

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



Date: April 4, 2016
To: San Diego Gas and Electric
From: CPUC Ex Ante Review Staff
Cc: R.12-01-005 and R.13-11-005 Service Lists
Subject: Final 2015 Efficiency Savings and Performance Incentive Ex Ante Review Performance Scores

Pursuant to Decision (D).13-09-023 and D.15-10-028 Appendix 5, Commission staff and consultants completed the 2015 Efficiency Savings and Performance Incentive (ESPI) mechanism ex ante review performance scoring as prescribed in Attachment 7 of D.13-09-023. The scores contained in this memo are final and San Diego Gas & Electric Company (SDG&E) shall use the final total score of 43.79 out of 100 to calculate the 2015 ESPI ex ante review component award. The final score is explained in more detail in Attachments A and D to this memo.

The 2015 ex ante review performance score was developed using a detailed scoring by metric for each reviewed workpaper and each reviewed custom project, as well as a scoring of the utility's internal due diligence processes and Quality Assurance/Quality Control (QA/QC) procedures and methods.

This is the first time that the final scores were "built-up" from a detailed assessment of each reviewed work product. Commission staff believes the quantitative scoring utilized for the 2015 review period results in a more accurate assessment of utility performance both comparatively between utilities, and against Commission expectations, but also results in generally lower scores than in previous years. It is Commission staff's expectation that this detailed scoring approach, along with the detailed qualitative workpaper and custom project level feedback, is more consistent with the direction provided in the ESPI D.13-09-023 Attachment A, which defines each metric and provides "benchmarks" for scoring using counts, percentages and fractions of workpapers and custom projects that conform or deviate from Commission and Commission staff guidance¹. We believe this scoring approach will provide more specific guidance to the utilities on how to improve their ex ante due diligence. However, we acknowledge that this quantitative scoring approach does not correlate with the scoring approaches used in the previous two years of the ESPI, so it would be inappropriate to compare these results with past years'

¹ The benchmarks listed for each metric are not presented as a required scoring approach or limiting set of factors in scoring, however, they do provide guidance that the scoring should have a quantitative framework that is transparent and objective such that a pathway to higher scores is clear.

results for the purposes of drawing any conclusions regarding improvements or deterioration in SDG&E's compliance with the CPUC's Ex Ante Review requirements.

For each metric, each reviewed utility work product was first determined to have components either applicable or not applicable to a metric². If not applicable to a metric that item was not used in the final score development for the metric. 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 as either deficient (or “-“), apparent but minimal (or “yes”), or superior (or “+”). Each of the ratings were then assigned a score percentage level of 0%, 50% and 100%, respectively. The assigned percentage scores were averaged across all the reviewed items. This resulted in a custom review overall percentage metric score and a workpaper process percentage score. Additionally, the workpaper metric benchmarks from D.13-09-023 Attachment 7 were used to calculate a workpaper percentage score and thus workpaper points for each metric. Lastly, utility-specific custom review process “adders” were developed for each applicable metric based on observed QA/QC processes and procedures developed and under implementation in 2015 that are expected to positively impact future selected project reviews. Commission staff believes it is important to provide ESPI points for positive due diligence developments as recognition of the effort and continue encouragement even before a change in project-level results is observed.

To produce final scores, the individual metric scores for the two workpaper contributing areas (benchmarks and processes) were weighted together (65% benchmarks and 35% process) and the three custom review contributing areas (project reviews, QA/QC, and process adders) were summed. The larger weight was given to the workpaper benchmark activities due to the large number of workpaper submissions required or received from SDG&E. The separate process scoring provides an avenue for assessing overall QA/QC processes and procedures put into place by SDG&E³. Attachment D contains tables of the metric components and total scores for each utility. Attachments B and C of this memo provide more specifics on the rationale and project-level issues Commission staff and consultants used in scoring for each metric for SDG&E.

² 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 9 (“Professional care and expertise in the use and application of adopted DEER values and DEER methods”). Another example would be a minor workpaper or small custom project may not receive a score for metric 4 (“Efforts to bring high profile, high impact, or existing (with data gaps) projects and/or measures to Commission staff in the formative stage for collaboration or input ”)

³ 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 1a), 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.”

For the 2015 workpaper review assessment, Commission staff continues to observe a high level of SDG&E staff activity oriented toward improving the overall quality of workpapers and accompanying ex ante data submissions as well as streamlining the review process. However, with the exception of a couple of workpaper examples, SDG&E staff seem to have made no progress in their workpaper submissions since the preliminary review stage resulting in overall performance that declined in 2015 as compared to 2014.

As for the 2015 custom projects review assessment, Commission staff ex ante review activities touched 11 SDG&E custom projects. SDG&E's engineering team continues to show sincere attentiveness to better understand and implement the Commission directions, policies, and Commission staff's expectations for custom project reviews. Despite the fact that there is a lot of room for improvement, SDG&E staff scored the highest points in the ESPI custom ex ante review among the four investor-owned utilities. Commission staff expect to see improvements throughout 2016 in both SDG&E's internal custom project reviews and tracking and follow-up on projects selected for the ex ante review.

For the 2015 ex ante activities, Commission staff finds the following:

Workpaper:

In the mid-year 2015 review, Commission staff had performed preliminary workpaper and ex ante data reviews on most SDG&E submissions. Commission staff noted that workpaper narratives had some shortcomings related to support for critical ex ante values such as use of "hard-to-reach" net-to-gross values. Commission staff also noted progress in the quality of ex ante data submissions but that some corrections were still needed. The mid-year review encouraged SDG&E to establish a more formal approach for updating Commission staff on its workpaper development activities.

Overall in 2015, SDG&E staff and consultants worked collaboratively with the Commission staff to develop and approve two workpapers for new technologies or applications (residential advanced power strips and LED outdoor sports facility lighting), but there have been no other submissions of work since April of 2015. Commission staff acknowledges that there appear to be activities undertaken by SDG&E intended to improve workpaper quality and streamline ex ante review. For example, SDG&E conducts bi-weekly meetings with Commission staff to cover its on-going internal work on deemed measures. Additionally, SDG&E regularly interacts with staff in its efforts to utilize approved ex ante data directly in its program development. SDG&E staff and consultants have provided demonstrations of how they directly access the Commission's ex ante data base with their own internal program management software tools. Unfortunately, there have been no significant submissions from SDG&E since April of 2015 so measuring specific progress in past identified areas is limited.

Custom Projects:

In the 2015 mid-year feedback to SDG&E, Commission staff identified several areas of concern relating to specific custom projects as well as generally for SDG&E's review process. Commission staff continued to follow those issues throughout 2015 and SDG&E's

efforts to address them. Overall, Commission staff interacted with SDG&E staff on 11 custom incentive projects during the year plus numerous overarching review or programmatic implementation questions.

Commission staff finds the interactions with SDG&E staff during the custom project review process to be sincere and focused on the continued improvement of the utility's internal due diligence. Commission staff appreciates the positive attitudes SDG&E staff brings to the collaborative review activities. SDG&E staff continues to be proactive in bringing forth thoughtful topics for discussions with Commission staff via the early opinion process and in the weekly meetings. Commission staff recognizes this is an important component of the utility internal due diligence process. SDG&E Engineering Department staff continues to be proactive in bringing the utility's program staff to the project discussion calls so that the program staff will better understand the Commission directions, policies, and Commission staff review expectations for custom projects. SDG&E staff informed Commission staff some time ago that they were working on a pilot free-ridership screening mechanism; however, SDG&E staff has not yet shared the progress made with Commission staff. As the Commission's ex post evaluation activity continues to highlight free-ridership as an area needing added attention, Commission staff looks forward to SDG&E staff collaborating with us to improve this area.

These above mentioned positive areas were the primary reasons Commission staff was able to augment many ESPI metric scores with added points above those assigned from the detailed results of custom projects reviewed during 2015. This augmentation was done to acknowledge efforts on the part of the SDG&E Engineering Team staff that have not yet been observed in projects under review during 2015 due to the lag time in projects moving through the pipeline. For 2016 the internal process activities mentioned above will need to result in selected projects being observed to have improved in order to justify increased metric scores.

Commission staff identifies areas below where the SDG&E custom activities still need enhanced attention during internal reviews.

- **Need to Demonstrate and Document Program Influence and Limit Free-ridership.** Commission staff observed that for Application EEBI 5905, SDG&E staff did not demonstrate that the energy efficiency program influenced the customer to accelerate the proposed replacement of their existing welding equipment and, thus, there were likely no program-attributable benefits. Ultimately, the customer decided to proceed with the project without energy efficiency financial incentives, citing that it did not wish to wait for approval, thus supporting the ex ante review concerns regarding the lack of program influence.

SDG&E staff voluntarily submitted three Savings By Design (SBD) projects, Applications 5001196548, 5001240301 and 5000946081, for early opinion reviews. The project documentation packages provided no evidence that the final designs were influenced by program participation to incorporate added energy efficiency alternatives beyond those required by the statewide SBD program rules. The SBD program must demonstrate that it had sufficiently influenced the design to qualify the project for program participation and thus limit potential free-ridership. This is a common

problem statewide for the SBD program. During the last decade, Commission staff has noted that SBD program staffs have seemingly abandoned their mission to influence owners and designers to do more and are often satisfied with providing incentives to projects simply because they exceed code minimums. SDG&E needs to improve the documentation that supports and demonstrates program influence, take steps to limit free-ridership, and move customer projects beyond what they would have normally done without program intervention.

- **Need to Improve Thoroughness of Initial Project Assessments, Completeness of Project Documentation, and Tracking of Projects Selected for Ex Ante Review.** Retro-commissioning Project Application 2069-01 is an example where the initial project documentation provided was inadequate to support an Ex Ante Review. Commission staff notified SDG&E staff of this via email on October 7, 2013. SDG&E did not submit further documentation until they uploaded to the Custom Measures and Projects Archive (CMPA) the final savings claim in May 2015. Hence, SDG&E did not follow the Ex Ante Review process properly and the project proceeded to completion before Commission staff had an opportunity to review the project. Although, Commission staff later found that the final project documentation for Application 2069-01 was adequate, Commission staff identified missing information that must be uploaded to the CMPA project folder when requested prior to the project proceeding. For Project Application ID 5001132432, Commission staff issued the final disposition on January 6, 2015 approving the project savings and requested that the final Incremental Measure Cost (IMC) data be uploaded to the corresponding CMPA project folder. As of this writing, SDG&E has not uploaded the missing IMC data to the CMPA project folder.

SDG&E submitted an early opinion request for project 5001230752, a proposal for a wastewater treatment facility to begin receiving waste bio-fuel (grease) as an alternate fuel, processed in its digesters to produce gas, for use in the facility's on-site generators as well as for sludge drying. Commission staff responded quoting Decisions, including D.05-04-051 and D.09-12-022, dealing with both on-site generation as well as renewables that involved fuel switching that rejected classifying generating and non-generating renewable measures as energy efficiency. SDG&E removed the on-site generation portion of the gas use and proceeded to approve the project, assuming they had addressed the Commission staff rejection of the project. However, SDG&E did not appreciate the fuel switching and renewable nature of the project and inappropriately evaluated the eligibility from those perspectives taking into account the previous Commission determinations in this area. In the future SDG&E needs to actively seek and obtain a reversal of a Commission staff opinion that rejects a project rather than assuming their response adequately address the concerns that lead to the rejection.

During 2015, SDG&E paid incentives and filed impact claims for Project Applications 5340-13 (CPUC Tracking ID X027) and 3125-92 without first completing the Ex Ante Review process. Commission staff found that SDG&E had lost track of the selected project tracked as X027 when it transitioned from a project lead to an actual project application. SDG&E staff needs to more effectively track custom projects that are selected to undergo the ex ante review process through their entire project cycle and

clearly communicate changes in key information such as a change in the Project Application ID. For example, Commission staff did not realize that Application ID 5001134947 (X281) was changed to Application ID 5001169278 until SDG&E submitted the final project documentation. Only recently did SDG&E indicate that they were using comments in their Bi-Monthly CMPA List projects submittals to flag such changes.

Commission staff notes that there has been little change in the 2014 ex post gross and net evaluation results for SDG&E’s custom programs from the previous results. The change, although small, has been disappointingly downward. Commission staff recommends that SDG&E staff focus on developing procedural changes to its custom project implementation and review process which can effectively improve both gross and net ex post realization.

In accordance with D.13-09-023, the IOUs’ ex ante activities are assessed against a set of 10 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 1-5 rating scale is distinguished as follows:

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

SDG&E’s final ESPI ex ante review scores for 2015 are as follows:

Metric	Total Possible	Workpaper	Custom	Total Score
1a	5	0.92	1.58	2.50
1b	5	0.50	1.34	1.84
2	10	1.86	3.23	5.09
3	10	1.84	2.29	4.13
4	10	1.53	5.00	6.53
5	10	2.73	1.43	4.16
6a	5	0.52	0.50	1.02
6b	5	0.84	0.84	1.68
7	10	2.28	2.00	4.28
8	10	1.00	2.67	3.67

Metric	Total Possible	Workpaper	Custom	Total Score
9	10	1.40	2.50	3.90
10	10	1.80	3.19	4.99
Total	100	17.22	26.57	43.79

It should be noted that in the preparation of the final 2015 ESPI ex ante review scores, Commission staff did not have all desired data available. For instance, Commission staff did not have enough time to conduct a comprehensive claims review for these scores. For custom projects, Commission staff reviewed the 2015 activities and dispositions issued as discussed above.

The intention of the ESPI ex ante review component is to motivate utilities to employ a superior level of due diligence to their activities and reduce the need for the extensive level of oversight currently undertaken by Commission staff and consultants. The due diligence expectations include complying with the Commission’s ex ante review policies and procedures in a manner that results in the development and reporting of reliable, defensible, and accurate ex ante estimates. Commission staff finds that all of the utilities still tend to rely on Commission staff input and analysis before finalizing ex ante estimates.

While collaboration and information-sharing is always encouraged, Commission staff envisions that, through the feedback provided in this ESPI component and ongoing collaboration, the utilities’ internal ex ante review policies and activities will become sufficient such that Commission staff can devote more time and resources towards collaboration and less time to correcting or re-analyzing ex ante values on behalf of the utilities. Commission staff recognizes and commends the progress that has been made to date and encourages the utilities to continue to strive for excellence in this issue area.

If you have any questions or comments about the feedback or final scores, please contact Peter Lai (peter.lai@cpuc.ca.gov). Note that pursuant to D.13-09-023, Commission staff will schedule a time with each individual utility to discuss its final scores.

	Metric	Workpapers			Custom			Total		
		Max Points	Score	Percent Score	Total Points	Max Points	Score		Percent Score	Total Points
1a	Timeliness of action in the implementation of ordered ex ante requirements (e.g., A.08-07-021, D.11-07-030, D.12-05-015, etc.) in the pre-submittal/ implementation phase: Timing of disclosure in relation to reporting	2.5	1.84	36.8%	0.92	2.5	3.16	63.2%	1.58	2.5
1b	Timeliness of action in the implementation of ordered ex ante requirements (e.g., A.08-07-021, D.11-07-030, D.12-05-015, etc.) in the post-submittal/ implementation phase: Timing of responses to requests for additional information	2.5	1.00	20.0%	0.5	2.5	2.68	53.6%	1.34	1.84
2	Breadth of response of activities that show an intention to operationalize and streamline the ex ante review process	5	1.86	37.2%	1.86	5	3.23	64.6%	3.23	5.09
3	Comprehensiveness of submittals (i.e., submittals show that good information exchange and coordination of activities exists, and is maintained, between internal program implementation, engineering, and regulatory staff to ensure common understanding and execution of ex ante processes)	5	1.84	36.8%	1.84	5	2.29	45.8%	2.29	4.13
4	Efforts to bring high profile, high impact, or existing (with data gaps) projects and/or measures to Commission staff in the formative stage for collaboration or input	5	1.53	30.6%	1.53	5	5.0	100%	5.0	6.53
5	Quality and appropriateness of project documentation (e.g., shows incorporation of Commission policy directives)	5	2.73	54.6%	2.73	5	1.43	28.6%	1.43	4.16

Attachment A: Final ESPI Ex Ante Review Scores

6a	Depth of IOU quality control and technical review of ex ante submittals: Third party oversight	2.5	1.04	20.8%	0.52	2.5	1.0	20.0%	0.5	1.02
6b	Depth of IOU quality control and technical review of ex ante submittals: Clarity of submittals and change in savings from IOU-proposed values not related to M&V	2.5	1.68	33.6%	0.84	2.5	1.68	33.6%	0.84	1.68
7	Use of recent and relevant data sources that reflect current knowledge on a topic for industry standard practice studies and parameter development that reflects professional care, expertise, and experience	5	2.28	45.6%	2.28	5	2.0	40.0%	2.0	4.28
8	Thoughtful consideration, and incorporation, of CPUC comments/inputs. In lieu of incorporation of comments/input, feedback on why comments/input were not incorporated	5	1.0	20.0%	1.0	5	2.67	53.4%	2.67	3.67
9	Professional care and expertise in the use and application of adopted DEER values and DEER methods	5	1.4	28%	1.4	5	2.5	50.0%	2.5	3.90
10	Ongoing effort to incorporate cumulative experience from past activities (including prior Commission staff reviews and recommendations) into current and future work products	5	1.80	60.2%	3.01	5	3.19	63.8%	3.19	4.99
Total		50			17.22	50			26.57	43.79

2015 Efficiency Savings and Performance Incentive Ex Ante Performance – Workpapers Scores

Metric	Description	Workpaper Benchmark	Final	Commission staff Assessment
1a	Timeliness of action in the implementation of ordered ex ante requirements (e.g., A.08-07-021, D.11-07-030, D.12-05-015, etc.) in the pre-submittal/implementation phase: Timing of disclosure in relation to reporting	<ol style="list-style-type: none"> 1. Fraction of deemed measures for which workpapers have been submitted to Commission prior to measure being offered in the portfolio; 2. Fraction of workpapers disclosed prior to or during work commencement and submitted upon completion rather than withheld and submitted in large quantity; 3. Fraction of workpaper development projects for new technologies submitted for collaboration versus total number of workpapers for new technologies submitted 	1.84	<p>SDG&E has informed Commission staff at several times that they are attempting to put in place a process that uses a streamlined approach to submitting workpapers that uses approved ex ante values and calculation methods. This, in turn, would reduce paper work, ensure that all submitted values are consistent with existing policies and address direction from previous decisions. There have been no significant submissions from SDG&E since April of 2015 so it is unclear what progress has been made. The mid-year review noted that Commission staff would be reviewing claims for deemed measures where workpapers had not been submitted. At this time it is not possible to determine the extent of this problem since SDG&E has submitted very few workpapers.</p> <p>SDG&E submitted 27 workpapers in 2015. All but 3 of them were submitted on 4/3/2015. EAR team reviewed 6 workpapers from SDG&E which considered technologies that were first proposed in 2015. Of these, SDG&E submitted for collaboration on 1 workpaper.</p> <p>The workpaper submitted for collaboration covered LED lighting for exterior sports recreation facilities. SDG&E performed an analysis of interval meter data across a wide range of customers to develop a value for typical hours of use for exterior recreation lighting.</p> <p>The mid-year review noted that SDG&E did not have a formal process for informing CPUC of their on-going workpaper development activities. SDG&E has addressed this concern by hosting brief, bi-weekly conference calls to provide updates and solicit input from Commission staff and EAR consultants. SDG&E then posts summary notes of each meeting. Commission staff finds this approach adequate for staying up-to-date with SDG&E workpaper development activities.</p>

Metric	Description	Workpaper Benchmark	Final	Commission staff Assessment
1b	Timeliness of action in the implementation of ordered ex ante requirements (e.g., A.08-07-021, D.11-07-030, D.12-05-015, etc.) in the post-submittal/ implementation phase: Timing of responses to requests for additional information	Percentage of workpaper reviews which experience significant delay[3] due to slow response to requests for readily available (or commonly requested)[4] additional information (higher percentage = lower score)	1.0	<p>Commission staff reviewed 26 workpapers with 4 of them complete the first time they were reviewed. Of the 22 incomplete workpapers, only 1 was resubmitted in 2015. Although Commission staff discussed various workpapers with SDG&E throughout the year, no additional submissions were made.</p> <p>Without written responses to staff reviews or additional submittals, it is not clear whether SDG&E undertook any adjustments nor is it clear how the programs could continue to operate without approved work papers.</p> <p>One workpaper (outdoor sports and recreation lighting) was developed collaboratively with all significant issues resolved prior to submission. Commission staff issued a detailed review on another workpaper (residential Tier 2 advanced plug strips). While there were some delays in final submissions, SDG&E did respond to the detailed review with the required additional analysis and plans for future research.</p>
2	Breadth of response of activities that show an intention to operationalize and streamline the ex ante review process	Percentage of workpapers that address all aspects of the Uniform Workpaper Template (as described in A.08-07-021, or any superseding Commission directive)	1.86	<p>In 2015, additional EAR team emphasis and resources were spent on Preliminary review of SDG&E workpapers, particularly in providing specific review comments regarding each workpaper's ex ante database submission. EAR team reviewed and scored 27 SDG&E workpaper submissions for this metric. Twelve of these submissions address all (or almost all) of the Uniform Workpaper Template and ex ante database format.</p> <p>While SDG&E may have made improvements to their workpaper submission format since their April submissions, they have only submitted 3 workpapers since April so this score is heavily weighted toward the quality of work submitted last spring. Examples of the 15 submissions where SDG&E did not meet the format include the following:</p> <ul style="list-style-type: none"> • Anti-Sweat Heat (ASH) Control (WPSDGENRRN0009r1): Implementation / Measure Catalog table did not include all measures claimed in the workpaper. Also, the measures entered into the table did not have the same values as described and documented in the narrative workpaper (e.g. wrong Net-to-gross ID). Finally, the submitted cost record did not match EAR teams 2014 cost guidance document and did not include as much detail as was documented in the workpaper. • Tier 2 Advanced Power Strip (WPSDGEREHE0004r0.1): Submitted implementations are inconsistent with the workpaper, the measure table definition did not match the ex ante specifications, and the

Metric	Description	Workpaper Benchmark	Final	Commission staff Assessment
				<p>cost record did not match the 2014 guidance (less detail in the submission than in the workpaper)</p> <p>SDG&E also had several submissions that did match all (or nearly all) of the workpaper template including the following:</p> <ul style="list-style-type: none"> • Air Compressor VSD (WPSDGENRPR0001r0) • Sprinkler to Drip Irrigation (WPSDGENRAG0001r1)
3	<p>Comprehensiveness of submittals (i.e., submittals show that good information exchange and coordination of activities exists, and is maintained, between internal program implementation, engineering, and regulatory staff to ensure common understanding and execution of ex ante processes)</p>	<ol style="list-style-type: none"> 1. Percentage of workpapers that include appropriate program implementation background as well as analysis of how implementation approach influences development of ex ante values; 2. Percentage of workpapers which, on initial submission, were found to include all applicable supporting materials or an adequate description of assumptions or calculation methods 	1.84	<p>Since the mid-year review, SDG&E’s workpaper submittals have slowed dramatically and, other than workpapers for Tier 2 power strips, no new or revised workpapers have been submitted since April 3. Shortcomings with supporting documentation observed include:</p> <ul style="list-style-type: none"> • Residential power strips initial submittal did not include analysis of full set of field trial data. The data left out of analysis indicated a lower savings in actual operations compared to estimated savings following measurement and verification protocols. • Commercial power strips only included field data for limited space types in universities that was inadequate to support savings estimates for other commercial buildings. • There were some conflicts between the narrative description of measures and the submitted ex ante data. • Limited back up development of costs for commercial refrigerators. • Commission staff requested additional analysis to support the annual hours of operation for the new workpaper covering outdoor sports and recreation lighting. • Supporting program information and analysis for the use of the hard-to-reach net-to-gross value <p>SDG&E has informed Commission staff that they are developing a comprehensive ex ante data submittal, but has not yet provided it. SDG&E also have noted their preference to utilize already approved measure, cost, and impact data and provide workpapers that address program and delivery issues needed to support the implementation records which are the records that link the measure, cost, net-to-gross and gross savings adjustments together. However, since very little information has been submitted, it is unclear what progress has been made since the mid-year review.</p>

Metric	Description	Workpaper Benchmark	Final	Commission staff Assessment
4	Efforts to bring high profile, high impact, or existing (with data gaps) projects and/or measures to Commission staff in the formative stage for collaboration or input	Percentage of high profile program, or high impact measure, workpapers submitted for collaboration or flagged for review	1.53	There have been only 4 SDG&E submissions of any type since April, 2015. It is therefore difficult to assess the number, type and portfolio contribution of high profile measures. SDGE sought out early input on Tier 2 Power strips (two workpapers) and outdoor sports lighting. SDG&E also brings up new workpaper topics in its bi-weekly calls with CPUC staff and ex ante team. As discussed under several other metrics, SDG&E generally underperforms in terms of workpaper submissions and responses to preliminary reviews, yet there are large numbers of reported deemed claims without submitted workpapers to support them.
5	Quality and appropriateness of project documentation (e.g., shows incorporation of Commission policy directives)	Frequency of inappropriate or inferior quality at the time of initial Commission staff review (higher frequency = lower score)	2.73	<p>EAR team reviewed and scored 22 SDG&E workpapers for this metric. Most of the submissions (15) were of appropriate quality and included all information needed to understand and review the workpaper, especially since the scope of SDG&E’s submissions was generally limited to the ex ante data. Note that this metric excludes ex ante data submissions since other ESPI metrics cover that topic.</p> <p>Two examples of the 7 SDG&E workpapers scored down in this category are the following:</p> <ul style="list-style-type: none"> • Tier 2 Commercial Information Technology (IT) Advanced Power Strip (APS) (WPSDGENROE0002): the supporting documentation for this workpaper was inappropriate and did not support the proposed measures. As well the measure application type (retrofit add-on) and EUL were submitted incorrectly (conflicting with each other) and illustrated a misunderstanding of the CPUC program requirements. • Commercial Reach in Refrigerators and Freezers (WPSDGENRRN0010r2): although a spreadsheet was submitted which included cost information, the data could not be reviewed as there were no labels or explanation for how the costs were derived.

Metric	Description	Workpaper Benchmark	Final	Commission staff Assessment
6a	Depth of IOU quality control and technical review of ex ante submittals: Third party oversight	Quality of workpapers prepared by consultants, third parties, and local government partners submitted by IOUs	1.04	On initial review, Commission staff identified six workpapers that were developed primarily by, or with the assistance of, consultants. Most workpapers required some level of correction to submit ex ante data, but no revised ex ante data submittals have been provided since April 2015. Workpapers for Tier 2 Power Strips (WPSDGEREWP0002, WPSDGEREWP004) have undergone detailed review with significant revisions or additional research required. At least one workpaper uses out-of-date cost information from DEER 2005.
6b	Depth of IOU quality control and technical review of ex ante submittals: Clarity of submittals and change in savings from IOU-proposed values not related to M&V	<ol style="list-style-type: none"> 1. Percentage of workpapers which required changes to parameters of more than 10% or required substantial changes to more than two parameters among UES, EUL/RUL, NTG, impact shape, or costs; 2. Percentage change from IOU-proposed values to ED-approved values (higher percentage = lower score) 	1.68	Commission staff issued preliminary reviews and dispositions on workpapers that included either revised values or direction for further analysis that will likely result in revised values. Of the 11 workpapers where revisions to ex ante values are required, Commission staff estimate that 7 require changes to at least two values or any one value requires a downward revision by more than 10%.
7	Use of recent and relevant data sources that reflect current knowledge on a topic for industry standard practice studies and parameter development that reflects professional care, expertise, and experience	Percentage of workpapers with analysis of existing data and projects that are applicable to technologies covered by workpaper	2.28	<p>Using review comments from 2015 Preliminary and Detailed workpaper reviews, EAR team rated workpaper submissions for whether or not they correctly used recent and relevant data sources.</p> <p>SDG&E has done a good job of working with EAR team on the power strip. Development of research plans and field trials for this program has been a positive process. In the future, EAR team expects that SDG&E will perform similar research or identify relevant data on their own prior to submitting workpapers.</p>

Metric	Description	Workpaper Benchmark	Final	Commission staff Assessment
				<p>In addition, 11 of SDG&E’s 2015 submissions used irrelevant or outdated data sources including the following:</p> <ul style="list-style-type: none"> • Six workpapers were reviewed which directly use cost data from outdated versions of DEER. These were the following: Sprinkler to Drip Irrigation (WPSDGENRAG0001), PTAC EMS (WPSDGENRHC1050), Anti-Sweat Heat (ASH) Control (WPSDGENRRN0009), Auto Closers Main Doors (WPSDGENRRN0110), Energy Star Room Air Conditioners (WPSDGEREHC1060), and Heat Pump Water Heaters (WPSDGEREWH0022) • Exterior LED Lighting Outdoor Street and Area (WPSDGENRLG0181). An ISP study was needed for the proposed measure; however, it was not conducted until the EAR team recommended it <p>Commission staff notes there has been limited workpaper activity since the mid-year review.</p>
8	Thoughtful consideration, and incorporation, of CPUC comments/inputs. In lieu of incorporation of comments/input, feedback on why comments/input were not incorporated	Frequency of revisions to workpapers in response to (and/or appropriate and well-defended rejection of) CPUC reviewer's recommendations	1.0	<p>SDG&E had very poor responses to 2015 preliminary workpaper reviews. Twenty three SDG&E 2015 workpapers were scored for this metric because they received EAR team review comments noting that the workpaper submission was “incomplete” in April of 2015. SDG&E did not respond to 22 of these reviews. Although SDG&E initiated discussion, sent EAR team various emails, and created notes from various meetings attended by the EAR team, no formal submissions were filed to the WPA for CPUC review on 22 "incomplete" workpapers. Therefore, SDG&E is a consistent underperformer in this area and does not meet the basic commission expectations. The 1 workpaper SDG&E did get a positive score for it the Tier 2 Power Strip workpaper. This workpaper was re-submitted and ultimately approved.</p> <p>SDG&E has not submitted any new workpapers since the mid-year review. SDG&E has stated that it is working on a comprehensive ex ante data submittal that will demonstrate it has incorporated CPUC input and comments. However, since this ex ante data has not been submitted, it is not possible for Commission staff to make an additional assessment for this metric.</p>
9	Professional care and expertise in the use and application of adopted DEER values and DEER methods	Percentage of workpapers, including those covering new or modified existing measures, that appropriately incorporate DEER assumptions and methods	1.4	<p>EAR team used all workpaper reviews for this metric and scored the metric based on the accuracy of SDG&E’s ex ante data submission. Twenty seven submissions were scored for this metric and 7 of them appropriately incorporate DEER assumptions and methods including correct (or nearly correct) selection of ex ante database values from the DEER support tables. Although it seems that SDG&E’s team is working hard internally to develop tools that will comply with DEER values and DEER methods, the EAR team has only viewed the results of these tools via a teleconference video in January 2016. SDG&E</p>

Metric	Description	Workpaper Benchmark	Final	Commission staff Assessment
				<p>needs to make submittals for 2016 programs.</p> <p>Examples from the 20 submissions that were scored down include the following:</p> <ul style="list-style-type: none"> • Net-to-gross in the ex ante data was either inconsistent with the workpaper, or had typographic errors that needed to be corrected before the value would link to the ex ante database tables (8 work papers) • Similar to net-to-gross, the measure application type (MeasAppType) was inconsistent with the work paper or had typographic errors (7 work papers) • RUL-ID was not included for retrofit (RET) and retrofit add-on (REA) measures, as required (6 workpapers) • The delivery types (DelivType) in the submitted data were either inconsistent with the workpaper or types that are in the workpaper were not included in the ex ante data (2 workpapers) <p>SDG&E has not submitted any new workpapers since the mid-year review.</p>
10	Ongoing effort to incorporate cumulative experience from past activities (including prior Commission staff reviews and recommendations) into current and future work products	Percentage of workpapers including analysis of previous activities, reviews and direction	1.80	<p>In April, SDG&E submitted 26 workpapers, most of which were only intended to update the ex ante database. Only 4 submissions have been received since April. At this time, Commission staff have no understanding of SDG&E's plan for 2016 portfolio and we have received very limited workpaper data since April. This is an on-going issue; SDG&E seems to operate in a “wait-and-see” mode in order to react to issues that Commission Staff discusses with other utilities instead of collaborating and submitting planning information for their own portfolios in a timely manner. Therefore, SDG&E is a consistent underperformer and does not meet the basic commission expectations in this area.</p> <p>CPUC staff notes the difficulty in scoring this metric since it the overall level of SDG&E’s efforts are unclear. Of the 27 workpapers submitted in 2015, 20 submissions included analysis of previous activities, reviews and direction. This alone would lead to a high score (close to 4). However, this high is only based on the work prior to the mid-year review and the 4 submissions received since April. In consideration that SDG&E did not appear to be submitting, or updating, many of the workpapers to support current and upcoming cycles, the benchmark score was reduced by one-half.</p> <p>One specific example from the ex ante data submitted in April is in regards to the use of the hard-to-reach net-to-gross value. Six of the workpapers reviewed in April claimed the use of this net-to-gross</p>

Metric	Description	Workpaper Benchmark	Final	Commission staff Assessment
				value and none of the narrative workpapers provided documentation or explanation regarding how SDG&E identifies and tracks the hard-to-reach population. EAR team requested clarification on these workpapers and has not yet received a response.

Final 2015 Efficiency Savings and Performance Incentive – Ex Ante Performance – Custom Project Scores

Metric	Description	Custom Benchmark	Final 2015 Score	Commission staff Assessment
1a	Timeliness of action in the implementation of ordered ex ante requirements (e.g., A.08-07-021, D.11-07-030, D.12-05-015, etc.) in the pre-submittal/ implementation phase: Timing of disclosure in relation to reporting	(1) Percentage of projects in quarterly or annual claims that were reported in the CMPA twice-monthly list submissions; (2) Percentage of projects for which there is a two weeks or less difference between the application date and the date reported in the CMPA; (3) Percentage of tools used for calculations disclosed prior to use	3.16	Commission staff did not conduct a claims review in 2015. However, SDG&E staff lost track of a couple of projects under review. For example, Project Application 5340-13 aka List ID 1256 (X027), was an early selection in the EAR process for which the initial documentation was inadequate. At the time the project was selected, SDG&E considered it just a project lead. Commission staff indicated that we would follow it. SDG&E lost track of the project until it reappeared as Application 5340-13 as a completed project and SDG&E had already made a partial incentive payment to the 3rd party implementer. Similarly, SDG&E lost track of the ex ante review status of Project Application 3125-92 (X098) and proceeded to paid and claim it before Commission staff completed the ex ante review. This particular site was selected as part of the 2014 ex post evaluation sample as site H40501.
1b	Timeliness of action in the implementation of ordered ex ante requirements (e.g., A.08-07-021, D.11 07-030, D.12 05-015, etc.) in the post-submittal/ implementation phase: Timing of responses to requests for additional information	Percentage of projects which experience significant delay due to slow response to requests for readily available (or commonly requested) additional information (higher percentage = lower score)	2.68	There were 2 projects X027 and X098 whereby SDG&E lost track and paid the projects before EAR approval. For Application 5001169278, formerly 5001134947 (X281) a whole building project, the SDG&E changed the application ID without alerting Commission staff that they were using comments in their CMPA List submittals to indicate changes. We found the final documentation submittal for Application 5001169278 adequate to allow us to waive the final review. For Application 5001132432 (X213), we approved the project on 1/6/2015 and requested that SDG&E post the final IMC data to the CMPA. SDG&E has not followed through as of this writing. For Application 2034-06 (X526), an RCx project, SDG&E proceeded with the project and followed available prior guidance from other projects. When SDG&E uploaded the post-implementation documentation, we found the analysis was complete including an hourly net electrical grid impact analysis to limit the savings claim. In addition, SDG&E paid no incentives, as stipulated in the IOU's Statewide RCx Manual, since all the implemented measures

Metric	Description	Custom Benchmark	Final 2015 Score	Commission staff Assessment
				had simple paybacks of less than 2 years without incentives. We waived this project from final review and cited this project follow-up and final technical review as a good example as the final implementer RCx report was well done.
2	Breadth of response of activities that show an intention to operationalize and streamline the ex ante review process	(1) Percentage of custom project submissions that show standardization of custom calculation methods and tools; (2) Development and/or update of comprehensive internal (to IOUs, third parties, and local government partners, as appropriate) process manuals/checklists and QC	3.23	<p>Although the scoring appears to indicate that SDG&E was meeting expectations in this metric, SDG&E did not follow the Ex Ante Review process as required. For example:</p> <ul style="list-style-type: none"> • Application 5340-13 aka List ID 1256 (X027), SDG&E did not properly keep track of the application and proceeded to claim the project before we had an opportunity to review it. We found that the installed measure did not exceed code requirements and was ineligible. • Application 3125-92 (X098), while the MBCx methodology was under Commission staff scrutiny, SDG&E paid and claimed this project without Commission Staff's approval. • Application 2069-01 (X347), SDG&E did not follow the ex ante review process properly before proceeding. We informed SDG&E that the initial documentation was inadequate for a review and SDG&E did not provide anything further until the project was at the post-implementation stage, i.e., SDG&E allowed the project to proceed without adhering to the ex ante review process. SDG&E provided adequate documentation at the post-implementation stage to allow Staff to waive the final review. • Application 2034-06 (X526), Staff found in its final review that SDG&E properly conducted an hourly net electrical grid impact analysis and Staff was able to waive the final ex ante review. <p>Commission staff added one point in this metric under the Process Adder to recognize SDG&E engineering staff's efforts in this activity observed in the weekly meetings.</p>

Metric	Description	Custom Benchmark	Final 2015 Score	Commission staff Assessment
3	Comprehensiveness of submittals (i.e., submittals show that good information exchange and coordination of activities exists, and is maintained, between internal program implementation, engineering, and regulatory staff to ensure common understanding and execution of ex ante processes)	Number of repeated formal requests for additional documentation for project information and/or reporting claims that support ex ante review activities (fewer requests = higher score).	2.29	The initial documentation submittal and subsequent follow-ups for Application 5340-13 aka List ID 1256 (X027) was inadequate since SDG&E lost track of the project for ex ante review purposes. For Project Application 2069-01 (X347), Commission staff found the initial project documentation was inadequate to undertake the initial ex ante review. SDG&E did not upload any additional documentation until the project was completed and ready for the final savings claim review. Application 2034-06 (X526) is a good example of comprehensive documentation that followed prior Staff guidance for other projects.
4	Efforts to bring high profile, high impact, or existing (with data gaps) projects and/or measures to Commission staff in the formative stage for collaboration or input	Percentage of large high impact projects or measures referred to CPUC early or flagged for review	5.0	SDG&E submitted two projects for early opinion discussion; one concerning the modeling of a Variable Refrigerant Flow AC system for a Hotel project and one concerning welding equipment for a shipyard. However, Staff found that SDG&E's views and requirements analysis on these projects required more depth. Also, Staff recognizes that SDG&E sought Staff's early opinion for Application 5001230752 (X539), a bio-fuel storage tank project, but appears to not have followed our guidance in the end.

Metric	Description	Custom Benchmark	Final 2015 Score	Commission staff Assessment
5	Quality and appropriateness of project documentation (e.g., shows incorporation of Commission policy directives)	Frequency of inappropriate or inferior quality documentation on project eligibility, baseline determination, program influence, use of custom elements in projects, assumptions and data supporting savings, and project costs (higher frequency = lower score)	1.43	SDG&E's project documentation for many older projects still are of inadequate quality. However, a recent project activity such as Application 2034-06 (X526), better reflect incorporation of Commission Staff's guidance and contains more complete documentation. SDG&E should use this project as an example of how it could improve in this metric.
6a	Depth of IOU quality control and technical review of ex ante submittals: Third party oversight	Quality of custom project estimates prepared by customers, third parties, and local government partners submitted by IOUs	1.0	Based on the project reviews over the course of 2015, Commission Staff observes that SDG&E needs to more vigorously pursue in-depth QA/QC of third party and Partnership projects before projects are committed. The number of older projects with continued issues is reflected in the scoring for this Metric, i.e., Applications 5340-13, 3125-92, 2069-01, and 5744. For Application 5744 (X507) in particular, a data center air flow management project that had already received Staff approval with guidance, SDG&E submitted follow-up third party replies without a critical SDG&E QA/QC review prior to submittal to Commission staff.

Metric	Description	Custom Benchmark	Final 2015 Score	Commission staff Assessment
6b	Depth of IOU quality control and technical review of ex ante submittals: Clarity of submittals and change in savings from IOU-proposed values not related to M&V	(1) Percentage of Projects requiring three reviews or re-requests for supporting information commonly requested; (2) Percentage of projects for which IOU-proposed savings and ED-approved savings differ by 20% or more (higher percentage = lower score)	1.68	Overall, Commission staff observes that SDG&E needs to improve its QA/QC process and to more closely question the eligibility and baseline assumptions in its internal reviews of project applications incorporating prior Commission staff dispositions. Commission staff commends SDG&E for taking the initiative in their internal final review of Application 2034-06 (X526), an RCx project, for performing an hourly net grid impact analysis. Further steps in this direction will improve future scores in this metric.
7	Use of recent and relevant data sources that reflect current knowledge on a topic for industry standard practice studies and parameter development that reflects professional care, expertise, and experience	Percentage of custom projects that use data sources and methods per standard research and evaluation practices	2.0	SDG&E needs to improve upon this area by bringing to bear more recent and relevant data in its internal examinations of project, a willingness to ask the hard questions, and due diligence in the examination of data sources used to support claims. On a positive note, for project Application 2034-06, although the precise hourly data was not available for the hourly net electrical grid impact analysis, SDG&E's approximation was adequate and well-reasoned.

Metric	Description	Custom Benchmark	Final 2015 Score	Commission staff Assessment
8	Thoughtful consideration, and incorporation, of CPUC comments/inputs. In lieu of incorporation of comments/input, feedback on why comments/input were not incorporated	(1) Frequency of improved engineering/M&V methods and processes resulting from (and/or appropriate and well-defended rejection of) CPUC reviewer's recommendations; (2) Percent of projects in custom reviews that reflect guidance provided in prior reviews	2.67	Although SDG&E incorporated and/or adequately addressed Commission staff comments and requirements from prior dispositions for some projects and early opinions, over the course of the 2015 review activities, there were too many instances where Commission staff-identified issues remained unaddressed in SDG&E's follow-ups. For example, demonstration of program influence on a project continues to be an issue. This metric score was also negatively impacted by SDG&E's failure to follow the EAR process properly for two project applications, 5340-13 and 3125-92, which were paid and claimed before a final Commission staff review could take place.
9	Professional care and expertise in the use and application of adopted DEER values and DEER methods	Percentage of custom projects including, and not limited to, new or modified existing technologies or project types that appropriately incorporate DEER assumptions and methods	2.5	Over the course of the 2015 ex ante review activities, there were no project areas identified directly related to the application of DEER values and methodologies outside of EUL/RUL values and default NTGR values. There were no custom lighting projects examined over the course of the year since SDG&E has made a concerted effort for lighting projects to use approved deemed values. The projects Commission staff examined over the course of 2015 conformed in the estimation peak demand reduction methodology to the DEER peak demand period definition.
10	Ongoing effort to incorporate cumulative experience from past activities (including prior Commission staff reviews and recommendations) into current and future work products	Percentage of projects identified in claims review that were implemented per CPUC directions in previous reviews	3.19	Compared to the mid-year feed ratings, Commission staff saw positive SDG&E improvement in this metric area. However, failure to adequately follow-up on Applications 5340-13, 3125-92, 5905, and 5001230752 weighed down the progress seen in the other areas.

Summary of all IOU custom measure and project ex ante review activities scoring for both the 2015 annual review as well as previously issued 2015 mid-year review:

2015 Annual Ratings	Metric 1a	Metric 1b	Metric 2	Metric 3	Metric 4	Metric 5	Metric 6a	Metric 6b	Metric 7	Metric 8	Metric 9	Metric 10
SCE "-"	15	2	3	11	2	6	10	9	11	8	2	8
SCE "+"	1	2	2	2	4	0	0	1	0	2	2	3
SCE "Yes"	2	2	7	3	1	5	2	1	1	2	2	6
PG&E "-"	15	13	13	18	6	18	20	14	16	13	2	19
PG&E "+"	0	5	3	6	2	4	5	3	2	5	0	6
PG&E "Yes"	1	2	7	5	0	1	2	4	1	1	2	2
SDG&E "-"	4	4	5	4	0	5	4	4	6	4	0	4
SDG&E "+"	3	2	4	2	3	2	1	2	1	2	0	3
SDG&E "Yes"	0	0	0	1	0	0	0	0	1	0	0	1
SCG "-"	2	2	4	5	1	5	3	3	3	5	0	4
SCG "+"	0	0	0	1	1	0	0	0	0	1	0	0
SCG "Yes"	0	1	1	1	0	0	0	1	0	0	0	3

2015 Mid Year Ratings	Metric 1a	Metric 1b	Metric 2	Metric 3	Metric 4	Metric 5	Metric 6a	Metric 6b	Metric 7	Metric 8	Metric 9	Metric 10
SCE "mid -"	3	3	4	8	0	5	5	5	8	8	2	10
SCE "mid +"	1	3	3	0	0	0	0	1	0	3	0	1
SCE "mid m"	0	0	0	1	0	0	0	0	0	0	0	0
SCE "mid n/a"	18	16	15	13	22	17	17	16	14	11	20	11
PG&E "mid -"	6	4	11	10	3	15	10	14	14	12	2	14
PG&E "mid +"	0	2	3	2	0	1	0	1	0	2	0	3
PG&E "mid m"	1	0	0	1	0	1	0	2	1	0	0	1
PG&E "mid n/a"	17	18	10	11	21	7	14	7	9	10	22	6
SDG&E "mid -"	0	1	1	3	0	3	2	4	4	0	0	1
SDG&E "mid +"	2	0	2	1	1	1	0	0	0	1	0	0
SDG&E "mid m"	2	1	0	1	0	1	1	2	0	0	1	0
SDG&E "mid n/a"	6	8	7	5	9	5	7	4	6	9	9	9
SCG "mid -"	0	0	1	4	0	4	1	1	0	2	0	1
SCG "mid +"	0	2	0	0	0	0	0	0	1	1	0	0
SCG "mid m"	0	3	3	1	0	0	3	1	2	2	0	4
SCG "mid n/a"	5	0	1	0	5	1	1	3	2	0	5	0

Details of SDG&E custom measure and project activities scoring:

2015 Annual Rating	Metric 1a	Metric 1b	Metric 2	Metric 3	Metric 4	Metric 5	Metric 6a	Metric 6b	Metric 7	Metric 8	Metric 9	Metric 10	
SDG&E "-"	57%	67%	56%	57%	0%	71%	80%	67%	75%	67%	0%	50%	
SDG&E "+"	43%	33%	44%	29%	100%	29%	20%	33%	13%	33%	0%	38%	
SDG&E "Yes"	0%	0%	0%	14%	0%	0%	0%	0%	13%	0%	0%	13%	
Overall Score	43%	33%	44%	36%	100%	29%	20%	33%	19%	33%	0%	44%	TOTALS
Metric Points	1.08	0.84	2.23	1.79	5.00	1.43	0.50	0.84	1.00	1.67	1.00	2.19	19.57
QA Adders									1.00		1.50		2.50
Process Adders	0.50	0.50	1.00	0.50						1.00		1.00	4.50
Final Points	1.58	1.34	3.23	2.29	5.00	1.43	0.50	0.84	2.00	2.67	2.50	3.19	26.57

Explanations of scoring tables row entries:

1. The row labeled with *IOU* “-“ lists the percent of custom project reviews undertaken in 2015 where the Commission staff evaluation of the project 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 custom project reviews undertaken in 2015 where the Commission staff evaluation of the project 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 “Overall Score” row 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.
4. The “Metric Points” row provides the point value derived from the three scoring rows and the resulting overall score row with the final score constrained between a maximum score of 5 and a minimum score of 1. Even if the overall goes negative, due to the “-“ rows overwhelming the total, a minimum score of 1 is assigned.
5. The row labeled with *IOU* “Yes“ lists the percent of custom project reviews undertaken in 2015 where the Commission staff evaluation of the project materials or information indicated that the IOU performance in this metric for the submission exceeded met minimum expectations or requirements relative to the metric.
6. The row labeled with *QA Adders* lists Commission 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 in 2015 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 2015 but not yet seen in the custom review activity.
7. The row labeled with *Process Adders* lists Commission staff points added to the metric based on an evaluation of the overall IOU performance in putting into place new internal review processes and procedures in 2015 related to this metric area that are expected to improve performance going forward on projects started during 2015 but not yet seen in the custom review activity.
8. The final points row indicated the total score for each metric as a sum of the overall score plus the two types of adder points.

Details of other IOU custom measure and project activities scoring:

2015 Annual Rating	Metric 1a	Metric 1b	Metric 2	Metric 3	Metric 4	Metric 5	Metric 6a	Metric 6b	Metric 7	Metric 8	Metric 9	Metric 10	
SCE "-"	83%	33%	25%	69%	29%	55%	83%	82%	92%	67%	33%	47%	
SCE "+"	6%	33%	17%	13%	57%	0%	0%	9%	0%	17%	33%	18%	
SCE "Yes"	11%	33%	58%	19%	14%	45%	17%	9%	8%	17%	33%	35%	
Overall Score	11%	50%	46%	22%	64%	23%	8%	14%	4%	25%	50%	35%	TOTALS
Metric Points	0.50	1.25	2.30	1.10	3.22	1.14	0.50	0.50	1.00	1.25	2.50	1.77	17.03
QA Adders											0.50		0.50
Process Adders	0.50			0.50	0.50					1.50		2.00	5.00
Final Points	1.00	1.25	2.30	1.60	3.72	1.14	0.50	0.50	1.00	2.75	3.00	3.77	22.53
2015 Annual Rating	Metric 1a	Metric 1b	Metric 2	Metric 3	Metric 4	Metric 5	Metric 6a	Metric 6b	Metric 7	Metric 8	Metric 9	Metric 10	
PG&E "-"	94%	65%	57%	62%	75%	78%	74%	67%	84%	68%	50%	70%	
PG&E "+"	0%	25%	13%	21%	25%	17%	19%	14%	11%	26%	0%	22%	
PG&E "Yes"	6%	10%	30%	17%	0%	4%	7%	19%	5%	5%	50%	7%	
Overall Score	3%	30%	28%	29%	25%	20%	22%	24%	13%	29%	25%	26%	TOTALS
Metric Points	0.50	0.75	1.42	1.47	1.25	1.00	0.56	0.60	1.00	1.45	1.25	1.30	12.55
QA Adders											0.50		0.50
Process Adders			1.00	0.50	3.00					1.00		1.50	7.00
Final Points	0.50	0.75	2.42	1.97	4.25	1.00	0.56	0.60	1.00	2.45	1.75	2.80	20.05

2015 Annual Rating	Metric 1a	Metric 1b	Metric 2	Metric 3	Metric 4	Metric 5	Metric 6a	Metric 6b	Metric 7	Metric 8	Metric 9	Metric 10	
SCG "-"	100%	67%	80%	71%	50%	100%	100%	75%	100%	83%		57%	
SCG "+"	0%	0%	0%	14%	50%	0%	0%	0%	0%	17%		0%	
SCG "Yes"	0%	33%	20%	14%	0%	0%	0%	25%	0%	0%		43%	
Overall Score	0%	17%	10%	21%	50%	0%	0%	13%	0%	17%	0%	21%	TOTALS
Metric Points	0.50	0.50	1.00	1.08	2.50	1.00	0.50	0.50	1.00	1.00	1.00	1.08	11.66
QA Adders											1.50		1.50
Process Adders				1.00									1.00
Final Points	0.50	0.50	1.00	1.08	3.50	1.00	0.50	0.50	1.00	1.00	2.50	1.08	14.16

Summary of all

IOU workpaper review activities scoring details for the 2015 annual review:

2015 SCE Annual Rating	Metric 1a	Metric 1b	Metric 2	Metric 3	Metric 4	Metric 5	Metric 6a	Metric 6b	Metric 7	Metric 8	Metric 9	Metric 10	
Workpapers Score	42%	90%	29%	39%	50%	33%	67%	19%	53%	50%	66%	50%	
Workpapers Points	2.12	4.52	1.45	1.93	2.50	1.67	3.33	0.95	2.00	2.50	3.00	2.50	
Workpaper Process	1.31	1.44	1.60	1.15	1.07	1.51	1.16	1.10	1.05	1.22	1.33	1.04	
Process weight	35%	35%	35%	35%	35%	35%	35%	35%	35%	35%	35%	35%	TOTAL
Metric Points	0.92	1.73	1.51	1.66	2.00	1.62	1.29	0.51	1.67	2.06	2.42	1.99	19.38
2015 PG&E Annual Rating	Metric 1a	Metric 1b	Metric 2	Metric 3	Metric 4	Metric 5	Metric 6a	Metric 6b	Metric 7	Metric 8	Metric 9	Metric 10	
Workpapers Score	43%	79%	52%	42%	75%	14%	11%	27%	78%	40%	68%	72%	
Workpapers Points	2.57	3.93	2.62	1.96	3.75	0.71	0.56	1.33	3.91	1.00	3.39	2.50	
Workpaper Process	1.23	1.00	1.19	1.18	1.58	1.30	1.20	1.17	1.12	1.94	2.01	1.44	
Process weight	35%	35%	35%	35%	35%	35%	35%	35%	35%	35%	35%	35%	TOTAL
Metric Points	1.06	1.46	2.12	1.70	2.99	1.00	0.50	0.64	2.94	1.33	2.92	2.13	20.79
2015 SDG&E Annual Rating	Metric 1a	Metric 1b	Metric 2	Metric 3	Metric 4	Metric 5	Metric 6a	Metric 6b	Metric 7	Metric 8	Metric 9	Metric 10	
Workpapers Score	43%	5%	44%	42%	25%	68%	17%	36%	58%	4%	23%	37%	
Workpapers Points	2.13	0.23	2.22	2.12	1.25	3.41	0.83	1.82	2.88	0.22	1.17	1.85	
Workpaper Process	1.30	1.28	1.18	1.31	2.03	1.45	1.39	1.42	1.13	1.86	1.83	1.70	
Process weight	35%	35%	35%	35%	35%	35%	35%	35%	35%	35%	35%	35%	TOTAL
Metric Points	0.92	0.50	1.86	1.84	1.53	2.73	0.52	0.84	2.28	1.00	1.40	1.80	17.22
2015 SCG Annual Rating	Metric 1a	Metric 1b	Metric 2	Metric 3	Metric 4	Metric 5	Metric 6a	Metric 6b	Metric 7	Metric 8	Metric 9	Metric 10	
Workpapers Score	100%	50%	50%	42%	75%	67%	10%	40%	86%	100%	50%	67%	
Workpapers Points	5.00	2.50	2.50	2.08	3.75	3.33	0.50	2.00	4.29	5.00	2.50	3.33	
Workpaper Process	2.49	2.75	2.05	2.51	3.39	2.04	2.72	2.87	1.89	2.80	2.83	2.55	
Process weight	65%	65%	65%	65%	65%	65%	65%	65%	65%	65%	65%	65%	TOTAL
Metric Points	1.69	1.34	2.21	2.36	3.52	2.50	0.98	1.29	2.74	3.57	2.72	2.83	27.75