

ENERGY EFFICIENCY PROGRAMS

Implementation Plan Template Guidance

**Energy Efficiency
Energy Division
California Public Utilities Commission**

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Implementation Plan Template Guidance

Section 1. Introduction

This Guidance document updates and replaces the Implementation Plan template initially adopted in D.15-10-028 (Appendix 4) to reflect subsequent CPUC decisions and direction, including those related to energy efficiency third-party program requirements. All CPUC requirements for program administrators (PAs) to maintain and submit implementation plans remain in effect.

This document is provided to all PAs, which includes but is not limited to the following:

- **Investor-Owned Utilities (IOUs):** Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Southern California Gas Company (SoCalGas), and Southern California Edison Company (SCE); and
- **Regional Energy Networks (RENs):** San Francisco Bay Area REN (BayREN), Southern California REN (SoCalREN), and Tri-County REN;¹ and
- **Community Choice Aggregator (CCA):** Marin Clean Energy (MCE) and Lancaster Choice Energy (LCE).^{2,3}

Beginning May 1, 2020, this Guidance applies to new and revised Energy Efficiency (EE) Programs, including all programs that are a result of the third-party solicitation process required by D.18-01-004. Implementation Plan documents are added to the Commission website for EE programs. At the issuance of this Guidance, documents are to be posted to the CEDARS website.⁴ PAs must keep posted documents on CEDARS current.⁵ Implementation plans on the Commission website encourage program success and transparency.⁶

CEDARS is the referential data system for EE program tracking claims and annual program budget filings. Each program has a dedicated page showing program details including implementation plans. The PAs shall upload and keep current all implementation plans in PDF format on the appropriate

¹ This is the current list of RENs as of the release of this template and is subject to change. Any new RENs will also be required to follow the procedures in this document where relevant.

² This is the current list of CCAs as of the release of this template and is subject to change. Any new CCAs will also be required to follow the procedures in this document where relevant.

³ Per D.12-11-015, OP 2, both the RENs and CCAs are required to file Implementation Plans.

⁴ CPUC California Energy Data and Reporting System (CEDARS) is available at <http://cedars.sound-data.com>

⁵ D.15-10-028, OP 6 states: OP 6 “Each PA will maintain current implementation plans on the online system. PAs will catalog any changes to implementation plans when made.”

⁶ D.18-01-004 FoF 21 states: “Maintenance of updated implementation plans associated with third party programs will encourage program success and transparency, consistent with the terms of D.15-10-028.”

program pages on CEDARS. Additional guidance is provided to the PAs in Appendix C for submitting and maintaining implementation plans.

This update does not require replacement of implementation plans or program implementation plans that are current. Prior to 2015, PAs created “program implementation plans”, some of which were grandfathered in with the adoption of the most recent business plans. The Guidance does apply to revisions of these older program implementation plans. Sections 2 and 3 of the Guidance cover triggers for revising and updating both implementation plans and program implementation plans. For the remainder of this document only the term “implementation plan” will be used, and should be considered inclusive.

This Guidance includes the following Appendices for PAs to utilize:

- Appendix A: Implementation Plan Template (2.0),
- Appendix B: Implementation Plan Management,
- Appendix C: Implementation Plan Change Summary Form, and
- Appendix D: New Innovation Definition (2.0) for Third-Party Programs

New programs, not covered in an existing implementation plan, should utilize Appendices A, B, and, if applicable, D.

Revising implementation plans (or program implementation plans) will trigger use of Appendices B and C, and might require use of Appendices A and D depending on the nature of the program or sub-program changes. Sections 2 and 3 will explain revision triggers.

The PAs may change and post updated implementation plans as needed without formal Energy Division review and approval; the CEDARS system automatically notifies subscribers when changes are made to ensure transparency. The version of the implementation plan on CEDARS will always be current. The PAs will catalog any changes, or it will be automated, and file a list of the changes annually (D.15-10-028, p. 63). PAs are responsible for providing implementation plans that are compliant with all relevant Commission regulations.

-- End Section 1 --

Section 2. When a Revised Implementation Plan is Required

The following triggers require the PAs to develop a revised implementation plan:

1. Changes to eligibility rules
2. Changes affecting incentive levels
3. Fund shifts
4. Changes to Program Theory/Logic Models
5. Addition or elimination of programs and/or sub-programs
6. Changes in program targets
7. Changes in program target customers
8. Change in sub-program approach
9. Changes in incented measures
10. Changes in adopted program performance metrics (PPMs)s / market transformation indicators (MTIs)
11. Other Commission–Directed Changes

The PA is responsible for reviewing the Implementation Plan Template (see Appendix A) to ensure that a revised Implementation Plan has all relevant sections that connect to the program's changes.

Upon revision of the implementation plan, the PA will post both clean and redlined documents of the implementation plan on CEDARS along with the Implementation Plan Change Summary Form Order (see Appendix C). Older versions will be archived by the system automatically, and the current version will be displayed on the program's page on CEDARS.

-- End Section 2 --

Section 3. PA Revisions to Portfolio or Business Plan

For existing energy efficiency programs, certain portfolio modifications may trigger the need for the PA to revise the program's implementation plan.⁷ Examples of portfolio modifications are:

1. The PA needs to adjust its portfolio in response to goal, parameter, or other updates in order to:
 - a. meet savings goals,
 - b. stay within the budget parameters of the last-approved business plan, or
 - c. meet the CPUC-established portfolio cost-effectiveness requirements on a prospective basis (excluding Codes and Standards and spillover adjustments).
2. The CPUC requires a new business plan application as a result of a decision in the policy track of the proceeding (or for any other reason).

Upon revision of the implementation plan, the PA will post both a clean and redlined documents of the implementation plan on CEDARS along with the Implementation Plan Change Summary Form Order (see Appendix C). Older versions will be archived by the system automatically, and the current version will be displayed on the program's page on CEDARS.

-- End Section 3 --

⁷ D.15-10-028, p. 46 - 47.

Section 4. Process for Posting an Implementation Plan

The PAs are required to upload implementation plans on [CEDARS](#). The PAs are directed to follow the updated process⁸ as outlined in Appendix B for posting and maintaining implementation plans in CEDARS. Consistent with the terms of D.15-10-028, PAs shall post updated implementation plans in a timely manner to encourage program transparency and allow program oversight. Per D.15-10-028, “PAs can change the implementation plans as needed without further review, and the version on the publicly available web page will always be current.” (p. 63).

The new process for maintaining implementation plans in the CEDARS system is as follows:

1. Logon to CEDARS using your PA login and navigate to the filing dashboard for the appropriate program;
2. Click the link to download the Change Summary Template, click Replace Implementation Plan, and upload the following three documents:
 - a. A “clean” version (.pdf) which will become the current official implementation plan version.
 - b. A red-lined version (.pdf) of the IP containing all changes since the program was first introduced; and
3. A completed Implementation Plan Change Summary form (.pdf) (See Appendix C).

-- End Section 4 --

⁸ This guidance document updates and replaces the Memorandum: New Guidance for EE Program Implementation Plan Submission, Change Management, and Related Program Fund Shifting, June 28, 2017, http://eestats.cpuc.ca.gov/EEGA2010Files/GuidanceDocuments/IP_Guidance_062817.pdf

Appendices

Appendix A: Implementation Plan Template (2.0)

Appendix B: Implementation Plan Change Management

Appendix C: Implementation Plan Change Summary Form

Appendix D: New Innovation Definition (2.0) for Third-Party Programs

Appendix A: Implementation Plan Template (2.0)

The following information shall be uploaded to the CPUC-maintained website, the California Energy Data and Reporting System (CEDARS)⁹, in accordance with CPUC decisions and Staff guidance.

Program Overview

The Program Overview, which consists of the Program Budget and Savings Implementation Narrative sections, shall be completed consistently by all IOUs for statewide programs.

Program Budget and Savings

The CEDARS platform generates summary views of the following information, based on application tables that the PAs upload to CEDARS. The information is organized at the program level and, if applicable, sub-program level to enable multiple cross tabulations and outputs for stakeholders' review and consideration. Programs with subprograms will be displayed at subprogram level and will roll up to a program summary page.

1. Program and/or Sub-Program Name
2. Program / Sub-Program ID number
3. Program / Sub-program Budget Table
4. Program / Sub-program Gross Impacts Table
5. Program / Sub-Program Cost Effectiveness (TRC)
6. Program / Sub-Program Cost Effectiveness (PAC)
7. Type of Program / Sub-Program Implementer (PA-delivered, third party-delivered or Partnership)
8. Market Sector(s) (i.e., residential, commercial, industrial, agricultural, public)
9. Program / Sub-program Type (i.e., Non-resource, Resource)
10. Market channel(s) (i.e., downstream, midstream, and/or upstream) and Intervention Strategies (e.g., direct install, incentive, finance, audit, technical assistance, etc.), campaign goals, and timeline.

Implementation Plan Narrative

PAs shall include the following narrative description for each program (and sub-program, if applicable):

1. **Program Description:** Describe the program, its rationale and objectives.
2. **Program Delivery and Customer Services:** Describe how the energy efficiency program will deliver offerings (including program strategies/tactics, market channel, and targeted market/customer group); how it will reach customers, including those in CPUC-defined

⁹ California Energy Data and Reporting System (CEDARS), <https://cedars.sound-data.com/>

hard-to-reach and/or disadvantaged communities (if applicable), and any services that the program will provide. Describe all services and tools that are provided.

3. **Program Design and Best Practices:** Describe the program strategies/tactics that will be used to reduce the identified market barriers for the targeted customer group and/or market actor(s). Describe why the program approach constitutes “best practices” and/or “lessons learned.” Include descriptions of key software tools that are significant to program strategy and implementation, including audit tools. Provide references where available.
4. **Innovation** (If applicable and for programs designed and implemented by a third party): Describe how the program is innovative and will increase the uptake of cost-effective energy efficiency and minimizes lost opportunities for promoting other demand side energy reduction efforts by advancing a technology, marketing strategy, or delivery approach in a manner different from previous efforts. See Appendix D for the update innovation definition and requirements.
5. **Metrics:** Provide metrics that will be used to track program progress. For programs design and implemented by third parties, include the required performance metric for innovation. Metrics can include non-energy metrics if applicable.
6. **For Programs claiming to-code savings:** Describe how the program complies with Applicable Laws and:
 - a. Identify where to-code savings potential resides;
 - b. Specify which equipment types, building types, geographical locations, and/or customer segments promise cost-effective to-code savings;
 - c. Describe the barriers that prevent code-compliant equipment replacements;
 - d. Explain why natural turnover is not occurring within certain markets or for certain technologies; and
 - e. Detail the program interventions that would effectively accelerate equipment turnover.
7. **Pilots:** Describe if any pilot projects are part of this program and explain the innovative characteristics to these pilots. The inclusion of this description should not replace the Ideation Process requirements currently agreed by CPUC staff and the IOUs. This process

is still undergoing refinements and will be further discussed as part of Phase III of this proceeding (R.13-11-005).¹⁰

8. **Workforce Education and Training:**¹¹ Describe how the program will support workforce, education, and training to:
 1. Expand/initiate partnerships with entities that do job training and placement;
 2. Require placement experience for any new partners in the workforce, education, and training programs and new solicitations;
 3. Require “first source” hiring from a pool of qualified candidates, before looking more broadly, beginning with self-certification; and
 4. Facilitate job connections, by working with implementers and contractor partners, and utilizing energy training centers.

9. **Workforce Standards:**¹² Identify all relevant workforce standards that the Implementer deems applicable to the Program, including any specific skills certification and/or broader occupational training and experience for the following:
 - a. HVAC Measures
 - i. Installation, modification, or maintenance of non-residential HVAC measures with an incentive of \$3,000 or more are required to be installed by workers or technicians that meet one of the following criteria:
 1. Enrolled in and/or completed an accredited HVAC apprenticeship
 2. Completed more than five years of work experience at the journey level per California Department of Industrial Relations definition, passed competency tests, and received specific credentialed training
 3. Has a C-20 HVAC contractor license issued by the California Contractor’s State Licensing Board?
 - b. Advanced Lighting Control Measures
 - i. Installation of non-residential lighting control measures with an incentive of \$2,000 are required to be installed by installation technicians who have completed the California Advanced Lighting Controls Training Program (CALCTP).

¹⁰ The Ideation Process is a set of reporting requirements developed collaboratively to ensure adequate reporting and review of pilots and other similar projects. This process will be further deliberated as part of Phase III. The current set of guidelines can be found here: <https://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=5292>

¹¹ D.18-05-041, page 20-21 and Ordering Paragraph 7

¹² D.18-10-008, Ordering Paragraph 1-2 and Attachment B, Section A-B, page B-1.

10. **Disadvantaged Worker Plan:**¹³ Describe how the program will provide Disadvantaged Workers with improved access to career opportunities in the energy efficiency industry for programs that directly involve the installation, modification, repair, or maintenance of Energy Efficiency equipment. Also describe the method that will be used for tracking this population in order to satisfy metric reporting requirements.

11. **Additional information:** Include here additional information as required by CPUC decision or ruling, as applicable. Indicate decision or ruling and page numbers.

Supporting Documents

Attach the following documents (in PDF format):

1. **Program Manuals and Program Rules (See below)**
2. **Program Theory¹⁴ and Program Logic Model¹⁵:** Program Theory and Logic Models should visually explain underlying program theory supporting the sub-program intervention approach, referring as needed to the relevant literature (e.g., past evaluations, best practices documents, journal articles, books, etc.).
3. **Process Flow Chart:** Provide a program or, if applicable, a sub-program process flow chart that describes the administrative and procedural components of the sub-program. For example, the flow chart might describe a how a customer submits an application, how the implementer screens the application, the application approval/disapproval process, verification of purchase or installation, incentive processing and payment, and any quality control activities.
4. **Incentive Tables, Workpapers, Software Tools:** Provide a summary table of measures and incentive levels, along with links to the associated workpapers.
5. **Quantitative Program Targets:** Provide estimated quantitative information on number of projects, companies, non-incentive customer services and/or incentives that program aims to deliver and/or complete annually. Provide references where available.

¹³ D.18-10-008, Attachment B, Section D, page B-9.

¹⁴ The expected causal relationships between program goals and program activities in a way that allows the reader to understand why the proposed program activities are expected to result in the accomplishment of the program goals. A well-developed program theory can (and should) also describe the barriers that will be overcome in order to accomplish the goals and clearly describe how the program activities are expected to overcome those barriers. California Evaluation Framework, June 2004.

¹⁵ The graphical representation of the program theory showing the flow between activities, their outputs, and subsequent short-term, intermediate, and long-term outcomes. California Evaluation Framework, June 2004.

6. **Diagram of Program:** Provide a one-page diagram of the program including sub-programs. This should visually illustrate the program/sub-program linkages to areas such as:
 - a. Statewide and individual IOU marketing and outreach
 - b. Workforce Education & Training programs
 - c. Emerging Technologies and Codes and Standards
 - d. Integrated efforts across demand-side management programs

7. **Evaluation, Measurement & Verification (EM&V):** Describe any process evaluation or other evaluation efforts that the program administrator (PA) or program implementor (PI) will undertake to identify the evaluation needs that the must be built into the program, clearly identifying who will be responsible for which evaluation activity. These might include:
 - a. Data collection strategies embedded in the design of the program or intervention to ensure ease of reporting and near-term feedback, and
 - b. Internal performance analysis during deployment
 - c. Performance metrics
 - d. All PAs should indicate what coordination support and funding, if any, they will provide to support program evaluation.

8. **Normalized Metered Energy Consumption (NMEC):** If NMEC is applicable please include a detailed Program-level M&V plan, as called for in the most recently updated NMEC Rulebook. The revised Rulebook includes requirements for Program-level M&V plans to be submitted as part of the Implementation Plan:

Site-level NMEC Programs:

1. PAs must submit a Program-level M&V Plan for each Site-level NMEC program. For third-party programs, PAs may work with – or task – Implementers to develop parts or all of the Program-level M&V Plan. However, PAs are responsible for authoring and submitting the Program-level M&V Plan for all NMEC programs (third-party and PA-implemented). The Program-level M&V Plan must be included in Implementation Plan filings for the program and must include:
 - a. Methodology, analytical methods and software employed for calculating Normalized Metered Energy Consumption, as well as both gross and net savings, resulting from the energy efficiency measures installed and not influenced by unrelated changes in energy consumption.
 - b. Data collection plan.
 - c. Approach to ensure adequate monitoring and documentation of energy savings for each project over the reporting period.
 - d. A method of identifying and adjusting for non-routine events.
 - e. Method of determining program influence, either through a detailed data collection and analysis plan provided in the M&V Plan or adoption of Commission approved default NTG values.

- f. Programs targeting savings that comprise less than 10% of annual consumption must provide a rationale and explanation of how savings will be distinguishable from normal variations in consumption.
 - g. A description of the incentive structure, including a) a description of which entity receives compensation at each stage of the project; and b) method(s) and tools utilized in the calculation of incentives and/or compensation;
 - h. Documentation of the expected costs, energy savings, peak impacts, and effective useful life (EUL) of planned measures and intervention strategies. Include supporting documentation, work papers and/or DEER values.
 - i. Describe how the project level EUL will be calculated for purposes of energy savings claims.
 - j. Describe the program target population, and participant eligibility criteria.
 - k. Demonstrate compliance with Decision 17-11-006 Ordering Paragraph 2 for programs targeting to-code savings. Specifically:
 “The investor owned utilities shall ensure that all program proposals and program implementation plans, for programs that target (or will claim) to-code savings, describe what program design elements, data collection activities, and/or analyses will be conducted to help lend insight into the following questions as part of the planned implementation of the proposed program:
Where does the to-code savings potential reside? What equipment types, building types, geographical locations, and/or customer segments promise cost-effective to-code savings? What kinds of barriers are preventing code-compliant equipment replacements? Why is natural turnover not occurring within certain markets or for certain technologies? What program interventions would effectively accelerate equipment turnover? “
 - l. A copy of any Bid M&V Plan submitted by third-party implementers in their bid.
 - m. Any other item as required by the NMEC rulebook and other applicable rules.
2. Third-party implementers shall provide an M&V Plan as part of their bid package. The Bid M&V Plan in bid packages must include, at a minimum:
 - a. A description of the program target population and participant eligibility criteria;
 - b. Documentation of the expected costs, energy savings, peak impacts, and effective useful life (EUL) of planned measures and intervention strategies;
 - c. Identification of the method(s) and calculation software that will be used to calculate savings, including required information as outlined elsewhere in this rulebook; and
 - d. Approach to ensure adequate data collection, monitoring and documentation of energy savings for each project over the reporting period.

Population-level NMEC Programs:

1. PAs must submit a program-level M&V Plan for each Population-level NMEC program. For third-party programs, PAs may work with – or task – implementers to develop parts or all of the Program-level M&V Plan. However, the Program-level M&V Plan is still a PA document that PAs will submit directly to the Commission. The program-level M&V

Plan must be included in any Implementation Plan filings for the program and must include:

- a. Identification of the analytical methods(s) and calculation software that will be used to determine payable and claimable savings, including references to the version and up-to-date documentation for the method(s) and software.
- b. A description of how the method(s) and software will be used to calculate both gross and net savings and peak impacts, including how they will or will not address the following:
 - i. Normalization for weather and other factors;
 - ii. Determination of net savings: explain if using default net-to-gross values or some other method (e.g. a comparison group and other adjustments); and
 - iii. Outlier site & non-routine event identification and data treatment including filtering and other amelioration.
- c. Hourly load shape impact calculations
- d. Data collection plan;
- e. Approach to ensure adequate monitoring and documentation of energy savings, including meter mapping for each project over the reporting period;
- f. A description of plans for the following, in compliance with the rules as outlined in Section II.2. of this rulebook:
 - i. Permissible project types;
 - ii. Program design criteria, including the calculations for forecasted average savings and fractional savings uncertainty (FSU);
 - iii. Payments and incentives, including the schedule and structure for payments to implementers;
 - iv. Qualifying measures;
 - v. Cost effectiveness.
- g. Description of program participant eligibility criteria, such as the program's approach to participants with non-routine events in their baseline period, participation in other energy efficiency programs and/or other demand side management offerings (electric vehicles, solar PV, storage, tenant turnover, etc.).
- h. A description of how the project and program-level EULs will be calculated demonstrating compliance with current Technical Guidelines for determining weighted average EUL¹⁶, unless staff approves an alternative method for EUL calculation.

¹⁶ For details, please refer to documents posted here: ftp://ftp.cpuc.ca.gov/gopher-data/energy_division/EnergyEfficiency/RollingPortfolioPgmGuidance/Combining_Measures_Claims.DRAFT.xlsm

- i. A full description of the method(s) and calculation software that will be used to determine payable and claimable savings, and the payment terms for any planned payments (to customers, third party implementers, contractors) based on savings measured using Population-level NMEC methods. Describe if/how payable savings may differ from claimable savings, and if so, why is this appropriate and how will the program address risk?
 - j. Demonstrated compliance with Decision 17-11-006 Ordering Paragraph 2 for programs targeting to-code savings.
*“The investor owned utilities shall ensure that all program proposals and program implementation plans, for programs that target (or will claim) to-code savings, describe what program design elements, data collection activities, and/or analyses will be conducted to help lend insight into the following questions as part of the planned implementation of the proposed program:
 Where does the to-code savings potential reside?
 What equipment types, building types, geographical locations, and/or customer segments promise cost-effective to-code savings?
 What kinds of barriers are preventing code-compliant equipment replacements?
 Why is natural turnover not occurring within certain markets or for certain technologies?
 What program interventions would effectively accelerate equipment turnover?”*
 - k. A copy of any Bid M&V Plan submitted by third-party implementers in their bid.
 - l. Any other item as required by the NMEC rulebook and other applicable rules.
2. **Bid M&V Plans:** Implementers must develop and submit an M&V Plan as part of their bid. The Bid M&V Plan in bid packages must include at least the following:
- a. A description of the program target population and participant eligibility criteria;
 - b. Documentation of the expected costs, energy savings and effective useful life (EUL) of planned measures and intervention strategies;
 - c. Identification of the method(s) and calculation software that will be used to calculate savings, including required information as outlined elsewhere in this rulebook.

Program Manuals

All programs must have manuals uploaded in CEDARS to clarify the eligibility requirements and rules of the program for implementers and customers. Program rules must comply with CPUC policies and rules. Table templates are available at CEDARS. At minimum, manuals should include:

1. **Eligible Measures or measure eligibility, if applicable:** Provide requirements for measure eligibility or a list of eligible measures.
2. **Customer Eligibility Requirements:** Provide requirements for program participation (e.g., annual energy use, peak kW demand)

3. **Contractor Eligibility Requirements:** List any contractor (and/or developer, manufacturer, retailer or other “participant”) or sub-contractor eligibility requirements (e.g. specific required trainings; specific contractor accreditations; and/or, specific technician certifications required).
4. **Participating Contractors, Manufacturers, Retailers, Distributors, and Partners:** For upstream or midstream incentives and/or buy down programs indicate, if applicable.
5. **Additional Services:** Briefly describe any additional sub-program delivery and measure installation and/or marketing & outreach, training and/or other services provided, if not yet described above
6. **Audits:** Indicate whether pre and post audits are required, if there is funding or incentive levels set for audits, eligibility requirements for audit incentives, which demand side resources will be included within the audit’s scope and who will perform the audit.
7. **Sub-Program Quality Assurance Provisions:** Please list quality assurance, quality control, including accreditations/certification or other credentials
8. **Other Program Metrics:** List all documentation and data used to calculate Program Metrics. This includes but is not limited to data in support of sector-level and portfolio-level metrics.

(End of Appendix A)

Appendix B: Implementation Plan Management

Pursuant to CPUC D.15-10-028, the PAs are required to maintain current implementation plans on the California Energy Data and Reporting System (CEDARS). The following information provides guidance to the PAs for implementation plan submission, change management, and related program fund shifting.¹⁷

CEDARS is designed to show the current implementation plans on each program’s webpage. The PAs are directed to follow this process and to ensure that the data in their implementation plans are consistent with the CEIs and annual budget advice letter (ABAL) filings and, in some cases, Program Definitions Table data. The “PIP Addenda” process that was a function within the Energy Efficiency Group Application (EEGA)/EE Stats for past program cycles has been discontinued, and all PIP-related addenda have been archived. Implementation plan change management will now be a function of the CEDARS platform.

Managing Implementation Plans on CEDARS

CPUC D.15-10-028 discussed the requirements for implementation plans within the rolling portfolio framework; namely, that such plans would be maintained on an online system (CEDARS)¹⁸. The system displays each program on its own webpage, controls versioning, and alerts the Energy Division and subscribers and when implementation plans change occur.

The PAs may change implementation plans as needed without further Energy Division review; the CEDARS system issues a notification to Energy Division staff, and other subscribers, when changes are made.

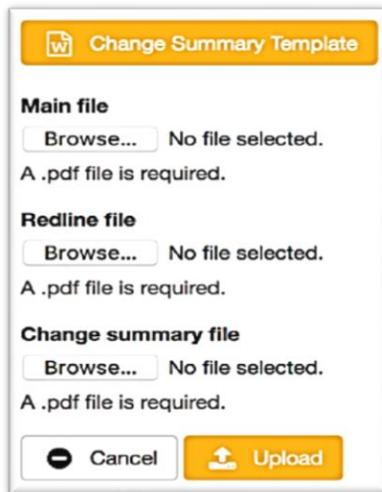


Figure 1: Screenshot of implementation plan upload/change dashboard on CEDARS.

¹⁷ Updates to Energy Divisions’ Memorandum: New Guidance for EE Program Implementation Plan Submission, Change Management, and Related Program Fund Shifting, June 28, 2017 as described in CEDARS.

¹⁸ D.15-10-028, section 3.2.2.4, p. 63.

The new process for maintaining implementation plans in the CEDARS is as follows:

1. Logon to CEDARS using your PA login and navigate to the filing dashboard for the appropriate program.
2. Click the link to download the Change Summary Template. Click Replace Implementation Plan and upload the following three documents:
 - A “clean” version (.pdf) which will become the current official implementation plan version.
 - A red-lined version (.pdf) of the implementation plan containing all changes since the program was first introduced, and
 - A completed Implementation Plan Change Summary form (.pdf) in Appendix C below.

CEDARS will not accept implementation plan revisions unless all three files are uploaded as .pdf files. The Energy Division staff and other subscribers will receive a system-generated notification when implementation plan changes have been uploaded, but they are not required to approve the documents in the system.

In many cases, changes to program implementation include fund shifts, which are indicated in the Implementation Change Summary Form note below. Decision 15-10-028 removed the requirement to file advice letters for fund shifting; however, fund shifts will likely require updates to annual compliance filings. In such cases, the PAs are directed to submit revised CEI inputs for that budget year, plus revisions to other compliance filing documents, such as appendices and the program definitions table.

(End of Appendix B)

Appendix C: Guidance for the Implementation Plan Change Summary Form

The Energy Division developed an Implementation Plan Change Summary Form to accompany all implementation plan changes uploaded to CEDARS. This online form is available on CEDARS and should be used to document any required changes to the implementation plan and uploaded to CEDARS as a pdf file.

General Program Information: Complete the top section of the form. If the implementation plan belongs to a subprogram, use the subprogram budget for the “Current Program Budget.”

Program Name		Date	
Subprogram Name(s)		PA Name	
Program ID		PA Program Contact	
Current Program Budget		Past Program Budget (if applicable)	

Trigger requiring change to implementation plan: Select one of the following triggers requiring a change to the implementation plan.

1. Changes to eligibility rules
2. Changes affecting incentive levels
3. Fund shifts
4. Changes to Program Theory/Logic Models
5. Addition or elimination of programs and/or sub-programs
6. Changes in program targets
7. Changes in program target customers
8. Change in sub-program approach
9. Changes in incented measures
10. Changes in adopted program performance metrics (PPMs)s / market transformation indicators (MTIs)
11. Other Commission–Directed Changes

Driver of change: Content for change driver(s) should be specific and succinct.

Description of change: Change descriptions should clearly indicate what area(s) of program implementation is changing, such as program financial/budget detail, logic models, eligibility rules, marketing plans, target sectors, etc.

IMPORTANT: Some changes will require updates to CEI and the Program Definition Table. D.15-10-028 requires consistency among these filings. It is the PA’s responsibility to keep that information current in order for the system to accept program savings claims.

Budget change: Budget change should indicate any other program budget(s) involved in the fund shift (money shifted from one program to another), measure incentive/rebate changes, changes to PA budgets or other budget items, and other relevant budget details. Revised budgets should be consistent with CEI in annual compliance filings.

Implementation plan section and/or wording changed or replaced: Cite specific implementation plan section(s) to be changed or replaced.

Replacement language or information: Summarize replacement content or relevant information within this change version.

Revised energy savings (if any): indicate revised energy savings associated with the change(s).

Other implementation plan changes required: Identify if the implementation changes require changes to the Program Definitions Table or Cost Effectiveness inputs.

(End of Appendix C)

Appendix D: New Innovation Definition (2.0) for Energy Efficiency Programs Designed and Implemented by Third Parties

Context

Since the current definition of “innovation” was developed in 2007, the EE Procurement Review Group (EE-PRG) proposed to update the definition. The intent in doing so was to simplify the definition that will be included in upcoming third-party requests for abstract (RFAs) and requests for proposal (RFPs) and to provide guidance for what bidders need to include in their submissions to enable the IOU, Independent Evaluator, and EE-PRG reviewers to sufficiently assess the feasibility of the opportunity.

Proposed Definition

To be “innovative,” the proposal must demonstrate that the program will ultimately increase the uptake of cost-effective energy efficiency by advancing a **technology, marketing strategy, or delivery approach** in a manner different from previous efforts.

Such strategies would ideally be scalable and replicable across sectors, segments, and technologies and seek to integrate other demand side technologies where feasible, such as demand response and distributed generation, to minimize lost opportunities in conformance with the guidance established by the Commission. While each innovative program may not individually be cost-effective, the intent is to lead to cost-effective savings over time. See examples below as guidance.

To demonstrate that a proposed program is innovative, the bidder must include:

- A. A clear and concise rationale in the RFA and RFP stages for why new combinations of proven technologies,¹⁹ updated or re-designed marketing strategies, or modified delivery approaches (including using new relationships or partnerships) would yield greater uptake savings than previous models;
- B. A high-level analysis in the RFA stage and a detailed analysis in the RFP stage showing how the innovative approach will yield increased savings and/or participation beyond existing strategies; and
- C. Metrics that will be used to track progress.

All innovative ideas, rationale, and analysis will be protected under the proprietary/confidentiality clause found in Section ##. Each IOU will also provide a process to file a complaint in the event the bidder believes the clause was violated

¹⁹ Emerging Technology (ET) program technologies would not be part of this approach as it would be pursued within the ET program.

Examples of Innovative EE Programs

General examples of “technology” innovation could include, but are not limited to:

- A measure that is no longer considered “emerging technology” but not yet fully in the market,
- A more advanced energy-saving technology, or
- A novel combination of technologies, including strategies that integrated EE with other demand side technologies such as demand response and distributed generation.

General examples of “market strategy” innovation could include, but are not limited to:

- Online systems or new software strategies that support and promote comprehensive energy resource management,
- Creative incentives or prizes for participation, or
- Embedded in other transactions (e.g., in post office mailers when moving)

General examples of “delivery approach” innovation could include, but are not limited to:

- A new strategy for customer engagement and enrollment,
- A competition (e.g., “golden carrot” used for refrigerators),
- A new partnership/relationship to reach different/additional customers,
- A new approach to customer targeting that allows the program to focus on high-value savings opportunities or to specifically reach key customer groups,
- A more streamlined implementation process, or
- A strategy that addresses a persistent market barrier.
- A program delivery strategy that promotes comprehensive integrated site specific energy solutions across demand side resources such as EE, demand response and distributed generation.

For Emerging Technologies Programs, which are not a customer-facing program, innovation or innovative concepts that yield measurable improvements upon past IOU implementation may include but are not limited to the following:

- A new or improved partnership/relationship or process to reach different/additional stakeholder(s) that can assist in identifying, evaluating, and/or introducing emerging technologies.
- A new or improved process(es) for identifying, evaluating and/or introducing EE technologies that have the capability to promote comprehensive integrated energy solutions across other demand side resources such as demand response and distributed generation.
- Development of a new or improved process(es) to:
 - More efficiently support, among other things, the timely discovery, screening, assessment, and demonstration of new EE technologies and solutions for consideration for inclusion into the program portfolio.
 - Reduce the lack of information, performance uncertainty and/or other barriers related to customer adoption of emerging technologies.

- More efficiently identify and vet measures that are suited to unique needs of DAC and HTR customers.
- Increase access to and use of ET findings and recommendations by EE Program Implementers.

An innovative Emerging Technology Program design may include any of the above elements, but is not limited to those any of the above elements. In addition, an innovative Emerging Technology Program design is not limited to specific measures and can include novel combinations of demand side technologies such as energy efficiency, distributed generation, and demand response program interventions for energy efficiency program intervention.

[\[1\]](#) Emerging Technology (ET) program technologies would not be part of this approach as it would be pursued within the ET program.

(End of Appendix D)

-- End of Guidance Document --