

PUBLIC UTILITIES COMMISSION

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To: San Diego Gas & Electric (SDG&E)

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Cc: R.13-11-005 Service Lists

Subject: 2021 EX ANTE REVIEW (EAR) SCORING AND EVALUATION PERFORMANCE

Table of Contents

- I. Summary of 2021 EAR Scores - Custom Projects and Measure Packages 2
- II. CPUC Staff Findings 2021 Activities..... 3
 - A. Custom Projects Review Overview 3
 - B. Measure Packages Review Overview..... 4
- III. Discussion 5
 - A. Custom Projects Performance Review..... 5
 - B. Measure Packages Performance Review 9
- IV. The Scoring Methodology 11
 - A. Measure Package Metric 1-5 Scoring Methodology..... 12
 - B. Custom Metric 1 Scoring Methodology..... 13
 - C. Custom Metric 2 Scoring Methodology..... 13
 - D. Custom Metric 3, 4 and 5 Scoring Methodology 13
 - E. Score Enhancement Methodology 14
- Attachment A: Final EAR Performance Scores (without Enhancement Points) 16
- Attachment B: Custom Project Scores and Feedback 18
- Attachment C: Measure Package Scores and Feedback 21
- Attachment D: 2021 Performance Annual Ratings..... 23

I. Summary of 2021 EAR Scores - Custom Projects and Measure Packages

Pursuant to Decision (D).13-09-023, D.15-10-028, D.16-08-019, and D.20-11-013, California Public Utilities Commission (CPUC) staff and consultants score the investor-owned utilities (IOUs) based on their performance during the pre-approval phase (or “ex ante” phase) of developing an energy efficiency project or measure. The ex ante review (EAR) scoring is a part of the EAR awards¹. D.20-11-013 placed a moratorium on EAR awards but directed that EAR scoring shall continue. CPUC staff and consultants completed the 2021 EAR performance review scoring as prescribed in Table 3 of D.16-08-019. Decision D.16-08-019 established consolidated metrics to evaluate and further direct the utilities. Ordering Paragraph 19 of this decision states that the EAR scores “shall be weighted for the utility program administrators based on the proportion of deemed savings and custom measures in each utility’s portfolio”.

A breakdown of SDG&E’s 2021 EAR performance score of 78.22/100 for Measure Packages² and custom projects is shown below in Table 1. SDG&E’s 2021 total points is a 0.72 point decrease from its 2020 total points of 78.94. Scores for 2020 are provided in Table 2 on the following page.

Table 1: SDG&E 2021 EAR Scoring for Measure Packages and Custom Projects

SDG&E 2021 EAR Performance Scores and Points		Measure Packages				Custom			
Metric	Metric Area of Scoring	Metric Score	Metric Weight Factor	Points	Max Points	Metric Score	Metric Weight Factor	Points	Max Points
1	Timing and Timeliness of Submittals	2.50	10%	2.50	5	5.00	10%	5.00	5
2	Content, Completeness, and Quality of Submittals	2.50	30%	7.50	15	4.83	30%	14.48	15
3	Proactive Initiative of Collaboration	3.75	10%	3.75	5	4.60	10%	4.60	5
4	Due Diligence and QA/QC Effectiveness	3.75	25%	9.38	12.5	4.40	25%	11.00	12.5
5	Responsiveness to Needs for Process/Program Improvements	3.75	25%	9.38	12.5	4.25	25%	10.63	12.5
Total				32.51	50			45.71	50

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

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

Table 2: SDG&E 2020 EAR Scoring for Measure Packages and Custom Projects

SDG&E 2020 EAR Performance Scores and Points		Measure Packages				Custom			
Metric	Metric Area of Scoring	Metric Score	Metric Weight Factor	Points	Max Points	Metric Score	Metric Weight Factor	Points	Max Points
1	Timing and Timeliness of Submittals	2.50	10%	2.50	5	5.00	10%	5.00	5
2	Content, Completeness, and Quality of Submittals	2.50	30%	7.50	15	4.10	30%	12.31	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	6.25	25%	6.25	12.5	4.90	25%	12.25	12.5
5	Responsiveness to Needs for Process/Program Improvements	5.00	25%	12.50	12.5	4.25	25%	10.63	12.5
Total				33.75	50			45.19	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 2021 Activities

A. Custom Projects Review Overview

From the period beginning January 2021 to the end of December 2021, CPUC staff issued 11 scored dispositions.³

A review of the project dispositions and the Review Process Score Enhancements points resulted in SDG&E's custom project score increasing by 0.52 points from 2020 scores (45.19 in 2020 vs. 45.71 in 2021 as shown in Tables 1 and 2 above). Similar to the previous EAR cycle, SDG&E demonstrated notable efforts to improve its documentation and processes and as a result their performance has increased again this cycle.

³ Some of the dispositions are for projects submitted at the end of 2020. Some projects that we selected in 2021 had dispositions issued in 2022. The memo is for dispositions issued in 2021.

1. Summary of 2021 Achievements

CPUC staff observed SDG&E to have improved in:

- **The proportion of gross savings impact issues decreased significantly.** In 2020, SDG&E had 62 percent of all issues related to gross savings impacts. In 2021, the number of issues related to gross savings impacts decreased to 48 percent of total issues. This demonstrates SDG&E's improvement in QA/QC processes, calculation methods, and M&V plan development across project submissions.
- **The proportion of Process, Policy and Program rules issues continues to decrease significantly.** In 2020 the number of deficiencies noted in this area was 13 percent of total issues identified, whereas in 2021 the number of deficiencies dropped to 7 percent of total. This demonstrates that SDG&E is making strides to improve its conformance with CPUC policy and program rules.
- **SDG&E continued to initiate discussions on project reviews to seek guidance and input from CPUC staff.** SDG&E continues to engage with CPUC staff by submitting early opinion requests, discussing high volume measures prior to implementation, and bringing forward pertinent program research conducted by a program implementors.

2. Summary of Areas Requiring Improvement

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

- **The number of issues regarding eligibility increased.** Custom Project Review found eligibility related deficiencies were one of the most prevalent areas in 2019 whereas SDG&E had no issues related to eligibility in 2020. However, in 2021 there was one eligibility related issue noted which indicates a slight decrease in effective QC of project documentation.
- **Analysis assumptions are still a significant deficiency noted on project submissions.** While the percent of deficiencies related to gross impacts decreased from the previous year, the issues surrounding analysis assumptions remains high, and comprises 77 percent of the total issues in this category.

B. Measure Packages Review Overview

SDG&E's Measure Packages scores have decreased compared to last year by 1.24 points (from 33.75 in 2020 to 32.51 as shown in Tables 1 and 2 above). SDG&E should continue its efforts to improve its performance.

1. Summary of 2021 Achievements

CPUC staff observed improvements in SDG&E's development and management of Measure Package submissions in the following areas:

- SDG&E has made improvements to their internal QC processes which have been apparent in the quality and timeliness of their measure package submittals.

- SDG&E has systematically reviewed aspects of Database for Energy-Efficient Resources (DEER)⁴ or Preliminary Ex Ante Resource database (PEAR)⁵ and reported back anomalies in a clear succinct manner. This has been beneficial to all stakeholders.
- SDG&E continues to be a proactive and effective communicator with CPUC regarding plans to update Measure Packages or Measure Package plans adherence to scheduled timelines.

2. Summary of Areas Requiring 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:

- SDG&E has played a limited role in the development and management of Measure Package submissions during the review period. With the large number of Measure Package submissions expected over the next year due to forthcoming Resolution E-5152, CPUC staff expects SDG&E to proactively engage in the Measure Package updates and submittals.

III. Discussion

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

A. Custom Projects Performance Review

Each year, CPUC staff reviews a selected sample of energy efficiency program custom project 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. Projects using Normalized Metered Energy Consumption (NMEC) methods were starting to show up on the ready to review list and were selected for review to look for issues with this relatively new program delivery strategy.

From the period beginning January 2021 to the end of December 2021, 11 SDG&E projects

⁴ The Database for Energy Efficient Resources contains information on selected energy-efficient technologies and measures.

⁵ The Preliminary Ex Ante Resource database contains proposed updates to DEER for vetting before being finalized in DEER.

received dispositions. The comments below are organized by the five metric areas of scoring prescribed in D.16-08-019 with metric scores shown prior to any enhancement points. 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 SDG&E for each metric both with and without the addition of any Enhancement Points.

Table 3: SDG&E 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%	5.0	5.0	5
2	Content, Completeness, and Quality of Submittals	30%	14.48	14.48	15
3	Proactive Initiative of Collaboration	10%	4.60	4.60	5
4	PA's Due Diligence and QA/QC	25%	11.00	11.00	12.5
5	PA's Responsiveness	25%	10.63	10.63	12.5
Total			45.71	45.71	50

1. Timeliness of Submittals

In 2021, SDG&E 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 11 custom project reviews completed in 2021. In 2021, SDG&E submitted project documentation for review for all 11 reviewed projects early. All of these projects (100 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.⁶ SDG&E continues to improve compared to prior year submissions and continues to exceed expectations with regards to timeliness by submitting projects well ahead of the required submission due date.

2. Content, Completeness, and Quality of Submissions

In 2021, SDG&E received a custom disposition score of 14.48 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 11 SDG&E custom project reviews. Of these 11 dispositions, 2 projects (18 percent) were approved without exception, 5 projects (45 percent) were marked Advisory, and no projects were marked Prospective.⁷ However, 1 project (9 percent) was rejected, and the remaining 3 projects (27 percent) were approved with noted deficiencies which resulted in a loss of points under this metric.

⁶ "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".

⁷ The objective of Advisory reviews is not to approve project savings claims, but to provide early feedback for implementation and to inform CPUC staff-led evaluation. NMEC project reviews are Advisory. The guidance for Prospective reviews applies to future projects that are not already in the PA's pipeline of projects. CPUC staff use Prospective reviews to provide feedback on new programs.

Table 4 below summarizes the 27 action items identified across the 11 scored dispositions⁸ issued between January 1, 2021, and December 31, 2021. These action items illustrate errors that impacted the project's eligibility, documentation, and efficiency savings estimate calculations.

Table 4: Summary of Categorized Action Items for Custom Projects

Issue Area	Action Categories	Summary of CPUC Staff Required Action by the PA:	Summary of CPUC Staff Notes or Instructions:	Percent of Total Actions
Issues Related to Gross Savings Impacts	Analysis assumptions	10	0	77%
	Calculation method	2	1	15%
	M&V plan	1	0	8%
	Subtotals	13	1	48%
Process, Policy, Program Rules	Eligibility	1	0	14%
	Fuel Switching	1	0	14%
	Subtotals	2	0	7%
Documentation Issues	Continue document upload	5	0	50%
	Missing documents	3	0	50%
	Subtotals	8	0	30%
Other Issues	Other - bimonthly upload savings discrepancy	3	4	75%
	Other - update quarterly submission	1	1	25%
	Other - bimonthly upload data error	0	4	0%
	Other - no action	0	1	0%
	Subtotals	4	5	15%
Grand Total		27	6	100%

A specific example of project and measure level deficiency is provided below.

- **Incorrect Baseline Value** occurred on only one project reviewed (CPUC ID 647) leading to a significant loss of points for this project due to the importance of this deficiency.

3. Proactive Initiative of Collaboration

In 2021, SDG&E received a custom disposition score of 4.6 out of 5.0 for Metric 3 (Proactive Initiative of Collaboration) prior to the addition of any enhancement points. At the portfolio level, SDG&E made efforts to bring measures, projects, or studies forward for discussion prior to CPUC staff review, including high volume direct install measures prior to implementation, use of modified lighting calculator (MLC) in new third party (3P) program, custom projects applications reporting requirements for third party program implementers, corrective actions and quality assurance activities, statewide technical review workbook, preponderance of evidence (POE) requirements for small businesses, equipment viability requirements under E-5115, statewide project feasibility study (PFS)

⁸ This table includes action items issued on 5 Advisory dispositions.

requirements, program influence requirements for small sized businesses, technical issues with MLC, effective useful life (EUL) for Savings by Design (SBD) pipeline projects, quarterly custom projects applications updates submission data issues, climate zone weather data files for custom projects, EnergyPro software bugs and workarounds, EUL/RUL high value or repair indefinitely equipment, sampling strategies for project quality control reviews, direct install energy management system (EMS) measure, clarifying rule differences between NMEC and IPMVP Option C custom projects, maintenance of the statewide disposition database, small business definition clarification, and developing an ISP study for a DC extruder measure. Additionally, CPUC staff noted SDG&E's active involvement in subgroup calls and a willingness to take the lead role in MLC updates and the Statewide technical review workbook. They have been an active participant in the Combined CPUC Custom and Small Project Subgroups and taken on assignments outside of subgroup meetings. These activities demonstrated to CPUC staff that SDG&E exceeded expectations with regards to proactive collaboration under this metric and has taken significant steps to improve engagement with CPUC staff.

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

In 2021, SDG&E received a custom disposition score of 11.0 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 performed 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 11 dispositions issued, 2 projects (18 percent) proceeded without exception, while 3 projects (27 percent) were allowed to proceed with exceptions as noted in the review. One project⁹ (9 percent) was rejected. In contrast to last year where SDG&E had 17 projects (47 percent) allowed to proceed with exceptions, this year SDG&E demonstrated better-than-expected performance for this metric as it pertains to effective QC of projects prior to submitting for review.

CPUC staff observed that SDG&E is taking steps to improve general internal processes and methodologies. Overall, CPUC staff believes SDG&E made efforts to improve the QA/QC related to document submissions and internal practices and exceeded CPUC staff expectations for this metric.

5. PA's Responsiveness

In 2021, SDG&E received a custom disposition score of 10.63 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 adaption to rule changes over time. CPUC staff found that projects reviewed from January 2021 through December 2021 exhibited a slight downward trend in terms of project performance over time (i.e., project submissions had more issues when submitted later in 2021 compared to earlier in the year). CPUC staff also noted that only 7 percent of issues were related to Process, Policy, and Program Rules, which is an improvement from the previous year where issues in that category comprised 13 percent of total issues.

⁹ There were also 5 Advisory dispositions issued that are not included in this count.

CPUC staff noted that SDG&E created a Corrective and Preventative Action Plan (CAPA) process to assist in the QA of 3rd party project submissions and continues to make improvements based on lessons learned and best practices. Additionally, they created a project review checklist and tracker to help standardize and ensure consistency in project submissions from 3rd party implementors, which will assist in avoiding persistent issues on future submission. As such, CPUC staff felt SDG&E made efforts to improve the performance of their program and is meeting or exceeding expectations for what is required under this Metric.

B. Measure Packages Performance Review

SDG&E had three measure packages which were submitted in 2021 which were reviewed and disposed and has one measure package still in development. This end of year memo provides measure package feedback on the three which were reviewed and disposed.

The comments below are organized by the five scoring metric areas created in D.16-08-019.¹⁰ The narrative includes observations common to multiple Measure Packages and feedback related to the Measure Package development process. Specific Measure Package feedback is provided in [Attachment C](#), at the end of this document. The Measure Package Detailed Review Table provides feedback on specific Measure Packages. The Measure Package Submissions Table lists all measure packages submitted by SDG&E during the review period. Measure Packages were selected for feedback from those that were led by SDG&E and were either disposed or reached approval status during the review period. CPUC staff acknowledges that Measure Package development may have been supported by multiple PAs; however, at this time, there is no mechanism for apportioning feedback among PAs. Therefore, feedback is only provided for the submitting PA, with the assumption that they are the lead PA. The scoring rubric for Measure Packages is defined as follows:

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

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

Table 5 below presents the Measure Package disposition points given to SDG&E for each metric both with and without the addition of any enhancement points.

¹⁰ See [D.16-08-019](#) at 87.

Table 5: SDG&E Measure Package Disposition Points Awarded by Metric

Metric	Metric Area of Scoring	Weight Factor	Measure Package 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%	7.50	7.50	15
3	Proactive Initiative of Collaboration	10%	3.75	2.50	5
4	PA's Due Diligence and QA/QC	25%	9.38	6.25	12.5
5	PA's Responsiveness	25%	9.38	6.25	12.5
Total			32.51	25.00	50

1. Timeliness of Submittals

In 2021, SDG&E received a Measure Package disposition score of 2.50 out of 5.0 for Metric 1 (Timeliness of Submittals) prior to the addition of any enhancement points. Though the updates were triggered by DEER Resolution E-5082 which requires Measure Packages to be submitted by January 1, 2021, SDG&E did not submit these Measure Packages until May 2021. This delay was to incorporate upcoming study results. However, the study was not completed in time for the submittal and the Measure Packages were submitted without the results. SDG&E communicated this to the CPUC staff during monthly meetings and as such they were not penalized for timeliness. SDG&E generally met deadlines for submission of statewide Measure Packages in the review period and all Measure Packages received a Yes, indicating that minimum expectations were met for timeliness.

2. Content, Completeness, and Quality of Submissions

In 2021, SDG&E received a Measure Package disposition score of 7.50 out of 15.0 for Metric 2 (Content, Completeness, and Quality of Submissions) prior to the addition of any enhancement points. The three Measure Packages disposed in the first half of the year contained minor updates which were completed with minimal comment. The CPUC staff encourages the continued development of new Measure Packages to ensure innovative measures. The content, completeness, and quality of Measure Packages has generally met standards.

3. Proactive Initiative of Collaboration

In 2021, SDG&E received a Measure Package disposition score of 2.50 out of 5.0 for Metric 3 (Proactive Initiative of Collaboration) prior to the addition of any enhancement points. SDG&E is the lead for HVAC measure development; however, CPUC staff engagement has been limited during the review period. SDG&E has submitted a measure package plan for UL Type B LED Screw-In Lamp HID Retrofits and has initiated conversations with the CPUC staff regarding the milestones and timelines for delivering of that measure package. Measure Packages met the minimum expectations of collaboration which was required to ensure each Measure Package met all PAs' needs, therefore all Measure Packages received a "Yes".

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

In 2021, SDG&E received a Measure Package 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. The quality of SDG&E's Measure Packages was adequate and averaged 50 percent of the direct work product points for this metric, meeting minimum expectations for Measure Package quality control.

5. PA's Responsiveness

In 2021, SDG&E received a Measure Package disposition score of 6.25 out of 12.5 for Metric 5 (PA's Responsiveness) prior to the addition of any enhancement points. SDG&E continues to respond to CPUC direction and the needs of programs to report embedded water energy savings with the Water Energy Nexus Measure Package meeting minimum expectations.

IV. The Scoring Methodology

The 2021 performance score was developed using five detailed scoring metrics for each directly reviewed work product (i.e., Measure Package and custom project), as well as a scoring of the utility's internal due diligence processes, QA/QC procedures and methods, as well as program implementation enhancements to support improved forecasted values.

[Attachment A](#) summarizes the Metrics adopted in D.16-08-019 as well as the CPUC staff developed scores and points for 2021. D.16-08-019 also directed that the custom and Measure Package scores be weighted together into a final score based on the PA total claims for custom and deemed activities, respectively.

In accordance with D.13-09-023, the PA's activities are assessed against a set of five metrics on a rating scale of 1 to 5. Once activities are assessed, the ratings for each are converted onto this scale, where 1 is the lowest score assigned and 5 is the highest score assigned. A maximum score on all metrics for both Measure Packages and custom projects will yield 100 points whereas a minimum score on all metrics would yield 20 points. The 1 to 5 rating scale is distinguished as follows:

1. Consistent underperformer in meeting the basic expectations.
2. Makes a minimal effort to meet CPUC expectations but needs dramatic improvement.
3. Makes effort to meet CPUC expectations, however improvement is required.
4. Sometimes exceeds CPUC expectations while some improvement is expected.
5. Consistently exceeds CPUC expectations.

As with the 2020 performance scores, the final scores were "built-up" from a metric-by-metric assessment of each reviewed work product. It is CPUC staff's expectation that this detailed scoring approach, along with the detailed qualitative Measure Package and custom project level feedback, is consistent with the direction provided in D.13-09-023. We believe this scoring approach provides specific guidance to the utilities on how to improve their due diligence review and scores moving forward.

A "Direct Work Product Review" portion of each metric score was developed based upon the individual scoring of dispositions issued for custom project or Measure Packages. Each reviewed utility work product was first determined to have components either applicable or not applicable to

a metric.¹¹ 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.

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

A. Measure Package Metric 1-5 Scoring Methodology

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

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

The assigned percentage scores were averaged across all the reviewed items. Individual Measure Package level disposition scoring, as well as related Measure Package activities, are provided in [Attachment C](#). Note the following approach to scoring individual Measure Packages by metric:

- Metric 1 Timeliness: The Measure Package submission schedule was designed to distribute the Measure Packages throughout the year. Measure Packages receive “+” if schedule was followed.
- Metric 2 Content: Straightforward Measure Package received a “Yes”, complex revisions received a “+”, unless there were errors in the content, which warranted a “-”.
- Metric 3 Collaboration: Straightforward consolidation effort Measure Package received a “Yes”, initiative to work with other PAs and CPUC receives “+”.
- Metric 4 Quality Assurance: Measure Packages that were complete, consistent, and without meaningful errors received a “Yes”. Those Measure Packages with inconsistencies between the data tables and narrative or where values were left undefined received a “-” score.
- Metric 5 Process: Measure Package responsiveness to program needs received a “Yes” for straightforward and “+” for complex Measure Package submissions.

¹¹ For example, Measure Packages 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 Measure Package which may not require proactive collaboration with CPUC staff and therefore not receive a score for Metric 3 (“Proactive Initiation of Collaboration”).

B. Custom Metric 1 Scoring Methodology

This metric is related to the timeliness of submittals and a maximum of 5 points is allocated to this metric based on the PA's responsiveness to requests and follow-up documentation required to complete the review. Scoring for this metric occurs at the individual project review stage.

Per Senate Bill (SB) 1131 requirement an allocation of 15 business days is given for the PA to submit materials following the date selected for review. PAs begin with a score of 5 and after 15 business days have passed, 1.0 point is deducted for each day the submittal is late.

C. Custom Metric 2 Scoring Methodology

This metric is related to content and completeness of submittals and a maximum of 15 points is allocated to this metric. Scoring occurs on each custom project during the individual project review stage. On a percentage basis Metric 2 is the single greatest determinant of the overall EAR score. Scoring for Metric 2 is achieved through numerous areas throughout the custom project review workbook. PA's begin with a full score of 5 for each custom project in the review workbook with each noted deficiency reducing the points accordingly. 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 Measure Package 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 2021 in order to positively impact future project reviews. CPUC staff believes it is important to provide EAR “Enhancement” points for positive due diligence developments to recognize the effort and to provide additional encouragement even before a change in project-level results is observed. In the custom scoring process, CPUC staff decided that SDG&E’s efforts did not rise to the level to be awarded “Enhancement” points.

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

- Metric 1 Timeliness: There were no added points for this metric.
- Metric 2 Content: There were no added points for this metric.
- Metric 3 Collaboration: SDG&E has shown collaboration as the monthly IOU meeting organizer and facilitator.
- Metric 4 Quality Assurance: SDGE has shown initiation to improved QA/QC internal processes.
- Metric 5 Process: SDG&E has shown process responsiveness as the monthly IOU meeting organizer and facilitator and CPUC staff requests for improvements and feedback.

To produce the final Measure Package scores, the metric scores for the three Measure Package contributing areas were added together, using a 50 percent weight for the process issues score. The 50 percent weight given to the process review has the effect of being a “score enhancement” or increase to the direct review score. Furthermore, within each contributing area (direct and process review areas), CPUC staff also assigned weights for individual items 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 SDG&E.¹²

¹² 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 applied 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

[Attachment D](#) contains custom and Measure Package summary tables showing the components and total scores and points for each metric in each of the two component areas of scoring described above.

Questions or comments about the feedback or final scores should be directed to 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 SDG&E staff to discuss this memorandum and its final scores by April 30, 2022.

on a large number of very low-impact, standardized projects will not make up for doing a poor job on a few projects that represent a major portion of portfolio dollars.”

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

Metric	Measure Packages				Custom			
	Max Points	Max Percent of Total Points	2021 Score	2021 Points	Max Points	Max Percent of Total Points	2021 Score	2021 Points
1 Timing and Timeliness of Submittals	5	10%	2.50	2.50	5	10%	5.00	5.0
Timely submittals: all lists, inventories, plans, studies, Measure Packages and project/measure documentation; timing and advanced announcement of submittals (spreading out submission when available rather than holding and turning in large batches); timely follow-up PA responses to review disposition action items including intention to submit/re-submit with proposed schedule.								
2 Content, Completeness, and Quality of Submittals	15	30%	2.50	7.50	15	30%	4.83	14.48
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%	2.50	2.50	5	10%	4.60	4.60
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%	2.50	6.25	12.5	25%	4.40	11.00

Metric	Measure Packages				Custom			
	Max Points	Max Percent of Total Points	2021 Score	2021 Points	Max Points	Max Percent of Total Points	2021 Score	2021 Points
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%	2.50	6.25	12.5	25%	4.25	10.63
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.								
Total	50	100%		25.00	50	100%		45.71

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 3 2016 Adopted Performance Metrics

Metric	2016 CPUC Adopted Performance Metrics	Maximum Points	Percent 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	Percent of Total Points	Total Scored Points	# Scored Dispositions	Scoring Notes (Portfolio Level ¹³)
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	11	SDG&E made notable efforts to comply with the SB1131 guidelines for submitting documentation well before the 15 business days required. All 11 projects with dispositions issued were submitted 5 days or more early, indicating that SDG&E is making significant improvements to submitting documentation earlier than required.
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%	14.48	11	Staff noted very few deficiencies on projects selected for review. Only 1 significant deficiency involving the use of an incorrect baseline was found on one project. The remaining 10 projects (91 percent) had no significant deficiencies detected, indicating that SDG&E has made notable strides on ensuring submittals are comprehensive and errors are minimized.
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%	4.60	11	Commission staff found that SDG&E made a significant effort to bring measures, projects, and studies forward for discussion prior to review. Topics reviewed during bi-weekly calls with Commission staff were what was expected to demonstrate proactive collaboration. SDG&E is also credited for their active participation in combined subgroups, discussing high volume Direct Install measures prior to implementation, and bringing forward their MLC baseline research conducted by a program implementor.
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%	11.00	11	Commission staff weighted the number of dispositions proceeding without exception against those that required resubmissions or resulted in rejections. Of the 11 projects reviewed in 2021, 2 projects (18 percent) proceeded without exception, 3 projects (27 percent) were allowed to proceed with exceptions as noted, and 1 project (9 percent) was rejected. These findings resulted in higher than expected performance with regards to effective QC of projects prior to submitting for review. CPUC staff found that SDG&E had strong QC procedures in place within the in-house review team and a robust QA process. While the count of submitted projects was small,

¹³ 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.

Metric	2016 CPUC Adopted ex ante Metrics	Maximum Points	Percent of Total Points	Total Scored Points	# Scored Dispositions	Scoring Notes (Portfolio Level ¹³)
						most proceeded without exceptions and only one project was rejected, indicating the SDG&E is being proactive in improving QA/QC processes.
Metric 5	<p>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.</p>	12.5	25%	10.63	11	SDG&E Projects reviewed from July 2021 through December 2021 exhibited a slight downward trend in terms of project performance over time. (i.e. project submissions performed more poorly over the course of the 2021 review period). Commission staff noted that only 7 percent of all issues related to Process, Policy, and Program Rules, which is a significant decrease compared to last year where this category comprised 13 percent of all issues.

Attachment C: Measure Package Scores and Feedback

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

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

Measure Package Reviews – Scored Measure Packages				EAR Metrics					
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5
SWHC013	2	Unitary Air-Cooled Ac Or Heat Pump, ≥ 65 Kbtuh, Commercial	Updates triggered by DEER Resolution. Measure package was reviewed with minimal comment.	1	Yes	Yes	Yes	Yes	Yes
SWHC014	2	Unitary Air-Cooled Ac Or Heat Pump, < 65 kbtuh, Commercial	Updates triggered by DEER Resolution. Measure package was reviewed with minimal comment.	1	Yes	Yes	Yes	Yes	Yes
SWHC042	2	Multiple Capacity Unitary Air-Cooled Commercial Air Conditioners Between 65 and 240 KBTU/H	Updates triggered by DEER Resolution. Measure package was reviewed with minimal comment.	1	Yes	Yes	Yes	Yes	Yes

Measure Package Submission Status – All Measure Packages and Measure Package Plans submitted in 2021

MP ID	Rev	Title	Submission Status: EAR Team Comments
SWHC013	2	Unitary Air-Cooled Ac Or Heat Pump, ≥ 65 Kbtuh, Commercial	Interim Approval.
SWHC014	2	Unitary Air-Cooled Ac Or Heat Pump, < 65 kBTuh, Commercial	Interim Approval.
SWHC042	2	Multiple Capacity Unitary Air-Cooled Commercial Air Conditioners Between 65 and 240 KBTU/H	Interim Approval.
SWLG020	1	UL Type B LED Screw-In Lamp HID Retrofits	In Development.

Process Adder

EAR Metrics

	Weight	1	2	3	4	5
SDGE has shown collaboration as the monthly IOU meeting organizer and facilitator.	1	No	No	Yes	No	No
SDGE has shown initiation to improved QA/QC internal processes.	1	No	No	No	Yes	No
SDG&E has shown process responsiveness as the monthly IOU meeting organizer and facilitator and CPUC requests for improvements and feedback.	1	No	No	No	No	Yes

Attachment D: 2021 Performance Annual Ratings

Custom Scoring

2021 Annual Custom Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	
Direct Work Product Review Score	Disposition Score (1-5)	5.00	4.83	4.60	4.40	4.25	
Review Process Score Enhancements	Technical & Policy QC Increase	0.00	0.00	0.00	0.00	0.00	
	Implementation Increase	0.00	0.00	0.00	0.00	0.00	
Total Score	Adjusted Final Metric Score (1-5)	5.00	4.83	4.60	4.40	4.25	Total Points
	Adjusted Metric Points	5.00	14.48	4.60	11.00	10.63	45.71

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	4.10	4.20	4.40	4.25	
Review Process Score Enhancements	Technical & Policy QC Increase	0.50	0.00	1.00	0.50	0.00	
	Implementation Increase	0.00	0.00	0.00	0.00	0.00	
Total Score	Adjusted Final Metric Score (1-5)	5.00	4.10	5.00	4.90	4.25	Total Points
	Adjusted Metric Points	5.00	12.31	5.00	12.25	10.63	45.19

This [workbook](#) contains all of the SDG&E Custom Scoring tables.

Measure Package Scoring

2021 Annual Measure Package Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	
Direct Workproduct Review Score	SDG&E "-"	0%	0%	0%	0%	0%	
	SDG&E "+"	0%	0%	0%	0%	0%	
	SDG&E "Yes"	100%	100%	100%	100%	100%	
	Dispositions Score %	50%	50%	50%	50%	50%	
	Dispositions Score	2.50	2.50	2.50	2.50	2.50	
Review Process Score Enhancements	SDG&E "-"			0%	0%	0%	
	SDG&E "+"			0%	0%	0%	
	SDG&E "Yes"			100%	100%	100%	
	Process Score %	0%	0%	50%	50%	50%	
	Process Increase Score	0.00	0.00	2.50	2.50	2.50	
	Process Increase Weight	0.50	0.50	0.50	0.50	0.50	
	Process Increase Wtd Score	0.00	0.00	1.25	1.25	1.25	
Total Score	Final Metric Score (1-5)	2.50	2.50	3.75	3.75	3.75	Total Points
	Metric Points with Weighting	2.50	7.50	3.75	9.38	9.38	32.51

2020 Annual Measure Package Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5
Direct Workproduct Review Score	SDG&E "-"	0%	0%	0%	0%	0%
	SDG&E "+"	0%	0%	0%	0%	0%
	SDG&E "Yes"	100%	100%	100%	100%	100%
	Dispositions Score %	50%	50%	50%	50%	50%
	Dispositions Score	2.50	2.50	2.50	2.50	2.50
Review Process Score Enhancements	SDG&E "-"			0%		0%
	SDG&E "+"			100%		100%

2020 Annual Measure Package Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	
	SDG&E "Yes"			0%		0%	
	Process Score %	0%	0%	100%	0%	100%	
	Process Increase Score	0.00	0.00	5.00	0.00	5.00	
	Process Increase Weight	0.50	0.50	0.50	0.50	0.50	
	Process Increase Wtd Score	0.00	0.00	2.50	0.00	2.50	
Total Score	Final Metric Score (1-5)	2.50	2.50	5.00	2.50	5.00	Total Points
	Metric Points with Weighting	2.50	7.50	5.00	6.25	12.50	33.75

Explanations of scoring tables row entries

- The row labeled with PA “-“ lists the percent of Measure Package reviews undertaken where the CPUC staff evaluation of the materials or information indicated that the PA performance in this metric for the submission did not meet minimum expectations or requirements relative to the metric.
- The row labeled with PA “+“ lists the percent of Measure Package reviews undertaken where the CPUC staff evaluation of the materials or information indicated that the PA performance in this metric for the submission exceeded minimum expectations or requirements relative to the metric.
- The rows labeled with PA “Yes“ lists the percent of Measure Package reviews undertaken where the CPUC staff evaluation of the materials or information indicated that the PA performance in this metric for the submission exceeded met minimum expectations or requirements relative to the metric.
- The “Dispositions Score %” row (and “Process Increase Score” for Measure Packages) indicates how the combination of the three rows of scores (+, -, and yes) sum into a total points multiplier for each metric. Each row contributes to the total based on the row count over the total count for all three rows.
- The “Disposition Score” (and “Process Increase Score” for Measure Packages) row converts the percent score into a numeric value of up to five by directly applying the percent to a value of 5.
- The custom row labeled with “Technical & Policy QC Increase” lists CPUC staff points added to the metric based on an evaluation of the overall PA 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.
- The custom row labeled with “Implementation Increase” lists CPUC staff points added to the metric based on an evaluation of the overall PA 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.

- The Measure Package rows labeled with “Review Process Score Enhancements” lists CPUC staff scoring for each metric based on an evaluation of the overall PA performance in putting into place quality assurance and/or quality control methods, documents and/or training for staff and contractors that are expected to improve the ability of review personnel to identify and cure issues going forward on Measure Packages. This score is weighted as an increase to the disposition score based on the fractional weight listed in the “Process Increase Weight” row.
- The “Final Metric Score” row indicates the total score for each metric as a sum of the Direct Work product Review Score plus the Review Process Score Enhancements (either as a simple sum for custom or a weighted value sum for Measure Packages) to provide a final metric score with the final score constrained between a maximum score of 5 and a minimum score of 1.
- 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.