

PUBLIC UTILITIES COMMISSION

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To: Southern California Gas (SoCalGas)

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

Cc: R.13-11-005 Service Lists

Subject: 2023 EX ANTE REVIEW (EAR) SCORING AND EVALUATION PERFORMANCE

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## I. Summary of 2023 EAR Scores - Custom Projects and Measure Packages

Pursuant to Decision (D).13-09-023, D.15-10-028, D.16-08-019, and D.20-11-013, California Public Utilities Commission (CPUC) staff and consultants score the investor-owned utilities (IOUs) based on their performance during the pre-approval phase (or “ex ante” phase) of developing an energy efficiency project or measure. The ex ante review (EAR) scoring is a part of the EAR awards<sup>1</sup>.

D.20-11-013 placed a moratorium on EAR awards but directed that EAR scoring shall continue. CPUC staff and consultants completed the 2023 EAR performance review scoring as prescribed in Table 3 of D.16-08-019. Decision D.16-08-019 established consolidated metrics to evaluate and further direct the utilities. Ordering Paragraph 19 of this decision states that the EAR scores “shall be weighted for the utility program administrators based on the proportion of deemed savings and custom measures in each utility’s portfolio”.

A breakdown of SoCalGas’ 2023 EAR performance score of 81.22/100 for Measure Packages<sup>2</sup> and custom projects is shown below in Table 1. SoCalGas’ 2023 total points is an 11.08 point increase from its 2022 total points of 70.14. Scores for 2022 are provided in Table 2 on the following page.

Table 1: SoCalGas 2023 EAR Scoring for Measure Packages and Custom Projects

SoCalGas 2023 EAR Review Performance Scores and Points		Measure Packages				Custom			
Metric	Metric Area of Scoring	Metric Score	Metric Weight Factor	Points	Max Points	Metric Score	Metric Weight Factor	Points	Max Points
1	Timing and Timeliness of Submittals	3.37	10%	3.37	5	5.00	10%	5.00	5
2	Content, Completeness, and Quality of Submittals	2.50	30%	7.50	15	4.24	30%	12.71	15
3	Proactive Initiative of Collaboration	2.97	10%	4.22	5	3.60	10%	3.60	5
4	Due Diligence and QA/QC Effectiveness	5.00	25%	12.50	12.5	4.43	25%	11.07	12.5
5	Responsiveness to Needs for Process/Program Improvements	5.00	25%	12.50	12.5	3.50	25%	8.75	12.5
<b>Total</b>				<b>40.09</b>	<b>50</b>			<b>41.13</b>	<b>50</b>

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

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

Table 2: SoCalGas 2022 EAR Scoring for Measure Packages and Custom Projects

SoCalGas 2022 EAR Review Performance Scores and Points		Measure Packages				Custom			
Metric	Metric Area of Scoring	Metric Score	Metric Weight Factor	Points	Max Points	Metric Score	Metric Weight Factor	Points	Max Points
1	Timing and Timeliness of Submittals	2.99	10%	2.99	5	4.17	10%	4.17	5
2	Content, Completeness, and Quality of Submittals	2.84	30%	8.53	15	3.25	30%	9.75	15
3	Proactive Initiative of Collaboration	2.99	10%	2.99	5	2.40	10%	2.40	5
4	Due Diligence and QA/QC Effectiveness	5.00	25%	12.50	12.5	3.60	25%	9.00	12.5
5	Responsiveness to Needs for Process/Program Improvements	5.00	25%	12.50	12.5	2.13	25%	5.31	12.5
<b>Total</b>				<b>39.51</b>	<b>50</b>			<b>30.63</b>	<b>50</b>

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 2023 Activities

### A. Custom Projects Review Overview

From the period beginning January 2023 to the end of December 2023, CPUC staff issued seven scored dispositions.<sup>3</sup>

A review of the project dispositions and the Review Process Score Enhancements points<sup>4</sup> resulted in SoCalGas's custom project score increasing by 10.50 points from 2022 scores (30.63 in 2022 vs. 41.13 in 2023 as shown in Tables 1 and 2 above). This is a marked increase over last year's performance indicating SoCalGas has made significant improvement efforts.

#### 1. Summary of 2023 Achievements

CPUC staff observed SoCalGas to have improved in:

- **Timing and timeliness of submittals.** SoCalGas submitted project documentation for review for all 7 of these custom projects on time with five projects (71 percent) earlier than required.
- **Issues related to process, policy, program rules.** SoCalGas is improving efforts to ensure compliance with CPUC policy and Program rules.

<sup>3</sup> Some of the dispositions are for projects submitted at the end of 2022. Some projects that were selected in 2022 had dispositions issued in 2023. The memo is for dispositions issued in 2023.

<sup>4</sup> Section IV.E provides details on the score enhancement methodology.

## 2. Summary of Areas Requiring Improvement

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

- **The proportion of gross savings impact issues remains high.** In 2022 SoCalGas had 36 percent of all issues related to gross savings impacts. In 2023, the number of issues related to gross savings impacts increased to 50 percent of total issues. SoCalGas needs to improve analysis assumptions and calculation methodology to reduce the impact of deficiencies within project submissions.
- **Issues related to documenting program influence remain high.** In 2022 issues related to program influence comprised 14 percent of total issues. In 2023, the number of program influence related issues has increased to 25 percent, indicating that SoCalGas still has work to ensure that the proper chain of influence documentation is submitted and accurate.

## B. Measure Packages Review Overview

SoCalGas' Measure Packages scores increased compared to last year by 0.58 points (from 39.51 in 2022 to 40.09 for 2023 as shown in Tables 1 and 2 above) which indicates that SoCalGas has generally maintained their practices for Measure Package submittals.

### 1. Summary of 2023 Achievements

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

- **SoCalGas continues to work closely with the CPUC staff and with the PAs to manage measure package submittals.** This was demonstrated through the Combination Oven, Wall Insulation, Ceiling Insulation, and Packaged Air Conditioner Heat Recovery measure package submittals with confirmation on guidance and proactive comments.
- **SoCalGas has continued to be a leader in measure package submissions through the eTRM.** SoCalGas met or exceeded their submission timeline for the DEER2024 update cycle. SoCalGas has continued to be responsive, clear, and timely with their eTRM submittals and measure package posts.
- **SoCalGas has continued to support stakeholders to develop new measure packages for the deemed portfolio.** SoCalGas assisted in the development of new electric-saving measure packages to support their implementers when electric IOUs did not want to take on the development of the measure package.
- **SoCalGas should continue to provide coordination and communication on sunseting measures.** There has been a recent focus on sunseting measure packages due to low uptake or eligibility reasons with the addition of the Sunset List on eTRM.

### 2. Summary of Areas Requiring Improvement

CPUC staff highlights the following recommendations for improvement:

- **There is room for improvement in the QA/QC process for measure packages.** SoCalGas should continue to focus on measure package QC before submitting to CPUC for

review as there are still many minor comments and typos that hold up measure package approval. While the large errors that impact savings are minimal, the smaller typos and readability comments can be improved.

- **SoCalGas can improve cover sheet QC.** With the enhancement to integrate the cover sheet to the eTRM in the Fall of 2023, there should be more focus on providing more detail in the cover sheet than what the eTRM automatically provides when measure package changes lead to substantial changes to savings.

### 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”.

**From the period beginning January 2023 to the end of December 2023, 7 SoCalGas projects received dispositions.** The comments below are organized by the five metric areas of scoring prescribed in D.16-08-019 with metric scores shown prior to any enhancement points. A summary table of all submitted dispositions is included in [Attachment B](#). [Attachment D](#) contains an embedded custom scores workbook that includes a tab with details on the individual project level disposition scores and feedback from the reviewer.

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

Table 3: 2023 SoCalGas Custom Disposition Points Awarded by Metric

Metric	Metric Area of Scoring	Weight Factor	Custom Disposition Points		Max Points
			With Enhance Pts <sup>5</sup>	w/o Enhance Pts	
1	Timeliness of Submittals	10%	5.00	5.00	5
2	Content, Completeness, and Quality of Submittals	30%	12.71	12.71	15
3	Proactive Initiative of Collaboration	10%	3.60	3.60	5
4	PA’s Due Diligence and QA/QC	25%	11.07	11.07	12.5
5	PA’s Responsiveness	25%	8.75	8.75	12.5
<b>Total</b>			<b>41.13</b>	<b>41.13</b>	<b>50</b>

#### 1. Timeliness of Submittals

In 2023, SoCalGas received a custom disposition score of 5.00 out of 5.0 for Metric 1 (Timeliness of

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

Submittals) prior to the addition of any enhancement points. This disposition score was based on the 7 SoCalGas custom projects reviews completed in 2023. In 2023, SoCalGas submitted project documentation for review for all 7 of these custom projects on time with five projects (71 percent) earlier than required.<sup>6</sup> This is significant improvement over last year which demonstrates SoCalGas effort to improve timeliness.

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

In 2023, SoCalGas received a custom disposition score of 12.71 out of 15.0 for Metric 2 (Content, Completeness and Quality of Submissions) prior to the addition of any enhancement points. This score was an increase from the 2022 score of 9.75 which indicates a marked improvement. Scoring was based on the completeness of the 7 SoCalGas custom project reviews. Of the 7 dispositions issued, 2 projects were approved without exception, 0 projects were marked Advisory, and 0 projects were marked Prospective.<sup>7</sup> However, 3 projects (43 percent) were approved with noted deficiencies which resulted in a loss of points under this metric.

Table 4 below summarizes the 8 action items identified across the 7 scored dispositions<sup>8</sup> issued between January 1, 2023, and December 31, 2023. 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 <sup>9</sup> by the PA:	Summary of CPUC Staff Notes or Instructions <sup>10</sup> :	Percent of Total Actions
<b>Issues Related to Gross Savings Impacts</b>	Analysis assumptions	2	0	25%
	Calculation method	1	0	13%
	Calculation tool	0	1	0%
	M&V plan	1	1	13%
	<b>Subtotals</b>	<b>4</b>	<b>2</b>	<b>50%</b>
<b>Process, Policy, Program Rules</b>	CPUC Policy	0	0	0%
	Eligibility	0	0	0%
	ER preponderance of evidence	0	0	0%

<sup>6</sup> “The electrical corporation or gas corporation shall make the project application supporting documentation available to the CPUC for review within 15 business days of the CPUC review selection date”.

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

<sup>9</sup> For Action items, the PA must make revisions or changes as noted in CPUC Staff's review comments before signed agreement with customer.

<sup>10</sup> Notes or Instructions are informational observations that do not require revision by the PA but should be considered for similar projects moving forward. They may also include documentation of pre-installation items to inform possible post-installation review(s). They are typically minor suggestions or clarifications that should not affect ESPI scoring.

Issue Area	Action Categories	Summary of CPUC Staff Required Action <sup>9</sup> by the PA:	Summary of CPUC Staff Notes or Instructions <sup>10</sup> :	Percent of Total Actions
	EUL/RUL	0	0	0%
	Measure cost	1	1	13%
	PA program rules	0	0	0%
	<b>Subtotals</b>	<b>1</b>	<b>1</b>	<b>13%</b>
<b>Documentation Issues</b>	Continue Document Upload	0	2	0%
	Missing required information	0	0	0%
	Project scope unclear	0	0	0%
	<b>Subtotals</b>	<b>0</b>	<b>2</b>	<b>0%</b>
<b>Issues Related to Net Impacts</b>	Program influence	2	1	25%
	<b>Subtotals</b>	<b>2</b>	<b>1</b>	<b>25%</b>
<b>Other Issues</b>	Other 1 - Quarterly submission	1	0	13%
	Other 2 - Bimonthly savings	0	1	0%
	Other 3 - Measure classification	0	1	0%
	Other 4 - Incentive calculation	0	1	0%
	Other 5 - Bimonthly description	0	1	0%
	<b>Subtotals</b>	<b>1</b>	<b>4</b>	<b>13%</b>
<b>Grand Total</b>		<b>8</b>	<b>10</b>	<b>100%</b>

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

- **Analysis assumptions and calculation method issues** occurred on three projects and resulted in a loss of EAR points due to the significance of these discrepancies.

### 3. Proactive Initiative of Collaboration

In 2023, SoCalGas received a custom disposition score of 3.60 out of 5.00 for Metric 3 (Proactive Initiative of Collaboration) prior to the addition of any enhancement points. CPUC found that SoCalGas made some effort to bring measures, projects, or studies forward for discussion during the bi-weekly meetings. However, SoCalGas did not submit any Early Opinions. CPUC staff noted a slight increase in custom project activity in the second half of 2023, with two of those being larger projects.

SoCalGas was active in statewide meetings and CalTF meetings and worked closely as advisors for the boiler custom measure package.

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

In 2023, SoCalGas received a custom disposition score of 11.07 out of 12.50 for Metric 4 (PA's Due Diligence, Quality Assurance, and Quality Control) prior to the addition of any enhancement points. Project and measure level disposition performance results reviewed under Metric 2 were used as a proxy for the level of QA/QC occurring by the PA. The number of dispositions proceeding without exception was weighed against those that required resubmissions or resulted in rejections. Of the 7

projects receiving dispositions, 2 projects proceeded without exception (28.5 percent), 3 projects (43 percent) were allowed to proceed with exceptions noted, and 2 projects (28.5 percent) were advisory only. CPUC staff determined SoCalGas has made improvement in performance for this metric over 2022 as it pertains to effective QC of projects prior to submitting for review.

## 5. PA's Responsiveness

In 2023, SoCalGas received a custom disposition score of 8.75 out of 12.50 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 expectations, the alignment of program policy and procedures with the number of exceptions based on eligibility and attribution, and the adaptation to changes in rules over time. SoCalGas had 4 projects reviewed in the first half of the year and 3 projects reviewed for the second half of the year. The lower performance score in Metric 5 was driven in large part by the substantial number of technical and program influence related issues documented across all project submissions. For this component CPUC staff noted that at the portfolio level, 50 percent of all actions noted on dispositions were related to issues potentially impacting future net to gross (NTG) values. Additionally, CPUC staff noted that 25 percent of actions noted on dispositions were related to program influence related issues. Though and improvement over the 2022 score, CPUC staff determined that SoCalGas has more work that can be done to address issues related to gross savings and program influence, and to bring about substantive process improvements in the future.

## B. Measure Packages Performance Review

SoCalGas had 49 Measure Packages submitted in 2023. Thirty-seven were reviewed and disposed, and the remaining twelve are under detailed review or in the measure package plan phase. This end of year memo provides Measure Package specific feedback on the 37 which were reviewed and disposed.

The comments below are organized by the five scoring metric areas created in D.16-08-019.11 The narrative includes observations common to multiple Measure Packages and feedback related to the Measure Package development process. Specific Measure Package feedback is provided in [Attachment C](#) at the end of this document. The Measure Package Review Table provides feedback on specific Measure Packages. The Measure Package Submissions Table lists all Measure Packages submitted by SoCalGas during the review period. Measure Packages were selected for feedback from those that were led by SoCalGas and were either disposed or reached approval status during the review period. CPUC staff acknowledges that Measure Package development may have been supported by multiple PAs; however, at this time, there is no mechanism for apportioning feedback among PAs. Therefore, feedback is only provided for the submitting PA, with the assumption that they are the lead PA. The scoring rubric for Measure Packages is defined as follows:

‘+’ indicates a positive scoring impact which receives 100% of total points for the metric

‘-’ indicates a negative scoring impact which receives 0% of total points for the metric

‘Yes’ indicates meeting minimum expectation which receives 50% of total points for the metric

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<sup>11</sup> See [D.16-08-019](#) at 87.



‘No’ indicates the review feedback is not applicable to a metric and does not impact the average. The assigned percentage scores were averaged across all the reviewed items.

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

Table 5: SoCalGas Measure Package Disposition Points Awarded by Metric

Metric	Metric Area of Scoring	Weight Factor	Measure Package Disposition Points		Max Points
			With Enhance Pts <sup>12</sup>	w/o Enhance Pts	
1	Timeliness of Submittals	10%	3.37	3.37	5
2	Content, Completeness, and Quality of Submittals	30%	7.50	7.50	15
3	Proactive Initiative of Collaboration	10%	4.22	2.97	5
4	PA’s Due Diligence and QA/QC	25%	12.50	7.09	12.5
5	PA’s Responsiveness	25%	12.50	7.26	12.5
<b>Total</b>			<b>40.09</b>	<b>28.19</b>	<b>50</b>

## 1. Timeliness of Submittals

In 2023, SoCalGas received a Measure Package disposition score of 3.37 out of 5.0 for Metric 1 (Timeliness of Submittals) prior to the addition of any enhancement points. SoCalGas has consistently met deadlines for submission of statewide measure packages. SoCalGas submitted the first batch of measure packages in late 2023 to begin the DEER2024 measure package review process. SoCalGas developed 8 new measure packages in 2023. These measure packages are not scored in timeliness and receive a “No” indicating these measure packages are omitted from the scoring of this metric. Two additional measure packages received high ratings because of the necessity for quick submissions to approve EUL changes beginning on January 1, 2024 to align with Decision D.23-04-035.

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

In 2023, SoCalGas 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.

SoCalGas has continued to show high quality submittals in 2023 with most measure packages meeting expectations. Most measure packages consisted of minor edits and clarifications rather than corrections and errors. The Combination Oven and Exhaust Hood Ventilation Energy Star measure package updates were well documented, well substantiated, and well written. These measure packages received high marks with high quality submittals. SoCalGas introduced eight new measure packages to the deemed portfolio and included two measure package updates with new offerings. These submittals met content, completeness, and quality expectations with minor clarifying comments on each measure package.

SoCalGas received a minus “-” on four measure package submittals. This was due to the lack in completeness and quality of the calculations and savings values that necessitated additional

<sup>12</sup> Section IV.E provides details on the score enhancement methodology.

comments on the Steam Table, Radiant Conveyor Toaster, and Combination Oven measure packages. In addition, the Space Heating Gas Absorption Heat Pump measure package had inflated savings due to improper efficiency and coefficient of performance values in the calculations. SoCalGas also received above expectation ratings “+” on measure packages for high-quality submittals that were approved without any comments like the Ceiling and Wall Insulation measure package updates.

### **3. Proactive Initiative of Collaboration**

In 2023, SoCalGas received a Measure Package disposition score of 2.97 out of 5.0 for Metric 3 (Proactive Initiative of Collaboration) prior to the addition of any enhancement points. Measure packages met the minimum expectations of collaboration which was required to ensure each measure package met all PA’s needs and minimally received a “Yes” with 6 measure packages exceeding minimum expectations. In December of 2023, SoCalGas took over as the lead for the all-IOU monthly ex-ante coordination call.

SoCalGas has been proactive with providing the CPUC staff with updates and preliminary work products on upcoming measure packages via the Measure Package Plan process. In addition, SoCalGas worked collaboratively with CPUC staff on a variety of measure package specific issues. Review questions on qualified product lists, assumptions used in costs and energy savings calculations necessitated the coordination of calls with measure developers that SoCalGas helped coordinate for the Steam Table, Convection Oven, and Combination Oven measure packages. In addition, SoCalGas quickly and proactively collaborated with CPUC staff to update the EUL for the Ceiling and Wall Insulation measure packages. Lastly, the review of the Solar Thermal Water Heating System was thorough and long, but SoCalGas staff helped alleviate a data collection requirement concern by digging up additional data for CPUC review that was clear and concise. SoCalGas continues to work with the CPUC to provide solutions to measure package comments and questions.

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

In 2023, SoCalGas received a Measure Package disposition score of 7.09 out of 12.5 for Metric 4 (PA’s Due Diligence, Quality Assurance, and Quality Control) prior to the addition of any enhancement points.

The quality of SoCalGas measure packages and their due diligence has continued to be a positive for SoCalGas. SoCalGas has clearly identified and updated DEER values and EUL updates when applicable like the Ceiling and Wall Insulation measure packages. Additionally, SoCalGas submitted other measures with proactive comments upon submittal to correct NTG tables in DEER and correctly update the new Restricted Permutation field in the permutations in measure packages like the Combination Oven and Packaged Air Conditioner Heat Recovery measure packages. Additionally, SoCalGas proactively updated a lot of Title 24 code language in the Heat Recovery Ventilation measure package when there was a code change between submission and CPUC review. SoCalGas worked quickly and effectively to incorporate detailed baseline differences that were climate zone specific to ensure the permutations and measure package narrative aligned. These scenarios exceeded minimum expectations.

## 5. PA's Responsiveness

In 2023, SoCalGas received a Measure Package disposition score of 7.26 out of 12.5 for Metric 5 (PA's Responsiveness) prior to the addition of any enhancement points.

CPUC staff and consultants have regularly and productively engaged with SoCalGas and continue to rely on them to provide answers for the gas measure packages. SoCalGas received high marks on several electric-saving food service measure packages that SoCalGas developed to support their implementer. This type of effort and program improvement approach is appreciated and noted. SoCalGas continues to show responsiveness and initiative when developing new measures, adding measure tiers, and updating measures with new study data. In addition, SoCalGas has continued to support the Food Service program by spending resources to support Food Service implementers in the development of new Measure Packages.

SoCalGas was responsive in their DEER2024 measure package revisions and new measure package development across the measure package process. There were no measure packages that received scores below expectations.

## IV. The Scoring Methodology

The 2023 performance score was developed using five detailed scoring metrics for each directly reviewed work product (i.e., Measure Package and custom project), as well as a scoring of the utility's internal due diligence processes, QA/QC procedures and methods, as well as program implementation enhancements to support improved forecasted values.

[Attachment A](#) summarizes the Metrics adopted in D.16-08-019 as well as the CPUC staff developed scores and points for 2023. D.16-08-019 also directed that the custom and Measure Package scores be weighted together into a final score based on the IOU total claims for custom and deemed activities, respectively.

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

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

As with the 2022 performance scores, the final scores were "built-up" from a metric-by-metric assessment of each reviewed work product. It is CPUC staff's expectation that this detailed scoring approach, along with the detailed qualitative Measure Package and custom project level feedback, is consistent with the direction provided in D.13-09-023. We believe this scoring approach provides

specific guidance to the utilities on how to improve their due diligence review and scores moving forward.

A “Direct Work Product Review” portion of each metric score was developed based upon the individual scoring of dispositions issued for custom project or Measure Packages. Each reviewed utility work product was first determined to have components either applicable or not applicable to a metric.<sup>13</sup> If a metric was determined to be not applicable to a given disposition, the metric was identified as not applicable (“N/A”) and the metric was assigned a score equal to the average 1 to 5 score from the remaining applicable metrics. Assigning this average score to any “N/A” metrics essentially normalized the final score so that a disposition neither benefitted nor was penalized because of a non-applicable metric.

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

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

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

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

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

- Metric 1 Timeliness: The Measure Package submission schedule was designed to distribute the Measure Packages throughout the year. Measure Packages receive “+” if schedule was followed.
- Metric 2 Content: Straightforward Measure Package received a “Yes”, complex revisions received a “+”, unless there were errors in the content, which warranted a “-”.
- Metric 3 Collaboration: Straightforward consolidation effort Measure Package received a “Yes”, initiative to work with other PAs and CPUC receives “+”.
- Metric 4 Quality Assurance: Measure Packages that were complete, consistent, and without meaningful errors received a “Yes”. Those Measure Packages with inconsistencies between

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<sup>13</sup> An example is the No Savings procedural measure package, which does not include any savings, costs, or permutations and therefore would not receive scoring for Metric 2 (“Content, Completeness, and Quality of Submittal”). Another example would be a minor Measure Package which may not require proactive collaboration with CPUC staff and therefore not receive a score for Metric 3 (“Proactive Initiation of Collaboration”).

the data tables and narrative or where values were left undefined received a “-”.

- Metric 5 Process: Measure Package responsiveness to program needs received a “Yes” for straightforward and “+” for complex Measure Package submissions.

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

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

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

## **C. Custom Metric 2 Scoring Methodology**

This metric is related to content and completeness of submittals and a maximum of 15 points is allocated to this metric. Scoring occurs on each custom project during the individual project review stage. On a percentage basis Metric 2 is the single greatest determinant of the overall EAR score. Scoring for Metric 2 is achieved through numerous areas throughout the custom project review workbook. PA’s begin with a full score of 5 for each custom project in the review workbook with each noted deficiency reducing the points accordingly. The scores from all custom projects are then averaged together to arrive at an average disposition score for Metric 2.

## **D. Custom Metric 3, 4 and 5 Scoring Methodology**

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

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

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

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

## **E. Score Enhancement Methodology**

The above process resulted in custom project and Measure Package work product review scores. Next, utility-specific “Review Process Score Enhancements” were developed for each applicable metric based on observed policy and technical reviews or program implementation processes/procedures developed and implemented in 2023 to positively impact future project reviews. CPUC staff believes it is important to provide EAR “Enhancement” points for positive due diligence developments to recognize the effort and to provide additional encouragement even before a change in project-level results is observed.

In the custom scoring process, CPUC staff decided that SoCalGas’ efforts did not rise to the level to be awarded “Enhancement” points. However, CPUC acknowledges that SoCalGas has made overall improvements to their portfolio as is reflected in their base scores.

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: SCG has taken control of the all-IOU monthly ex-ante coordination call as of December 2023.
- Metric 4: QA/QC: SCG has continued to lead new Food Service Measure Packages as the Food Service lead.
- Metric 5: Process improvements: SCG has led the process improvement of updating Measure Packages with embedded water energy savings in the eTRM.

To produce the final Measure Package scores, the metric scores for the two Measure Package contributing areas were added together, using a 50 percent weight for the process issues score. The 50 percent weight given to the process review has the effect of being a “score enhancement” or increase to the direct review score. Furthermore, within each contributing area (direct and process review areas), CPUC staff also assigned weights for individual items to reflect greater importance of different individual review items. The separate process scoring provides an avenue for assessing overall QA/QC processes and procedures put into place by SoCalGas.<sup>14</sup>

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<sup>14</sup> The guidance on scoring approach provided in D.13-09-023, at 74, provides that when only a small number of

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

Questions or comments about the feedback or final scores should be directed to Lisa Paulo ([lisa.paulo@cpuc.ca.gov](mailto:lisa.paulo@cpuc.ca.gov)) or Peter Biermayer ([peter.biermayer@cpuc.ca.gov](mailto:peter.biermayer@cpuc.ca.gov)). Note that pursuant to D.13-09-023, CPUC staff will schedule a meeting with SoCalGas staff to discuss this memorandum and its final scores by April 30, 2024.

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

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

Metric		Measure Packages				Custom			
		Max Points	Max Percent of Total Points	2023 Score	2023 Points	Max Points	Max Percent of Total Points	2023 Score	2023 Points
<b>1</b>	<b>Timing and Timeliness of Submittals</b>	<b>5</b>	<b>10%</b>	<b>3.37</b>	<b>3.37</b>	<b>5</b>	<b>10%</b>	<b>5.00</b>	<b>5.00</b>
	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.								
<b>2</b>	<b>Content, Completeness, and Quality of Submittals</b>	<b>15</b>	<b>30%</b>	<b>2.50</b>	<b>7.50</b>	<b>15</b>	<b>30%</b>	<b>4.24</b>	<b>12.71</b>
	Completeness, appropriateness, comprehensiveness, accuracy, and clarity of submittals. Submittal adherence to CPUC policies, Decisions, and prior CPUC staff dispositions and/or guidance. Do the submittals include all materials required to support the submittal proposed values, methods and results. Is the project or measure clearly articulated. Are proposed or utilized methods clearly explained including step-by-step method or procedure descriptions. Will the proposed or utilized approach provide accurate results. Are all relevant related or past activities and submittals appropriately noted or disclosed, analyzed or discussed. Are the pros/cons of alternate possible approaches or conclusions discussed to support that the chosen one is most appropriate.								
<b>3</b>	<b>Proactive Initiative of Collaboration</b>	<b>5</b>	<b>10%</b>	<b>2.97</b>	<b>2.97</b>	<b>5</b>	<b>10%</b>	<b>3.60</b>	<b>3.60</b>
	PA efforts to bring either measures, projects, studies, questions, and/or savings calculation methods and tools to CPUC staff for discussion in the early formative stages, before CPUC staff review selection. In the case of tools, before widespread use in the programs. CPUC staff expects collaboration among the PAs to develop common or coordinated submissions and for the PAs to undertake joint or coordinated planning activities and study work. The PAs are expected to engage with CPUC staff in early discussions on unique or high profile, high impact measures or projects before program or customer commitments are made. The PAs are expected to engage with CPUC staff on planning and execution of studies that support proposed offerings, tools, or determination of proposed baselines or other programmatic assumption that can impact ex ante values to be utilized.								
<b>4</b>	<b>Program Administrator's Due Diligence and Quality Assurance/Quality Control Effectiveness</b>	<b>12.5</b>	<b>25%</b>	<b>2.84</b>	<b>7.09</b>	<b>12.5</b>	<b>25%</b>	<b>4.43</b>	<b>11.07</b>



Metric	Measure Packages				Custom			
	Max Points	Max Percent of Total Points	2023 Score	2023 Points	Max Points	Max Percent of Total Points	2023 Score	2023 Points
CPUC staff expects the PA to have effective Quality Control (QC) and Quality Assurance (QA) processes for their programs and measures. The PAs are expected to have a pro-active approach to reviewing existing measure and project assumptions, methods and values and updating those to take into account changes in market offerings, standard practice, updates to DEER methods and assumptions, changes to codes, standards and regulations, and other factors that warrant such updates. The depth and correctness of the PA's technical review of their ex-ante parameters and values, for both Core, Local Government and Third-Party programs, are included under this metric. The depth and correctness of the PA's technical review of their own staff and subcontractor work related to supporting deemed and custom measure and project submissions are included in this metric. Evidence of review activities is expected to be visible in submissions so that CPUC staff can evaluate the effectiveness of the PA internal QA/QC processes.								
<b>5 Program Administrator's Responsiveness to Needs for Process and Program Improvements</b>	<b>12.5</b>	<b>25%</b>	<b>2.91</b>	<b>7.26</b>	<b>12.5</b>	<b>25%</b>	<b>3.50</b>	<b>8.75</b>
This metric reflects the PAs ongoing efforts to improve their internal processes and procedures resulting in increased ex post evaluated gross and net savings impacts. CPUC staff looks not only to the PA's internal QC/QA processes, but also whether individual programs and their supporting activities incorporate and comply with CPUC policies and prior CPUC staff disposition guidance in their program rules, policies, procedures and reporting. This includes changes to program rules, offerings and internal operations and processes required to improve overall review and evaluation results.								
<b>Total</b>	<b>50</b>	<b>100%</b>		<b>28.19</b>	<b>50</b>	<b>100%</b>		<b>41.13</b>

## Attachment B: Custom Project Scores and Feedback

The table below lists the identification numbers associated with each disposition. All custom projects were scored using new metrics adopted in 2016. The metrics are shown in the Table below.

*Table 4 2016 Adopted Performance Metrics*

<b>Metric</b>	<b>2016 CPUC Adopted Performance Metrics</b>	<b>Maximum Points</b>	<b>% of Total Points</b>
<b>Metric 1</b>	<b>Timeliness and Timing of Submittals</b> Timely submittal of all documentation and follow-up utility responses to review disposition action items.	<b>5.0</b>	<b>10%</b>
<b>Metric 2</b>	<b>Content, Completeness, and Quality of Submittals</b> Completeness, appropriateness, comprehensiveness, accuracy, and clarity of submitted documentation. In addition, this metric is an assessment of the utility's adherence to CPUC policies, Decisions, and prior CPUC staff disposition guidance.	<b>15.0</b>	<b>30%</b>
<b>Metric 3</b>	<b>Proactive Initiation of Collaboration</b> Utility's efforts to bring either measures, questions, and/or savings calculation tools to CPUC staff for discussion in the early formative stages, before CPUC staff review selection. In the case of tools, before widespread use in the programs. CPUC staff expects collaboration among the utilities and for the program administrators to engage with CPUC staff in early discussions on high profile, high impact measures well before customer commitments are made.	<b>5.0</b>	<b>10%</b>
<b>Metric 4</b>	<b>Utility Due Diligence and QA/QC Effectiveness</b> CPUC staff expects the utility to have effective Quality Control (QC) and Quality Assurance (QA) processes for its programs and measures. The depth and correctness of the utility's technical review of its ex ante parameters and values, for both Core and Third Party programs, are included under this metric.	<b>12.5</b>	<b>25%</b>
<b>Metric 5</b>	<b>Utility Responsiveness to Needs for Process &amp; Program Improvements (Course Corrections)</b> This metric reflects the utility's efforts to improve, operationalize, and improve its internal processes 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.	<b>12.5</b>	<b>25%</b>

Metric	2016 CPUC Adopted ex ante Metrics	Maximum Points	% of TOTAL POINTS	TOTAL SCORED POINTS	# of Scored Dispositions	Scoring Notes (Portfolio Level)
Metric 1	<b>Timeliness and Timing of Submittals</b> Timely submittal of all documentation and follow-up utility responses to review disposition action items.	5	10%	5.00	7	In general, SoCalGas complied with SB1131 guidelines for submitting documentation before the 15 business days required. Of the 7 projects with dispositions in 2023, all 7 of these custom projects were submitted on time with five projects (71 percent) submitted prior to the 15 business days.
Metric 2	<b>Content, Completeness and Quality of Submittals</b> Completeness, appropriateness, comprehensiveness, accuracy, and clarity of submitted documentation. In addition, this metric is an assessment of the utility's adherence to CPUC policies, Decisions, and prior CPUC staff disposition guidance.	15	30%	12.71	7	Out of the 7 projects submitted and selected for review, 4 projects had deficiencies for a total of 8 deficiencies. The more significant deficiencies were around the analysis assumptions and calculation methods, and not demonstrating program influence. These deficiencies resulted in the loss of points under this metric.
Metric 3	<b>Proactive Initiation of Collaboration</b> Utility's efforts to bring either measures, questions, and/or savings calculation tools to CPUC staff for discussion in the early formative stages, before CPUC staff review selection. In the case of tools, before widespread use in the programs. CPUC staff expects collaboration among the utilities and for the program administrators to engage with CPUC staff in early discussions on high profile, high impact measures well before customer commitments are made.	5	10%	3.60	7	CPUC found that SoCalGas made some effort to bring measures, projects, or studies forward for discussion during the bi-weekly meetings. However, SoCalGas did not submit any Early Opinions. CPUC staff noted a slight increase in custom project activity in the second half of 2023, with two of those being larger projects. SoCalGas was active in statewide meetings and CalTF meetings and worked closely as advisors for the boiler custom measure package.
Metric 4	<b>Utility Due Diligence and QA/QC Effectiveness</b> CPUC staff expects the utility to have effective Quality Control (QC) and Quality Assurance (QA) processes for its programs and measures. The depth and correctness of the utility's technical review of its ex-ante parameters and values, for	12.5	25%	11.07	7	Commission staff weighted the number of dispositions proceeding without exception against those that required resubmissions or resulted in rejections. Of the 7 projects receiving dispositions, 2 projects proceeded without exception (29 percent), 3 projects (43 percent) were allowed to proceed with exceptions noted, and 2 projects (29 percent) were advisory only. CPUC staff determined SoCalGas has a significant

Metric	2016 CPUC Adopted ex ante Metrics	Maximum Points	% of TOTAL POINTS	TOTAL SCORED POINTS	# of Scored Dispositions	Scoring Notes (Portfolio Level)
	both Core and Third Party programs, are included under this metric.					improvement in performance for this metric as it pertains to effective QC of projects prior to submitting for review.
Metric 5	<p><b>Utility Responsiveness to Needs for Process &amp; Program Improvements (Course Corrections)</b>                      This metric reflects the utility's efforts to improve, operationalize, and improve its internal processes that are responsible for the creation and assignment of ex ante parameters and values. CPUC staff looks not only to the utility's internal QC/QA process, but also whether individual programs incorporate and comply with CPUC policies and prior CPUC staff disposition guidance in its program rules, policies, and procedures.</p>	12.5	25%	8.75	7	SoCalGas had four projects reviewed in the first half of the year and three projects reviewed for the second half of the year. For projects reviewed from Jan 2023 through December 2023, Commission Staff noted a number of issues related to Gross Savings Impacts as well as Program Influence. Three of the projects reviewed (43 percent) were approved with noted deficiencies. As such, CPUC staff notes SoCalGas performance for this metric is not meeting minimum expectations.

## Attachment C: Measure Package Scores and Feedback

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

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

Measure Package Reviews - Scored Measure Packages 2023						EAR Metrics				
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5	
SWFS001	3	Convection Oven, Commercial	Mid-cycle measure package submission to include Energy Star v3.0 standard update. Clarifying comments on baseline specifications database for non-qualifying units, CEC database language, migration to an hours of use based calculation for energy savings, and minor building type and vintage permutation value clarifications. SCG collaborated with the review team to resolve additional comments on hours of cooking time, hours of use per day, and operating days per year assumptions. Measure package was updated in response to the call. Measure package was approved after comment response review.	1	yes	yes	+	yes	yes	

Measure Package Reviews - Scored Measure Packages 2023						EAR Metrics				
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5	
SWWH034	2	Solar Thermal Water Heating System, Commercial and Multifamily	Mid-cycle measure package submission to include new commercial offerings. Clarifying comments on base case efficiency value source, HW loads source and differences between DEER Water Heater Calculator, calibration approach, and confirming if recirculation is assumed. One of the main comments that required additional collaboration was the data collection requirement of orientation and slope. SCG was able to provide additional data that showed a narrow distribution to keep this as an optional data collection requirement. Measure package approved after comment response review.	1	no	yes	+	yes	yes	
SWFS024	1	Hot Food Holding Bins, Electric, Commercial	New measure package submission. Clarifying comments on building vintage permutation values, if the normalizing unit can accurately produce savings and costs values, units used for calculations and minor typos. Review team preferred an updated measure case percentile cutoff that resulted in updated measure case savings and cost values. Comments on operating days per year and hours per day. Values from Emerging Technology study were not from a robust source, so the measure package was updated from another source of data focused on food service measures and applications. Measure package approved after comment response review.	1	no	yes	yes	yes	+	
SWHC054	1	Heat Recovery Ventilation, Residential	New measure package submission. Clarifying comments on multifamily Title 24 prescriptive code marking multifamily as ineligible, eligibility section updates to exclude single family baseline where applicable based on single family Title 24 prescriptive requirements, clarifications on how heat pump prescriptive code requirements impact eligibility. Comment to update the NTG ratio. Minor typo in eligibility section that required updated permutation file to correctly align offerings to climate zones in the permutations. Measure package approved after comment response review.	1	no	yes	yes	+	yes	
SWFS026	1	Cooktop, Commercial	New measure package submission. Clarifying comments on narrative organization, typos, and rounding preferences. Clarifying comments on capacity assumptions, base case/measure case labels and application of a coincident demand factor for peak demand calculations. Incorrect operating days per year value used in initial submission. Value was updated after review in accordance with latest report. Measure package approved after comment response review.	1	no	yes	yes	yes	+	

Measure Package Reviews - Scored Measure Packages 2023						EAR Metrics				
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5	
SWFS003	3	Combination Oven, Commercial	Mid-cycle measure package update to incorporate Energy Star v3.0 standard change. Minor clarifying comments on significant figures and rounding and minor typo in calculations. Typo in base case and measure case specification file that included a measure case qualifying unit in the base case calculations. References updated for the reviewer to be able to reproduce savings calculations. Measure package approved after comment response review.	1	yes	-	+	yes	yes	
SWFS025	1	Radiant Conveyor Toaster, Commercial	New measure package submission. Clarifying comments on building location permutation values, more detailed field study results, prevalence of manual setback operation. Incorrect operating days per year value used in submittal. Assumptions updated after secondary review of data. Measure package approved after comment response review.	1	no	-	yes	yes	+	
SWFS027	1	Soup Well, Electric, Commercial	New measure package submission. Clarifying comments on QPI details like the exclusion of rethermalizers, induction unit baseline specifications, and field data and study references. Incorrect operated days per year value that needed correction. Clarifying comment on the base case normalization units and a minor comment on the MP title. Measure package was approved after comment response review.	1	no	yes	yes	yes	+	
SWFS029	1	Rotisserie, Gas, Commercial	New measure package submission. Clarifying comments on building location and building type permutation values and future requirements like preheat energy and idle rates. Material cost data and methodology did not align with measure package text. One final clarifying comment on the data collection requirements. Measure package approved after comment response review.	1	no	yes	yes	yes	+	
SWHC057	1	Space Heating Gas Absorption Heat Pump, Multifamily	New measure package submission. Clarifying comments on references, data collection requirements, DEER versions, and minor typos. Other comments on peak sizing methodology and differences between space heating and water heating, updating the code language section to explain the transition of standard efficiency level, and COP/efficiency values in the calculations. Measure package approved after comment review.	1	no	-	yes	yes	yes	
SWHC001	4	Wall Furnace, Residential	Mid-cycle measure package submission to include new thermoelectric generator offering. Clarifying comments on carbon dioxide emissions, base case description for new offering, and NTG ratio distinction between existing offerings and the new offering. Measure package approved after comment responses.	1	no	yes	yes	yes	yes	

Measure Package Reviews - Scored Measure Packages 2023						EAR Metrics				
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5	
SWHC058	1	Patio Heater, Gas, Commercial and Residential	New measure package submission. Clarifying comments to follow up on the test data and assumption data sources that impact savings. Minor comment on permutation building type rules. Measure package approved after more detailed information from lab test data and its impact on the measure case and base case threshold was shared for review.	1	no	yes	yes	yes	yes	
SWFS028	1	Steam Table, Electric, Commercial	New measure package submission. Clarifying comments to follow up from the measure package plan on lab test data and assumption data sources that impact savings. Minor comment on permutation building type rules. Collaborative meeting on August 28, 2023, to discuss more details on the lab test data. Calculations did not specify number of wells and provide enough information to determine if the units tested for the calculations were representative of the base case and measure case manufacturers and models. Measure package approved after more detailed information from lab test data was shared for review.	1	no	-	+	yes	+	
SWHC004	6	Space Heating Boiler, Commercial & Multifamily	MP update for DEER2024. Minor clarifying comment on building type differences between downstream and upstream delivery types. Measure package approved.	1	+	yes	yes	yes	yes	
SWHC011	3	Furnace, Commercial	MP update for DEER2024. Minor clarifying comment on building type differences between downstream and upstream delivery types. Measure package approved.	1	+	yes	yes	yes	yes	
SWFS012	2	Exhaust Hood Demand Controlled Ventilation, Commercial	MP mid-cycle update to clarify Title 24 requirements and measure costs. SME review complete without comment. Measure package update was well documented. Measure package approved without comment.	1	yes	+	yes	yes	yes	
SWAP005	3	Ozone Laundry, Commercial	MP update for DEER2024. Minor clarifying comment on building vintage permutation values. Measure package approved.	1	+	yes	yes	yes	yes	
SWAP012	2	Gas Dryer Modulating Valve, Commercial and Multifamily	MP update for DEER2024. Minor clarifying comments on EUL language in measure package and building vintage permutation values. Measure package approved.	1	+	yes	yes	yes	yes	
SWPR003	2	Steam Trap, Commercial	MP update for DEER2024. Clarifying comments on use of 'Com' vs commercial-specific building types and removal of sentence specific to SWPR003-01. Measure package approved.	1	+	yes	yes	yes	yes	



Measure Package Reviews - Scored Measure Packages 2023							EAR Metrics				
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5		
SWBE001	4	Greenhouse Heat Curtain	MP update for DEER2024. Clarifying comments on the data collection requirements from Resolution E-5152 and updating the NTG version to DEER2023 instead of DEER2019. In response to this measure package, the DEER database was updated to clarify applicable delivery types to measure-specific NTG ID. Measure package approved.	1	+	yes	yes	yes	yes		
SWBE002	4	Greenhouse Infrared Film	MP update for DEER2024. Clarifying comments on the data collection requirements from Resolution E-5152, building vintage permutation applications, and updating the NTG version to DEER2023 instead of DEER2019. In response to this measure package, the DEER database was updated to clarify applicable delivery types to measure-specific NTG ID. Measure package approved.	1	+	yes	yes	yes	yes		
SWRE001	3	Pool Cover, Commercial	MP update for DEER2024. Two clarifying comments on building vintage applications and the source reference for EUL/RUL policy for AOE measure application types. Measure package approved.	1	yes	yes	yes	yes	yes		
SWFS002	4	Door-Type Dishwasher, Commercial	MP update for DEER2024. One minor clarifying comment on building vintage applications. Measure package approved.	1	yes	yes	yes	yes	yes		
SWFS004	2	Griddle, Commercial	MP update for DEER2024. One minor clarifying comment on building vintage applications. Measure package approved.	1	yes	yes	yes	yes	yes		
SWFS005	4	Steamer, Commercial	MP update for DEER2024. One minor clarifying comment on building vintage applications. Measure package approved.	1	yes	yes	yes	yes	yes		
SWFS008	2	Conveyor Oven, Gas, Commercial	MP update for DEER2024. One minor clarifying comment on building vintage applications. Measure package approved.	1	yes	yes	yes	yes	yes		
SWFS011	6	Fryer, Commercial	MP update for DEER2024. One minor clarifying comment on building vintage applications. Measure package approved.	1	yes	yes	yes	yes	yes		
SWFS013	3	Low-Flow Pre-Rinse Spray Valve	MP update for DEER2024. One minor clarifying comment on building vintage applications. Measure package approved.	1	yes	yes	yes	yes	yes		
SWFS017	3	Automatic Conveyor Broiler, Commercial	MP update for DEER2024. One minor clarifying comment on building vintage applications. Measure package approved.	1	yes	yes	yes	yes	yes		
SWFS018	5	Undercounter Dishwasher, Commercial	MP update for DEER2024. One minor clarifying comment on building vintage applications. Measure package approved.	1	yes	yes	yes	yes	yes		
SWFS019	3	Underfired Broiler, Commercial	MP update for DEER2024. One minor clarifying comment on building vintage applications. Measure package approved.	1	yes	yes	yes	yes	yes		

Measure Package Reviews - Scored Measure Packages 2023						EAR Metrics				
MP ID	Rev	Title	Comments	Weight	1	2	3	4	5	
SWHC048	4	Packaged Air Conditioner Heat Recovery, Commercial	MP update for DEER2024. One minor clarifying comment on building vintage applications. Measure package approved.	1	yes	yes	yes	+	yes	
SWFS014	3	Rack Oven, Gas, Commercial	MP update for DEER2024. One minor clarifying comment on building vintage applications. Measure package approved.	1	yes	yes	yes	yes	yes	
SWFS003	4	Combination Oven, Commercial	MP update to revise costs to latest EnergyStar v3.0 data. One proactive comment to revise the NC and Ag/Inc sector permutations to comply with D.23-04-035 OP3. Measure package approved.	1	yes	+	+	+	yes	
SWHC047	4	Gas Fireplace, Residential	MP update for DEER2024. Minor clarifying comments on building vintage applicability, MAT tables, correcting the version of the Preponderance of Evidence guidance document, and safety considerations. Measure package approved.	1	yes	yes	yes	yes	yes	
SWBE006	3	Ceiling Insulation, Residential	MP update revised EUL to new DEER2024 EUL value per EUL study. Proactively identified update to NTG ratio based on 2011 DEER Update Study. No other comments. Measure package approved.	1	+	+	+	+	yes	
SWBE007	3	Wall Insulation, Residential	MP update revised EUL to new DEER2024 EUL value per EUL study. Proactively identified update to NTG ratio based on 2011 DEER Update Study. No other comments. Measure package approved.	1	+	+	+	+	yes	

## Measure Package Submission Status – All Measure Packages submitted in 2023

MP ID	Rev	Title	Submission Status: EAR Team Comments
SWFS001	3	Convection Oven, Commercial	Interim approval.
SWWH034	2	Solar Thermal Water Heating System, Commercial and Multifamily	Interim approval.
SWFS024	1	Hot Food Holding Bins, Electric, Commercial	Interim approval.
SWHC054	1	Heat Recovery Ventilation, Residential	Interim approval.
SWFS026	1	Cooktop, Commercial	Interim approval.
SWFS003	3	Combination Oven, Commercial	Interim approval.
SWFS025	1	Radiant Conveyor Toaster, Commercial	Interim approval.
SWFS027	1	Soup Well, Electric, Commercial	Interim approval.
SWFS029	1	Rotisserie, Gas, Commercial	Interim approval.
SWHC057	1	Space Heating Gas Absorption Heat Pump, Multifamily	Interim approval.
SWHC001	4	Wall Furnace, Residential	Interim approval.
SWHC058	1	Patio Heater, Gas, Commercial and Residential	Interim approval.
SWFS028	1	Steam Table, Electric, Commercial	Interim approval.
SWHC004	6	Space Heating Boiler, Commercial & Multifamily	Interim approval.
SWHC011	3	Furnace, Commercial	Interim approval.
SWFS012	2	Exhaust Hood Demand Controlled Ventilation, Commercial	Interim approval.
SWAP005	3	Ozone Laundry, Commercial	Interim approval.
SWAP012	2	Gas Dryer Modulating Valve, Commercial and Multifamily	Interim approval.
SWPR003	2	Steam Trap, Commercial	Interim approval.
SWBE001	4	Greenhouse Heat Curtain	Interim approval.
SWBE002	4	Greenhouse Infrared Film	Interim approval.
SWRE001	3	Pool Cover, Commercial	Interim approval.
SWFS002	4	Door-Type Dishwasher, Commercial	Interim approval.
SWFS004	2	Griddle, Commercial	Interim approval.
SWFS005	4	Steamer, Commercial	Interim approval.
SWFS008	2	Conveyor Oven, Gas, Commercial	Interim approval.
SWFS011	6	Fryer, Commercial	Interim approval.

## Measure Package Submission Status – All Measure Packages submitted in 2023

MP ID	Rev	Title	Submission Status: EAR Team Comments
SWFS013	3	Low-Flow Pre-Rinse Spray Valve	Interim approval.
SWFS017	3	Automatic Conveyor Broiler, Commercial	Interim approval.
SWFS018	5	Undercounter Dishwasher, Commercial	Interim approval.
SWFS019	3	Underfired Broiler, Commercial	Interim approval.
SWHC048	4	Packaged Air Conditioner Heat Recovery, Commercial	Interim approval.
SWFS014	3	Rack Oven, Gas, Commercial	Interim approval.
SWFS003	4	Combination Oven, Commercial	Interim approval.
SWHC047	4	Gas Fireplace, Residential	Interim approval.
SWBE006	3	Ceiling Insulation, Residential	Interim approval.
SWBE007	3	Wall Insulation, Residential	Interim approval.
SWFS024	2	Hot Food Holding Bins, Commercial	Detailed review in progress.
SWFS025	2	Radiant Conveyor Toaster, Commercial	Detailed review in progress.
SWFS026	2	Cooktop, Commercial	Detailed review in progress.
SWWH002	4	Low-Flow Showerhead, Residential	Detailed review in progress.
SWWH003	3	TSV with and without an Integrated Low-Flow Showerhead, Residential	Detailed review in progress.
SWWH020	5	Low-Flow Showerhead, Commercial	Detailed review in progress.
SWWH001	4	Faucet Aerator, Residential	Detailed review in progress.
SWWH026	3	Water Heater Pipe Wrap, Residential	Detailed review in progress.
SWWH017	5	Hot Water Pipe Insulation, Nonresidential & Multifamily	Detailed review in progress.
SWWH019	5	Faucet Aerator, Commercial	Detailed review in progress.
SWWH035	1	Gas Water Heater Controller, Residential	Measure package plan review in progress.
SWSV015	1	Weather Sealing, Residential	Measure package plan review in progress.

Process Adder	EAR Metrics					
	Weight	1	2	3	4	5
SCG continued to work collaboratively with stakeholders and support food service implementers for new measure packages even at the request of electric measure offerings. These measure packages began development in 2022 but received review and approval in 2023.	1	No	No	No	+	No
SCG continued to work collaboratively with the CPUC to ensure the embedded energy savings of water values from measure packages are correctly applied in the eTRM and align with the CET fields. Measure package updates were approved in Q2 of 2023 to align the measure package permutation values with the new water savings fields in the CET.	1	No	No	No	No	+
SCG has taken control of the all-IOU monthly ex-ante coordination call as of December 2023. SCG will continue to lead these calls in 2024.	1	No	No	Yes	No	No

## Attachment D: 2023 Performance Annual Ratings

### Custom Scoring

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

2022 Annual Custom Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	
Direct Work Product Review Score	Disposition Score (1-5)	4.17	3.25	2.40	3.60	2.13	
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)	4.17	3.25	2.40	3.60	2.13	Total Points
	Adjusted Metric Points	4.17	9.75	2.40	9.00	5.31	30.63

## Measure Package Scoring

2023 Annual Measure Package Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	
Direct Workproduct Review Score	SCG "-"	0%	11%	0%	0%	0%	
	SCG "+"	35%	11%	19%	14%	16%	
	SCG "Yes"	65%	78%	81%	86%	84%	
	Dispositions Score %	67%	50%	59%	57%	58%	
	Dispositions Score	3.37	2.50	2.97	2.84	2.91	
Review Process Score Enhancements	SCG "-"			0%	0%	0%	
	SCG "+"			0%	100%	100%	
	SCG "Yes"			100%	0%	0%	
	Process Score %	0%	0%	50%	100%	100%	
	Process Increase Score	0.00	0.00	2.50	5.00	5.00	
	Process Increase Weight	0.50	0.50	0.50	0.50	0.50	
	Process Increase Wtd Score	0.00	0.00	1.25	2.50	2.50	
Total Score	Final Metric Score (1-5)	3.37	2.50	4.22	5.00	5.00	Total Points
	Metric Points with Weighting	3.37	7.50	4.22	12.50	12.50	40.09

2022 Annual Measure Package Ratings		Metric 1	Metric 2	Metric 3	Metric 4	Metric 5	
Direct Workproduct Review Score	SCG "-"	0%	5%	0%	0%	0%	
	SCG "+"	20%	20%	20%	16%	6%	
	SCG "Yes"	80%	75%	80%	84%	94%	
	Dispositions Score %	60%	57%	60%	58%	53%	
	Dispositions Score	2.99	2.84	2.99	2.89	2.65	
Review Process Score Enhancements	SCG "-"			0%	0%	0%	
	SCG "+"			0%	100%	100%	
	SCG "Yes"			0%	0%	0%	
	Process Score %	0%	0%	0%	100%	100%	
	Process Increase Score	0.00	0.00	0.00	5.00	5.00	
	Process Increase Weight	0.50	0.50	0.50	0.50	0.50	
	Process Increase Wtd Score	0.00	0.00	0.00	2.50	2.50	
Total Score	Final Metric Score (1-5)	2.99	2.84	2.99	5.00	5.00	Total Points
	Metric Points with Weighting	2.99	8.53	2.99	12.50	12.50	39.51

### Explanations of scoring tables row entries

1. The row labeled with *IOU* "-" lists the percent of Measure Package reviews undertaken where the CPUC staff evaluation of the materials or information indicated that the IOU performance in this metric for the submission did not meet minimum expectations or requirements relative to the metric.
2. The row labeled with *IOU* "+" lists the percent of Measure Package reviews undertaken where the CPUC staff evaluation of the materials or information indicated that the IOU performance in this metric for the submission exceeded minimum expectations or requirements relative to the metric.
3. The rows labeled with *IOU* "Yes" lists the percent of Measure Package reviews undertaken where the CPUC staff evaluation of the materials or information indicated that the IOU performance in this metric for the submission exceeded met minimum expectations or requirements relative to the metric.
4. The "Dispositions Score %" row (and "Process Increase Score" for Measure Packages) indicates how the combination of the three rows of scores (+, -, and yes) sum into a total points multiplier for each metric. Each row contributes to the total based on the row count over the total count for all three rows.
5. The "Disposition Score" (and "Process Increase Score" for Measure Packages) row converts the percent score into a numeric value of up to five by directly applying the percent to a value of 5.
6. The custom row labeled with "*Technical & Policy QC Increase*" lists CPUC staff points added to the metric based on an evaluation of the overall IOU performance in putting into place quality assurance and/or quality control methods, documents and/or training for staff and contractors related to this metric area that are expected to improve the ability of review personnel to identify



and cure issues going forward on projects started during 2016 but not yet seen in the custom review activity.

7. The custom row labeled with “*Implementation Increase*” lists CPUC staff points added to the metric based on an evaluation of the overall IOU performance in putting into place new or changed program rules, eligibility criteria, incentive structures, application and implementation contract processes and procedures in 2016 related to this metric area that are expected to improve performance going forward on projects started but not yet seen in the custom review activity.
8. The Measure Package rows labeled with “*Review Process Score Enhancements*” lists CPUC staff scoring for each metric based on an evaluation of the overall IOU performance in putting into place quality assurance and/or quality control methods, documents and/or training for staff and contractors that are expected to improve the ability of review personnel to identify and cure issues going forward on Measure Packages. This score is weighted as an increase to the disposition score based on the fractional weight listed in the “Process Increase Weight” row.
9. The “Final Metric Score” row indicates the total score for each metric as a sum of the Direct Work product Review Score plus the Review Process Score Enhancements (either as a simple sum for custom or a weighted value sum for Measure Packages) to provide a final metric score with the final score constrained between a maximum score of 5 and a minimum score of 1.
10. The “Metric Points” row provides the point value derived from the Final Metric Score row. If the maximum point value associated with a metric is greater than 5 then the score is multiplied by the max point value divided by 5 to obtain the metric point value related to the final score.