STATE OF CALIFORNIA EDMUND G. BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

December 8, 2015 **Advice Letter: 4859-G**

Southern California Gas Company
Attention: Sid Newsom
555 West Fifth Street, GT14D6
Los Angeles, CA 90013-1011

SUBJECT: Energy Efficiency Final Incentive Award for Program Year 2013

Dear Mr. Newsom:

Advice Letter 4859-G is effective as of January 1, 2016, per Resolution G-3510 Ordering Paragraphs.

Sincerely,

Edward Randolph

Edward Randolph
Director, Energy Division

Ronald van der Leeden
Director
Regulatory Affairs

555 W. Fifth Street, GT14D6
Los Angeles, CA 90013-1011
Tel: 213.244.2009
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RvanderLeeden@semprautilities.com

September 15, 2015

Advice No. 4859
(U 904 G)

Public Utilities Commission of the State of California

Subject: Energy Efficiency Final Incentive Award for Program Year (PY) 2013

Southern California Gas Company (SoCalGas) hereby submits for approval by the California Public Utilities Commission (Commission) its PY 2013 Energy Efficiency (EE) Incentive Mechanism final award in the amount of $2,141,962. This filing is made in compliance with Decision (D.) 13-09-023, dated September 5, 2013 in Rulemaking (R.) 12-01-005.

Background

In D.13-09-023, the Commission adopted the Efficiency Savings and Performance Incentive (ESPI) mechanism for the 2013-2014 EE program cycle and beyond. The ESPI consists of the following components:

1. Non-Resource Program Management Fee

   For the implementation of non-resource programs, the Investor Owned Utilities (IOUs) will receive a management fee equal to three percent of non-resource program expenditures, exclusive of administrative costs. The IOUs will use actual expenditures for the respective award year, as verified in the Utility, Audit, Finance, and Compliance Branch (UAFCB) reports. The potential earnings for the Non-Resource Program Management Fee are capped at three percent of the authorized 2013-2014 non-resource program budgets and will be paid according to the schedule outlined below.

2. Codes & Standards (C&S) Program Management Fee

   For the implementation of the C&S Program, the IOUs will receive a management fee equal to 12 percent of C&S program expenditures, exclusive of administrative costs. The IOUs will use actual expenditures for the respective award year, as verified in the UAFCB reports. The potential earnings for the C&S Program Management Fee are capped at 12 percent of the authorized 2013-2014 C&S program budget and will be paid according to the schedule outlined below.

3. *Ex Ante* Review Process Performance Award

   The Energy Division will conduct an annual assessment of the IOUs conformance with the *ex ante* review requirements established by the Commission. The assessment will generate a score, using a scale of 1 to 100, which will be multiplied, as a percentage, by three percent of the resource program expenditures, exclusive of administrative costs. The IOUs will use actual expenditures for the respective award year, as verified in the UAFCB reports. The potential earnings for the *Ex Ante* Review Process Performance Award are capped at three percent of the authorized 2013-2014 resource program budget and will be paid according to the schedule outlined below.

4. Energy Efficiency Resource Savings Performance Award

   For the implementation of resource programs, the IOUs are awarded an opportunity to earn an incentive based on the amount of net lifecycle energy savings achieved. The incentive is calculated as follows:

   [Gross Annual Savings] x [Net to Gross Ratio] x [Effective Useful Life] x [Earnings Coefficient] = [Total Earnings]

   The potential earnings for the Energy Efficiency Resource Savings Performance Award are capped at nine percent of the authorized 2013-2014 resource program budget and will be paid according to the schedule outlined below.

The Commission adopted the following schedule which outlines the payment sequence associated with the individual components of the ESPI:

- Claims for ESPI awards covering the first PY of each cycle shall be made during the first following year (PY +1) for the following elements:
  - Non-Resource Program Management Fee
  - C&S Program Management Fee

- *Ex Ante* Review Process Performance Award
- Preliminary *Ex Ante* Deemed Measure Savings Award[1]

- Claims for ESPI awards covering the first PY of each cycle shall be made during the second following year (PY +2) for the following elements:
  - *Ex Post* Verified Custom Measure Savings Award
  - *Ex Post* Verified Deemed Measure Savings Award
  - True Up of Preliminary *Ex Ante* Deemed Measure Savings Award

On December 18, 2014, the Energy Division requested an extension to comply with D.13-09-023, Ordering Paragraph (OP) 8 in order to provide the utilities with the information needed to calculate the *ex post* component of the Energy Efficiency Resource Savings Performance Award for PY 2013, which include the following:

- *Ex Post* Verified Custom Measure Savings Award
- *Ex Post* Verified Deemed Measure Savings Award

On December 24, 2014, Interim Executive Director, Timothy Sullivan, approved Energy Division's request, revising the timeline to release the Final Savings Performance Statement by August 15, 2015. A copy of this approval letter is provided as Attachment A.

The Energy Division released the 2013 Ex-post ESPI Performance Statement Report on August 15, 2015, shown in Attachment B. In the Performance Statement Report, the Energy Division calculates the SoCalGas *ex post* component of the Energy Efficiency Resource Savings Performance Award for PY 2013 to be $2,141,962.[2]

In D.13-09-023, the Commission established an earnings cap for the 2013-2014 program cycle. As illustrated below in Table 1, the earnings awarded, and under request by, SoCalGas do not exceed the prescribed earnings cap.[3]

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[1] Excludes measures defined as "uncertain" on the list provided by Commission Staff associated with Program Year 2013.
[2] 2013 Ex-post ESPI Performance Statement Report, dated August 15, 2015, at p 4.
[3] As awarded to SoCalGas in Resolution G-3497 and the pending request of SoCalGas in Advice No. (AL) 4826.

Table 1: SoCalGas 2013-2014 EE Earnings Compared to Earnings Cap

Energy Efficiency Incentive Award	Earnings Award			2013-2014 Earnings Cap
	2013	2014	2013-2014 Total	
2013-2014 Efficiency Savings and Performance Incentive				
Non-Resource Program Management Fee	$110,342	$128,906	$239,248	$256,359
C&S Program Management Fee	$24,963	$73,418	$98,381	$181,413
Ex Ante Review Process Performance Award	$784,105	$1,047,976	$1,832,081	$4,183,118
Energy Efficiency Resource Savings Performance Award	$578,652	$2,936,243	$3,514,895	$12,549,354
SUBTOTAL	**$1,498,062**	**$4,186,543**	**$5,684,605**	
2013 UAFCB Audit True Up	N/A	($5,262)	($5,262)	
TOTAL	**$1,498,062**	**$4,181,281**	**$5,679,343**	

Note: 2014 includes the earnings award requested by SoCalGas in Advice Letter 4826, which is pending review by the Commission.

<u>Calculation of Final 2013 Shareholder Incentive Award</u>

SoCalGas' final EE incentive award for PY 2013 is $2,141,962 which is based on the incentive award formula associated with the ESPI components prescribed in D.13-09-023. The final PY 2013 incentive award is calculated as follows:

1. ***<u>Energy Efficiency Resource Savings Performance Award</u>***

For the implementation of resource programs, SoCalGas has an opportunity to earn an incentive based on the total amount of net lifecycle savings it achieves. According to the ESPI mechanism and the adopted earnings schedule, SoCalGas is eligible to earn an incentive from the custom and deemed activity from PY 2013, as verified *ex post* by the Commission.[4] These awards are referred to as the *Ex Post* Verified Custom Measure Savings Award and the *Ex Post* Verified Deemed Measure Savings Award.

a. ***<u>Ex Post Verified Custom Measure Savings Award</u>***

The Performance Statement Report calculates that SoCalGas installed 83,628,883 net lifecycle therm savings, including market

[4] Memorandum from Katie Wu on *Final ESPI Uncertain List for 2013-14* on December 6, 2013 issued to the service list of R.12-01-005.

effects, through its custom programs in PY 2013.[5] SoCalGas multiplied the net lifecycle therm savings, including market effects, by the earnings rate coefficient applicable to Program Year 2013, as provided in D.13-09-023, Attachment 1, Table 3. This was done utilizing the following formula:

[Net Lifecycle Savings] x [Earnings Rate Coefficient] = [Total Earnings]

The *Ex Post* Verified Custom Measure Savings Award for PY 2013 is calculated as:

83,628,883/1,000,000 x $21,331 = $1,783,888

b. ***Ex Post Verified Deemed Measure Savings Award***

The Performance Statement Report calculates that SoCalGas installed 16,798,157 net lifecycle therm savings, including market effects, through its eligible deemed measures in PY 2013.[6] SoCalGas multiplied the net lifecycle therm savings, including market effects, by the earnings rate coefficient applicable to Program Year 2013, as provided in D.13-09-023, Attachment 1, Table 3. This was done utilizing the following formula:

[Net Lifecycle Savings] x [Earnings Rate Coefficient] = [Total Earnings]

The *Ex Post* Verified Deemed Measure Savings Award for PY 2013 is calculated as:

16,798,157/1,000,000 x $21,331 = $358,322

c. ***Total Savings Award***

The final PY 2013 incentive award claim is represented in Table 2 below.

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[5] ESPI_2013_Results_Tables_DraftFInal_SCG.xlsx posted to http://www.cpuc.ca.gov/PUC/energy/Energy+Efficiency/Shareholder+Incentive+Mechanism.htm on 7/31/2015.

[6] ESPI_2013_Results_Tables_DraftFInal_SCG.xlsx posted to http://www.cpuc.ca.gov/PUC/energy/Energy+Efficiency/Shareholder+Incentive+Mechanism.htm on 7/31/2015.

Table 2: Energy Efficiency Incentive Awards for PY 2013

Energy Efficiency Incentive Award	Earnings Amount
Energy Efficiency Resource Savings Performance Award	
Ex Post Verified Custom Measure Savings Award	$1,783,888
Ex Post Verified Deemed Measure Savings Award	$358,322
True Up of Preliminary *Ex Ante* Deemed Measure Savings Award	($248)
TOTAL	**$2,141,962**

Dispensation of the Shareholder Incentive Award

D.13-09-023 directed the utilities to file a Tier 3 Advice Letter with the claim for the initial PY 2013 award according to the schedule set forth in Attachment 6 of that decision.[7] As noted above, the schedule was augmented by the Commission's Executive Director, pursuant to the letter included in Attachment A. This submission is thus in compliance with Commission orders, and is intended to accommodate the processing schedule outlined in D.13-09-023.

Table 3 below summarizes the revenue requirement impact by class of service. In addition, SoCalGas provides herein as Attachment C the annual Natural Gas Transportation Rate Revenues table comparing present and proposed rates associated with inclusion of the final PY 2013 shareholder incentive award in its gas transportation rates.

Table 3: Revenue Requirement Impact by Class of Service (Includes FF&U)

Class of Service	Applicable Rate Schedules	Increase/ (decrease) $000's
Core	GR, GS, GM, GO-AC, G-NGVR, GL, G-10, G-AC, G-EN, G-NGV	$2,048
Noncore	GT-F, GT-I, GT-TLS	$121
Total		**$2,168**

Protests

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 impact, and should be submitted expeditiously. The protest must be made in writing and received within 20 days of the date of this Advice Letter which is October 5, 2015. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

[7] D.13-09-023, OPs 4 and 6.

CPUC Energy Division
Attn: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the Energy Division Tariff Unit (EDTariffUnit@cpuc.ca.gov). A copy of the protest should 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.

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

Effective Date

OP 4 of D.13-09-023 orders SoCalGas to file this Advice Letter as Tier 3 and, as such, requires a Resolution to be issued by the Commission. SoCalGas respectfully requests that it be approved by the Commission at the earliest opportunity, and no later than the November 19, 2015 Commission Business Meeting, so that it may provide the desired market certainty associated with energy efficiency shareholder awards, and be included in the January 1, 2016 gas transportation rate change.

Notice

A copy of this Advice Letter is being sent to SoCalGas' GO 96-B service list and the Commission's service list in R.12-01-005. Address change requests to the GO 96-B should be directed by electronic mail to tariffs@socalgas.com or call 213-244-3387. 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.

Ronald van der Leeden
Director – Regulatory Affairs

Attachments

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 GAS COMPANY (U 904G)**

Utility type:	Contact Person: Sid Newsom
☐ ELC ☒ GAS	Phone #: (213) 244-2846
☐ PLC ☐ HEAT ☐ WATER	E-mail: SNewsom@semprautilities.com

EXPLANATION OF UTILITY TYPE	(Date Filed/ Received Stamp by CPUC)
ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat WATER = Water	

Advice Letter (AL) #: 4859

Subject of AL: Energy Efficiency Final Incentive Award for Program Year (PY) 2013

Keywords (choose from CPUC listing): Energy Efficiency

AL filing type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other

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

D.13-09-023

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL No

Summarize differences between the AL and the prior withdrawn or rejected AL[1]: N/A

Does AL request confidential treatment? If so, provide explanation: No

Resolution Required? ☒ Yes ☐ No Tier Designation: ☐ 1 ☐ 2 ☒ 3

Requested effective date: 1/1/16 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 proposed[1] See Advice Letter

Pending advice letters that revise the same tariff sheets: None

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	Southern California Gas Company
Attention: Tariff Unit	**Attention: Sid Newsom**
505 Van Ness Ave.,	**555 West 5th Street, GT14D6**
San Francisco, CA 94102	**Los Angeles, CA 90013-1011**
EDTariffUnit@cpuc.ca.gov	**SNewsom@semprautilities.com**
	tariffs@socalgas.com

[1] Discuss in AL if more space is needed.

ATTACHMENT A

Advice No. 4859

Executive Director's Letter Authorizing Energy Division's Request for an Extension of Time to Comply with Decision 13-09-023, Ordering Paragraph 8

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

December 24, 2014

Edward Randolph
Energy Division Director
California Public Utilities Commission
RE: R.13-11-005 and R.12-01-005 Request for an Extension of Time to Comply with Decision 13-09-023, Ordering Paragraph 8.

Dear Mr. Randolph:

In your memo dated December 18, 2014, the Energy Division requests an extension to comply with Decision 13-09-023, Ordering Paragraph 8, the decision adopting the Efficiency Savings and Performance Incentive (ESPI) mechanism. Your letter states that Ordering Paragraph 8 establishes the schedule for processing, reviewing, approving awards subject to ex post evaluations.

You report that "two of the three evaluation contractors did not have fully executed contracts until October 2013 and the evaluation contractor responsible for all of the nonresidential evaluation work (including custom and lighting) did not have a fully executed contract until February 2014. As a result, the full scope of evaluation activities could not begin before March 2014. In addition, the IOU data necessary to begin the evaluation activities was not available until June 2014. This was not enough time to produce results by the December 31, 2014, deadline set forth in the ESPI mechanism." As this is the case, I grant Energy Division's request as reasonable; Energy Division may complete the 2013 ESPI ex-post savings award process in accordance with Table 1 below.

Table 1 - Adopted and Requested Due Dates

Activity Ordered in D.13-09-023, Attachment 6	**Original Due Date**	**Requested Due Date**
PY2013 Draft Evaluation Results posted	12/31/2014	3/31/2015
PY2013 Evaluation Results Conference	1/15/2015	4/15/2015
Deadline for Written Comments on Draft PY 2013 Evaluation Results	1/31/2015	4/29/2015
Results of Public Comments Incorporated	2/28/2015	5/13/2015
If parties have continued disputes with how the comments were addressed or handled, they may submit an issue to the ALJ via the Dispute Resolution process	3/15/2015	5/27/2015

Activity Ordered in D.13-09-023, Attachment 6	**Original Due Date**	**Requested Due Date**
outlined in D.10-04-029 by March 15 of PY +2.		
Draft Savings Performance Statement Posted	3/31/2015	6/17/2015
Draft Savings Performance Statement Webinar	4/15/2015	7/1/2015
Written Comments on Performance Statement	4/30/2015	7/15/2015
Final Savings Performance Statement Posted	5/31/2015	8/15/2015
IOUs file advice letters based on ED Report	6/30/2015	9/15/2015
CPUC Resolution approving IOU advice letters / Effective Date for 2013 Ex Post Savings Award	8/31/2015	11/30/2015

Per Rule 16.6 of the Rules of Practice and Procedure, Energy Division shall promptly inform all parties to the proceeding of this extension and state in the opening paragraph that the Executive Director has authorized the extension.

Sincerely,

Timothy J Sullivan

Timothy Sullivan
Interim Executive Director

cc: ALJ Thomas Pulsifer; ALJ Todd Edmister; Edward Randolph, Director of Energy Division; Pete Skala, Energy Division; Carmen Best, Energy Division

ATTACHMENT B

Advice No. 4859

2013 Ex-Post Efficiency Savings and Performance Incentive

Performance Statement Report

STATE OF CALIFORNIA EDMUND G. BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298

2013 Ex-post Efficiency Savings and Performance Incentive (ESPI)

Performance Statement Report

August 15, 2015

1. Introduction

This Final Performance Statement report provides Commission Staff's proposed earnings amounts for the evaluated or ex-post portion of the 2013 Efficiency Savings and Performance Incentive (ESPI), as well as true-up adjustments to the reported or ex-ante portion of the 2013 ESPI, paid last year. These earnings amounts reflect the following:

- Adding 5% to the lifecycle gross savings to account for market effects
- Making adjustments to make sure records from the ex-ante payment and ex-post payments are not double counted
- Making adjustments to correct for issues with database versions (mainly impacts PG&E)
- Not making adjustments for CFL carry-over: All CFLs purchased in the 2010-2012 program cycle already earned a management fee from the 2010-2012 shareholder mechanism in place at that time.

The IOUs will use these final values in an advice letter filing. The actual award will come in the form of a resolution from the CPUC in response to the advice letter.

2. Regulatory Background

D.13-09-023 adopted the Efficiency Savings and Performance Incentive (ESPI) and ordered Commission Staff to submit 2013 ex-post results by December 31, 2014. On December 24, 2014, Interim Executive Director Timothy Sullivan granted Commission Staff's extension request to submit draft evaluation results by March 31, 2015. Commission staff is working on process improvements to continue to streamline the outputs for the ESPI deliverables and the transparency and accessibility of the deliverables.

Commission Staff posted the 2013 ESPI memos on March 9, 2015 and held a public stakeholder workshop on March 25, 2015. On April 21, 2015, Pacific Gas and Electric Company (PG&E) and Southern California Edison Company (SCE) filed joint comments, while San Diego Gas and Electric Company (SDG&E) and Southern California Gas Company (SCG) filed individual comments[1]. Commission Staff and its evaluation

[1] All comments are located here: http://www.energydataweb.com/cpuc/comment.aspx?did=1253

consultants reviewed the technical comments and made edits to the memos and data where necessary, and posted the final memos and 2013 ESPI database to the CPUC web site[2] on May 7, 2015.

Commission staff issued the Draft 2013 ESPI Performance Statement report on June 15, 2015 and held a public input webinar on June 18, 2015. PG&E, SDG&E, and SCG filed timely comments by July 13, 2015. Commission staff and its evaluation consultants reviewed the comments and made edits to this report, where applicable. A matrix of comments and responses can be found in Appendix E. Supporting documentation for this Final 2013 Performance Statement Report can be found at

http://www.cpuc.ca.gov/PUC/energy/Energy+Efficiency/Shareholder+Incentive+Mechanism.htm.

3. Earnings

Based on the values from the 2013 ESPI database and the earnings coefficients established in D.13-09-023, Commission staff recommends the following earnings amounts for utility performance of 2013 energy efficiency program activity. These amounts include increases to add 5% for market effects and adjustments to ensure ex-ante and ex-post payments are not double counted (this is the column *Adjusted ExAnte Review Earnings**.) These amounts do not include any adjustments for CFL carry-over. All CFLs purchased in 2010-2012 program cycle already earned a management fee from the 2010-2012 shareholder mechanism in place at that time; therefore, any savings carried-over into 2013 will only apply to goal attainment and not ESPI purposes:

Table 1 – Proposed 2013 Ex-Post Earnings by Utility

	kWh Earnings	kW Earnings	Therms Earnings	Sum of ExPost Earnings	Adjusted ExAnte Review Earnings*	Total New Payment
PG&E	$8,546,888	$3,778,597	$2,523,458	**$14,848,943**	-$115,673	**$14,733,270**
SCE	$7,532,558	$3,043,705		**$10,576,263**	-$121,040	**$10,455,223**

[2] http://www.cpuc.ca.gov/PUC/energy/Energy+Efficiency/Shareholder+Incentive+Mechanism.htm

SCG			$2,142,209	**$2,142,209**	-$248	**$2,141,962**
SDG&E	$1,990,531	$879,146	$5,753	**$2,875,429**	-$48,217	**$2,827,212**
Total Statewide	**$18,069,977**	**$7,701,448**	**$4,671,419**	**$30,442,845**	**-$285,178**	**$30,157,667**

** Please see Appendix D for an explanation of differences between the values above and those in the Draft Performance Statement Report dated June 15, 2015*.

These amounts are below the resource savings earnings caps established in Attachment 1 of D.13-09-023, and shown in Table 1a:

Table 2a – 2013 Resource Savings Caps

	Energy Savings Performance Awards (capped at 9% of resource program budget minus C&S)	
	2013-2014 ESPI Ex-Post Cap	**2013 ESPI Ex-Post Cap**
PGE	**58.9**	**29.45**
SCE	**40.9**	**20.45**
SCG	**12.5**	**6.25**
SDGE	**14.5**	**7.25**
Total	**126.8**	**63.4**

The earnings are based on the lifecycle net electric, demand, and natural gas savings for both deemed and custom measures. In Table 2 the ex-post lifecycle net savings values for both deemed and custom measures are shown along with how the savings translates to the proposed earnings amounts in Table 1. The row "Total Payment" includes the addition of 5% for market effects.

Table 3 - 2013 Ex-Post Savings for Lifecycle (LC) Custom and Deemed by Utility

	Electric (GWh)	Demand (MW)	Natural Gas (MM Therms)	Total
PG&E				
ExPost (LC Net) Deemed	956	225	-4	
ExPost (LC Net) Custom	2,158	336	113	
Total ExPost LC Net	**3,114**	**560**	**108**	
Earnings Rate	$2,525	$6,200	$21,331	
Payment (Before Market Effects)	$7,863,966	$3,472,308	$2,311,596	**$13,647,870**

	Electric (GWh)	Demand (MW)	Natural Gas (MM Therms)	Total
Total Payment	$8,546,888	$3,778,597	$2,523,458	**$14,848,943**
SCE				
ExPost (LC Net) Deemed	1,383	214	-17	
ExPost (LC Net) Custom	1,369	239	3	
Total ExPost LC Net	**2,752**	**453**	**0**	
Earnings Rate	$2,525	$6,200	$21,331	
Payment (Before Market Effects)	$6,948,808	$2,807,583	N/A	**$9,756,391**
Total Payment	$7,532,558	$3,043,705	N/A	**$10,576,263**
SCG				
ExPost (LC Net) Deemed	0	0	18	
ExPost (LC Net) Custom	13	13	76	
Total ExPost LC Net	**13**	**13**	**93**	
Earnings Rate	$2,525	$6,200	$21,331	
Payment (Before Market Effects)	N/A	N/A	$1,988,673	**$1,988,692**
Total Payment	N/A	N/A	$2,142,209	**$2,142,209**
SDG&E				
ExPost (LC Net) Deemed	412	78	-4	
ExPost (LC Net) Custom	315	53	4	
Total ExPost LC Net	**727**	**131**	**0.2**	
Earnings Rate	$2,525	$6,200	$21,331	
Payment (Before Market Effects)	$1,835,919	$811,789	$5,221	**$2,652,930**
Total Payment	$1,990,531	$879,146	$5,753	**$2,875,429**

4. Components of the Earnings Calculation

Earnings Coefficients

D.13-09-023 established the earnings coefficient to apply to each unit of savings each IOU achieved in 2013, on an ex-post basis:

Electricity ($/MWh) $2,525
Peak Demand ($/MW – Yr) $6,200
Natural Gas ($/MMTh) $21,331

Commission staff applies these coefficients to the net lifecycle ex-post values per IOU for kWh, kW, and therms.

Lifecycle Savings

To estimate lifecycle kWh, kW, and therms savings, Commission Staff applied the ex-post parameters from the final 2013 ESPI memos. Per Attachment 2 of D.13-09-023, the following parameters may be updated for purposes of determining performance:

1. Measure Installations/Measure Count
2. Unit Energy Savings
3. Gross Energy Savings (product of 1 and 2)
4. Net-To-Gross Ratios by Program Strategy and/or Measure
5. Net Energy Savings (product of 3 and 4)
6. Effective Useful Life
7. Load Factor or Daily Load Shape used to transform annual electricity savings estimates into peak savings estimates
8. For custom projects, all components of the projects will be subject to review. An evaluation based estimate of the savings claim for custom projects in the defined program year will be applied

Ex-Post Results

Commission staff's evaluation contractors produced 2013 ex-post ESPI memos (hereafter 2013 ESPI memos) for "uncertain measures" as identified in D.13-09-023. The evaluation results are discussed in detail in the following memo:

http://www.cpuc.ca.gov/NR/rdonlyres/3F9E5EF6-E399-47AB-80D3-821FB3C9FB76/0/2013ESPIMemosFinal.docx.

Table 3 shows which uncertain measures received ex-post parameter updates based on field work or best available information. Section 5 shows the decision-tree for when Commission staff applied ex-post results or passed through reported values.

Table 4 - Measures that Received Ex-Post Updates

Applied results from field work	Used best available information
Behavior	HVAC quality maintenance
Custom projects	HVAC mini-split
Non-res new construction	Residential lighting (CFLs)
Sprinklers (Net-to-Gross only)	Home upgrade program
Pipe insulation Sprinklers (Net-to-Gross only)	Water kits
Non-res downstream lighting	Pool pump

5. **Creation of Ex-Post Dataset**

Commission staff utilized the detailed quarterly tracking data for 2013 as the foundation for prioritizing evaluation activities and applying updates from evaluation work. The ex-post 2013 ESPI memos carried out Commission staff's guidance to make updates to the claims on a parameter basis. Commission staff and evaluation contractors utilized the following options in making updates to the utility savings claims for the aforementioned parameters:

1. Pass through: Accept reported savings values for claims that do not fall within the frame of an impact evaluation (no change); or

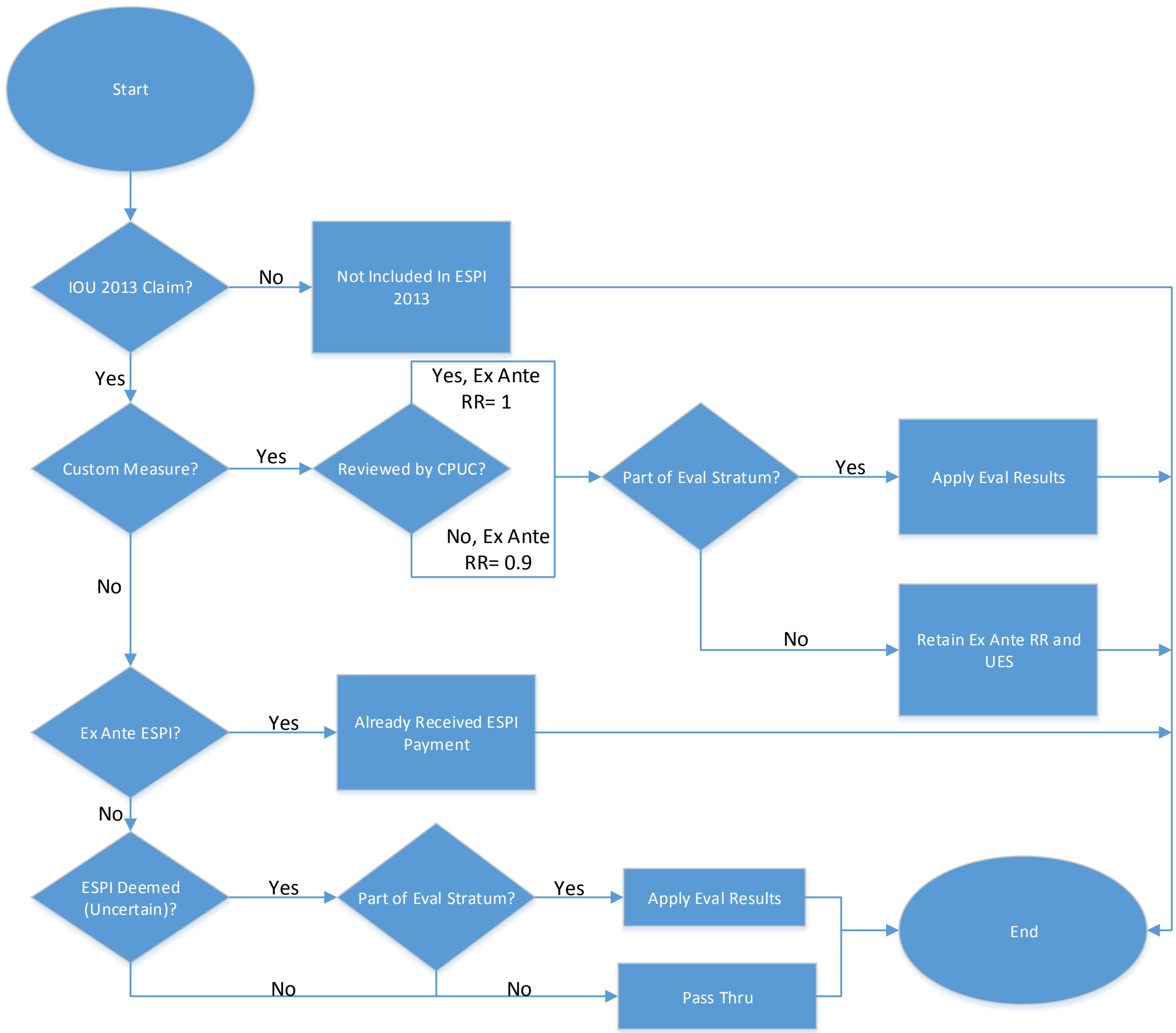
2. Leverage results from a 2013 ESPI memo: Apply stratum-level results to records included in the frame of an impact evaluation. These data are considered "evaluated results" and are used in the context of this report.

Evaluation Decision Tree

The decision tree in the following figure illustrates how Commission Staff updated IOU claims with evaluation results from the 2013 ESPI memos.

More detailed information regarding how the ex-post dataset was created can be found in Appendix C.

Figure 1: Evaluation Framework Decision Tree 2013 ESPI



6. Biggest Drivers of Change in Earnings

This section provides three different looks at the portfolio based on the 2013 ESPI process.

The first subsection presents the relative effect that updates to each of the parameters has on the overall claimed savings. These graphs illustrate how the evaluated parameters change the life cycle savings first from gross ex-ante to gross ex-post and then to net ex-post. These graphs allow the reader to see which parameters had the biggest impact on evaluated net savings (i.e. was it the installation rate, or UES, or the EUL, or the NTG).

The next subsection shows how much of the net lifecycle savings values were "Passed Through vs. Evaluated" so the reader can see what percent of the portfolio savings were "touched" or updated based on an evaluation result.

Finally, the last section presents the distribution of savings by ESPI measure group for those measures that make up the 2013 ESPI Deemed Uncertain measures. This allows the reader to see which measures had the largest contribution to savings.

a. Key Drivers of Evaluation Updates – Parameter Updates

The following graphics provide an illustration of the relative influence of each parameter update. Several caveats are necessary to appreciate the limitations and value of these graphics, and in fact their calculation is pathway-dependent. First, more than one parameter update may have been applied to a measure (e.g. unit energy savings and installation rate were updated for an installed light bulb). Hence the influence of each parameter cannot be completely isolated but they interact. Second, the parameter may have multiple factors within its calculation that could influence the value (e.g. hours of use within the unit energy savings) and this break down is at the highest parameter level. Third, the parameter gauging program influence (the net to gross ratio) is estimated in the program plans, and in many cases updated with evaluated results. The graphics show the program attribution in its two constituent parts to illustrate the additional net adjustments from evaluation relative to the already assumed net adjustment. The following parameter adjustments in the graphics are defined as follows:

a) Installation Rate – the units were verified as installed and operating

b) Unit Energy Savings & Realization Rate Adjustment

    i. Unit Energy Savings (UES) – savings per unit installed (primarily for deemed measures)

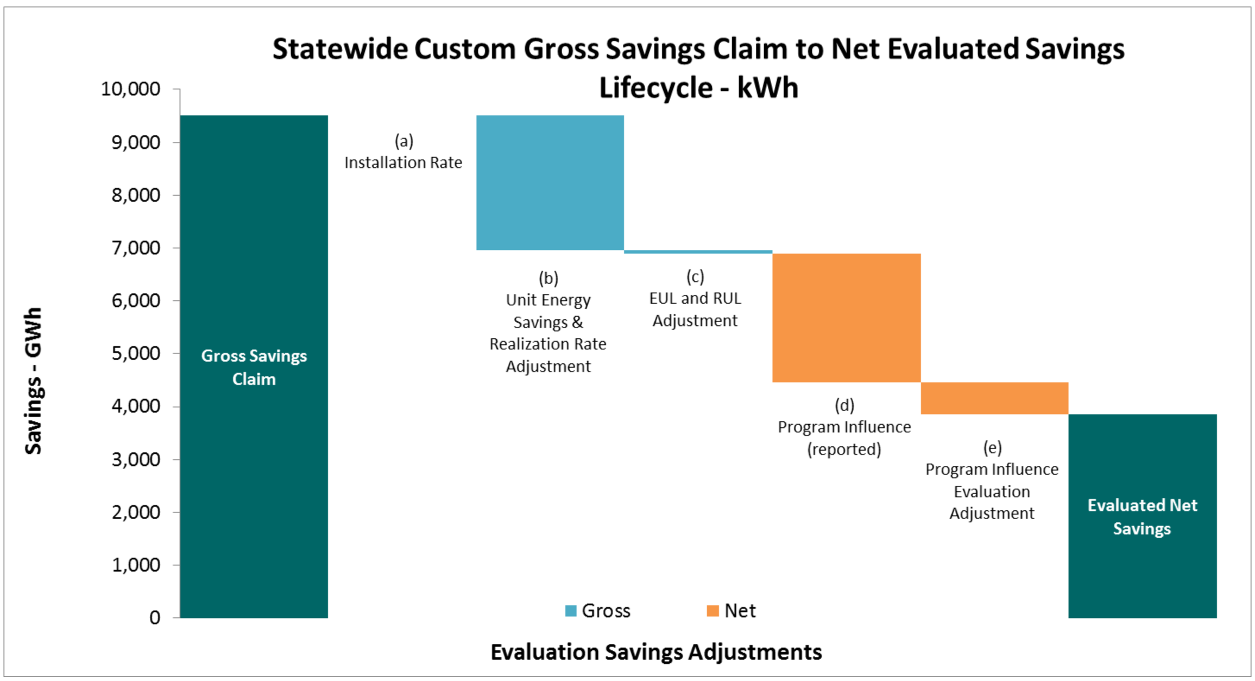
ii. Realization Rate (RR) – savings achieved versus expected (ratio used primarily for custom projects)

c) Effective Useful Life/Remaining Useful Life Adjustment – adjustments made to EUL and RUL

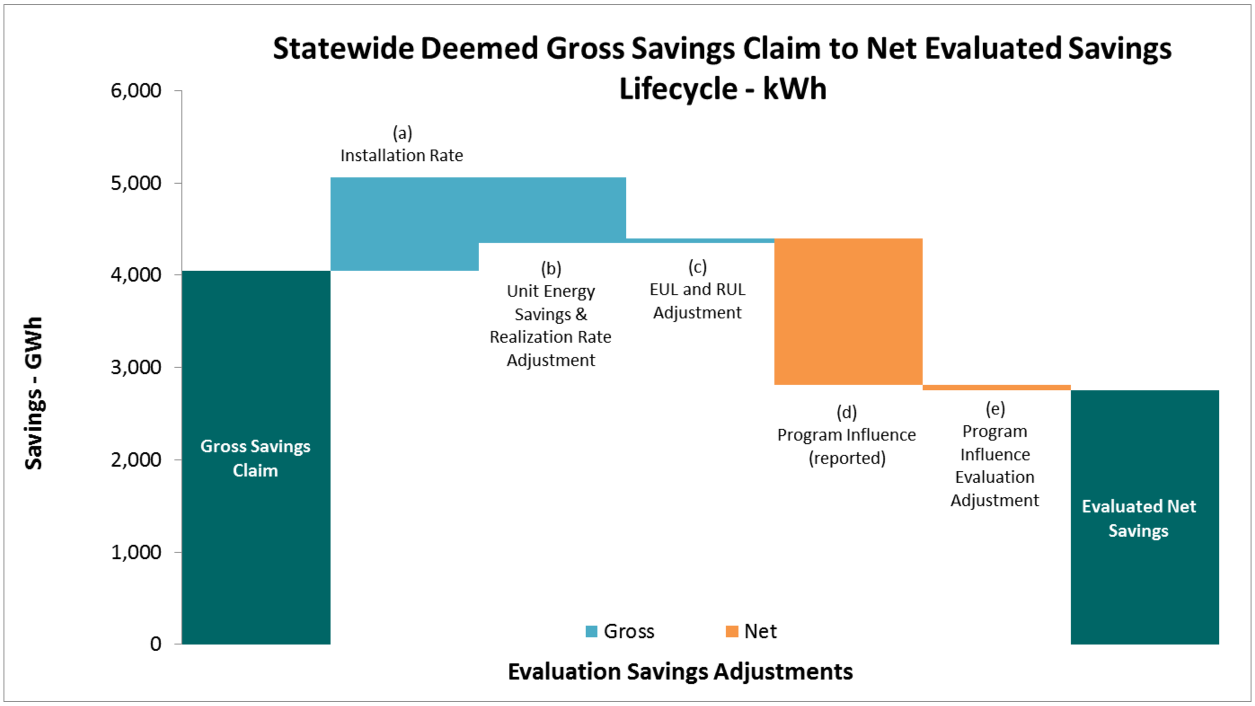
d) Program Influence Expected Adjustment (reported) – planning assumption of program influence

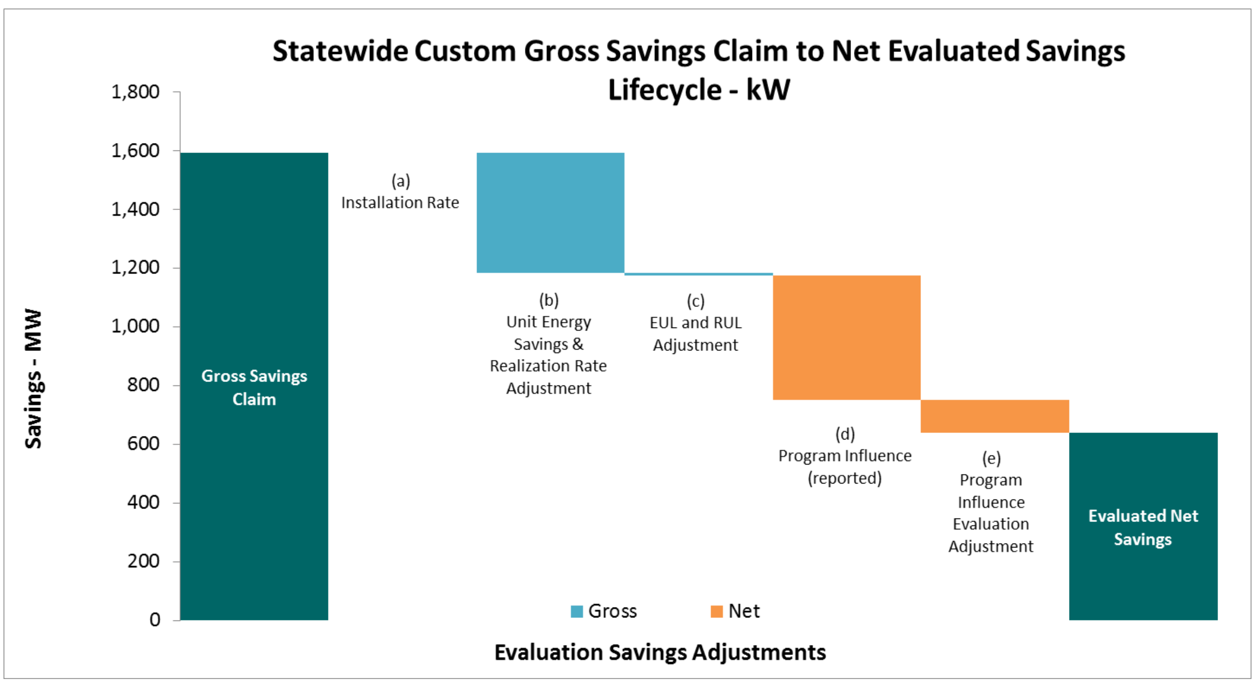
e) Program Influence Evaluation Adjustment – incremental difference in program influence found through field evaluation

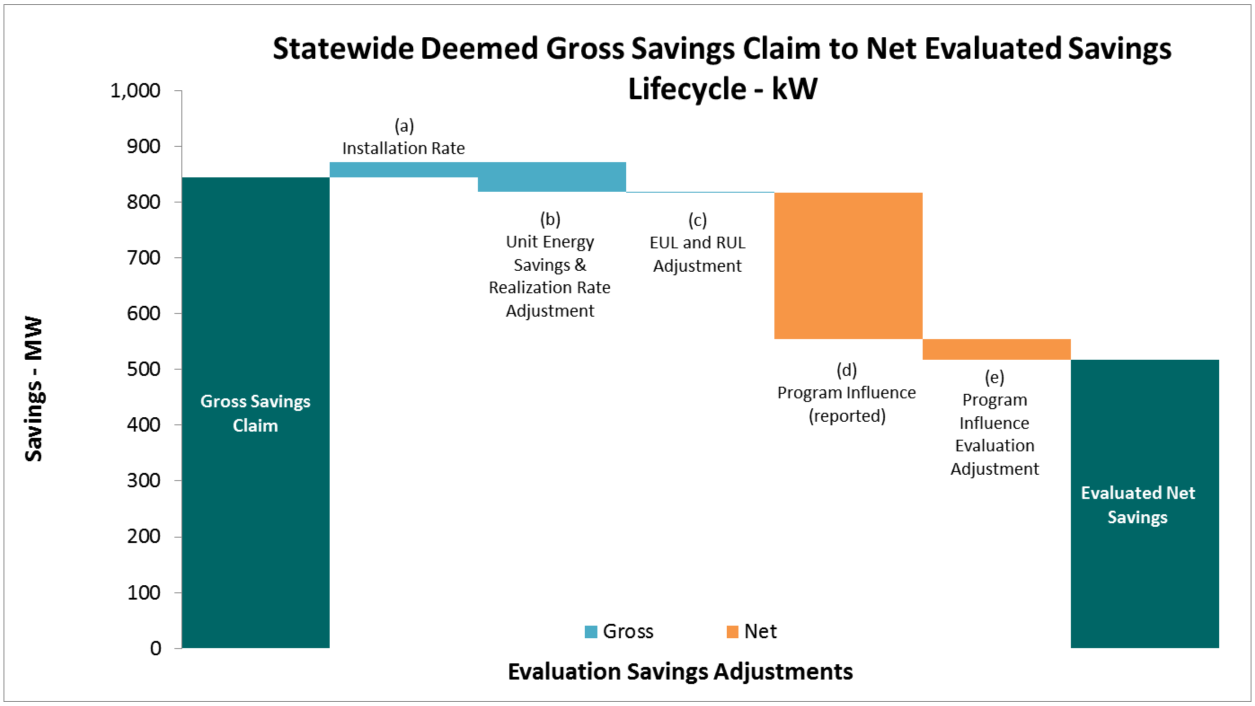
The statewide results are provided in the following series of graphics[3], while the utility specific results are presented in the attached appendix.

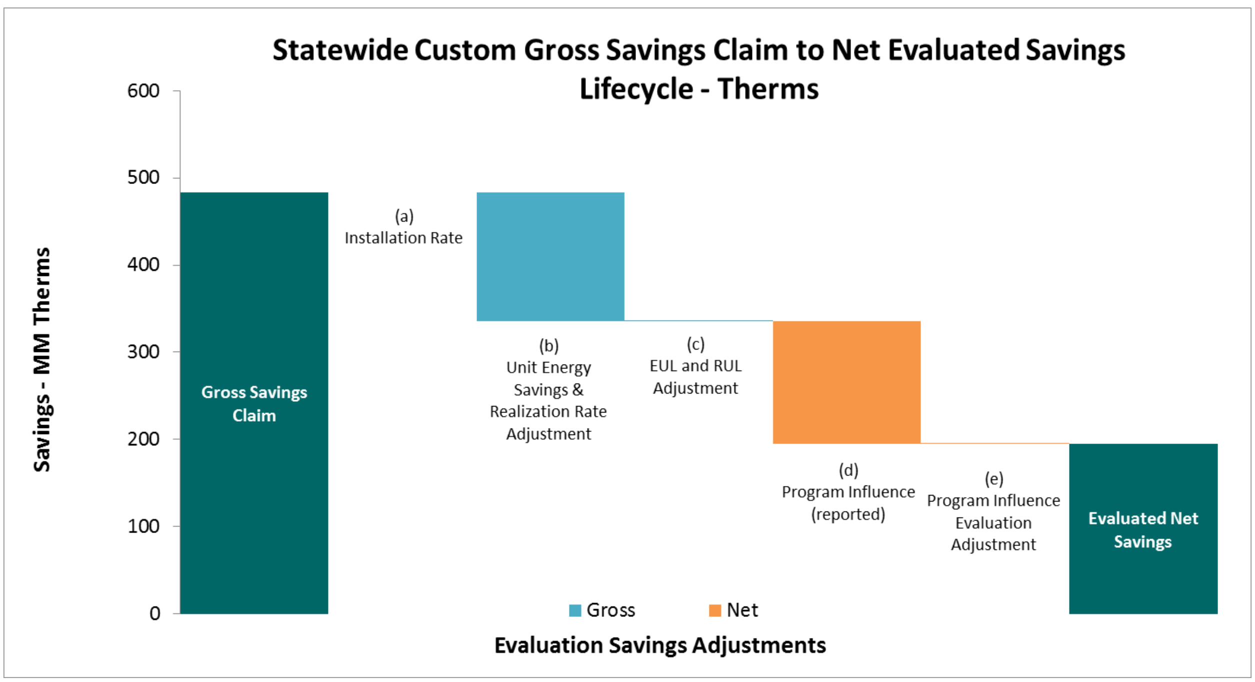


[3] The lifecycle therm savings for deemed measures graph is not included in this report, intentionally, due to difficulties graphically displaying the negative therm values.


Statewide Deemed Gross Savings Claim to Net Evaluated Savings Lifecycle - kWh
Savings - GWh
6,000
5,000
4,000
3,000
2,000
1,000
0
Gross Savings Claim
(a) Installation Rate
(b) Unit Energy Savings & Realization Rate Adjustment
(c) EUL and RUL Adjustment
(d) Program Influence (reported)
(e) Program Influence Evaluation Adjustment
Evaluated Net Savings
Gross
Net
Evaluation Savings Adjustments

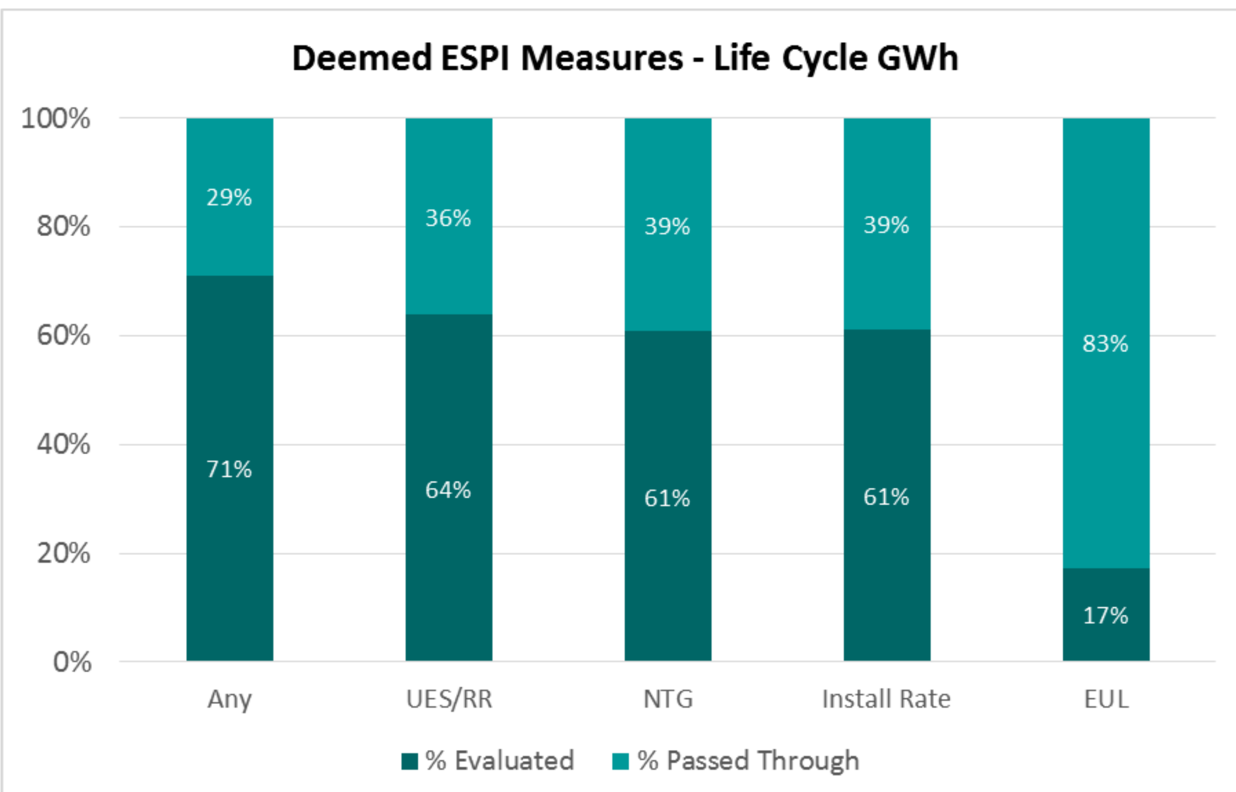

Statewide Custom Gross Savings Claim to Net Evaluated Savings Lifecycle - kW
Savings - MW
1,800
1,600
1,400
1,200
1,000
800
600
400
200
0
Gross Savings Claim
(a) Installation Rate
(b) Unit Energy Savings & Realization Rate Adjustment
(c) EUL and RUL Adjustment
(d) Program Influence (reported)
(e) Program Influence Evaluation Adjustment
Evaluated Net Savings
Gross
Net
Evaluation Savings Adjustments

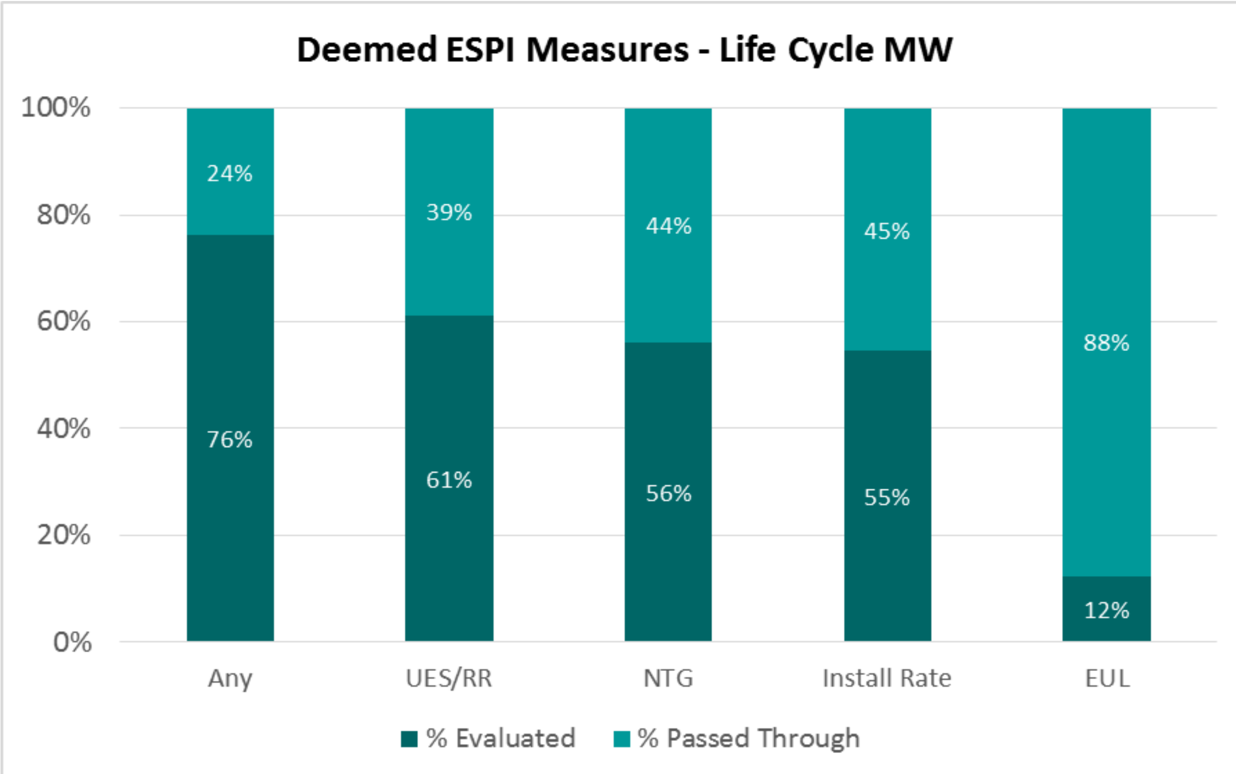

Statewide Deemed Gross Savings Claim to Net Evaluated Savings
Lifecycle - kW
Savings - MW
1,000
900
800
700
600
500
400
300
200
100
0
Gross Savings Claim
(a) Installation Rate
(b) Unit Energy Savings & Realization Rate Adjustment
(c) EUL and RUL Adjustment
(d) Program Influence (reported)
(e) Program Influence Evaluation Adjustment
Evaluated Net Savings
Gross
Net
Evaluation Savings Adjustments

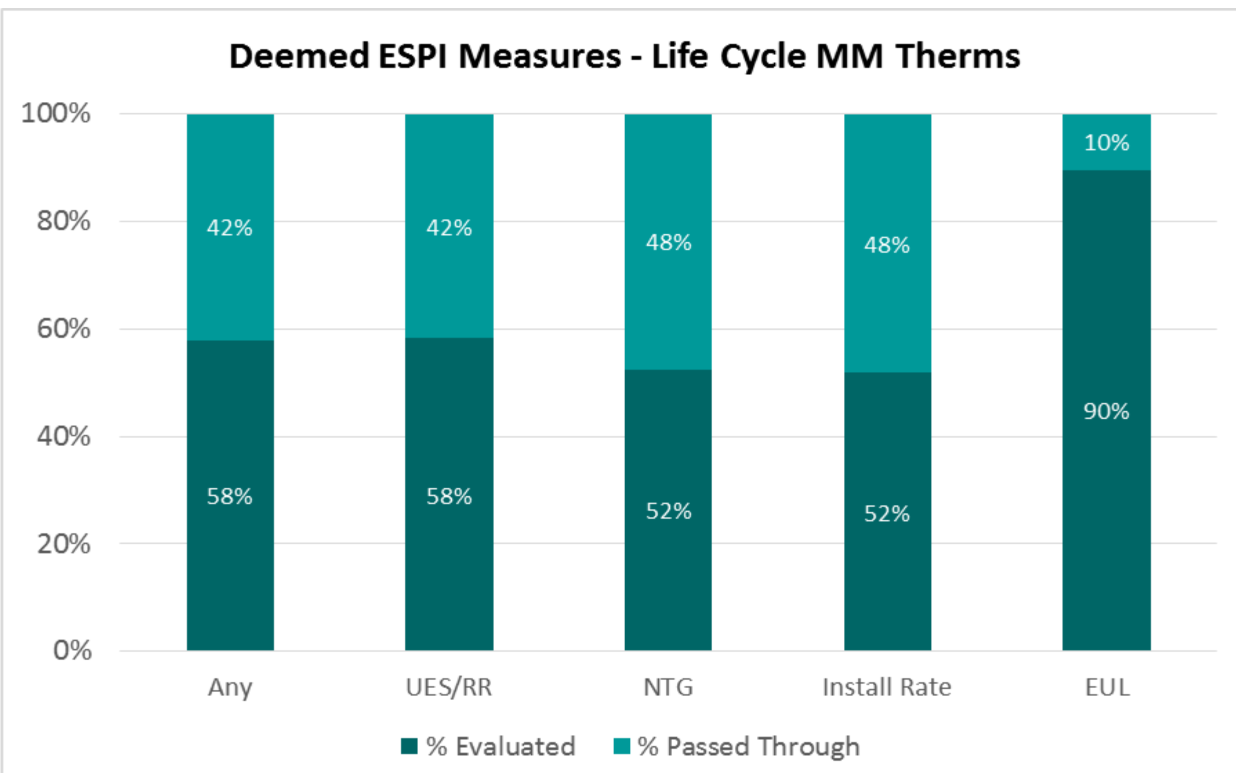

Statewide Custom Gross Savings Claim to Net Evaluated Savings
Lifecycle - Therms
Savings - MM Therms
600
500
400
300
200
100
0
Gross Savings Claim
(a) Installation Rate
(b) Unit Energy Savings & Realization Rate Adjustment
(c) EUL and RUL Adjustment
(d) Program Influence (reported)
(e) Program Influence Evaluation Adjustment
Evaluated Net Savings
Gross
Net
Evaluation Savings Adjustments

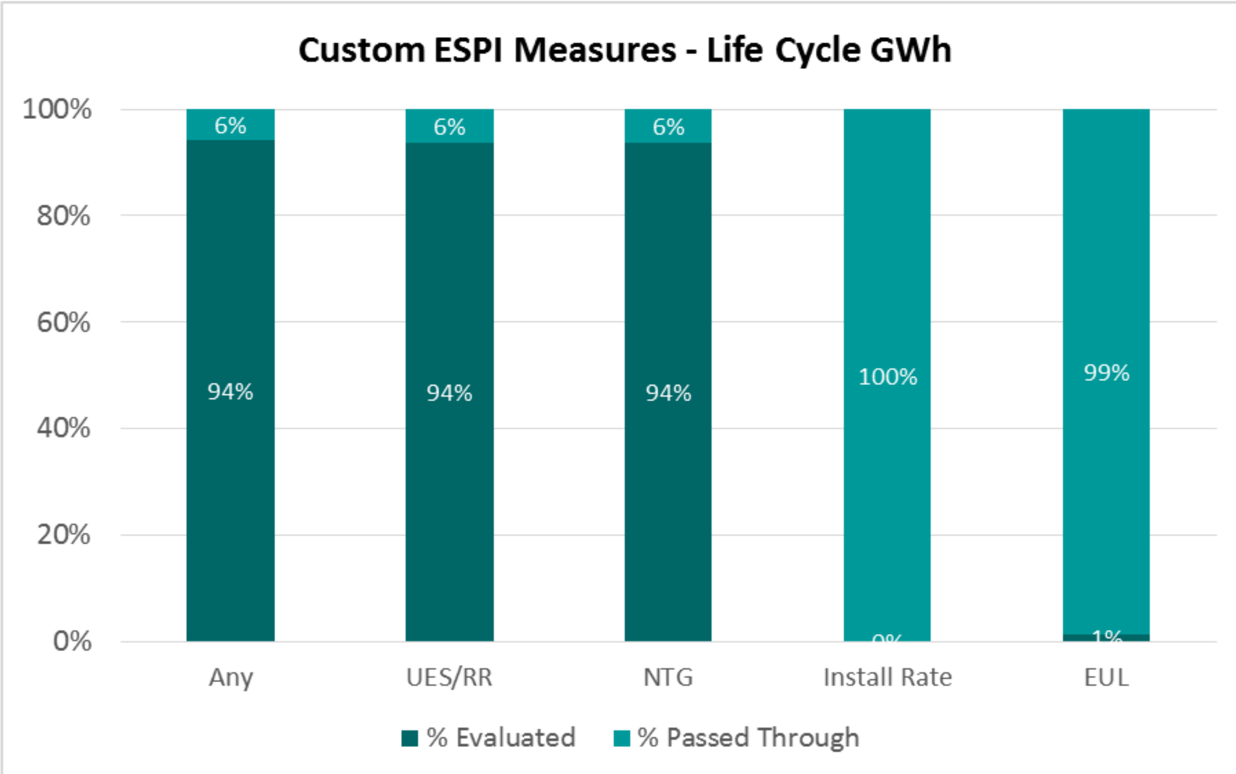
b. Key Drivers of Evaluation Updates – Pass-Through versus Evaluated Records

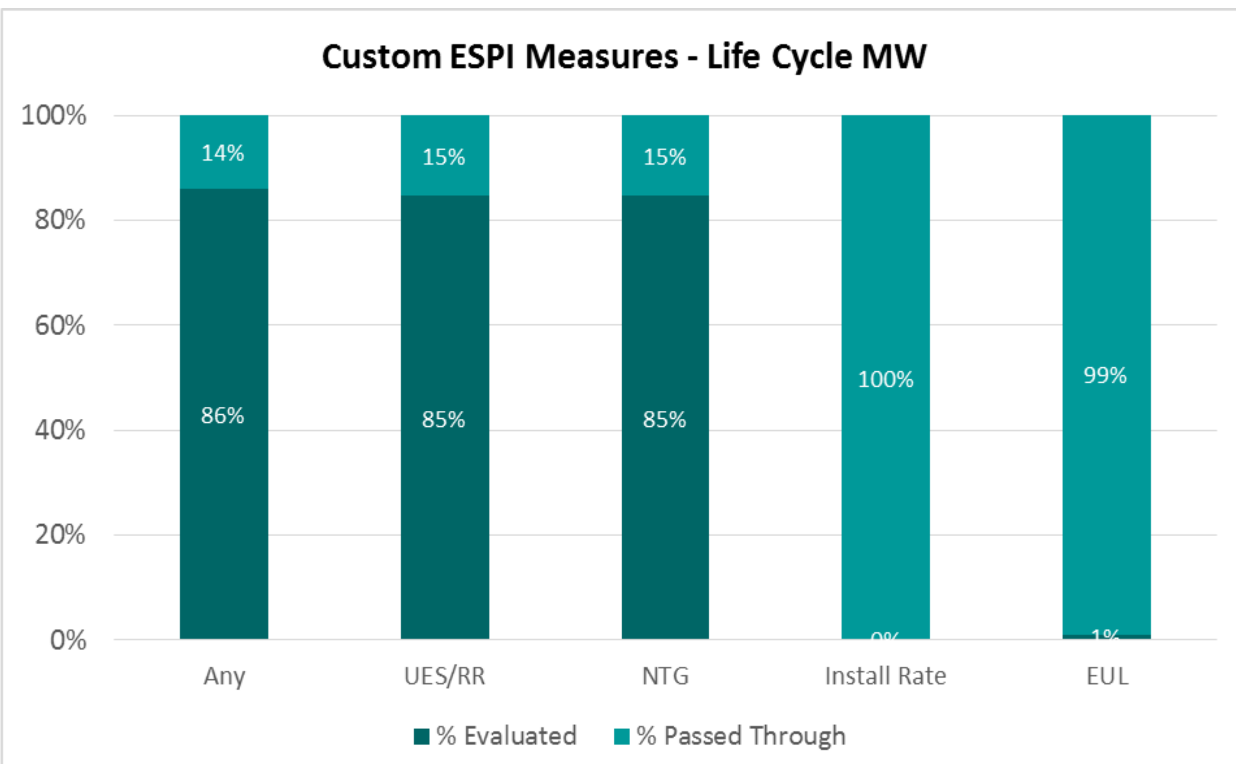
These charts show the evaluation lifecycle savings and what percent received an evaluation update for each parameter. The 2013 ESPI memos only covered a portion of the portfolio, with 29% of the deemed lifecycle kWh savings and 42% of the lifecycle therm savings being passed through. However, for custom measures, 94% of lifecycle kWh savings and 96% of lifecycle therm savings received some evaluation update. Notably, for custom and deemed measures, the EUL parameter was the least evaluated. The lifecycle therms chart is included, but please note that in order to calculate a percentage of savings that were passed through, an absolute value of the savings was taken.

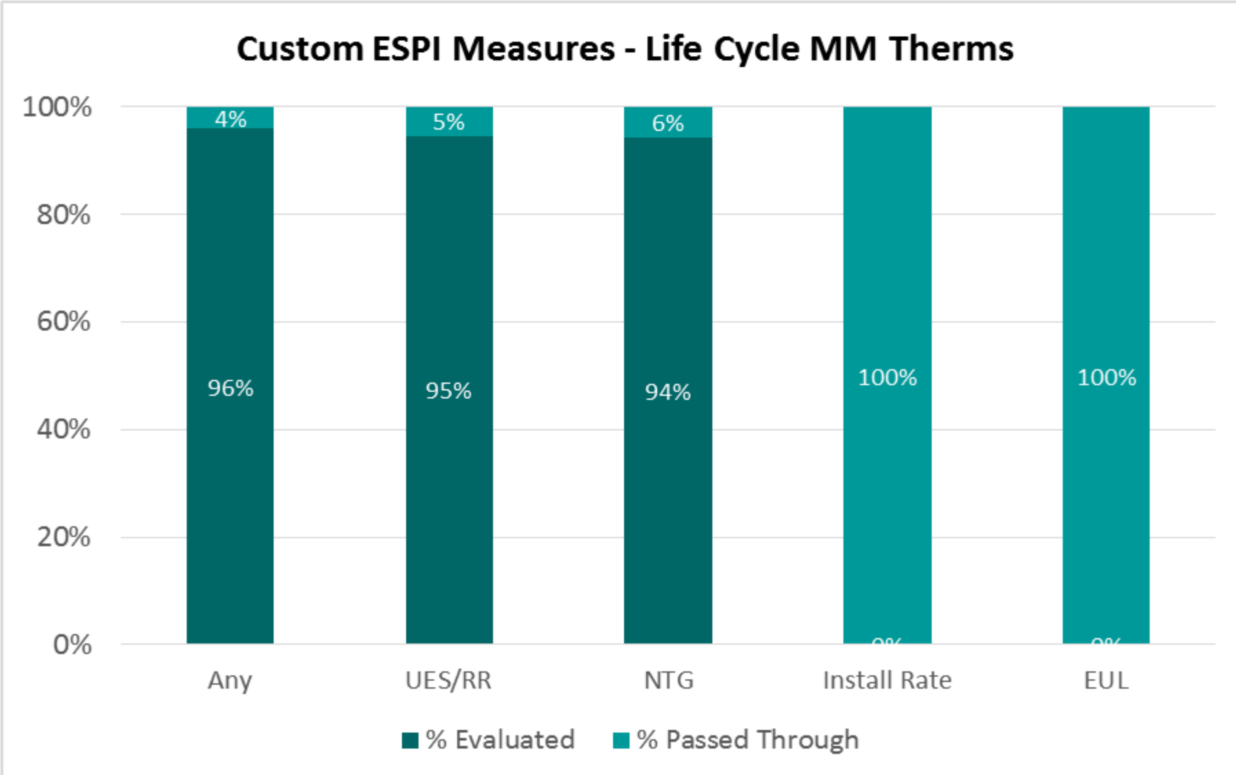



Deemed ESPI Measures - Life Cycle MW
100%
80%
60%
40%
20%
0%
24%
39%
44%
45%
88%
76%
61%
56%
55%
12%
Any
UES/RR
NTG
Install Rate
EUL
% Evaluated
% Passed Through


Deemed ESPI Measures - Life Cycle MM Therms
100%
80%
60%
40%
20%
0%
42%
42%
48%
48%
10%
58%
58%
52%
52%
90%
Any
UES/RR
NTG
Install Rate
EUL
% Evaluated
% Passed Through

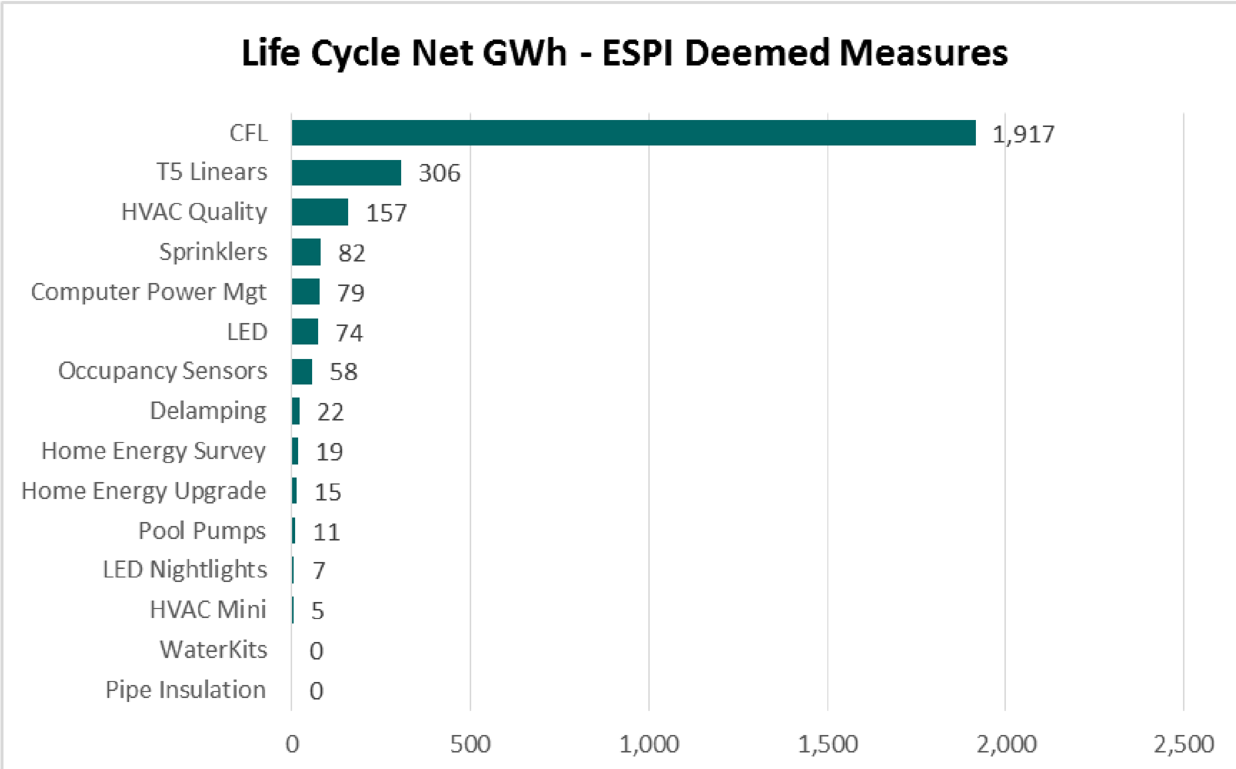

Custom ESPI Measures - Life Cycle GWh
100%
80%
60%
40%
20%
0%
6%
6%
6%
94%
94%
94%
100%
99%
0%
1%
Any
UES/RR
NTG
Install Rate
EUL
% Evaluated
% Passed Through

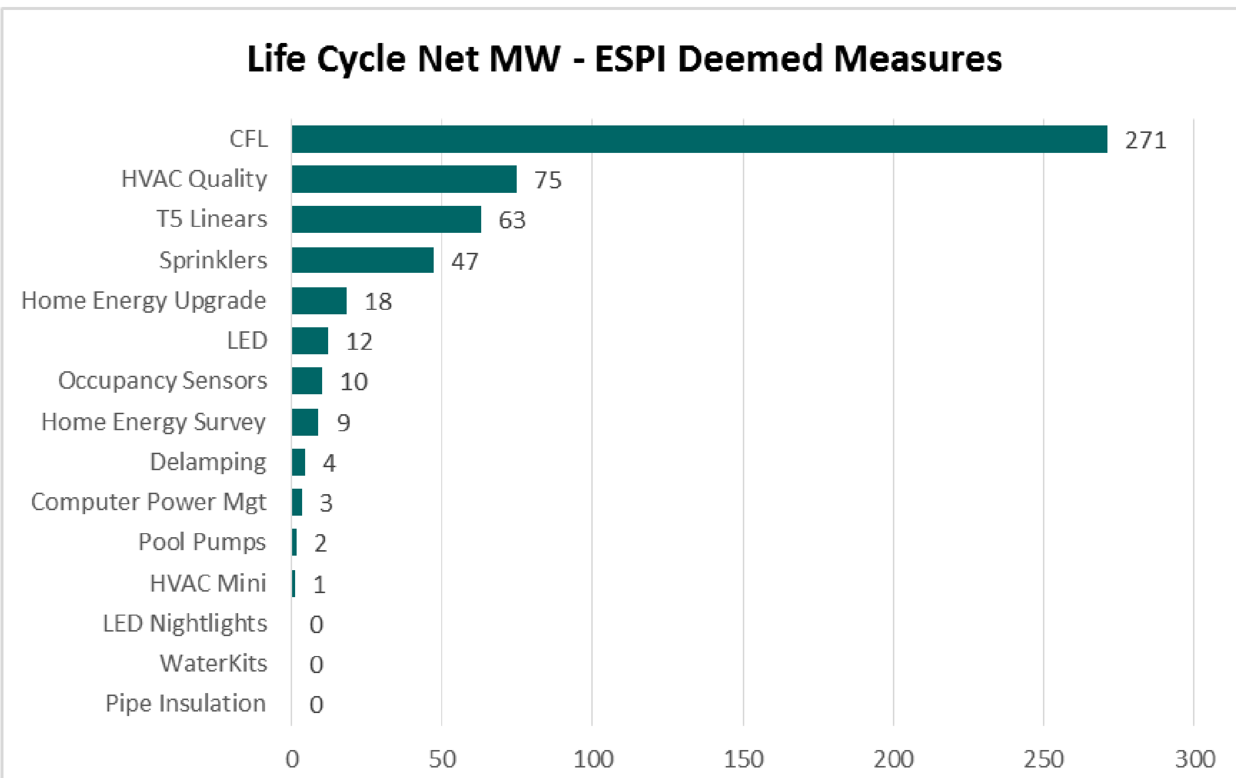

Custom ESPI Measures - Life Cycle MW
100%
80%
60%
40%
20%
0%
14%
15%
15%
86%
85%
85%
100%
99%
0%
1%
Any
UES/RR
NTG
Install Rate
EUL
% Evaluated
% Passed Through

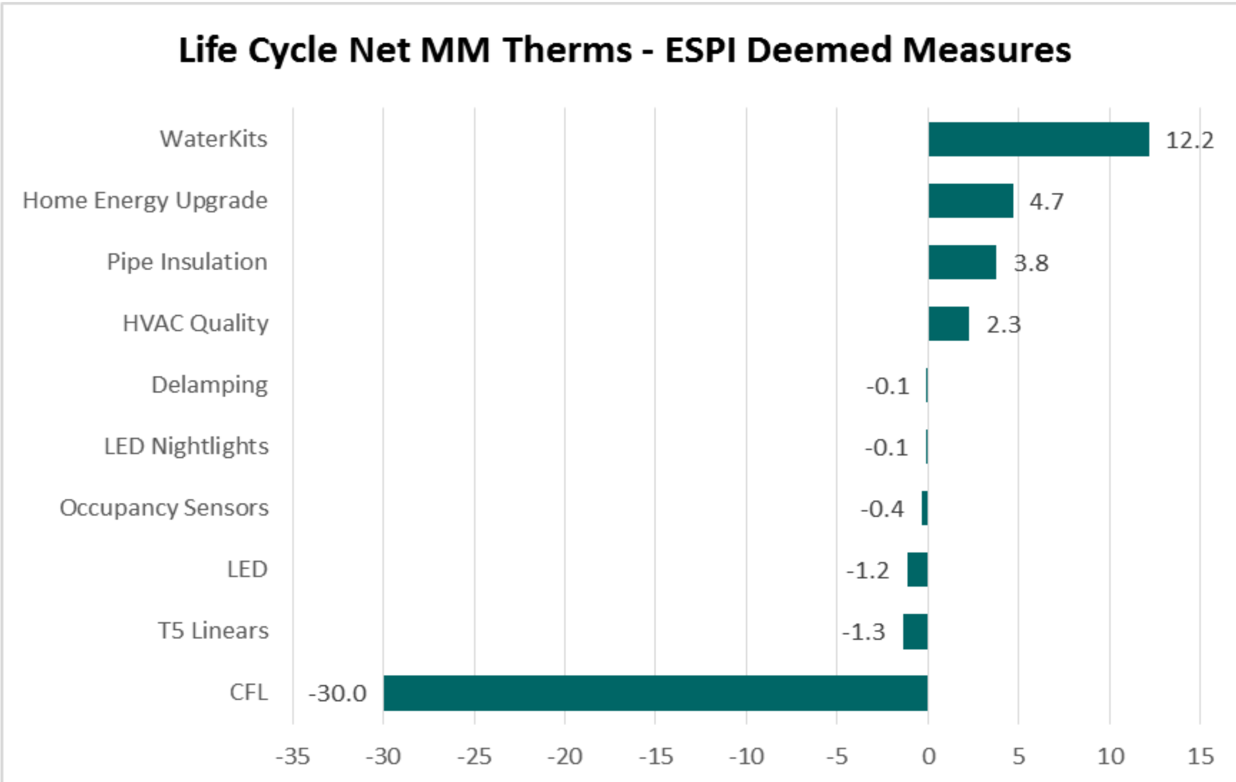


c. **Key Drivers of Evaluation Updates – Largest ESPI Deemed Measures**

These charts rank the deemed uncertain measures and their contribution to statewide lifecycle electric, demand, and natural gas ex-post savings. CFLs continue to be a significant portion of the portfolio in 2013, contributing the most to lifecycle GWh and MW for 2013 ESPI purposes. Water Kits were the largest contributor for lifecycle therm savings (again, this is within the 2013 ESPI Deemed uncertain measure savings and does not include therm savings from Codes & Standards, ESPI Custom or ESPI Deemed – ExAnte review).


Life Cycle Net GWh - ESPI Deemed Measures
CFL 1,917
T5 Linears 306
HVAC Quality 157
Sprinklers 82
Computer Power Mgt 79
LED 74
Occupancy Sensors 58
Delamping 22
Home Energy Survey 19
Home Energy Upgrade 15
Pool Pumps 11
LED Nightlights 7
HVAC Mini 5
WaterKits 0
Pipe Insulation 0
0
500
1,000
1,500
2,000
2,500


Life Cycle Net MW - ESPI Deemed Measures
CFL 271
HVAC Quality 75
T5 Linears 63
Sprinklers 47
Home Energy Upgrade 18
LED 12
Occupancy Sensors 10
Home Energy Survey 9
Delamping 4
Computer Power Mgt 3
Pool Pumps 2
HVAC Mini 1
LED Nightlights 0
WaterKits 0
Pipe Insulation 0
0
50
100
150
200
250
300


Life Cycle Net MM Therms - ESPI Deemed Measures
WaterKits
Home Energy Upgrade
Pipe Insulation
HVAC Quality
Delamping
LED Nightlights
Occupancy Sensors
LED
T5 Linears
CFL
12.2
4.7
3.8
2.3
-0.1
-0.1
-0.4
-1.2
-1.3
-30.0
-35
-30
-25
-20
-15
-10
-5
0
5
10
15

7. Appendices

All the tables and charts used in this report can be found in Appendix A. In addition, Appendix A also includes the IOU specific workbooks. All the measure level data and queries used to build the tables in Appendix A can be found in Appendix B. Appendix C includes more detail on how the final dataset was developed. Appendix D provides a detailed explanation of the difference between the payments from the June 15, 2015 Draft 2013 Performance Statement report and this Final 2013 Performance Statement Report. Appendix E provides a response for comments on the Draft 2013 Performance Statement report submitted by July 13, 2015.

Appendix A. 2013 Performance Statement Workbook

Appendix B. 2013 ESPI Database

Appendix C. Creation of Ex-Post Dataset

Appendix D. Differences between Draft and Final Payment Values

Appendix E. Comment – Response Matrix

Appendix A: 2013 Performance Statement Workbooks

The 2013 ESPI workbooks can be found at:

http://www.cpuc.ca.gov/PUC/energy/Energy+Efficiency/Shareholder+Incentive+Mechanism.htm

The embedded workbook below was used to create all results tables and graphs presented in this report. This embedded workbook includes the statewide results. These are presented separately from IOU-specific results (available via the link above), giving rise to five workbooks in total. Each workbook contains results data by Scenario, PA, ESPI Group, ESPI Category, Uncertain Measure, having Evaluation Results, Measure Group, and RoadMap ID. The results include Record Counts, Quantities, and Gross and Net First Year and Life Cycle Savings. The subsequent tables and charts are derived from this data.

The workbooks contain tables and graphs not available in the report. These are provided to allow the reader to interpret the results at a finer level of detail.

ESPI_2013_Results_T
ables_DraftFinal_SW.x

Appendix B: 2013 ESPI Database

The 2013 ESPI database can be found at:
http://www.cpuc.ca.gov/PUC/energy/Energy+Efficiency/Shareholder+Incentive+Mechanism.htm

This database includes a table with the detailed claim level data for the four IOUs. For each record, the ExAnte and ExPost[4] savings values (including gross and net, first year and life cycle) are available. In addition, the parameter level data is also included (including ExAnte and ExPost values). This database table is the basis for this report and the aggregated data presented in the Excel files in Appendix A.

The queries included in this database were developed to verify that the data in the database match the aggregated data in the Excel file (included in Appendix A) which was then used to produce all tables and graphs in this report. The ReadMe file below provides information detailing the contents of each query and identifies the Excel tables each is intended to match.

ESPI_2013_Appendix
B_DatabaseReadMeFi

[4] Note that the ExPost values for ESPI Deemed ExAnte Review and Codes & Standards records are only pass through values at this time.

Appendix C: Creation of Ex-Post Dataset

Claim Data

The utility energy efficiency program tracking data forms the basis for critical program reporting functions and for evaluation sampling and execution. The cumulative 2013 Q1 – 2014 Q4 quarterly tracking claim data subset for 2013 is the foundation for the values in this report.

Claim Submission Processing

The following steps were followed to process the program tracking data in preparation for ESPI 2013:

1. Receive FTP link to download data from IOUs
2. Write IOU data together into standardized tables
3. Clean data and create "EDFilled" table
4. Quality check the data submission
5. Post IOU data submissions and "EDFilled" table onto ED Central Server (EDCS) and into SQL Server database

Data Cleaning

Although the IOU claims have continuously improved from quarter-to-quarter and cycle-to-cycle, the central data set still required some level of data cleaning to enable processing through the cost effectiveness tool. Data elements necessary for evaluation were cleaned by the CPUC evaluation contractors in conjunction with IOU staff. Throughout the cycle, the amount of data cleaning necessary was continuously reduced as IOUs improved their reporting capabilities. The result of the data cleaning process was a table named "EDFilled," which contains all cleaned ex-ante IOU data necessary for evaluation teams.

Validation and Quality Control

The main component of the Energy Division's data cleaning process was a quality control algorithm. All quality control algorithms were communicated to the IOUs via the Data Transfer Tool, an Access file that the PAs use to transfer their quarterly tracking data to the ED and QC their own data before transferring. The end product was a clean, consistent data set of claims which were ready for evaluation sampling and update.

Evaluation Data

Evaluation data provided in the final 2013 ESPI memos forms the basis for ex-post updates for this report. Evaluation data is reported by evaluation teams, and each evaluation team provides stratum-level results for each parameter being evaluated. The evaluation results are discussed in detail in the ESPI memorandums.[5]

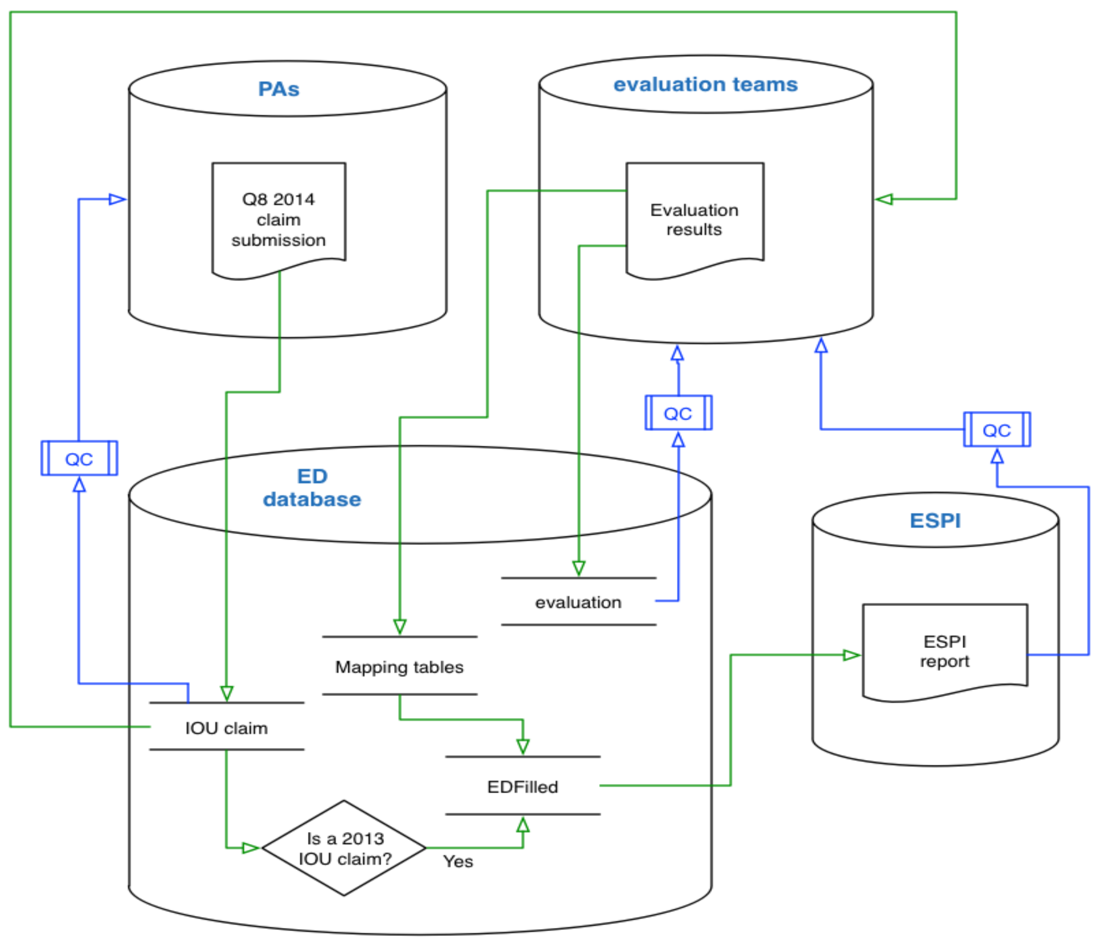
Evaluation Data Processing

The following steps were followed to process the evaluation data in preparation for ESPI 2013:

1. Evaluation team posts evaluation data submission database to Smartfile
2. Bring evaluation data into SQL Server database
3. Write evaluation data together into the Evaluation table
4. Quality check the data submission

[5] http://www.cpuc.ca.gov/PUC/energy/Energy+Efficiency/Shareholder+Incentive+Mechanism.htm

Figure 2: Claims Processing



Evaluation Decision Framework

Commission staff utilized the detailed quarterly tracking data, described in the prior section, as the foundation for prioritizing evaluation activities and applying updates from evaluation work. The detailed evaluation plans carried out Commission staff's guidance to make updates to the claims on a parameter basis in addition to meeting other evaluation objectives.

Commission staff and evaluation contractors utilized the following options in making updates to the utility savings claims for the aforementioned parameters:

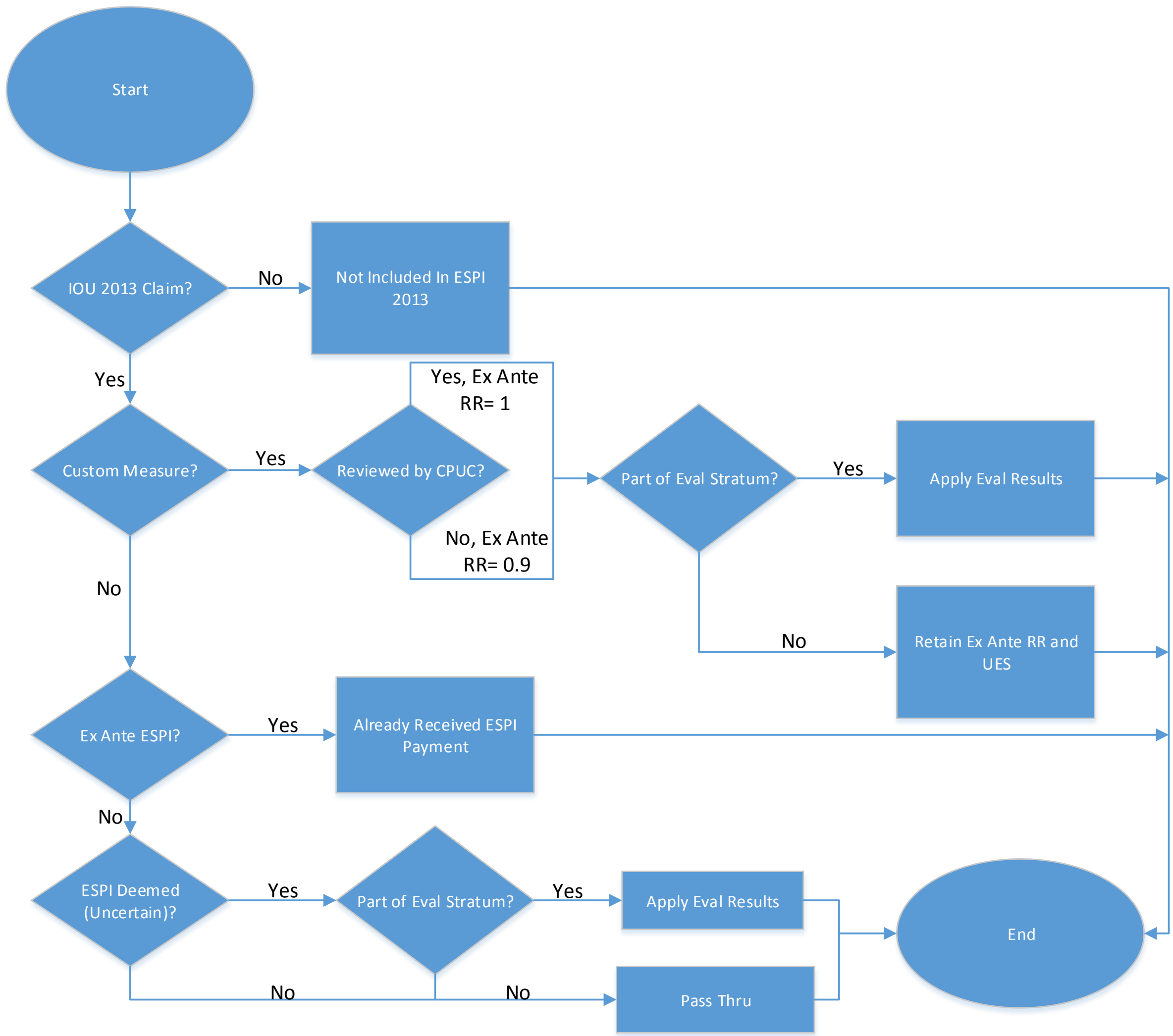
1. Pass through: Accept reported savings values for claims that do not fall within the frame of an impact evaluation (no change); or

2. Leverage results from an evaluation study: Apply stratum-level results to records included in the frame of an impact evaluation. These data are considered "evaluated results" and are used in the context of this report.

Evaluation Decision Tree

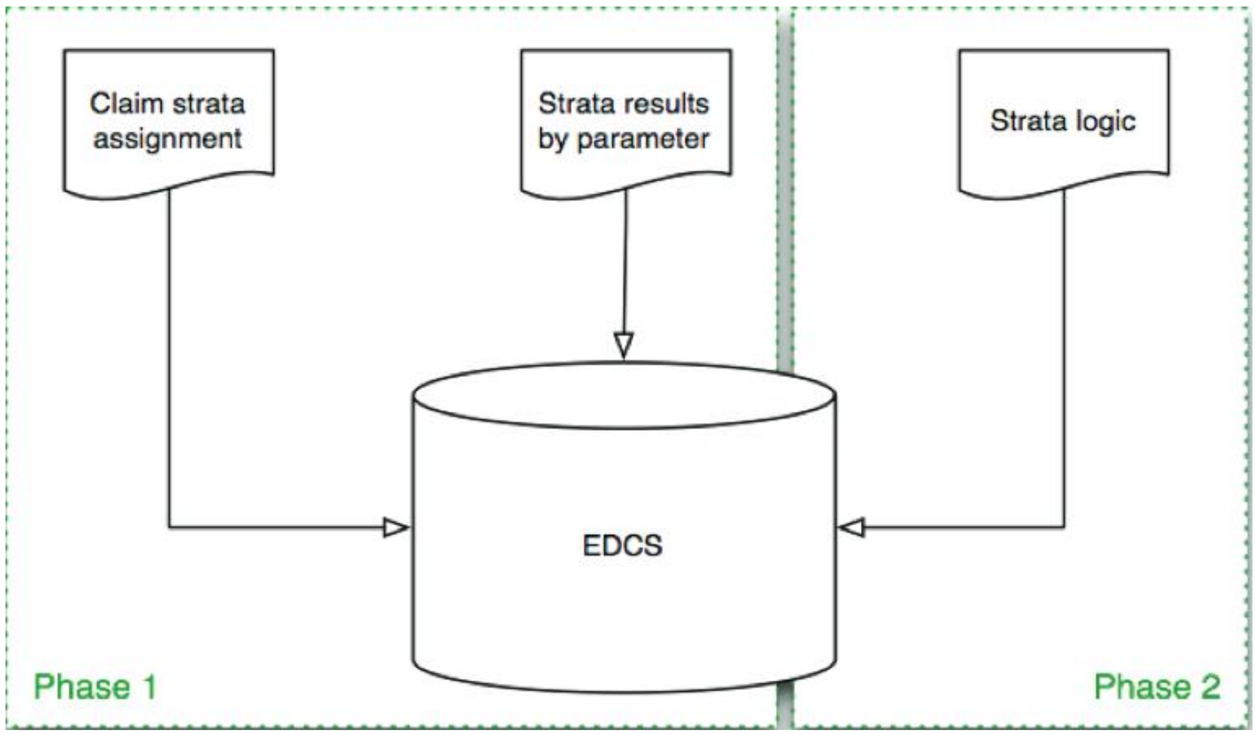
The decision tree in the following figure illustrates how IOU claims were updated with evaluation results for ESPI 2013 and applies to all parameter updates.

Figure 3: Evaluation Framework Decision Tree



ESPI 2013 evaluation results were submitted by the evaluation teams in the form of memos. Each ESPI memo was reviewed and vetted via the public review process, and the final numbers were provided to the data reporting team. Evaluation results were downloaded and processed into the SQL Server database on the Energy Division Central Server (EDCS), an internal server (not publicly available) used to manage the data in a secure environment. Evaluation results are reported in two phases: the first phase is to deliver the data required to apply evaluation results to the final ESPI 2013 claim. In the second phase the evaluation contractors provided the logic which assigns ESPI 2013 claims into strata. A visual of this process is provided in the following figure.

Figure 4: Reporting of Evaluation Results: Phase 1 and Phase 2



Following phases one and two is the third and final phase of evaluation data reporting. Phase three covers submission of all raw and processed evaluation data.

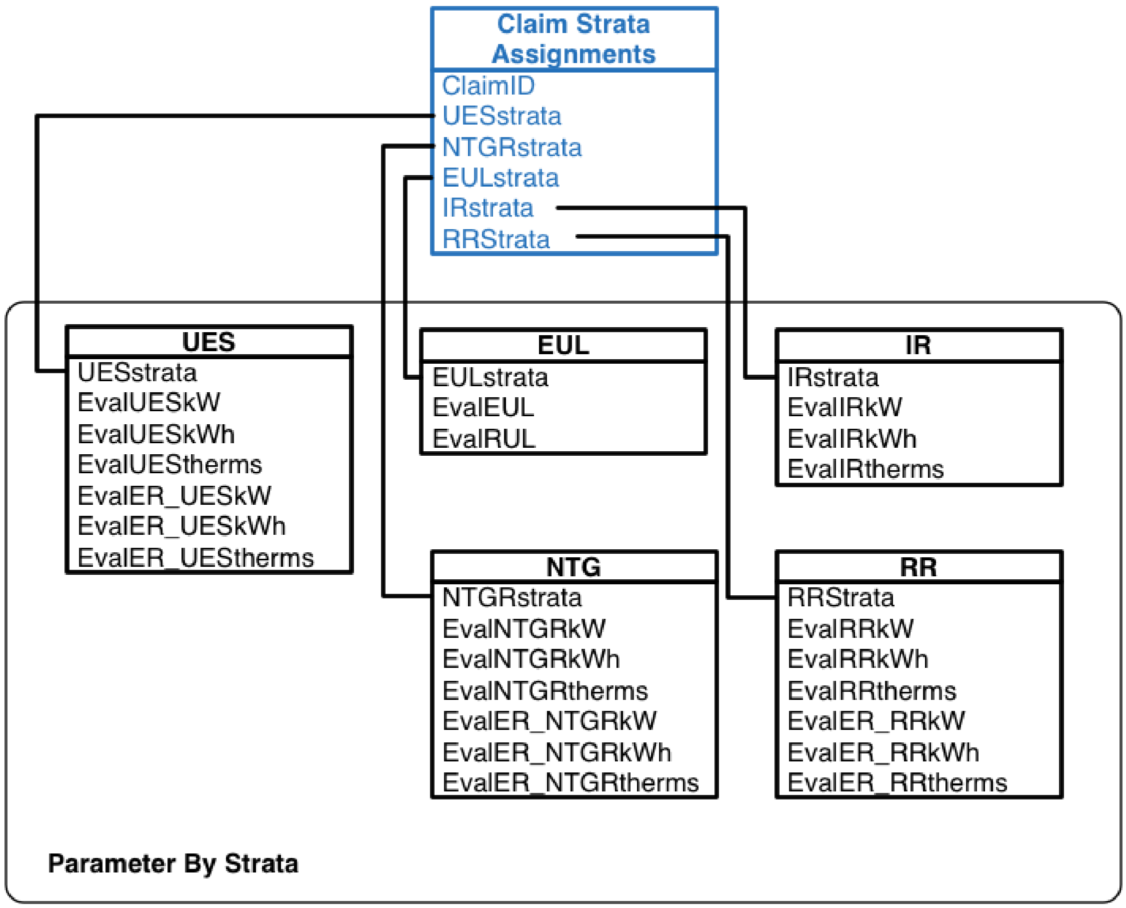
Phase 1 Data Specification

The data specification for evaluation results submitted by evaluation contractors consists of two primary components: record assignments to strata (the blue table in the middle of the following figure), and evaluation parameter results by strata (the five other black tables of the following figure). The two components are linked to assign evaluation parameter results to claim records in a transparent relationship. The connection and resulting data is designed to be consistent with the field evaluation sample structure.

Phase 1 Data Elements

1. Parameter by Strata (PbS) - evaluation parameter results for each strata
2. Strata by ClaimID (SbC) - assignment of claim lines to strata. These two data elements are brought together to assign evaluation results to the claim data.

Figure 5: Evaluation Phase 1 Data Specification



Appendix D: Differences between Draft and Final Payment Values

As noted briefly above, there are differences in the Earnings Estimates presented in this memo compared to the draft June 15, 2015 memo. The tables below present the two sets of estimates.

Table 5 – Proposed 2013 Ex-Post Earnings by Utility – Draft Memo Dated June 15, 2015

	kWh Earnings	kW Earnings	Therms Earnings	Total
PG&E	$8,157,248	$3,731,710	$2,287,886	**$14,176,845**
SCE	$7,033,712	$2,907,608		**$9,941,320**
SCG			$1,988,692	**$1,988,692**
SDG&E	$1,857,525	$834,859	$8,750	**$2,701,134**
Total Statewide	**$17,048,486**	**$7,474,177**	**$4,285,328**	**$28,807,991**

Table 6 – Proposed 2013 Ex-Post Earnings by Utility – Current Memo Dated Aug 14, 2015

	kWh Earnings	kW Earnings	Therms Earnings	Sum of ExPost Earnings	Adjusted ExAnte Review Earnings	Total New Payment
PG&E	$8,546,888	$3,778,597	$2,523,458	**$14,848,943**	-$115,673	**$14,733,270**
SCE	$7,532,558	$3,043,705		**$10,576,263**	-$121,040	**$10,455,223**
SCG			$2,142,209	**$2,142,209**	-$248	**$2,141,962**
SDG&E	$1,990,531	$879,146	$5,753	**$2,875,429**	-$48,217	**$2,827,212**
Total Statewide	**$18,069,977**	**$7,701,448**	**$4,671,419**	**$30,442,845**	**-$285,178**	**$30,157,667**

Table 6 – Showing changes from June 15th draft to Final performance statement report

C	D	E	F	G	H	I	J
	June 15th DRAFT	Amount Removed from June 15th Draft to Account for Amounts Already Paid with 1st ExAnte Payment, But Were Double Counted in the Draft Ex-Post Payment	8/15 Final before Market Effects (D+E)	Add 5% to Gross LC Savings for Market Effects (Gross LC * 0.05)	8/15 Final after Market Effects (F + G)	Amounts that were paid in ex-post, but should not have been paid in the 1st ExAnte payment + the adjustment due to correcting the database versions	8/15 Final Payment (H + I)
PG&E	$14,176,845	-$528,975	$13,647,870	$1,201,073	$14,848,943	-$115,673	$14,733,270
SCE	$9,941,320	-$184,929	$9,756,391	$819,872	$10,576,263	-$121,040	$10,455,223
SCG	$1,988,692	$0	$1,988,692	$153,517	$2,142,209	-$248	$2,141,962
SDG&E	$2,701,134	-$48,204	$2,652,930	$222,499	$2,875,429	-$48,217	$2,827,212
Total Statewide	**$28,807,991**	**-$762,108**	**$28,045,883**	**$2,396,962**	**$30,442,845**	**-$285,178**	**$30,157,667**

Overview of Differences

There are three key reasons for the differences between the Ex-Post Earnings estimates between the June 15, 2015 draft memo and this current memo. These are each explained in more detail below, and is also contained in the "Earnings_Detail_PrelimExAnte" tab in the accompanying workbook[6].

[6] This workbook can be found at http://www.cpuc.ca.gov/PUC/energy/Energy+Efficiency/Shareholder+Incentive+Mechanism.htm

1. **Market Effects Adder**
    - **Result:** Earnings estimates increase for all IOUs.
2. **2013 ESPI Database Versions**
    - **Result:** The earnings estimates increase for PG&E.
3. **Reconciliation with 1st ESPI Payment**
    - **Result:** Due to the overlaps (claims already paid under the first ESPI payment, but also included in the current memo), the earnings estimates decrease for each IOU.

Market Effects Adder

As the IOUs noted in comments, the June 15, 2015 memo neglected to add the 5% adder to the ex-post savings values. Once the ex-post updates were made to the Custom and Uncertain Deemed measures, the total gross savings values were multiplied by 5% and added to the earnings estimates. Please note that the only place where this adder is seen is in the tables presenting earnings values in this memo and the embedded MS Excel workbook. The CPUC and its contractors did not adjust any savings values in order to ensure that all parties could compare the ex-post values presented in this memo and the accompanying workbook and database with the Ex-Post Evaluation Memos published by the evaluation consultants in May 2015.

The result of these changes is that the earnings estimates increase for all IOUs and for each fuel. Table 2 above presents the earnings estimates with and without the 5% adder to illustrate the affect it has on the overall payment. This is also shown in column G in Table 6 above.

2013 ESPI Database Versions

The frozen 2013 ESPI Database (used as the basis for the results in this memo and delivered to stakeholders originally with the June 15, 2015 Draft Ex-Post Earnings Report) is more recent than the version used for the 1st ESPI Payment. The frozen 2013 ESPI Database used as the basis for this memo is based on the 2014 Q4 submittal from the IOUs (referred to as the first submission of the Q8 data in March, 2015). The data used as the basis for the 1st ESPI Payment was the 2014 Q2 data (Q6). Between these two datasets, the primary difference that affected the 2013 claims was for a handful of measures under one PG&E HVAC program. It appears that the updates were made to include building type allowing a more appropriate mapping to the values in the approved workpapers. While at the claim level this resulted in some savings estimates increasing and some decreasing, the net result was an increase in kWh and kW savings for PG&E. This update resulted in an adjustment that increases PG&E Ex-Ante Review earnings estimate by approximately $125k. Note that while PG&E's overall adjustment shown in Table 1 and Table 5 show a decrease, this value would have been a larger decrease had it not been increased by this adjustment.

If the reader reviews the MS Excel workbook[7] in detail, more information on this adjustment can be found on the "Earnings_Detail_PrelimExAnte" tab (in columns AF-AH). Note that when recreating the Ex-Ante Review earnings estimates using the all-inclusive database, the primary difference between the re-creation and the values in the Ex-Ante Review Earnings Resolution is due to the update to these HVAC claims.

These changes are included as part of the adjustments in column I in Table 6 above (the other part of the changes are found in Table 7 below).

Reconciliation with 1st ESPI Payment

As noted in the June 15, 2015 memo, the CPUC and its contractors had not completed the reconciliation with the claims paid under the Resolutions G-3947 and E-4700. This reconciliation is now complete. In short (and explained in more detail below), there were many claims (line item tracking data) that were included in both the Ex-Ante Review (the first ESPI payment) and in the Deemed Ex-Post Review (covered under this memo). If the reconciliation had not been completed, it would have resulted in many claims being included as part of both payments.

The evaluation teams in coordination with the Ex-Ante Team and the CPUC reviewed the overlap claims and determined the appropriate placement for each. Approximately two-thirds of the original overlap claims were assigned to the Ex-Ante Review and the remaining third remained assigned to the Deemed ExPost Review. Since all of the overlap claims were included in both the Draft Ex-Post Earnings Report (dated June 15, 2015) and already paid for under the Ex-Ante Review: 1) those claims that were moved out of Draft Ex-Post Earnings Report caused a decrease in earnings presented in this memo and 2) the claims that remained in this memo had to be deleted out of the Ex-Ante Review (causing an adjustment to the Ex-Ante Review Earnings).

[7] This workbook can be found at http://www.cpuc.ca.gov/PUC/energy/Energy+Efficiency/Shareholder+Incentive+Mechanism.htm

The CPUC and its contractors have already set up a process to ensure future overlapping claims are minimized by finalizing the mapping exercise prior to the Ex-Ante Review process.

The tables below attempt to illustrate the description of differences above. Table 7 presents the earnings estimates associated with the claims that have been officially assigned to the Ex-Post Review (but have already been paid under the first ESPI payment). Table 8 presents the earnings estimates associated with the claims that have been removed from the Ex-Post Review. These claims were already paid under the first ESPI payment.

These tables can be used when comparing how the earnings estimates between the June 15, 2015 memo versus this final memo. The values in Table 7 line up closely with the adjustments presented in Table 1 and Table 5. There are a couple reasons these are not exact: 1) PG&E's adjustment needs to be further adjusted by the change caused by the HVAC updates and 2) other very minor changes in the data between the two frozen datasets. The values in Table 7 are included as part of the adjustments in column I in Table 6 above (the other part of the changes come from the 2013 ESPI database versions mentioned above).

Table 8 should be used when comparing Table 1 in the June 15, 2015 Draft Ex-Post Earnings Report (or Table 4 above) with the "Before Market Effects" earnings estimate in Table 2 above. The difference between these two tables is close to values in Table 8. This can be seen in column E of Table 6 above and comparing to Table 8.

Table 7 – Overlaps – Claims Remaining under the ExPost Review

	kWh Earnings	kW Earnings	Therms Earnings	Total
PG&E	$192,100	$71,957	($24,403)	$239,654
SCE	$66,951	$54,084	$0	$121,035
SCG	$0	$0	$228	$228
SDG&E	$30,936	$15,647	$61	$46,645

Table 8 – Overlaps – Claims no Longer under the ExPost Review

	kWh Earnings	kW Earnings	Therms Earnings	Total

PG&E	**$293,282**	**$259,402**	**($23,709)**	**$528,975**
SCE	**$84,904**	**$100,025**	**$0**	**$184,929**
SCG	**$0**	**$0**	**$19**	**$19**
SDG&E	**$21,606**	**$23,069**	**$3,932**	**$48,608**

Appendix E: Comment / Response Matrix

PA	Subject:	Page or Reference:	Question / Comment	Comment or Question:	Response
PGE	Adjustments for Spillover	Table 2 of draft report. Adjustments reflected in Tables 1 and 2 of PGE response	Comment/Question	The Electric (GWh), Demand (MW) and Natural Gas (MM Therms) values provided in Table 2 of the draft statement should be adjusted upward by 5% to account for spillover. Pursuant to the ESPI Decision (D.13-09-023), "We also intend to award incentives based on net savings goals, adjusted for the effects of "free riders" and 'spillover" (page 36). Elsewhere in the decision, it is stated that "Savings estimates are also increased to account for estimated 5% spillover effects for the 2013-2014 portfolio in the business-as-usual tables, since spillover effects will increase savings total" (page 27). The adjustments are reflected in Tables 1 and 2 below.	This has been incorporated in the payment calculation, memo and is reflected in the accompanying workbooks. Please note that the accompanying Access database (ESPI_2013_Public_v3.accdb) only reflects evaluation results and ESPI first payment adjustments; it does not inlcude the market effects adder so as to remain consistent with evaluation results found in individual studies.

PA	Subject:	Page or Reference:	Question / Comment	Comment or Question:	Response
PGE	Adjustments for CFL Carryover	Table 2 of draft ESPI Statement	Comment/Question	The values provided in Table 2 of the draft statement should be adjusted to account for the lifecycle savings of CFLs that are carried over to 2013 from previous cycles of the Upstream Lighting Program (ULP) that are considered to have been installed in 2013. Detail of the adjustments requested to the ex-post ESPI award for 2013 to account for CFL carryover are shown in the worksheet contained in Appendix A. Ex post net-to-gross values used for the calculation, along with negative therms interactive effects, were retrieved from the WO_028 (2010-2012 California Upstream Lighting) Impact Evaluation Addendum. To compute lifecycle savings, we used the workbook provided with the WO_028 impact evaluation report to calculate mean EUL values for Basic Spiral Lamps, A-Lamp CFL, and Reflector CFL categories. The details of the carry-over of stored CFLs are documented in Appendix K of the CPUC's 2010-2012 Energy Efficiency Annual Progress Evaluation Report ("annual report," published	All savings from CFLs purchased in 2010-2012 were already paid earnings in the 2010-2012 shareholder payment. Therefore, any carry-over savings that was identified in Appendix K of the annual report, was only being carried over for goal attainment purposes, not ESPI purposes.

PA	Subject:	Page or Reference:	Question / Comment	Comment or Question:	Response
				March 2015). Commission staff allowed the investor-owned utilities (IOUs) to select the proportion of lamps to be treated as installed in 2013 and 2014, subject to a proposed 16% cap on energy savings (GWh) for CFLs as a percentage of each IOU's portfolio goals (described in the annual report as the "stored bulb savings transition election"). Since PG&E achieved a relatively small percentage of total savings from CFLs in 2013-14 (4%), PG&E elected to carry over the maximum allotment of lamps, which yields a total energy savings attributable to CFLs still under the 16% cap. As shown in table K-4 of the annual report, the PG&E carryover for the 2013-2014 cycle amounts to 4,233,000 lamps. PG&E's stored bulb savings transition election is 35% for 2013 and 65% for 2014. Since the incentive mechanism has changed over the course of the last cycles, we recount some of the history of the treatment of carryover lamps here: • From 2006-2009, PG&E operated under a shared savings benefit mechanism	

PA	Subject:	Page or Reference:	Question / Comment	Comment or Question:	Response
				and was not awarded incentives for CFLs that carried forward. The definition of installation rate was "percent of IOU-discounted CFLs installed by end of 2008" (Final Evaluation Report: Upstream Lighting Program, CALMAC Study ID: CPUC0015.01, table 6, emphasis added). As noted in 2006-2008 Risk/Reward True-Up Decision (D. 10-12-049, page 60): "In any event, nothing in this decision precludes the utilities from seeking credit for energy savings based on the installation of CFLs that were procured and rebated over the 2006-2008 cycle but which were not installed in that period, provided an incentive mechanism is adopted on a going forward basis." • Beginning with 2010-12, installation rate was defined as "the proportion of CFLs rebated through the program that are purchased and then eventually installed" (ULP impact evaluation, page 6-7, emphasis added). • For 2013 and beyond, PG&E is operating under the ESPI incentive mechanism (approved in	

PA	Subject:	Page or Reference:	Question / Comment	Comment or Question:	Response
				D.13-09-023) which allows for claiming savings for all lamps installed during this cycle. The lifecycle savings associated with the carried-over lamps should therefore be counted toward the 2013-14 ex-post ESPI mechanism for measures determined to have been installed during this period (D. 13-09-023).	
PG E	Verification of the ESPI database	Over-Arching	Comment	PG&E accepts the energy savings values presented by Commission staff and appreciates the efforts of the Energy Division and its consultants to provide the IOUs with measure-level data, as this enabled the verification process and gives us better confidence in the results. Ultimately, the savings values are fairly close; however, PG&E was unable to completely match the savings values contained in the ESPI database against our quarterly EEGA submissions. PG&E would	Energy Division and its consultants would also like to work closely on ensuring the quality of data. For 2013, due to time constraints, a frozen 2013 database needed to be set for evaluation purposes. For 2014, we already have the annual submission from PAs that contain lighting disposition updates. We hope to work with all PAs to help finalize this dataset far before 2014 evaluation studies finish.

PA	Subject:	Page or Reference:	Question / Comment	Comment or Question:	Response
				like to work closely with Energy Division staff during the 2014 Ex Post ESPI efforts to streamline the verification process moving forward.	
PGE	Proposed modifications to the ex-post ESPI incentive	Over-Arching. See updated Tables 1 and 2 in PGE response.	Comment	As a result of the 5% increase for spillover and the CFL carryover savings documented above, we recommend that the values associated with PG&E's savings and associated ex-post earnings in Tables 1 and 2 of the 2013 ESPI Performance Statement Report be updated as follows.	We will apply 5% increase for market effects. For carry-over, all savings from CFLs purchased in 2010-2012 were already paid earnings in the 2010-2012 shareholder payment. Therefore, any carry-over savings that was identified in Appendix K of the annual report, was only being carried over for goal attainment purposes, not ESPI purposes.
SCG	SoCalGas Supports the Use of EM&V Study Data, Not Best Available Information	Over-Arching	Comment/Question	The ESPI Memo identifies a measure group process that was used to update ex ante information, beginning with (1) "applied results from field work," followed by (2) "best available information," and if those two options were not applicable, (3) no update was made. In Decision (D.) 13-09-023, the Commission authorized the ESPI mechanism, including the Ex Post Savings Incentive Component, which is to be evaluated using the following approach:	This issue is not in scope for the performance statement phase of this process, but rather the ex-post results phase, which concluded in May.

PA	Subject:	Page or Reference:	Question / Comment	Comment or Question:	Response
				"To preserve the integrity of the incentive mechanism and ensure that ratepayers fund incentive payments based only [on] reliable data, we will require ex post evaluations as the basis for calculating savings incentive payments for custom projects and for specific "deemed" measures with ex ante parameters that we identify as highly uncertain. Ex post evaluations will be based on adopted EM&V protocols as prescribed in Attachment 2."3 The referenced Attachment 2 provides further clarity concerning the methodology to be utilized for evaluating unit energy savings: "For custom projects, Commission staff, with assistance from evaluation contractors, will assess the project savings versus savings claimed based on a review of the engineering assumptions (for example ensuring appropriate baseline was used), and conduct on-site measurement to make any necessary adjustments to the savings claim based on actual field operations."4 It is SoCalGas'	

PA	Subject:	Page or Reference:	Question / Comment	Comment or Question:	Response
				understanding that the Commission adopted the use of an ex post evaluation process using on-site measurement in order to calculate ESPI awards. This process was utilized by Commission Staff in some cases; however, in others, it was not. The second item of the measure group process utilized in the ESPI Memo is the application of "best available" information – typically, EM&V studies from older program cycles were employed. However, this approach may not render results consistent with use of ex post EM&V studies with on-site measurement. For example, the 2013 Energy Upgrade California® Home Upgrade Program (HUP) results in the ESPI Memo were extrapolated from an EM&V study conducted for the 2010-2012 program cycle. This approach does not include an on-site measurement of specificIn Decision (D.) 13-09-023, the Commission authorized the ESPI mechanism, including the Ex Post Savings Incentive Component, which is to be evaluated using the following approach:	

PA	Subject:	Page or Reference:	Question / Comment	Comment or Question:	Response
				"To preserve the integrity of the incentive mechanism and ensure that ratepayers fund incentive payments based only [on] reliable data, we will require ex post evaluations as the basis for calculating savings incentive payments for custom projects and for specific "deemed" measures with ex ante parameters that we identify as highly uncertain. Ex post evaluations will be based on adopted EM&V protocols as prescribed in Attachment 2."3 The referenced Attachment 2 provides further clarity concerning the methodology to be utilized for evaluating unit energy savings: "For custom projects, Commission staff, with assistance from evaluation contractors, will assess the project savings versus savings claimed based on a review of the engineering assumptions (for example ensuring appropriate baseline was used), and conduct on-site measurement to make any necessary adjustments to the savings claim based on actual field operations."4 It is SoCalGas'	

PA	Subject:	Page or Reference:	Question / Comment	Comment or Question:	Response
				understanding that the Commission adopted the use of an ex post evaluation process using on-site measurement in order to calculate ESPI awards. This process was utilized by Commission Staff in some cases; however, in others, it was not. The second item of the measure group process utilized in the ESPI Memo is the application of "best available" information – typically, EM&V studies from older program cycles were employed. However, this approach may not render results consistent with use of ex post EM&V studies with on-site measurement. For example, the 2013 Energy Upgrade California® Home Upgrade Program (HUP) results in the ESPI Memo were extrapolated from an EM&V study conducted for the 2010-2012 program cycle. This approach does not include an on-site measurement of specific projects undertaken by customers in 2013; SoCalGas is not aware of information as to whether the study is an appropriate substitute given the broad HUP alterations to program design in 2013 (as compared	

PA	Subject:	Page or Reference:	Question / Comment	Comment or Question:	Response
				to program features during 2010-2012). SoCalGas does not believe that the process to utilize "best available" information conforms to the specific EM&V requirements outlined in D.13-09-023. For such instances, SoCalGas instead recommends that no update be applied until the time where ex post evaluation studies with on-site measurement can actually be conducted.	
SCG	Key Omission to the Draft Report - Does not include Market Effects	Over-Arching	Comment/Question	In its review, SoCalGas identified that the Draft Report does not include the impact of market effects. SoCalGas believes this is a key omission that needs to be rectified as part of the Final Report. In D.12-11-015, the Commission directed a five percent market effects adjustment be applied to the energy efficiency portfolio.5 In Resolution (Res.) G-3497, the disposition of the 2013 ESPI award, the Commission applied the five percent market effects adjustment to the ESPI ex ante resource claim.6 Similarly, SoCalGas believes it is consistent with and appropriate to apply the market effects adjustment set out in D.12-	This has been incorporated in the payment calculation, memo and is reflected in the accompanying workbooks. Please note that the accompanying Access database (ESPI_2013_Public_v3.accdb) only reflects evaluation results and ESPI first payment adjustments; it does not include the market effects adder so as to remain consistent with evaluation results found in individual studies.

PA	Subject:	Page or Reference:	Question / Comment	Comment or Question:	Response
				11-015 uniformly to the entire portfolio, including the ex post results. SoCalGas is not aware of any circumstances that would instruct including the market adjustment to the ex ante savings, but not ex post savings. Thus, the Commission should apply the five percent market effects adjustment to the ex post component of the ESPI award. SoCalGas calculates an earnings amount of $2,142,209 when market effects are applied to the Draft Report.	
SCG	The Draft Report Includes Claim IDs That Are Improperly Mapped	Over-Arching	Comment/Question	In its review, SoCalGas noticed that the Draft Report included multiple claim identification numbers (Claim IDs) that were included in the incorrect resource component category. For example, certain project or measure results from custom programs were included in the deemed results. SoCalGas believes that the EM&V study results were correctly applied to the savings claims, so no adjustment to the results is necessary. However, for the sake of accuracy, the Claim IDs should be correctly mapped to the proper resource	Noted. Energy division and consultants have made the requested adjustments. However, we could not find a ClaimID indexed on "5001105524". We do believe SCG did mean ClaimID = 2013*SCG3715*5001185524*10 and have changed appropriately.

PA	Subject:	Page or Reference:	Question / Comment	Comment or Question:	Response
				component categories. SoCalGas describes the issues it identified for the Claim IDs below:• The following Claim IDs associated with pipe insulation are custom program results, not deemed measures / savings, and should be moved to the correct resource component category:- 5001173695- 5001171413- 5001105524• The following Claim IDs associated with water kits are custom program results, not deemed measures / savings, and should be moved to the correct resource component category:- 5001169565- 5001178161- 5001178006- 5001178106- 5001171380- 5001170603• The Energy Upgrade California® Home Upgrade Program is a custom program and should be moved from the deemed resource component to the custom resource component category.	
SDGE	Savings discrepancy for "Pass Thru" savings	Table 11 in Resolution C-3497 versus values in ex-post database	Comment/Question	In reviewing the Access database provided with the report, SDG&E notes a discrepancy between the savings from the first claim of "Pass Thru" savings as reported in Resolution C-3497 Table 11 and the data	Please reference Appendix D.

PA	Subject:	Page or Reference:	Question / Comment	Comment or Question:	Response
				supporting the ex post report. Please verify SDG&E's calculation of the Pass Thru savings.	
SDGE	Recommendation	Executive Summary	Comment	Although the report is primarily to provide information on the second ESPI installment claim for 2013, it would most useful to have the total portfolio 2013 summary information included in the executive summary section. This would minimize having to cross reference several reports to get total information on 2013 performance (e.g., total portfolio gross and net savings, etc.)	This has been noted for 2014 and we will work towards incorporating all relevant results into a single source where possible. For 2013, please reference Appendix D (concerning the reconciliation of the first and second ESPI payments). Also, the accompanying Access db (ESPI_2013_Public_v3.accdb) has incorporated the review done as part of the first ESPI payment in the form of "evaluated" realization rates. Please read the ESPI_2013_Public_README_Draft.docx document for more details.
SDGE	Recommendation	Over-Arching	Comment	Since this is the final performance report for 2013 ESPI, it would be helpful for the reader to have a brief section covering the total awarded claims in 2014 for the first installment of the ESPI.	Noted.
SDGE	Recommendation	Over-Arching	Comment	It would then be useful to provide a total portfolio savings table that would total both the first claim of pass through savings and second claim with the ex post/verified savings to show the total portfolio achievement. This would provide clarity as to what the total ESPI for the	This has been noted for 2014 and we will work towards incorporating all relevant results into a single source where possible. For 2013, please reference Appendix D (concerning the reconciliation of the first and second ESPI payments). Also, the accompanying Access db (ESPI_2013_Public_v3.accdb) has incorporated the review done as

PA	Subject:	Page or Reference:	Question / Comment	Comment or Question:	Response
				program year is (first and second claims) and the incremental claim for the second installment that would be requested in the September advice letters.	part of the first ESPI payment in the form of "evaluated" realization rates. Please read the ESPI_2013_Public_README_Draft.docx document for more details.
SDGE	Recommendation	Over-Arching	Comment	Related to the previous recommendation, it would be useful to provide both the gross and the net savings, for example in Table 2.	Noted. Since ESPI payments were based on life cycle net savings, only these results were primarily presented in the memo. For additional summaries, the database provided can be used.
SDGE	Recommendation	Over-Arching	Comment	The report mentions that it applies stratum-level results to records without any definition of what is stratum-level. Further explanation would help reader in understanding how expost parameters were applied.	Noted and will keep in mind to incorporate for 2014.
SDGE	Recommendation	Table 3 of draft statement report	Comment	Table 3 does specifically identify the source of information used to update the savings assumptions whether field work or best available information was part of the ESPI ex post memos or obtained outside of such memos. It would be most useful to actually provide the specific studies used to update specific information. It would provide useful references for future workpapers as they are updated or new measures are introduced.	Noted and will keep in mind to incorporate for 2014.

ATTACHMENT C

Advice No. 4859

Southern California Gas Company

Natural Gas Transportation Rates
January 2016

TABLE 1

Natural Gas Transportation Rates

Southern California Gas Company

EE Final Incentive Award for PY 2013

		Present Rates			Proposed Rates			Changes		
		Aug-1-15 Volumes Mth	Average Rate $/therm	Aug-1-15 Revenues $000's	Jan-1-16 Volumes Mth	Proposed Rate $/therm	Jan-1-16 Revenues $000's	Revenue Change $000's	Rate Change $/therm	% Rate change %
		A	B	C	D	E	F	G	H	I
1	CORE									
2	Residential	2,337,534	$0.71712	$1,676,283	2,337,534	$0.71785	$1,677,990	$1,707	$0.00073	0.1%
3	Commercial & Industrial	984,102	$0.34081	$335,393	984,102	$0.34115	$335,723	$330	$0.00034	0.1%
4										
5	NGV - Pre SempraWide	117,220	$0.13434	$15,747	117,220	$0.13444	$15,759	$12	$0.00010	0.1%
6	SempraWide Adjustment	117,220	$0.00867	$1,016	117,220	$0.00866	$1,015	($1)	($0.00001)	-0.1%
7	NGV - Post SempraWide	117,220	$0.14300	$16,763	117,220	$0.14310	$16,774	$11	$0.00009	0.1%
8										
9	Gas A/C	825	$0.14157	$117	825	$0.14168	$117	$0	$0.00011	0.1%
10	Gas Engine	16,774	$0.12163	$2,040	16,774	$0.12163	$2,040	$0	$0.00000	0.0%
11	Total Core	3,456,455	$0.58748	$2,030,596	3,456,455	$0.58807	$2,032,644	$2,048	$0.00059	0.1%
12										
13	NONCORE COMMERCIAL & INDUSTRIAL									
14	Distribution Level Service	893,164	$0.07035	$62,834	893,164	$0.07042	$62,895	$61	$0.00007	0.1%
15	Transmission Level Service (2)	654,456	$0.01872	$12,251	654,456	$0.01873	$12,258	$6	$0.00001	0.1%
16	Total Noncore C&I	1,547,620	$0.04852	$75,085	1,547,620	$0.04856	$75,153	$68	$0.00004	0.1%
17										
18	NONCORE ELECTRIC GENERATION									
19	Distribution Level Service									
20	Pre Sempra Wide	333,969	$0.05473	$18,277	333,969	$0.05478	$18,295	$18	$0.00005	0.1%
21	Sempra Wide Adjustment	333,969	($0.00910)	($3,039)	333,969	($0.00911)	($3,043)	($4)	($0.00001)	0.1%
22	Distribution Post Sempra Wide	333,969	$0.04563	$15,238	333,969	$0.04567	$15,252	$14	$0.00004	0.1%
23	Transmission Level Service (2)	2,641,080	$0.01555	$41,067	2,641,080	$0.01556	$41,093	$26	$0.00001	0.1%
24	Total Electric Generation	2,975,049	$0.01893	$56,305	2,975,049	$0.01894	$56,345	$40	$0.00001	0.1%
25										
26	TOTAL RETAIL NONCORE	4,522,669	$0.02905	$131,391	4,522,669	$0.02908	$131,498	$108	$0.00002	0.1%
27										
28	WHOLESALE									
29	Wholesale Long Beach (2)	92,897	$0.01521	$1,413	92,897	$0.01522	$1,414	$1	$0.00001	0.1%
30	Wholesale SWG (2)	67,209	$0.01521	$1,023	67,209	$0.01522	$1,023	$1	$0.00001	0.1%
31	Wholesale Vernon (2)	87,906	$0.01521	$1,337	87,906	$0.01522	$1,338	$1	$0.00001	0.1%
32	International (2)	69,979	$0.01521	$1,065	69,979	$0.01522	$1,065	$1	$0.00001	0.1%
33	Total Wholesale & International	317,990	$0.01521	$4,838	317,990	$0.01522	$4,841	$3	$0.00001	0.1%
34	SDGE Wholesale	1,247,558	$0.01258	$15,692	1,247,558	$0.01259	$15,701	$10	$0.00001	0.1%
35	Total Wholesale Incl SDGE	1,565,548	$0.01311	$20,530	1,565,548	$0.01312	$20,542	$13	$0.00001	0.1%
36										
37	TOTAL NONCORE	6,088,217	$0.02495	$151,920	6,088,217	$0.02497	$152,041	$121	$0.00002	0.1%
38										
39	Unbundled Storage (4)			$26,476			$26,476	$0		
40	System Total (w/o BTS)	9,544,672	$0.23144	$2,208,992	9,544,672	$0.23166	$2,211,160	$2,168	$0.00023	0.1%
41	Backbone Trans. Service BTS (3)	2,809	$0.17784	$182,354	2,809	$0.17784	$182,354	$0	$0.00000	0.0%
42	**SYSTEM TOTALw/BTS**	**9,544,672**	**$0.25054**	**$2,391,346**	**9,544,672**	**$0.25077**	**$2,393,514**	**$2,168**	**$0.00023**	**0.1%**
43										
44	EOR Revenues	203,920	$0.03151	$6,425	203,920	$0.03153	$6,430	$6	$0.00003	0.1%
45	Total Throughput w/EOR Mth/yr	9,748,592			9,748,592					