

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 10, 2010

Advice Letter 4114

Rasha Prince, Director
Regulatory Affairs
Southern California Gas
555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011

**Subject: 2010-2012 Energy Efficiency Program Performance Metrics
for Statewide Programs and Associated Sub Programs and
Other Required Program Documentation**

Dear Ms. Prince:

Advice Letter 4114 is effective December 2, 2010.

Sincerely,

A handwritten signature in blue ink that reads "Julie A. Fitch".

Julie A. Fitch, Director
Energy Division

May 28, 2010

ADVICE 2476-E

(Southern California Edison Company ID U 338-E)

ADVICE 3120-G/3675-E

(Pacific Gas & Electric Company ID U 39-M)

ADVICE 4114

(Southern California Gas Company ID U 904-G)

ADVICE 2172-E/1951-G

(San Diego Gas & Electric Company ID U 902-M)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

**SUBJECT: 2010-2012 Energy Efficiency Program Performance Metrics
for Statewide Programs and Associated Sub-programs
and Other Required Program Documentation**

Consistent with Ordering Paragraph (OP) 11 of California Public Utilities Commission (Commission or CPUC) Decision (D.) 09-09-047, Southern California Edison Company (SCE), Pacific Gas & Electric Company (PG&E), Southern California Gas Company (SoCalGas), and San Diego Gas & Electric Company (SDG&E), (collectively referred to as the Investor Owned Utilities or "IOUs"), submit this joint advice filing to establish Program Performance Indicator Worksheets for each energy efficiency statewide program and associated sub-programs no later than May 28, 2010. In addition, this advice letter addresses subcategories "a-h" of OP 11 in Attachments A - H.

PURPOSE

This advice filing complies with the Commission's directive to submit the Joint IOUs' Program Performance Indicator Worksheets, as revised by Energy Division on March

15, 2010, for each energy efficiency statewide program and associated sub-programs, as well as additional program documentation requirements, 120 days from the effective date of D.09-09-047, originally falling on January 22, 2010. However, on January 19, 2010, the IOUs jointly requested, and were granted, a four-month extension to make this filing by the Commission's Executive Director due to the need for additional time to develop statewide program metrics that satisfy the Commission's directive, thereby establishing a new due date of May 21, 2010. Further, the IOUs requested an extension of one week to allow additional time for internal IOU review of the Program Performance Metrics (PPMs), establishing a final due date of May 28, 2010. These proposed performance metrics are in addition to the energy savings, demand reduction, and program expenditures metrics the IOUs are required to track and report.

BACKGROUND

Within D.09-09-047, the CPUC discusses the need for the IOUs to develop PPMs that are objective, quantitative indicators of the the statewide programs' and sub-programs' progress toward goals and objectives. Additionally, in OP 11, the decision directs the IOUs to file one joint advice letter encompassing proposed performance metrics for each statewide program (and associated sub-programs).

Through ongoing collaboration between the CPUC's Energy Division staff and the IOUs, the PPMs were developed with consideration toward tracking program effectiveness, administrative simplicity and cost effectiveness of tracking and reporting, as well as avoiding dependence on EM&V or market assessment studies. Additionally, the PPMs include metrics for all 12 statewide programs, with some PPMs specific to various sub-programs.¹

After the PPMs are approved, the IOUs will work with Energy Division to develop appropriate reporting templates and schedules as part of the broader discussion on the Commission's reporting requirements.

In D.09-09-047, the CPUC requires the Joint IOUs to establish Program Performance Indicator Worksheets for each energy efficiency statewide program and associated sub-program.² In compliance with this directive, this advice filing includes:

- Completed Program Performance Indicator Worksheets (Attachment A);

¹ "We have no objection to the application of one set of program metrics to several programs if the metrics are otherwise valid for each program," (D.09-09-047, p. 92)

² OP# 11, p. 367

- Updated program logic models as indicated in the Program Performance Indicator Worksheets (also Attachment A);
- A discussion to specifically address the extent to which each program and sub-program plan included an end game for each technology or practice that transforms building, purchasing, and use decisions to become either standard practice, or incorporated into minimum codes and standards (Attachment B);
- Program targets for the Sustainable Communities pilot programs for Southern California Edison Company, Southern California Gas Company, and San Diego Gas & Electric Company (Attachment C);
- Quantitative targets for the Sustainable Portfolios pilot program for Southern California Edison Company (Attachment D);
- A draft template that outlines how the Joint IOUs will develop, organize and transfer information on best practices to the statewide local government program coordinator (Attachment E);
- A description of the integrated program evaluation and management structures put in place to ensure linkages between subprograms to minimize lost opportunities for the Direct Install Commercial subprogram, (Attachment F);
- A description of an integrated internal management and evaluation structure that will ensure increased coordination and information sharing between the local and the statewide commercial programs, both within utility and between utilities for Southern California Gas Company and San Diego Gas & Electric Company (Attachment G); and
- The IOUs' Program Performance Metric Selection Process Flow and Narrative (Attachment H).

This advice filing will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

TIER DESIGNATION AND EFFECTIVE DATE

The Joint IOUs believe that this filing should be classified as Tier 1 pursuant to GO 96-B. Therefore, the Joint IOUs respectfully requests that this advice letter become effective June 28, 2010, which is 30 calendar days after the date filed.

PROTEST

Anyone may protest this advice letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impacts, and should be submitted expeditiously. The protest must be made in writing and received within 20 days of the date this advice letter was filed with the CPUC. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

Public Utilities Commission
CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of Honesto Gatchalian (inj@cpuc.ca.gov) and Maria Salinas (mas@cpuc.ca.gov) of the Energy Division. It is also requested that a copy of the protest also be sent via both e-mail and facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

Southern California Edison Company
Akbar Jazayeri
Vice President of Regulatory Operations
2244 Walnut Grove Avenue
Rosemead, California 91770
Facsimile: (626) 302-4829
E-mail: AdviceTariffManager@sce.com

Southern California Edison Company
Bruce Foster
Senior Vice President, Regulatory Affairs
c/o Karyn Gansecki
601 Van Ness Avenue, Suite 2040
San Francisco, California 94102
Facsimile: (415) 929-5540
E-mail: Karyn.Gansecki@sce.com

Pacific Gas and Electric Company
Attention: Jane Yura
Vice President, Regulatory Relation and Rates
77 Beale Street, Mail Code B10B

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ADVICE 4114
ADVICE 2172-E/1951-G

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May 28, 2010

P.O. Box 770000
San Francisco, California 94177
Facsimile: (415) 973-6520
E-Mail: PGETariffs@pge.com

Southern California Gas Company
Attn: Sid Newsom
Tariff Manager - GT14D6
555 West Fifth Street
Los Angeles, CA 90013-1011
Facsimile No. (213) 244-4957
E-mail: snewsom@Semprautilities.com

San Diego Gas & Electric Company
Attn: Megan Caulson
Regulatory Tariff Manager
8330 Century Park Court, Room 32C
San Diego, CA 92123-1548
Facsimile No. (858) 654-1788
E-mail: mcaulson@semprautilities.com

NOTICE

A copy of this filing has been served on the utilities and interested parties shown on the attached list, including interested parties to service list A.08-07-023, by either providing them a copy electronically or by mailing them a copy hereof, properly stamped and addressed.

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Akbar Jazayeri
Vice President of Regulatory Operations
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, California 91770
Facsimile: (626) 302-4829
E-mail: AdviceTariffManager@sce.com

ADVICE 2476-E
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ADVICE 4114
ADVICE 2172-E/1951-G

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May 28, 2010

Bruce Foster
Senior Vice President, Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2040
San Francisco, California 94102
Facsimile: (415) 929-5540
E-mail: Karyn.Gansecki@sce.com

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

In accordance with Section 4 of General Order No. (GO) 96-B, SCE is serving copies of this advice filing to the interested parties shown on the attached GO 96-B service list and A.08-07-021 et al. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-4039. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by filing and keeping the advice filing at SCE's corporate headquarters. To view other SCE advice letters filed with the Commission, log on to SCE's web site at <http://www.sce.com/AboutSCE/Regulatory/adviceletters>.

For questions, please contact Michelle Thomas at (626) 633-3478 or by electronic mail at Michelle.Thomas@sce.com.

Southern California Edison Company

Akbar Jazayeri

AJ:mt:jm

Enclosures

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: James Yee

Phone #: (626) 302-2509

E-mail: James.Yee@sce.com

E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
 PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2476-E

Tier Designation: 1

Subject of AL: 2010-2012 Energy Efficiency Program Performance Metrics for Statewide Programs and Associated Sub-programs and Other Required Program Documentation

Keywords (choose from CPUC listing): Compliance

AL filing type: Monthly Quarterly Annual One-Time Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

D.09-09-047

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: _____

Summarize differences between the AL and the prior withdrawn or rejected AL¹: _____

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement.

Name and contact information to request nondisclosure agreement/access to confidential information:

Resolution Required? Yes No

Requested effective date: 6/28/10 No. of tariff sheets: -0-

Estimated system annual revenue effect: (%): _____

Estimated system average rate effect (%): _____

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: None

Service affected and changes proposed¹: _____

Pending advice letters that revise the same tariff sheets: _____

¹ Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Ave.,
San Francisco, CA 94102
inj@cpuc.ca.gov and mas@cpuc.ca.gov

Akbar Jazayeri
Vice President of Regulatory Operations
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, California 91770
Facsimile: (626) 302-4829
E-mail: AdviceTariffManager@sce.com

Bruce Foster
Senior Vice President, Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2040
San Francisco, California 94102
Facsimile: (415) 929-5540
E-mail: Karyn.Gansecki@sce.com

JOINT IOUs 2010-2012 ENERGY EFFICIENCY PROGRAM PERFORMANCE METRICS ADVICE
LETTER FOR STATEWIDE PROGRAMS AND SUB-PROGRAMS AND OTHER REQUIRED
PROGRAM DOCUMENTATION

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Attachment A
Statewide Program Performance Metrics and
Program Logic Models Index
(Worksheets and logic models in separate attachment)

Pacific Gas and Electric, Southern California Edison,
Southern California Gas, and San Diego Gas and Electric

Attachment A Contents	
1.	Statewide Residential Program & Statewide Lighting Marketing Transformation, and Logic Models
2.	Statewide Commercial Program and Logic Models
3.	Statewide Industrial Program & Statewide Agricultural Program, and Logic Models
4.	Statewide New Construction and Logic Models
5.	Statewide HVAC and Logic Models
6.	Statewide Codes & Standards and Logic Models
7.	Statewide Emerging Technologies and Logic Models
8.	Statewide Workforce Education & Training and Logic Models
9.	Statewide Marketing Education & Outreach and Logic Models
10.	Statewide Integrated Demand Side Management and Logic Models

Attachment B
Discussion on Program and Sub-program End Game

The market transformation section of the program implementation plans (PIPs) did not analyze end games for each technology or practice that could potentially transform the market because the utility programs are not the sole influencing factor in the market transformation process. Rather, the IOUs indicated that California, for the most part, lacks the type of data needed to understand and analyze market transformation.

Accordingly, IOU programs are generally based on traditional market adoption cycles, and typically energy efficiency technologies transfer out of programs when they are no longer cost-effective from a program implementation perspective, when they are integrated into codes and standards or become industry standard. The IOUs will continue to work with the EM&V process to plan, perform, and analyze further studies to identify the end games for specific technologies or practices of specific interest or concern.

Attachment C
Sustainable Communities Program Targets

Southern California Edison	
Target/Metric 1	Number of master-planned communities intervened in and with documented improvement in the qualitative nature of urban form per the LEED for Neighborhood Development checklist.
Target/Metric 2	Number of master-planned communities intervened in and with documented improvement in DSM performance per Title 24.
Target/Metric 3	Number of master-planned and zero net energy projects offered technical assistance and financial incentives to developers.
Target/Metric 4	Number of tools developed or existing tools calibrated to refine assumptions about non-code usage such as plug load and occupant behavior.
Target/Metric 5	Number of zero net energy projects intervened in and with documented progress toward zero net energy.

Sustainable Communities targets were submitted in Supplement to Advice 2425-E, Southern California Edison Company's 2010-2012 Energy Efficiency Pilot Programs and subsequently approved on April 30, 2010.

Southern California Gas	
Target/Metric 1	80% of residential projects at least 35% better than Title 24 by 2012.
Target/Metric 2	20% of new residential construction to be zero net energy by 2012.
Target/Metric 3	75% of commercial square footage at least 20% better than Title 24 by 2012.

Sustainable Communities targets were submitted in Advice Letter 4065-A, and approved on April 20, 2010.

San Diego Gas & Electric	
Target/Metric 1	80% of residential projects at least 35% better than Title 24 by 2012.
Target/Metric 2	20% of new residential construction to be zero net energy by 2012.
Target/Metric 3	75% of commercial square footage at least 20% better than Title 24 by 2012.

Sustainable Communities targets were submitted in Advice Letter 2138-E-B/1920-G-B that would be effective May 21, 2010.

Attachment D
Sustainable Portfolios Quantitative Targets

Southern California Edison	
Target/Metric 1	Total number of square feet of buildings where owners, occupants, and appraisers have been presented with economic, comfort, and productivity cases.
Target/Metric 2	Proposal of business models and supplier infrastructure to deliver integrated and comprehensive “one stop” energy management solutions.

Sustainable Portfolios targets were submitted in Supplement to Advice 2425-E, Southern California Edison Company’s 2010-2012 Energy Efficiency Pilot Programs and subsequently approved on April 30, 2010.

Attachment E
Local Government Partnership Best Practices Information Transfer Template

Pacific Gas and Electric, Southern California Edison,
Southern California Gas, and San Diego Gas and Electric

Local Government Partnership Program Work and Progress

Partnership Program	Menu Item Addressed	Best Practice Identified	Accomplishment	Contact Person
Pacific Gas and Electric Partnership Programs				
<i>Example:</i> <i>Partnership Name</i>	<i>Example:</i> <i>1.1.1 – Adopt building energy codes more stringent than Title 24’s requirements</i>	<i>Example:</i> <i>Require new residential and commercial construction to exceed Title 24 energy efficiency standards to extent permitted by law.</i>	<i>Example:</i> <i>Architecture 2030 was passed by the city to exceed Title 24 2005 requirements by 10%.</i>	<i>Example:</i> <i>Jane Doe (555) 555-5555 Jane.doe@city.org</i>
Southern California Gas Partnership Programs				
Southern California Edison Partnership Programs				
San Diego Gas and Electric Partnership Programs				

Interview Questions:

The following questions may be used by the Statewide Coordinator to discuss the Best Practices with the contact outlined on the previous chart:

1. Please provide a summary of what you hope to accomplish with this activity (**goals, objectives**).
2. What are the major highlights of the policy/program?
3. Did you estimate the amount of energy that will be saved by this policy/program, and/or the amount of greenhouse gas that will be reduced / avoided?
4. What is the cost to the city/county to operate this program? How many FTE staff persons are needed? What are the sources of funding?
5. What are your next steps, if any?
6. Is this activity part of larger city/county plan for sustainability such as a climate action plan or energy plan?
7. Did you encounter any obstacles during your efforts to adopt/implement this policy or program? If yes, what were they and how did you overcome them?
8. Have you developed any resources or templates that we can share with other local governments?
9. Have you initiated or do you plan to initiate any energy policy, plan or project as a result of your interaction with Utility supported programs (e.g., SEEC or PG&E's Green Communities Program)?
10. Do you know of other cities/counties that have a similar policy/program?

Attachment F
Direct Install Program Linkages

Pacific Gas and Electric, Southern California Edison,
Southern California Gas, and San Diego Gas and Electric

In the Commercial Direct Install subprogram Program Implementation Plan (PIP), section 6b, “Program delivery and coordination,” discusses the management structures in place to ensure linkages between subprograms and to minimize lost opportunities. As noted in section 6b, such structures include:

- Requirement that direct install contractors provide customers with information on statewide programs and offerings such as deemed measure incentives, where applicable;
- Requirement that direct install contractors provide customers with information on statewide and local WE&T opportunities;
- Program interactions include close coordination with local governments and faith- and community-based organizations;
- Marketing of IDSM options other than energy efficiency measures;
- Marketing of non-IOU programs that promote IDSM options; and
- Work with Energy Division to develop a comprehensive EM&V plan

Attachment G
Integrated Internal Coordination – Local and Statewide Commercial Programs

San Diego Gas & Electric and Southern California Gas

The following response was provided by SDG&E in its January 22, 2010 Advice Letter 2138-E/1920-G Attachment C with an effective date of May 21, 2010. SoCalGas provided a similar response in its January 22, 2010 Advice Letter 4065-A Attachment C, and approved April 30, 2010.

SDG&E and SoCalGas' Customer Programs organization is responsible for the oversight and implementation of the Energy Efficiency (EE) Programs and Demand Response Programs (DRP, SDG&E-only). The department was reorganized in 2006 such that the EE and DR programs are managed as follows: with a Residential segment supervisor, a Commercial segment supervisor, an Industrial segment supervisor, all under the Residential/Commercial/Industrial/Agricultural Segment Manager (SoCalGas only); a New Construction segment Manager (SDG&E and SoCalGas—referred to as Dual-Utility function); Engineering Support Manager (Dual-Utility function); Codes & Standards Manager (Dual-Utility function); Partnership Manager (Dual-Utility function); Market Analysis (now Strategic Planning; Dual-Utility function); Policy & Support Manager (Dual-Utility function) and Emerging Technologies (ET) Manager (Dual-Utility function); SDG&E Residential Segment Manager (EE and DRP) and SDG&E Com/Ind/Ag Segment Manager (EE and DRP). These Managers, with the exception of the ET Manager¹ report to the Customer Programs Director, who is responsible for the administration and implementation of Energy Efficiency and Demand Response program portfolios at both

¹ The ET Manager reports administratively to an RD&D department but program management is under the oversight of the Customer Programs Director.

SoCalGas and SDG&E.

Moving forward into 2010, SoCalGas and SDG&E are enhancing their comprehensiveness and integration by restructuring how programs are designed and managed. In the past its programs were managed across the residential and non-residential markets uniformly. Beginning in 2010, the program management staff will consist of two primary groups—the segment advisors and the program advisors. The segment advisors will be responsible for segments rather than specific programs. The goal is for segment managers to be even more knowledgeable about the needs of customer segments (residential owners and renters; non-residential manufacturing, agricultural, hospitality, foodservice, institutional, etc) and increase market penetration through segment specific marketing and outreach and data gathering. This additional step of segmentation enhances the company's ability to design program and communications/outreach materials geared towards managing the customer's energy needs in a comprehensive manner rather than the traditional piecemeal of offering independent programs. This approach will encourage segment advisors to first understand a customer's energy needs and offer assistance consistent with the loading order of the Energy Action Plan. Consolidate potential studies information, EM&V study results and research will be part of the segment advisors' task. Employees will receive proper training and have opportunities to improve their jobs skills to effectively manage the market segments assigned to them. Program Advisors, on the other hand, will be focused on managing the administrative aspects of the program to ensure that the programs are implemented efficiently and within budget.

Another enhancement to the organization structure is the creation of a new position, the Manager of Program Operations. This Manager is responsible for day-to-day program

implementation for both SDG&E and SoCalGas' Residential, Commercial, Industrial, Agricultural, New Construction programs. In addition, the Engineering, Inspections, Processing and Information Center are under his oversight. This ensures that direct program support functions are coordinated with the program needs.

The EM&V section (Joint-Utility) is managed under the Policy and Support Manager. The EM&V section has always engaged program staff in the development of study needs (e.g., processes evaluations, work paper development and load impact studies) and the dissemination of study results. The EM&V section consolidates program staff feedback to draft evaluations, such as the 2006-2008 draft load impact studies, so that the responses are comprehensive and consistent.

Because all the Managers report to one Director for both SDG&E and SoCalGas, lessons learned and information sharing is a natural part of staff discussions and meetings. Managers, in turn, disseminate this information to their respective groups.

SDG&E is always represented in all Statewide Teams and therefore shares in the process of information sharing and dissemination. A good example is the sharing of natural gas measures and associated work papers that were developed by the Engineering team.

Attachment H
Program Performance Metrics Development Plan

Pacific Gas and Electric, Southern California Edison,
Southern California Gas, and San Diego Gas and Electric

The development of the Program Performance Metrics (PPMs) is the last stage of a three stage process. In the first stage, IOU program managers were asked to respond to recommendations from 1) 2006-2008 impact evaluation reports; 2) 2006-2008 process evaluation reports; and 3) 2006-2008 market assessments. In the second stage, the IOU program managers were asked to update their logic models if any of the recommendations they adopted would necessitate a change to their program(s).

The following are detailed explanations of the criteria used to develop the PPM Selection Process diagram below. These explanations are indexed to the rows of boxes in the diagram. The Program Performance Metric Selection Process was used by the IOU program managers to develop PPMs, drawing from, in most cases, the “Short-term Outcomes” depicted in the respective program logic models.

<p>A1) Jeanne Clinton provided guidance to the IOUs to reduce number of possible metrics by focusing on program outcomes, not activities or linkages (in the logic model)².</p> <p>A2) On February 25, 2010, ED and the IOUs agreed that PPMs for the Strategic Plan support activities should only focus on Short-Term Outcomes, because those outcomes were within the control of the utility.</p> <p>A3) On February 25, 2010, ED asked IOUs to consider PPMs that track the adoption of recommendations that arose from evaluation reports.</p>
<p>B) IOUs were directed by ED not to rely upon EM&V and market assessment studies to provide data for the PPMs. Because of this, and because program outcomes often could not be meaningfully tracked on an annual basis, program managers were directed to consider program outputs and activities as possible proximal indicators and PPM candidates.</p>

² Via email from C. Fogel on 4/20/10.

<p>C) Program managers were asked to identify the source of the PPM whenever possible.</p>
<p>D) Program managers were asked to consider the PPM criteria in Appendix 2 of the Decision, as broken down into the five elements in E.</p>
<p>E1) Is this PPM useful for program management?</p> <p>E2) Does the PPM seem to measure what it claims to measure, prima facie?</p> <p>E3) Remove overlapping PPMs and roll up metrics. The Decision allows the metrics for subprograms to be combined into one PPM for the program whenever reasonable. Also, per the IOUs' discussion with ED, the IOUs understood that if a PPM for a program outcome encompassed the end result of all the activities and outputs leading up to the outcome, then there was no need for PPMs on the interim steps³.</p> <p>E4) Did the IOUs have a data trail for each PPM?</p> <p>E5) Was the cost of collecting the data for the PPM cost-prohibitive?</p>
<p>F) Overall review of PPMs for balance and relevance</p>
<p>G) IOUs were directed by ED not to rely upon EM&V and market assessment studies to provide data for the PPMs.</p>
<p>H) Fill out the Excel spreadsheet provided by ED on March 15, 2010. This spreadsheet replaces all other deliverables required in the Decision.</p>
<p>I) Per the Decision's required process for determining PPMs, and per the March 15, 2010 spreadsheet, the program managers put forth objectives for the PPMs. Per the Decision, IOUs tried to propose SMART objectives. Any objectives that could not be defined according to SMART criteria were rejected, as were their associated PPMs.</p>

³ Per phone call between ED and the IOUs on 4/19/10.

J) The statewide regulatory teams and respective management made the final determination of the PPMs to be filed, focusing mainly on criteria in E and F.

Program Performance Metric (PPM) Selection Process
(See Performance Indicator Worksheet)

