 custom project reviews completed in 2020. In 2020, SCE submitted project documentation for review for all 54 reviewed projects on time and 23 of these 54 projects (43 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] SCE 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, SCE received a custom disposition score of 11.64 out of 15.0 for Metric 2 (Content, Completeness, and Quality of Submissions) prior to the addition of any enhancement points. This disposition score was based on the completeness of the 54 SCE custom project reviews. Of these 54 dispositions issued, 18 projects (33 percent) were approved without exception and 5 projects (9 percent) were marked Advisory. In addition, CPUC staff project reviews exceeding the SB-1131 deadline resulted in 7 projects (13 percent) marked as Late dispositions (advisory only; does not

[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. The remaining 3 projects were withdrawn by the PA.
[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".

impact the project). However, 7 projects (13 percent) were rejected, and 17 projects (31 percent) were approved with noted deficiencies which resulted in a loss of points under this metric.

Table 4 summarizes the 129 action items identified across 54 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. While the total number of action items across the portfolio of projects increased significantly compared to 2019, 9 projects (17 percent) comprised 48 of the deficiencies (37 percent) leading to low individual project scores but minimizing overall impact on the portfolio.

[8] This table includes action items issued on 5 Advisory and 7 Late 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	43	0	43	61%
	Calculation method	16	0	16	23%
	M&V plan	11	1	12	17%
	Subtotals	**70**	**1**	**71**	**53%**
Process, Policy, Program Rules	Baseline	5	0	5	15%
	CPUC Policy	2	0	2	6%
	Did not follow previous CPUC guidance	0	1	1	3%
	Eligibility	7	0	7	21%
	EUL/RUL	3	0	3	9%
	Measure cost	3	1	4	12%
	Measure type	1	0	1	3%
	PA program rules	1	0	1	3%
	Self generation	10	0	10	29%
	Subtotals	**32**	**2**	**34**	**25%**
Documentation Issues	Missing documents	1	0	1	13%
	Missing required information	1	1	2	25%
	Project scope unclear	4	1	5	63%
	Subtotals	**6**	**2**	**8**	**6%**
Issues Related to Net Impacts	NTG	6	0	6	75%
	Program influence	2	0	2	25%
	Subtotals	**8**	**0**	**8**	**6%**
Other Issues	Other 1 - Savings discrepancy within project documentation and/or bimonthly upload	6	0	6	43%
	Other 3 - SEM analysis results show no savings	1	0	1	7%
	Other 3 - SPB > EUL	5	1	6	43%
	Other 4 - Timing discrepancy in measure reporting and savings	1	0	1	7%
	Subtotals	**13**	**1**	14	**10%**
	Grand Total	**129**	**6**	**135**	**100%**

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

- **Project Not Authorized Prior to Implementation** occurred on five projects (CPUC Project IDs 451, 469, 473, 487, and 488) and lost significant ESPI points due to the importance of authorizing projects prior to implementation.
- **Measure Performance less than Baseline Performance** occurred on three projects (CPUC Project IDs 355, 374, and 355_a) which resulted in significant deductions in ESPI points under this metric due to the importance of this check.
- **Savings not based on Equivalent Level of Service** occurred on one project (CPUC Project ID 538) and **Incorrect Measure EUL** occurred on three projects (CPUC Project IDs 394 and 455) which resulted in a deduction of ESPI points.
- **Savings Calculations Not Provided** occurred on eight projects (CPUC Project IDs 565, 566, 567, 568, 569, 455, 323_a, and 378) which resulted in a deduction of ESPI points.

3. Proactive Initiative of Collaboration

In 2020, SCE received a custom disposition score of 4.5 out of 5.0 for Metric 3 (Proactive Initiative of Collaboration) prior to the addition of any enhancement points. At the portfolio level, SCE made a significant effort to bring measures, projects, and studies forward for discussion prior to CPUC Staff review. SCE brought five early opinion requests covering compressed air system leak repairs, SBD review checklists, custom project savings claims, advanced maintenance, and pump sequencing. These topics, along with discussions around High Opportunity Project & Programs (HOPP) review processes, SBD modeling issues, virtual site inspections, updates to Industry Standard Practice (ISP) guidance documents, program influence requirements for small projects, streamlining of supplemental data requests, and new Strategic Energy Management (SEM) cohorts were reviewed during bi-weekly calls with CPUC Staff. This indicates that SCE is being proactive by initiating discussions with CPUC staff prior to approving projects and processes and is keeping staff informed of potential issues with savings methodologies before they arise.

In addition, SCE continues to demonstrate leadership abilities by leading Statewide groups and initiatives, particularly with the Guidance Document Maintenance/Update Process sub-group and the SBD Technical Review Checklist Task Force. SCE continues to dedicate resources to prioritizing statewide initiatives, actively participating in monthly meetings and sharing new initiatives. These actions demonstrate performance that exceeds CPUC Staff's expectations compared to what is expected to demonstrate minimum proactive collaboration. CPUC Staff believe SCE exceeded expectations with regard to proactive collaboration under this metric.

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

In 2020, SCE received a custom disposition score of 9.5 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, 18 of 54 (33 percent) proceeded without exception, 17 of the 54 (31

percent) were allowed to proceed with exceptions as noted, and 7 projects (13 percent) were rejected. Compared to 2019 when SCE had zero rejections, findings from 2020 resulted in lower-than-expected performance with regards to effective QC of projects prior to submitting for review.

CPUC staff noted that although SCE had more deficiencies in 2020 compared to last year, they also had a low number of Supplemental Data Requests (SDRs) compared to the total number of dispositions issued (24 percent). This resulted in higher-than-expected performance pertaining to effective QC of projects prior to submitting for review.

CPUC Staff also looked at what procedure documents were in place and found that SCE incorporated elements from the statewide documents into their processes as well as demonstrated a commitment to improving QC through internal trainings, focusing staff resources on medium and high incentive project reviews, and developing other improvements to streamline QC processes. Overall CPUC Staff believes SCE made significant efforts to exceed expectations for this metric and is encouraged by program activities that continue to streamline project intake, screening, and reviews in the future.

5. PA's Responsiveness

In 2020, SCE received a custom disposition score of 8.75 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 slight upward trend in terms of project performance over time (i.e., project submissions had fewer 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 SCE scored fairly well in all sub-categories (4 out of 5) except the policy component (there they scored a 2 out of 5). For this component we noted that at the portfolio level, 25 percent of all actions on projects were policy related indicating a need for improvement here.

CPUC staff acknowledges SCE's commitment to leading several groups from the Statewide Monthly Coordination meetings to streamline the custom project review process across PAs. Additionally, SCE is developing and updating processes for Normalized Metered Energy Consumption (NMEC) projects to help stakeholders better understand eligibility requirements and reduce time invested on ineligible NMEC projects. Based on these findings CPUC staff believe SCE is complying with the requirements under this metric.

B. Workpapers Performance Review

SCE had 50 workpapers which were submitted in 2020, 25 were reviewed and disposed, and the remaining 19 are still under detailed review. This end of year memo provides workpaper specific feedback on the 25 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 SCE or SCE workpapers that were disposed during the review period. Workpapers were selected for feedback from those that were submitted by SCE 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 SCE for each metric both with and without the addition of any enhancement points.

Table 5: SCE 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%	3.44	2.19	5
2	Content, Completeness, and Quality of Submittals	30%	11.25	7.50	15
3	Proactive Initiative of Collaboration	10%	4.98	3.10	5
4	PA's Due Diligence and QA/QC	25%	10.94	6.25	12.5
5	PA's Responsiveness	25%	10.66	6.75	12.5
			41.27	**25.79**	**50**

1. Timeliness of Submittals

In 2020, SCE received a workpaper disposition score of 2.19 out of 5.0 for Metric 1 (Timeliness of Submittals) prior to the addition of any enhancement points. SCE has largely met deadlines for submission of statewide workpapers in the review period, and a majority of workpapers received a Yes, indicating that minimum expectations were met for timeliness. However, eight (8) of the workpapers received either a No or a –, due to delays in submittals.

CPUC expects that workpaper plans will include at least a target workpaper submission date early in the development cycle. As the development cycle advances, the schedule should become more

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

detailed with itemized tasks and interim deliverables with projected due dates. In addition, there has been continued request from CPUC to adhere to workpaper submittal schedules to avoid overwhelming the workpaper review team at the end of the year. SCE has occasionally lagged with providing updates to workpaper timeline submissions which resulted in some workpapers being submitted in the final weeks of December.

2. Content, Completeness, and Quality of Submissions

In 2020, SCE received a workpaper disposition score of 7.5 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 minimum standards. However, for some workpapers there was a lack of completeness which causes multiple revisions prior to its approval. For example, in workpaper SWAP010, there were data collection requirements requested by the CPUC which were not included in the submittal. These requirements were laid out in previous dispositions and were not adhered to for the initial workpaper submission.

3. Proactive Initiative of Collaboration

In 2020, SCE received a workpaper disposition score of 3.10 out of 5.0 for Metric 3 (Proactive Initiative of Collaboration) prior to the addition of any enhancement points. Nineteen (19) workpapers met minimum expectations of collaboration which was required to ensure each workpaper met all PAs' needs and therefore received a Yes. However, six (6) workpapers exceeded the minimum requirements and went above and beyond the expectations of collaboration. Workpaper plans were submitted and communicated effectively with follow up review feedback addressed proactively.

CPUC Staff recognizes SCE played a leadership role in developing fuel substitution energy efficiency measures guidance and tools including technical guidelines, establishing policy clarifications, defining key system impacts, and training several energy efficiency stakeholders to support the success of fuel substitution measures in 2020.

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

In 2020, SCE received a workpaper disposition score of 6.25 out of 12.5 for Metric 4 (PA's Due Diligence, Quality Assurance, and Quality Control) prior to the addition of any enhancement points. Many workpapers lacked some essential QC of EAD tables to be sure the ID codes were matched in Pear. In addition, there were multiple workpapers which proposed the inclusion of gas equipment as a baseline condition for a standard electric to electric EE measure. Finally, SWHC050, proposed electric baseboard for a NR measure which was not in alignment with the standard practice. These items showed a lack of due diligence on the part of SCE to clarify baseline conditions which resulted in multiple meetings and caused delays of submittals.

5. PA's Responsiveness

In 2020, SCE received a workpaper disposition score of 6.75 out of 12.5 for Metric 5 (PA's Responsiveness) prior to the addition of any enhancement points. SCEs effectively responded to program needs with the retirement of multiple lighting measures and the addition of the Type B and C LED lighting workpaper. CPUC Staff and consultants have regularly and productively engaged with SCE and continue to rely on them to provide answers for the electric measure workpapers. In addition, SCE continues to show innovation in developing new workpapers. As the workpaper process transitions to eTRM, SCE 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 PAs' 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", 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

[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").

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, PA-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 3, 4 and 5 to reflect SCE staff's positive efforts in these metric areas as discussed earlier. Those initiatives included:

- Continuing to take the statewide lead role in collaborating with CPUC Staff to develop the Statewide Custom Project Guidance Document and leading the statewide guidance documents maintenance/update protocol subgroup and participation in other subgroups including the technical training, simplified processes for smaller and larger projects, and Custom Project Review Timeline Streaming subgroups. SCE has demonstrated extensive leadership for statewide initiatives and CPUC Staff recognize the significant effort they continue to contribute in 2020.
- Helping to lead the statewide coordination team and committing resources to manage meetings, including follow-up with notes and communications, including management of the external Sharepoint site. CPUC Staff recognize the effort it takes to run these meetings and commend SCE for these efforts.
- Having a prompt response time and limiting the number of SDRs needed to resolve issues with submitted project documentation. CPUC staff recognize that SCE was able to resolve any requests for supplemental data the first time around and commend them for keeping the number of SDRs low as a percentage of total projects submitted.
- At the portfolio level SCE submitted zero projects late and submitted more than 50% of their project documentation earlier than required by SB 1131.

Although these efforts may not yet be reflected in project specific disposition scores, CPUC Staff believes recognition of the efforts of SCE's staff is warranted. These activities offer promise to improve SCE' 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, and are summarized here by metric as:

- Metric 1: Timeliness: SCE was acknowledged for maintaining active communication with CPUC on schedule and timing.
- Metric 2: Content: SCE was acknowledged for initiating new and complex workpapers.
- Metric 3: Collaboration: SCE was acknowledged for the collaboration shown in the last year towards the completion of the statewide workpaper consolidation.
- Metric 4: Due Diligence: SCE was acknowledged for its role in coordinating comprehensive review of EAD tables.
- Metric 5: Process improvements: SCE is acknowledged for multiple initiatives to improve processes and update CPUC staff on various topics including establishing the communication plan between CPUC, IOUs, and stakeholders.

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 SCE.[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 SCE 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%	2.19	2.19	5	10%	5.00	5.00
	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%	2.50	7.50	15	30%	3.88	11.64
	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%	3.10	3.10	5	10%	4.50	4.50
	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%	2.50	6.25	12.5	25%	3.80	9.50

	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**	**12.5**	**25%**	**2.70**	**6.75**	**12.5**	**25%**	**3.50**	**8.75**
	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).								
Total		**50**	**100%**		**25.79**	**50**	**100%**		**39.39**

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[12])
Metric 1	**Timeliness and Timing of Submittals** Timely submittal of all documentation and follow-up utility responses to review disposition action items.	**5**	**10%**	**5.00**	**54**	SCE complied with SB1131 guidelines for submitting documentation before the 15 business days required. No projects were found to be late and 23 projects (43 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%**	**11.64**	**54**	In 2020, out of 65 projects submitted and selected for review, 54 projects received dispositions. Out of those, 19 exhibited deficiencies including 5 projects that were not authorized prior to implementation, baseline use exceeding measure performance, and M&V plans being out of compliance. Other less significant deficiencies included incorrect measure EUL, missing savings calculations, and issue with parameter assumptions. Staff notes that SCE has submitted projects with significantly more issues in 2020 in contrast to 2019.
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%**	**4.50**	**54**	Commission Staff found that SCE again 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 and were champions of several statewide initiatives. SCE demonstrated proactive collaboration by submitting early opinion requests on a variety of projects and undertook a study to update VRF modeling in EnergyPro.
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%**	**9.50**	**54**	Commission staff weighted the number of dispositions proceeding without exception against those that required resubmissions or resulted in rejections. Of the 54 projects receiving dispositions in 2020, 18 projects (33 percent) proceeded without exception, 17 projects (31 percent) were allowed to proceed with exceptions as noted, 7 projects (13 percent) were rejected. Compared to 2019 when SCE had zero rejections, these findings resulted in lower-than-expected performance with regards to effective QC of projects prior to submitting for review.

[12] The Metric 1 and 2 scores for each of the individual custom projects are included in the final custom workbook which is embedded in Attachment D.

						Commission staff did find that SCE incorporated elements from the statewide documents into their processes as well as demonstrated a commitment to improving their QC process through internal trainings, dedicated engineering staff with a focus on high and medium incentive project reviews, and other improvements to streamline QC processes.
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%**	**8.75**	**54**	SCE Projects reviewed from January 2020 through December 2020 exhibited a slight upward trend in terms of project performance over time. (i.e. project submissions performed better over the course of the 2020 review period). SCE did demonstrate improvement by developing and updating processes and eligibility requirements for NMEC projects as well as continuing to lead Statewide Coordination meetings to improve custom project quality and streamline reviews. These efforts demonstrate compliance with CPUC policies as well as a willingness to improve processes.

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
SWAP003	2	Clothes Dryer, Residential	Workpaper submitted to update costs, change MAT, and advance tier qualification. There were inconsistencies in the EAD tables and additional coordination with SCE to remove the gas baseline for electric workpapers which caused delays in submittals.	1	-	No	Yes	No	Yes
SWAP010	1	Smart Power Strips	Workpaper plan initially submitted in 2019. After multiple meetings to discuss data collection plan, workpaper was submitted in June 2020. Additional information was required for approval of a data collection plan with multiple meetings between CPUC and SCE to finalize causing delays in submittals. Disposition approving the workpaper set expiry date of 12/31/2022 with direction to collect savings data.	1	-	-	+	No	Yes
SWAP013	1	Residential Cooking Appliances – Fuel Substitution	Workpaper plan and workpaper initially submitted in 2019. Multiple meetings between CPUC and PA to clarify equipment baselines and efficiencies causing delays in submittals. SCE showed initiative with submittal of first Fuel Substitution workpaper.	1	-	No	+	No	Yes
SWAP014	1	Heat Pump Clothes Dryer, Residential, Fuel Substitution	Workpaper was timely with minimal revisions.	1	Yes	Yes	+	Yes	Yes
SWAP015	1	Induction Cooking with or without Electric Range, Residential	Workpaper plan submitted. There were inconsistencies in the EAD tables and additional coordination with SCE to remove the gas baseline for electric workpapers which caused delays in submittals.	1	-	Yes	+	No	Yes
SWCA001	2	Air Compressor VFD Retrofit	Workpaper submitted without comment.	1	+	+	Yes	Yes	Yes

SWCR003	1	High Efficiency Motor Retrofit for Refrigerated Display Case	Workpaper submitted with minimal comment.	1	+	Yes	Yes	Yes	Yes
SWCR004	1	EC Motor Retrofit For A Walk-In Cooler Or Freezer	Workpaper submitted with minimal comment.	1	+	Yes	Yes	Yes	Yes
SWCR014	2	High Efficiency Refrigerated Display Cases	Workpaper resubmittal to update costs and measure offerings. Minimal comment.	1	+	Yes	Yes	Yes	Yes
SWFS007	2	Insulated Hot Food Holding Cabinet	Workpaper revised as part of ISP study. Multiple revision and meetings between CPUC and SCE caused delays in workpaper submittals.	1	-	No	Yes	Yes	Yes
SWFS021	1	Commercial Fryer, Fuel Substitution	Preliminary submittal of workpaper. Workpaper was approved with minimal comment.	1	Yes	Yes	Yes	Yes	Yes
SWFS021	2	Commercial Fryer, Fuel Substitution	Workpaper resubmission to update equipment and costs. Minimal comment.	1	Yes	Yes	Yes	Yes	Yes
SWFS022	1	Commercial Convection Oven, Fuel Substitution	Preliminary submittal of workpaper. Workpaper was approved with minimal comment.	1	Yes	Yes	Yes	Yes	Yes
SWHC039	3	Smart Thermostat, Residential	Revised submittal at direction of CPUC disposition. Incorporated results of PY2018 Impact Evaluation. Disposition approving workpaper directing additional evaluation data analysis for 2022 submittal.	1	Yes	Yes	Yes	Yes	Yes
SWHC044	1	Ductless HVAC, Residential - Fuel Substitution	Preliminary submittal of workpaper. Workpaper was approved with minimal comment.	1	Yes	Yes	Yes	Yes	Yes
SWHC045	1	Heat Pump HVAC, Residential - Fuel Substitution	Preliminary submittal of workpaper. Workpaper was approved with minimal comment.	1	Yes	Yes	Yes	Yes	Yes
SWHC046	1	Heat Pump,Unitary Air-Cooled HVAC, Commercial - Fuel Substitution	Preliminary submittal of workpaper. Workpaper was approved with minimal comment.	1	Yes	Yes	Yes	Yes	Yes
SWHC049	1	SEER Rated AC and HP equipment, Residential	Additional coordination with SCE to remove the gas baseline for electric workpapers which caused delays in submittals.	1	-	Yes	Yes	No	Yes
SWHC050	1	Ductless Heat Pump, HVAC, Residential	Preliminary submittal of workpaper. Multiple meeting with CPUC and SCE to clarify baseline conditions for NR vs. AR cause delay in resubmittal.	1	-	Yes	Yes	No	Yes

SWLG009	2	LED Tube - Type A	Revised workpaper at the direction of CPUC disposition. Elegibility requirements and additional cost data were required. Multiple resubmissions to correct EAD tables. SCE showed responsiveness and collaboration with effort to retire old lighting measures.	1	No	Yes	+	No	+
SWLG018	1	Type B and Type C LED, Tube	Workpaper plan submitted. The plan was well proposed and workpaper was approved with disposition. SCE showed responsiveness with addition of new lighting workpaper.	1	Yes	Yes	+	Yes	+
SWWH014	2	Heat Pump Water Heater, Residential	Revised workpaper due to updated water heater calculator. Minimal comment.	1	Yes	Yes	Yes	Yes	Yes
SWWH025	1	Residential Heat Pump Water Heater - Fuel Substitution	Preliminary submittal of workpaper. Workpaper was approved with minimal comment.	1	Yes	Yes	Yes	Yes	Yes
SWWH025	2	Residential Heat Pump Water Heater Fuel Substitution	Revised workpaper due to updated water heater calculator. Minimal comment.	1	Yes	Yes	Yes	Yes	Yes
SWWH027	1	Heat Pump Water Heater, Commercial, Fuel Substitution	Preliminary submittal of workpaper. Workpaper was approved with minimal comment.	1	Yes	Yes	Yes	Yes	Yes

Workpaper Submission Status – All workpapers submitted in 2020			
WP ID	**Rev**	**Title**	**Submission Status: EAR Team Comments**
SWCR003	1	High Efficiency Motor Retrofit for Refrigerated Display Case	Interim approval.
SWAP003	2	Clothes Dryer, Residential	Interim approval.
SWAP015	1	Induction Cooking with or without Electric Range, Residential	Interim approval.
SWHC049	1	SEER Rated AC and HP equipment, Residential	Interim approval.
SWAP013	1	Residential Cooking Appliances – Fuel Substitution	Interim approval.
SWAP010	1	Smart Power Strips	Interim approval.
SWFS021	1	Commercial Fryer, Fuel Substitution	Interim approval.
SWHC039	3	Smart Thermostat, Residential	Interim approval.
SWWH025	2	Residential Heat Pump Water Heater Fuel Substitution	Interim approval.
SWFS022	1	Commercial Convection Oven, Fuel Substitution	Interim approval.
SWLG009	2	LED Tube - Type A	Interim approval.
SWWH014	2	Heat Pump Water Heater, Residential	Interim approval.
SWWH028	1	Multi-Family and Commercial Large Heat Pump Water Heater– Fuel Substitution	Detailed review in process.
SWWH027	1	Heat Pump Water Heater, Commercial, Fuel Substitution	Interim approval.
SWHC050	1	Ductless Heat Pump, HVAC, Residential	Interim approval.
SWLG018	1	Type B and Type C LED, Tube	Interim approval.
SWCR010	2	Bare Suction Pipe Insulation	Detailed review in process.
SWCA001	2	Air Compressor VFD Retrofit	Interim approval.
SWFS021	2	Commercial Fryer, Fuel Substitution	Interim approval.
SWCR001	2	Anti-Sweat Heat Controls	Detailed review in process.
SWCR002	2	Low-Temperature Display Case Doors with No Anti-Sweat Heaters	Detailed review in process.
SWCR014	2	High Efficiency Refrigerated Display Cases	Interim approval.
SWHC041	2	Software-Controlled Switch Reluctance Motor	Detailed review in process.
SWHC049	2	HVAC, SEER-Rated AC and HP Equipment, Residential	Detailed review in process.
SWHC042	2	Evaporative Pre-Cooler System And Controls For Packaged HVAC Unit	Detailed review in process.
SWHC020	2	Air-Cooled Chiller	Detailed review in process.
SWHC005	2	Water-Cooled Chiller	Detailed review in process.

SWHC038	2	Brushless Fan Motor Replacement, Residential	Detailed review in process.
SWWH014	3	Heat Pump Water Heater, Residential	Detailed review in process.
SWWH027	2	Heat Pump Water Heater, Commercial, Fuel Substitution	Detailed review in process.
SWCR005	2	Auto Closer for Refrigerated Storage Door	Detailed review in process.
SWCR022	2	Efficient Adiabatic Condenser	Detailed review in process.
SWHC030	2	Whole House Fan, Residential	Detailed review in process.
SWWB006	3	High Performance Crawlspace	Detailed review in process.
SWPR004	2	Circulating Block Heater	Detailed review in process.
SWHC029	2	Fan Controller for Air Conditioner, Residential	Detailed review in process.
SWHC024	2	Cogged V-Belt for HVAC Fan, Commercial	Detailed review in process.
SWAP011	2	Vending and Beverage Merchandise Controller	Detailed review in process.
SWWH025	1	Residential Heat Pump Water Heater - Fuel Substitution	Interim approval.
SWHC027	2	Package Terminal Air Conditioner or Heat Pump, Under 24kBtuh	Detailed review in process.
SWWH025	3	Residential Heat Pump Water Heater, Fuel Substitution	Detailed review in process.
SWCR007	2	Floating Head Pressure Controls, Multiplex	Detailed review in process.
SWCR008	2	Floating Suction Controls, Multiplex	Detailed review in process.
SWFS023	1	Converyorized Toaster, Commercial	Detailed review in process.
SWAP014	1	Heat Pump Clothes Dryer, Residential, Fuel Substitution	Interim approval.
SWCR004	1	EC Motor Retrofit For A Walk-In Cooler Or Freezer	Interim approval.
SWFS007	2	Insulated Hot Food Holding Cabinet	Interim approval.
SWHC044	1	Ductless HVAC, Residential - Fuel Substitution	Interim approval.
SWHC045	1	Heat Pump HVAC, Residential - Fuel Substitution	Interim approval.
SWHC046	1	Heat Pump,Unitary Air-Cooled HVAC, Commercial - Fuel Substitution	Interim approval.

Process Adder	ESPI Metrics					
	Weight	1	2	3	4	5
In March 2020, SCE dedicated an effort to make fixes to EAD tables that were identified to have issues. After carefully reviewing all workpapers submitted to WPA, SCE flagged 15 EAD tables that had issues, including implementation misspellings, offering ID separations, and/or sector conflicts. Not resolving these issues would leave IOUs stranded during claiming savings in CEDARs. SCE initiated and coordinated the changes with CPUC and CalTF for the mass resubmission, which also gave other IOUs a chance to submit implementations IDs on SCE-led workpapers which were not submitted in the initial phase. In addition, SCE also adopted and added implementation IDs to 15 additional non-SCE led workpapers. The EAD tables resubmission was delivered into 2 phases, 1st during the end of April and 2nd in early May.	1	Yes	No	Yes	+	Yes
SCE has initiated communications and engagement with HVAC equipment manufacturers, to gather data and evaluate high SEER-rated residential heat pumps. The goal is the development of deemed measures for these higher efficiency HVAC systems, that are not currently supported by DEER due to lack of this data. Inclusion of these measures in the energy efficiency portfolio will help drive the market to adopt higher efficiency HVAC systems.	1	No	No	+	+	Yes
SCE led an effort with the other IOUs to prepare a list of workpapers planned to be submitted to the CPUC in 2020. This list allows the CPUC Workpaper Review Team to plan their resources. After the initial submittal of this schedule, SCE has been updating and submitting this list monthly, as part of the IOU-CPUC Monthly Workpaper Coordination Meeting.	1	Yes	Yes	Yes	Yes	+
SCE supported BayREN, in collaboration with PG&E and the CPUC Workpaper Review Team, by providing technical assistance on the development of new fuel substitution measures for Residential applications. These include the replacement of gas-fired heating-only residential systems with heat pump systems. Measure development and workpaper submission was completed in 4th Qtr. 2020.	1	No	No	+	Yes	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)	5.00	3.88	4.50	3.80	3.50	
Review Process Score Enhancements	Technical & Policy QC Increase	0.50	0.00	0.50	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	3.88	5.00	4.30	4.00	Total Points
	Adjusted Metric Points	5.00	11.64	5.00	10.75	10.00	42.39

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	4.81	5.00	3.60	3.75	
Review Process Score Enhancements	Technical & Policy QC Increase	0.00	0.00	1.00	1.00	1.00	
	Implementation Increase	0.00	0.00	0.00	0.00	0.00	
Total Score	Adjusted Final Metric Score (1-5)	5.00	4.81	5.00	4.60	4.75	Total Points
	Adjusted Metric Points	5.00	14.42	5.00	11.50	11.88	47.80

This workbook contains all of the SCE Custom Scoring tables

Workpaper Scoring

2020 Annual Workpaper Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	
Direct Workproduct Review Score	SCE "-"	29%	5%	0%	0%	0%	
	SCE "+"	17%	5%	24%	0%	8%	
	SCE "Yes"	54%	91%	76%	100%	92%	
	Dispositions Score %	**44%**	**50%**	**62%**	**50%**	**54%**	
	Dispositions Score	**2.19**	**2.50**	**3.10**	**2.50**	**2.70**	
Review Process Score Enhancements	SCE "-"	0%	0%	0%	0%	0%	
	SCE "+"	0%	0%	50%	50%	25%	
	SCE "Yes"	100%	100%	50%	50%	75%	
	Process Score %	**50%**	**50%**	**75%**	**75%**	**63%**	
	Process Increase Score	**2.50**	**2.50**	**3.75**	**3.75**	**3.13**	
	Process Increase Weight	**0.50**	**0.50**	**0.50**	**0.50**	**0.50**	
	Process Increase Wtd Score	**1.25**	**1.25**	**1.88**	**1.88**	**1.56**	
Total Score	**Final Metric Score (1-5)**	**3.44**	**3.75**	**4.98**	**4.38**	**4.26**	**Total Points**
	Metric Points with Weighting	**3.44**	**11.25**	**4.98**	**10.94**	**10.66**	**41.27**

2019 Annual Workpaper Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	
Direct Workproduct Review Score	SCE "-"	0%	2%	0%	15%	0%	
	SCE "+"	0%	51%	0%	7%	57%	
	SCE "Yes"	100%	47%	100%	78%	43%	
	Dispositions Score %	**50%**	**74%**	**50%**	**46%**	**79%**	
	Dispositions Score	**2.50**	**3.72**	**2.50**	**2.32**	**3.94**	
Review Process Score Enhancements	SCE "-"		0%	0%	0%	0%	
	SCE "+"		100%	100%	0%	0%	
	SCE "Yes"		0%	0%	100%	100%	
	Process Score %	**0%**	**100%**	**100%**	**50%**	**50%**	
	Process Increase Score	**0.00**	**5.00**	**5.00**	**2.50**	**2.50**	
	Process Increase Weight	**0.50**	**0.50**	**0.50**	**0.50**	**0.50**	
	Process Increase Wtd Score	**0.00**	**2.50**	**2.50**	**1.25**	**1.25**	
Total Score	**Final Metric Score (1-5)**	**2.50**	**5.00**	**5.00**	**3.57**	**5.00**	**Total Points**
	Metric Points with Weighting	**2.50**	**15.00**	**5.00**	**8.92**	**12.50**	**43.92**

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 % score into a numeric value of up to five by directly applying the % 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.