

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE



May 19, 2022

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Center for Sustainable Energy
3980 Sherman Street, Suite 170
San Diego, CA 92110
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SUBJECT: Disposition of PG&E Advice Letter PG&E 4441-G-A/6201-E-A; CSE 127-E-A; SCE 4505-E-A; SoCalGas 5812-G-A - Supplemental: Self-Generation Incentive Program (SGIP) 2021-2025 Measurement and Evaluation Plan

Dear Mr. Dietz, Ms. Menon, Ms. Velazquez, and Ms. Ninow:

The Energy Division approves PG&E Advice Letter PG&E Advice Letter PG&E 4441-G-A/6201-E-A; CSE 127-E-A; SCE 4505-E-A; SoCalGas 5812-G-A with modifications discussed in Attachment 1.

On January 27, 2022, the SGIP Program Administrators (PAs) submitted joint advice letter PG&E 4441-G-A/6201-E-A; CSE 127-E-A; SCE 4505-E-A; SoCalGas 5812-G-A (Joint Supplemental) replacing joint advice letter PG&E 4441-G/6201-E; CSE 127-E; SCE 4505-E; SoCalGas 5812-G in its entirety and providing a revised SGIP Measurement and Evaluation (M&E) Plan for the period 2021-2025.

The Joint Supplemental is approved as follows. First, Energy Division reiterates that, in accordance with Ordering Paragraph 18(d) of D.22-04-036, "Commission Staff are authorized to modify the SGIP 2021-2025 evaluation plan at any time to advance the goals of a complete and efficient evaluation process, including modifying the timing and scope of individual SGIP evaluation reports."¹ Second, Energy Division adopts the modified M&E report schedule (Table 1) in Attachment 1, developed in consultation with the SGIP PAs, to accommodate the shortened timeframe for reports scheduled for completion in Q4 2022 through Q2 2023. The effective date of this Advice Letter is February 11, 2022.

¹ D.22-04-036 Ordering Paragraph 18(d) at 145.

Please contact Jonathan L. Lakey of Energy Division at Jonathan.Lakey@cpuc.ca.gov if you have any questions.

Sincerely,

 FOR

Pete Skala

Interim Deputy Executive Director for Energy and Climate Policy/
Interim Director, Energy Division, CPUC

Attachment 1

Staff Technical Review and Disposition

Background

D.01-03-073 originally established the SGIP M&E requirements to evaluate program administration, progress, and impacts to analyze the overall effectiveness of the program. The current SGIP M&E plan was developed by the California Public Utilities Commission's (Commission or CPUC) Energy Division in consultation with SGIP PAs in accordance with D.16-06-055 to measure and evaluate the progress and impacts of the SGIP for Program Years (PYs) 2016-2020.² This plan was originally developed by Energy Division and delivered to the SGIP PAs via email on January 13, 2017. At the time this plan was written, SGIP was set by statute to conclude in 2020. Senate Bill (SB) 700 (Stats. 2018, Ch. 839) extended administration of SGIP to January 1, 2026. The Energy Division subsequently modified the M&E plan and delivered it to the PAs via email on March 28, 2019. The modified M&E plan states, "as 2021 approaches, Energy Division, in consultation with the PAs, will develop an M&E plan for PYs 2021-2025."³

The original date by which to submit this plan, per D.19-09-027, was March 31, 2021. On March 8, 2021, Pacific Gas & Electric Company (PG&E), on behalf of the SGIP PAs, requested a 60-day extension of time to comply with OP 7(h) of D.19-09-027 to finalize the 2021–2025 M&E plan and submit it by May 31, 2021.

On March 24, 2021, Rachel Peterson, Executive Director of the CPUC, approved the SGIP PAs' extension request.

On May 24, 2021, PG&E, on behalf of the SGIP PAs, submitted the joint advice letter PG&E 4441-G/6201-E; CSE 127-E; SCE 4505-E; SoCalGas 5812-G (Joint Advice Letter) to the CPUC which included the SGIP M&E Plan for 2021-2025 as an attachment.

On June 24, 2021, the CPUC suspended Joint Advice Letter for up to 120 days beginning June 23, 2021.

On November 16, 2021, CPUC Energy Division staff reached out to the PAs to collaboratively revise the SGIP M&E plan and advised the PAs to submit the revised SGIP M&E plan via a supplemental advice letter.

On January 27, 2022, the SGIP PAs submitted joint advice letter PG&E 4441-G-A/6201-E-A; CSE 127-E-A; SCE 4505-E-A; SoCalGas 5812-G-A (Joint Supplemental) replacing Joint Advice Letter in its entirety.

Protests and Replies

There were no protests to the Joint Supplemental.

Disposition

The Joint Supplemental is approved as follows. First, Energy Division reiterates that, in accordance with Ordering Paragraph 18(d) of D.22-04-036, "Commission Staff are authorized to modify the SGIP

² D.16-06-055 Conclusion of Law 46 at 80.

³ PG&E 4441-G-A/6201-E-A et al. at 2.

2021-2025 evaluation plan at any time to advance the goals of a complete and efficient evaluation process, including modifying the timing and scope of individual SGIP evaluation reports.”⁴ Second, Energy Division adopts the below modified M&E report schedule (Table 1), developed in consultation with the SGIP PAs, to accommodate the shortened timeframe for reports scheduled for completion in Q4 2022 through Q2 2023.

Table 1. Measurement and Evaluation Report Schedule 2021 - 2025

Report	Due Date
Renewable Fuel Use Report for Q3 + Q4 PY 2021 and Q1+Q2 PY 2022	August 31, 2022 December 31, 2022
PY 2021 SGIP Impact Report	November 30, 2022 March 31, 2023
Review of the Annual Administrative Performance of Each PA for PY 2021	December 31, 2022 May 1, 2023
Review of the Annual Administrative Performance of Each PA for PY 2022	May 1, 2023 October 2, 2023
Biannual Fiscal Audit	June 1, 2023
Renewable Fuel Use Report for Q3 + Q4 PY 2022 and Q1 + Q2 PY 2023	August 31, 2023
PY 2022 SGIP Impact Report	November 30, 2023
Review of the Annual Administrative Performance of Each PA for PY 2023 including Program Performance and Process Evaluation	May 1, 2024
Renewable Fuel Use Report for Q3 + Q4 PY 2023 and Q1 + Q2 PY 2024	August 31, 2024
PY 2023 SGIP Impact Report	November 30, 2024
Review of the Annual Administrative Performance of Each PA for PY 2024	May 1, 2025
Biannual Fiscal Audit	June 1, 2025
Renewable Fuel Use Report for Q3 + Q4 PY 2024 and Q1 + Q2 PY 2025	August 31, 2025
PY 2024 SGIP Impact Report	November 30, 2025
Renewable Fuel Use Report for Q3 + Q4 PY 2025	March 31, 2026
SGIP Non-Energy Impact Evaluation	TBD
Final Program Summary PY 2001-2025	December 31, 2026

⁴ D.22-04-036 Ordering Paragraph 18(d) at 145.



January 27, 2022

Advice 4441-G-A/6201-E-A

(Pacific Gas and Electric Company ID U 39 M)

Advice No. 127-E-A

(Center for Sustainable Energy®)

Advice No. 4505-E-A

(Southern California Edison Company U 338-E)

Advice No. 5812-A

(Southern California Gas Company U 904-G)

Public Utilities Commission of the State of California

**Subject: Supplemental: Self-Generation Incentive Program (SGIP) 2021-2025
Measurement and Evaluation Plan**

Purpose

The SGIP Program Administrators (PAs) hereby jointly submit the revised SGIP 2021-2025 Measurement and Evaluation (M&E) Plan in accordance with Ordering Paragraph (OP) 7(h) of Decision (D.)19-09-027.

This supplemental advice letter replaces the original advice letter in its entirety.

Background

D.01-03-073 originally established the SGIP M&E requirements to evaluate program administration, progress, and impacts to analyze the overall effectiveness of the program. The current SGIP M&E plan was developed by the California Public Utilities Commission's (Commission or CPUC) Energy Division in consultation with SGIP PAs in accordance with D.16-06-055 to measure and evaluate the progress and impacts of the SGIP for Program Years (PYs) 2016-2020.¹ This plan was originally developed by Energy Division and delivered to the SGIP PAs via email on January 13, 2017. At the time this plan was written, SGIP was set by statute to conclude in 2020. Senate Bill (SB) 700 (Stats.

¹ D.16-06-055 COL 46 at 80.

2018, Ch. 839) extended administration of SGIP to January 1, 2026. The Energy Division subsequently modified the M&E plan and delivered it to the PAs via email on March 28, 2019. The modified M&E plan states, “as 2021 approaches, Energy Division, in consultation with the PAs, will develop an M&E plan for PYs 2021-2025.”

The original date by which to submit this plan, per D.19-09-027, was March 31, 2021. On March 8, 2021, Pacific Gas & Electric Company (PG&E), on behalf of the SGIP PAs, requested a 60-day extension of time to comply with OP 7(h) of D.19-09-027 to finalize the 2021–2025 M&E plan and submit it by May 31, 2021.

On March 24, 2021, Rachel Peterson, Executive Director of the CPUC, approved the SGIP PAs’ extension request.

On May 24, 2021, PG&E, on behalf of the SGIP PAs, submitted the joint advice letter, PG&E Advice Letter 4441-G/6201-E, et al., with the SGIP M&E plan attached (Joint Advice Letter), to the CPUC.² On June 24, 2021, the CPUC suspended the Joint Advice Letter for up to 120 days beginning June 23, 2021.

On November 16, 2021, CPUC Energy Division staff reached out to the PAs to collaboratively revise the SGIP M&E plan and advised the PAs to submit the revised SGIP M&E plan via a supplemental advice letter.

Accordingly, the SGIP PAs hereby jointly submit this supplemental Advice Letter and attached as Attachment A is the revised SGIP PY 2021-2025 M&E plan, replacing the plan attached in PG&E AL 4441-G/6201-E, et al., in its entirety.

Once the PY 2021-2025 M&E plan is approved by the CPUC, PG&E will initiate a bidding process to select a third-party SGIP program evaluator on behalf of the SGIP PAs. The SGIP PAs respectfully request expedited review and approval of the M&E plan to allow timely execution of the SGIP program evaluator contract.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail. Pursuant to General Order 96(b), Section 7.5.1, we request a shortened protest period of 10 days which is no later than February 6, 2022. Protests must be submitted to:

² PG&E AL 4441-G/6201-E / CSE 127-E / SCE 4505-E / SoCalGas 5812-G.

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to the SGIP PAs via E-mail at the addresses shown below on the same date it is electronically delivered to the Commission:

For SoCalGas: Attn: Grisel Juarez Velazquez
Sr. Regulatory Tariff Administrator
E-mail: GJuarezVelazquez@socalgas.com
E-mail: Tariffs@socalgas.com

For PG&E: Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
E-mail: PGETariffs@pge.com

For SCE: Shinjini C. Menon
Managing Director – State Regulatory Operations
Southern California Edison Company
E-mail: AdviceTariffManager@sce.com

And

Tara S. Kaushik
Managing Director, Regulatory Relations
c/o Karyn Gansecki
Southern California Edison Company
E-mail: Karyn.Gansecki@sce.com

For CSE: Sephra Ninow
Director, Regulatory Affairs
Center for Sustainable Energy®
E-mail: sephra.ninow@energycenter.org

Any person (including individuals, groups, or organizations) may protest or respond to an Advice Letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the Advice Letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

Effective Date

PG&E requests that this Tier 2 advice submittal become effective on, February 11, 2022 which is 15 calendar days after the date of submittal.

Notice

In accordance with General Order 96-B, Section IV, a copy of this Advice Letter is being sent electronically to parties shown on the attached list and the parties on the service list for R.20-05-012. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice Letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

Sidney Bob Dietz, II
Director, Regulatory Relations

Attachments

cc: Service List R.20-05-012



ADVICE LETTER SUMMARY

ENERGY UTILITY



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

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39 M)

Utility type:

☒ ELC ☒ GAS ☐ WATER
☐ PLC ☐ HEAT

Contact Person: Annie Ho

Phone #: (415) 973-8794

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: AMHP@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4441-G-A/6201-E-A et al

Tier Designation: 2

Subject of AL: Supplemental: Self-Generation Incentive Program (SGIP) 2021-2025 Measurement and Evaluation Plan

Keywords (choose from CPUC listing): Compliance

AL Type: ☐ Monthly ☐ Quarterly ☐ Annual ☒ One-Time ☐ Other:

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

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

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

Confidential treatment requested? ☐ Yes ☒ No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? ☐ Yes ☒ No

Requested effective date: 2/11/22

No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

¹Discuss in AL if more space is needed.

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

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson
Title: Director, Regulatory Relations
Utility/Entity Name: Pacific Gas and Electric Company

Telephone (xxx) xxx-xxxx: (415)973-2093
Facsimile (xxx) xxx-xxxx: (415)973-3582
Email: PGETariffs@pge.com

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

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

Clear Form

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtailable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

Attachment A

Introduction

In accordance with California Public Utilities Commission (CPUC) Decision (D.)19-09-027, Ordering Paragraph (OP) 7(h), the Self-Generation Incentive Program (SGIP) Program Administrators (PAs)¹ present this plan to measure and evaluate the progress and impacts of the SGIP for Program Years (PYs) 2021-2025.

Background

SGIP began in 2001, and the CPUC previously directed the PAs to complete a number of measurement and evaluation (M&E) plans through 2020.²

In October 2009, the Governor signed Senate Bill (SB) 412 (Stats. 2009, ch. 182).³ The CPUC Energy Division subsequently developed a Staff Proposal with recommendations on how to modify SGIP to comply with SB 412. In D.11-09-015, the CPUC modified SGIP to conform to SB 412 and accepted a Staff Proposal recommendation that the CPUC provide clear guidance for future SGIP M&E work after the implementation of those program changes.⁴

In September 2018, the Governor signed SB 700 (Stats. 2018, ch. 839), authorizing the CPUC to extend collections up to \$166 million in ratepayer funds annually for the SGIP to December 31, 2024 and extend SGIP administration to January 1, 2026. In addition, SB 700 required the CPUC to adopt new program rules to ensure energy storage systems receiving SGIP incentives reduce greenhouse gas (GHG) emissions and stipulated that all SGIP generation technologies must use 100% renewable fuel by January 1, 2020. Subsequently, D.19-08-001 established minimum GHG emissions reduction standards through

¹ SGIP operates in the service areas of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), Southern California Gas Company (SoCalGas) and San Diego Gas and Electric Company (SDG&E). SGIP is administered by PG&E, SoCalGas and SCE in their respective service territories. The Center for Sustainable Energy® (CSE) administers SGIP in SDG&E's service territory. Collectively, PG&E, SCE, SoCalGas and CSE are known as the SGIP Program Administrators (PAs).

² These include D.02-09-051 and an Administrative Law Judge's (ALJ) ruling of April 24, 2002 in Rulemaking (R.)99-10-025 and a May 18, 2006 Administrative Law Judge's ruling approving an M&E plan for 2006 and 2007, issued in R.06-03-004. The deadlines in these orders have also been adjusted on several occasions, such as the ALJ Rulings of February 27, 2007, and June 24, 2008. In a February 3, 2009 ruling in R.08-03-008, the assigned ALJ approved an M&E plan for SGIP for 2009 through 2011. In a July 23, 2014 ruling in R.12-11-005, the assigned ALJ approved an SGIP M&E plan for 2014-2015. D.16-06-055 directed the Energy Division to develop the 2016-2020 M&E plan in consultation with the PAs.

³ Senate Bill (SB) 412 (Stats. 2009, ch. 182) authorized the CPUC to determine eligible SGIP technologies based on greenhouse gas (GHG) emissions reductions. SB 412 also extended the SGIP sunset date from January 1, 2012 to January 1, 2016.

⁴ Staff Proposal, Part I, Section 4.5.1 states: "Since its inception, SGIP has undertaken an extensive measurement and evaluation (M&E) process. A full list of SGIP M&E reports can be accessed from the CPUC's website. These reports, which include annual Impacts Evaluations, Process Evaluations, Market Characterization Reports, Renewable Fuel Use Reports, and Cost-Effectiveness Evaluations, have all contributed to staff's analysis and recommendations in this proposal. Following the implementation of program changes pursuant to SB 412, staff recommends that the Commission provide clear guidance for future SGIP M&E work..."

new operational requirements as well as verification and enforcement requirements for all SGIP energy storage project applications received in early 2020.

In response to the increasing risk of California wildfires and related Public Safety Power Shutoff (PSPS) events, D.19-09-027 established the SGIP Equity Resiliency Budget to provide resiliency benefits through energy storage incentives to the most vulnerable customers and those that provide critical facilities or infrastructure in areas most affected by the threat of wildfires and PSPS events. Among other things, D.19-09-027 directed the SGIP PAs to jointly submit a Tier 2 advice letter no later than March 31, 2021 to finalize the 2021-2025 SGIP evaluation plan, providing suggested research questions and processes to be included specifically relating to the Equity Resiliency Budget, PSPS events, and Equity Budget storage system metrics.

On March 8, 2021, PG&E, on behalf of the Joint SGIP PAs, requested a 60-day extension of time to comply with OP 7(h) of D.19-09-027 to finalize the 2021–2025 M&E Plan and submit it by May 31, 2021. On March 24, 2021, Rachel Peterson, Executive Director of the CPUC, approved the Joint SGIP PAs' extension request. On May 24, 2021, PG&E, on behalf of the SGIP PAs, submitted a proposed M&E Plan via PG&E Advice Letter 4441-G/6201-E, et al. (Joint Advice Letter), to the CPUC. On June 24, 2021, the CPUC suspended the Joint Advice Letter for up to 120 days beginning June 23, 2021. On November 16, 2021, Energy Division staff reached out to the PAs to collaborate on revisions to the SGIP M&E plan and requested the PAs submit a revised SGIP M&E plan via a supplemental advice letter. As such, this revised SGIP PY 2021-2025 M&E Plan is timely submitted.

Regulatory Requirements for the SGIP Measurement & Evaluation Plan

D.16-06-055 set out firm requirements for the M&E plan, including that it require an evaluation of the administrative performance of each PA every year and fiscal performance every other year, with the first rounds of each of these evaluations completed within twelve months of the effective date of the Decision.

D.19-08-001 directed the SGIP storage impact evaluator to provide summary information on the GHG performance of developer fleets as part of the annual SGIP storage evaluation. The SGIP evaluator will calculate and provide in each Annual SGIP Impact Evaluation report the fleet GHG emissions performance of new commercial projects in years six through ten of their permanency period, by developer. The SGIP evaluator should utilize the data submitted quarterly by developers and any other data needed to complete the evaluation. Developers are required to provide quarterly data and ensure quarterly performance feedback for projects in years six through ten of their permanency period to allow developers an opportunity to make changes to projects that are increasing GHGs prior to the listing of the fleet GHG emissions performance in the annual SGIP storage impact evaluation. For residential legacy fleets, the annual GHG performance by developer for all projects of years one through ten of their SGIP permanency are also required to be included within the M&E plan.

D.19-09-027 stated that to ensure a transparent review and comment process on the 2021-2025 evaluation plan, the PAs should jointly submit a Tier 2 advice letter to finalize the evaluation plan. D.19-

09-027 also included a list of specific evaluation questions germane to the various SGIP budget categories and based on a representative sampling of customers. These questions include:

1. Equity Resiliency Budget:

- a. What are the resiliency needs of participating customers?
- b. For customers whose resiliency needs include backup for life-support systems, medical equipment, or any use where product failure could lead to injury or loss of life, did customers rely exclusively on their equity resiliency storage systems for backup? If no, what additional equipment did customers install or rely on and how much did that equipment cost? If yes, did the storage systems successfully provide the needed backup?
- c. What types of customers accessed the incentive?
 - i. Characterize participating customers by customer class, geographic location, on-site load, whether systems were paired with solar, and other key variables.
 - ii. Provide a list of participating developers and operators of the systems.
- d. What types (frequency, duration) of outages did participating customers experience? How many outages were PSPS events?
 - i. Did equity resiliency budget projects address critical resiliency needs? What percentage of the outage's duration did the SGIP-incentivized storage system provide power? How does the answer differ for storage-only versus storage paired with solar?
 - ii. Did the storage system energize the full on-site load or a subset?
- e. To what extent did customers report use of the incentives to install storage as an alternative to gasoline powered generators?
- f. Provide an estimate of average customer and total GHG emissions avoided as a result of incentive use.
- g. Were systems capable of longer duration discharge enrolled in appropriate programs (such as demand response or resource adequacy) and dispatched to address system ramping needs? If so, please summarize system ramping benefits provided, as feasible.
- h. What is the difference between the implied value of lost load (\$/kWh) of Equity Resiliency storage systems versus gasoline powered generators? If the storage system is more expensive per kilowatt hour of backup energy provided, does the value of reduced GHG emissions per kilowatt hour (\$/kWh) make up the difference?
- i. The known and expected performance of projects as a source of backup power;

- j. GHG emissions impacts;
 - k. Communities served by the critical facility or critical infrastructure; and
 - l. Customer coordination with the Office of Emergency Services, the electrical corporation serving the community and relevant local governments.
2. Equity budget storage system metrics, to the extent feasible and as directed by Commission staff:
- a. Actual costs of storage systems (equipment);
 - b. Actual costs of storage system installations;
 - c. Assessment of how many storage systems require electric panel upgrades;
 - d. Customer bill savings, relative to several baselines:
 - i. Customer is on the same TOU tariff but does not have storage;
 - ii. Customer's default tariff; and
 - iii. The most advantageous tariff available to the customer;
 - e. Impact on electric system costs;
 - f. Interaction between storage and grid-responsive appliances (where applicable);
 - g. Battery cycling metrics:
 - i. Daily percent capacity utilization;
 - ii. Discharge at on-peak and off-peak;
 - iii. Charging at on-peak and off-peak;
 - h. Use of longer duration discharge systems to address system ramping needs.

Public Utilities Code Section 379.6(l) also sets out performance measures for the program as a whole that must be evaluated as a part of any M&E plan:

- (1) The amount of reductions of emissions of greenhouse gases.
- (2) The amount of reductions of emissions of criteria air pollutants measured in terms of avoided emissions and reductions of criteria air pollutants represented by emissions credits secured for project approval.
- (3) The amount of energy reductions measured in energy value.

- (4) The amount of reductions of aggregate noncoincident customer peak demand (normally expressed as kilowatts (kW)).
- (5) The ratio of the electricity generated by distributed energy resource projects receiving incentives from the program to the electricity capable of being produced by those distributed energy resource projects, commonly known as a capacity factor.
- (6) The value to the electrical transmission and distribution system measured in avoided costs of transmission and distribution upgrades and replacement.
- (7) The ability to improve onsite electricity reliability as compared to onsite electricity reliability before the self-generation incentive program technology was placed in service.

For SGIP participants receiving performance-based incentive (PBI) payments, the Decision also directs the M&E plan to ensure a public online report documenting performance for the following measures: energy generated (kWh), gross and net greenhouse gas (GHG) emissions, number of charging and discharging events and total amount of energy charged and discharged (for storage), amount and type of fuel consumed, and heat recovered [for combined heat and power (CHP) systems]. Additional measures, such as system efficiency for CHP and round-trip efficiency for storage systems, may also be included.

Proposed Measurement & Evaluation Plan for SGIP: Program Years 2021-2025

Public Website for SGIP Performance Data

As proposed in the previous M&E plan, the SGIP PAs developed a public website (selfgenca.com) that allows access to the following SGIP data for each active SGIP project that receives PBI funding:

- Energy generated in kilowatt-hours (kWh)
- Fuel type (natural gas or renewable fuel)
- Amount of fuel consumption (SCF)
- Amount of waste heat recovered (MMBtu) for combined heat and power (CHP) projects
- Gross and net GHG emissions
- For energy storage projects, the number of charging and discharging events and total amount of energy charged and discharged.

Customer load data is specifically excluded from the data to be publicly displayed. While not specified in the Decision, individual customer identities must remain confidential, and therefore, the website must not directly reveal a customer's identity.

While the Decision only requires that this data be publicized for PBI projects, to the extent this data can be collected for non-PBI projects then that information should be included as well.

Reports

This M&E plan includes the following studies to be conducted in accordance with the Decisions and other mandates. It includes the deadlines⁵ for M&E activities for PY 2021-2025. This M&E Plan consolidates some of the previously required reports without reducing any of the content. This plan also includes new evaluation content proposed by both the SGIP PAs and Energy Division staff incremental to the previous M&E plan.

- Annual SGIP Impact Evaluations: Collect data, conduct analyses, and provide annual impact evaluations on SGIP for PY 2021-2024 (due November 30, 2022-2025⁶). This report contrasts with the previous M&E plan where the annual energy storage impact evaluation was a separately filed report. This all-encompassing impact report covers all technologies incentivized by SGIP. SGIP-funded HPWH impacts will also be measured for the PY 2023 and 2024 reports.⁷ Furthermore, these annual impact evaluations will incorporate a new storage market assessment section that will track energy storage market trends and SGIP's role in those trends in addition to evaluating the efficacy and efficiency of the Equity and Equity Resiliency budgets. The PY 2024 and PY 2025 reports will also include generation and HPWH market assessment sections that tracks generation and HPWH market trends. The PY 2021 impact evaluation will also include PY 2020 impact evaluations for non-storage technology types since this material was not covered by the previous M&E plan. The PY 2025 impact evaluation should be submitted as part of the Final Program Summary in 2026. Detailed requirements for these annual impact evaluations appear later in this plan.
- Biannual Fiscal Audit (due June 1, 2023 and 2025). Per the Decision, these fiscal audits should ensure that program funds are accounted for, are being spent appropriately, and that safeguards are in place to ensure both.
- Review of the Annual Administrative Performance of Each PA (due December 31, 2022⁸ and May 1, 2023, 2024⁹, and 2025). These reviews should include at a minimum a survey of program participants' feedback regarding each PA's clarity and timeliness of oral and written communications, their accessibility, their helpfulness to applicants submitting and processing

⁵ "Deadline" in this context means that a draft version is finalized by the PAs and submitted to Energy Division by this date for review prior to distribution to the public. Renewable Fuel Use Reports are excepted; they may be finalized and distributed by the PAs without Energy Division review.

⁶ The PY 2021 deadline is set as November 30, 2022 to comply with D.19-09-027's requirement that the 2021 SGIP storage impact evaluation for program year 2021 should be provided no later than December 2, 2022 and to allow for adequate time to solicit and contract a third-party evaluator.

⁷ The SGIP HPWH Staff Proposal was filed by Energy Division on April 16, 2021 and proposes an annual impact evaluation of HPWHs. Given the timeline to finalize program administration of HPWH, it is unlikely that many HPWHs will enter the program in PY 2021 or PY 2022, thus this M&E plan proposes an evaluation beginning in PY 2023 once there are HPWHs to evaluate.

⁸ The first Review of Administrative Performance of Each PA deadline is set as December 31, 2022 to allow adequate time to solicit and contract a third-party evaluator and complete the report.

⁹ The PY 2023 Review of Administrative Performance of Each PA will include a new SGIP Program Performance and Process Evaluation as explained in the sub-bullet point that follows.

applications, and the clarity and helpfulness of their websites. This report will be incorporated in the Final Program Summary for PY 2025. Currently, the third-party evaluator completes this review annually.

- Review of the Annual Administrative Performance of Each PA for PY 2023 will include new SGIP Program Performance and Process Evaluation (PPPE) content (due May 1, 2024): For the PY 2023 annual PA performance evaluation, a new one-time PPPE content will be additive to the scope of the Review of the Administrative Performance of Each PA. The PPPE will include an evaluation of the overall effectiveness of program design and processes in order to inform ongoing program administration. This will provide the PAs with recommendations to improve program delivery and better meet the needs of stakeholders while satisfying the D.16-06-055 requirement to evaluate administrative performance every year.
- Renewable Fuel Use Reports (RFURs; due August 31, 2022-2025 and March 31, 2026). As currently required, these reports should include an analysis of renewable fuel use data for SGIP participants.
- SGIP Non-Energy Impact Evaluation (due date to be determined by Energy Division staff). This report will consider the impacts of SGIP holistically. Possible areas of study include life-cycle societal and environmental impacts of technologies incented, effects of the SGIP on the market for storage technologies, the extent to which SGIP technologies could impact CAISO grid planning, etc. Final determination of what to include in this report will be made by Energy Division staff.
- Final Program Summary (due December 31, 2026): Prepare a final summary report covering the entirety of the SGIP from its inception in 2001 through the end of 2025. This summary should also include the contents of the Annual Impact Evaluation and Review of Administrative Performance of Each PA for PY 2025.

While no specific M&E budget is set for PY 2021-2025, in D.11-09-015, the CPUC established that the overall budget for administration of SGIP (including M&E expenditures) should not exceed 7% of SGIP funding.¹⁰ D.20-01-021¹¹ further established that CSE's allocation for administrative funds should increase from 7% to 10% for the 2020-2024 period.

The work will be funded by the four SGIP PAs through a co-funding agreement based on the current CPUC-approved budget allocation (PG&E 44%, SCE 34%, CSE 13%, and SoCalGas 9%) for shared expenses.

The nature of the reports required by this M&E plan differs somewhat from previous SGIP M&E plans in the following ways:

¹⁰ See D.11-09-015 at 59.

¹¹ See D.20-01-021 at 26.

- The previously separate Annual Energy Storage Impact Evaluation and Biannual Impact Evaluation are now combined as the Annual SGIP Impact Evaluation. This evaluation will cover all SGIP-funded technologies (including HPWHs beginning in PY 2023). Furthermore, the Storage Market Assessment from the previous M&E plan will now be rolled into the Annual SGIP Impact Evaluation and take on a new form. The Storage Market Assessment section will track energy storage market trends and SGIP's role in those trends in addition to evaluating the efficacy and efficiency of the Equity and Equity Resiliency budgets. Generation and HPWH Market Assessment sections that track generation and HPWH market trends will be included in the PY 2024 and PY 2025 impact reports.
- This M&E plan enhances one of the Reviews of Administrative Performance of Each PA by including more detailed Program Performance and Process Evaluation. The scope of the additional Program Performance and Process Evaluation should balance the aspects of PA performance with a more in-depth evaluation of program processes to improve program administration. D.16-06-055 requires that M&E funds be used to evaluate administrative performance every year. This proposal to enhance the PY 2023 Review of Administrative Performance of Each PA to include Program Performance and Process Evaluation to provide the PAs with recommendations to improve program delivery, while satisfying the requirements of the Decision.
- New Developer Fleet storage GHG compliance tracking is required.

Details of Proposed Reports

The following table summarizes the reports required by this M&E plan and the due dates for each.

Report	Due Date
Renewable Fuel Use Report for Q3 + Q4 PY 2021 and Q1+Q2 PY 2022	August 31, 2022
PY 2021 SGIP Impact Report	November 30, 2022
Review of the Annual Administrative Performance of Each PA for PY 2021	December 31, 2022
Biannual Fiscal Audit	June 1, 2023
Renewable Fuel Use Report for Q3 + Q4 PY 2022 and Q1 + Q2 PY 2023	August 31, 2023
PY 2022 SGIP Impact Report	November 30, 2023
Review of the Annual Administrative Performance of Each PA for PY 2022	May 1, 2023
Review of the Annual Administrative Performance of Each PA for PY 2023 including Program Performance and Process Evaluation	May 1, 2024
Renewable Fuel Use Report for Q3 + Q4 PY 2023 and Q1 + Q2 PY 2024	August 31, 2024
PY 2023 SGIP Impact Report	November 30, 2024
Review of the Annual Administrative Performance of Each PA for PY 2024	May 1, 2025
Biannual Fiscal Audit	June 1, 2025

Report	Due Date
Renewable Fuel Use Report for Q3 + Q4 PY 2024 and Q1 + Q2 PY 2025	August 31, 2025
PY 2024 SGIP Impact Report	November 30, 2025
Renewable Fuel Use Report for Q3 + Q4 PY 2025	March 31, 2026
SGIP Non-Energy Impact Evaluation	TBD
Final Program Summary PY 2001-2025	December 31, 2026

Descriptions of Each Report

Review of Administrative Performance of Each PA

These reports are to include, at a minimum, a survey of program participants regarding each PA's clarity and timeliness of oral and written communications, their accessibility, their helpfulness to applicants submitting and processing applications, and the clarity and helpfulness of their websites. D.16-06-055 requires an annual review of the administrative performance of each PA.¹² This review, along with the SGIP Performance Audit, will satisfy the requirements of the Decision.

Review of Administrative Performance of Each PA including Program Performance and Process Evaluation

The Program Performance and Process Evaluation is a new addition to the PY 2023 Administrative Performance report and will encompass the scope of the Review of Administrative Performance of Each PA, as well as further determine the overall effectiveness of program design and processes. This evaluation will provide a more holistic view of program performance, including documenting barriers, determining the success of the PAs in meeting their stated goals, and providing recommendations for improved program delivery. The scope of the process evaluations should encompass all aspects of the PY 2023 Review of Administrative Performance of Each PA, while further allowing for more in-depth evaluation of program processes to improve program administration.

D.16-06-055 requires that M&E funds be used to evaluate administrative performance every year. This proposal to enhance one Review of Administrative Performance of Each PA with a Program Performance and Process Evaluation will provide the PAs with recommendations to improve program delivery, while satisfying the decision requirement.

Biannual Fiscal Audit Reports

¹² D.16-06-055 at 47.

The Decision requires biannual fiscal audit reports on SGIP.¹³ Per the Staff Proposal, these audits should ensure that SGIP funds are accounted for, are being spent appropriately, and that safeguards are in place to ensure both.

Annual SGIP Impact Evaluations

This M&E plan differs from previous practices by requiring SGIP program-wide impact evaluation reports on an annual basis. All SGIP-funded technologies will be covered in these reports. Among the impacts to be assessed on an SGIP-wide annual basis are:

- Electrical energy production and demand reduction by specific time periods (e.g., peak hour as well as seasonal) and by technology category.
- Operating and reliability performance characteristics (e.g., capacity factor) for each technology category and how they compare to each other.
- Electrical, thermal and overall efficiencies and the contribution of each technology category to electricity system efficiency and reliability.
- Extent to which SGIP technologies employ renewable fuels and the impact of that fuel use on performance and cost characteristics (including a breakdown of how each technology category performs on GHG emissions based on renewable projects in that category, non-renewable projects in that category, and blended projects in the category).
- The extent to which each technology category provides net GHG emissions reductions and special considerations to changes in design or operation that could lead to improved GHG emission reductions.
- Developer Fleet Compliance
- Energy storage specific impacts:
 - Net GHG emissions of energy storage systems as a class, and net GHG emissions differentiated between residential and non-residential systems, and between systems paired with renewable generation and non-paired systems.
 - Timing of charge and discharge on an average basis and duration, and identification of groups of storage systems exhibiting certain trends in the timing of charge and discharge. In other words, the average timing should be broken down to reveal any distinct groups of storage systems that have similar patterns of charge and discharge.

¹³ D.16-06-055 at 47.

- In accordance with Public Utilities Code § 379.6(l)(6), quantify any contribution of energy storage projects to grid services where that storage system substituted for and replaced planned investment into grid services.
- Summary information on the GHG performance of developer fleets, in accordance with D.19-08-001.
- The impacts for SGIP-funded HPWH include but are not limited to those listed below. Specific evaluation metrics should be developed by the SGIP Evaluator in consultation with CPUC staff:
 - The total GHG emissions reductions achieved by the SGIP-funded load-shifting HPWH, which includes reductions in therms or kWhs
 - The peak reduction benefits compared to a non-load shifting HPWH.

In addition to the impacts discussed above, Public Utilities Code § 379.6(l) requires that other SGIP goals and objectives be assessed, including:

- The amount of reductions of emissions of criteria air pollutants measured in terms of avoided emissions and reductions of criteria air pollutants represented by emissions credits secured for project approval. Potentially, this analysis could include a quantification of the contribution of SGIP projects to an Air Quality Management District's pollution goals (if applicable).
- The amount of reductions of customer peak demand (kW).
- The value to the electrical transmission and distribution system measured in avoided costs of transmission and distribution upgrades and replacement. This M&E plan proposes to defer consideration of this program objective until the Distribution Resources Plan (DRP) proceeding (R.14-08-013) completes its consideration of the locational value of distributed energy resources.¹⁴
- The ability to improve onsite electricity reliability as compared to onsite electricity reliability before the SGIP project was placed into service.

Furthermore, in the Decision, the CPUC also embraced certain other SGIP goals that may require measurement and evaluation, including:

- Extent to which energy storage projects facilitate integration of renewable energy resources.¹⁵

¹⁴ Once approved and implemented, the Locational Net Benefits Analysis (LNBA) in the DRP will provide estimated locational avoided transmission and distribution costs. One of the LNBA deliverables is a public tool where one may enter a distributed energy resource profile (such as that of an SGIP-funded project) to calculate the estimated net benefits of a project at a given location.

¹⁵ There would likely need to be a more dynamic methodology to analyze integration of renewables, perhaps considering renewable generation capacity when storage is charging/discharging and evaluating how storage shifts

- Extent to which SGIP resources affect the water impacts of grid energy generation.¹⁶
- Extent to which SGIP resources improve the efficiency and reliability of the transmission and distribution system.¹⁷
- Extent to which SGIP resources provide ancillary services to the utilities and grid operators.¹⁸

To achieve these goals, all storage projects must be monitored at 15-minute intervals for power flow at the utility point of connection, at the storage alternating current (AC) connection, and at the AC connection for any additional on-site generating sources. Measurement accuracy must be assured for each of these, although at this time the acceptable bounds of accuracy have not been determined. Currently, 15-minute interval consumption data from the inverter native to the battery (as opposed to a revenue-grade meter attached to the battery) is acceptable. However, this requirement may be changed by Energy Division if the accuracy of the inverter data is not sufficient to allow for acceptable GHG emission calculations.

The following additional data from SGIP-funded energy storage projects must be provided to the evaluator: the customer's load as registered by the utility's meter, the customer's utility, the customer's tariff (including all tariff add-ons such as net energy metering, pilot programs or wholesale market participation), and the interval data described above for any paired renewable generation such as a solar system.

This M&E plan specifically calls for the evaluation of the performance of energy storage systems to include results for sub-categories of customers, including residential and non-residential customers, customers with and without paired generation, customers on different rates, and customers that do and do not participate in demand response programs or wholesale market programs.

D.19-09-027,¹⁹ which established the SGIP equity resiliency budget, additionally states that the 2021 SGIP storage impact evaluation for program year 2021 should be provided no later than December 2,

this generation. Examining local renewable generation as well as system-wide renewable integration may also be required. The analysis may also be conducted per IOU territory or possibly per Sub-LAP area (the CAISO uses sub-LAPs for behind the meter resources participating in the wholesale market as demand response). These details will need to be addressed in consultation with stakeholders on the M&E plan.

¹⁶ D.16-06-055 at 9.

¹⁷ D.16-06-055 at 10.

¹⁸ Research questions for this topic may include: Why are systems being dispatched (generation – generate electricity; storage – charge or discharge)? Are some technologies, like storage, responding to signals from utilities or participating in wholesale markets? Knowing why systems are being used may help in determining if they are providing ancillary services. If SGIP projects are participating in the wholesale market, what type of response do they produce (proxy demand response or non-generating resource) and what services do they provide (energy, resource adequacy, ancillary services)? At a minimum, the evaluator should determine if an SGIP project is participating in load-modifying demand response programs or participating in supply-side demand response programs.

¹⁹ See D.19-09-027 at 103.

2022, be based on a representative sampling of customers as directed by Commission staff, and should assess the following regarding the equity resiliency budget:

- The known and expected performance of projects as a source of backup power;
- GHG emissions impacts;
- Communities served by the critical facility or critical infrastructure; and
- Customer coordination with the Office of Emergency Services, the electrical corporation serving the community and relevant local governments.

Regarding the storage market assessment section of the Annual SGIP Impact Evaluations, D.19-09-027 established the SGIP Equity Resiliency Budget to provide resiliency benefits through energy storage incentives to the most vulnerable customers and those that provide critical facilities or infrastructure areas most affected by the threat of wildfires and PSPS events. The Decision also directs Commission staff to work with the SGIP evaluator to incorporate additional research questions, provided earlier in this M&E plan, to evaluate the efficacy and efficiency of the equity and equity resiliency budgets. The SGIP evaluator will work with the PAs and CPUC staff to finalize the research questions for the storage market assessment section. Potential research questions as stated in D.19-09-027 (page 101) include:

- What are the resiliency needs of participating customers?
- For customers whose resiliency needs include backup for life-support systems, medical equipment, or any use where product failure could lead to injury or loss of life, did customers rely exclusively on their equity resiliency storage systems for backup? If no, what additional equipment did customers install or rely on, and how much did that equipment cost? If yes, did the storage systems successfully provide the needed backup?
- What types (frequency, duration) of outages did participating customers experience? How many outages were PSPS events?
- To what extent did customers report use of the incentives to install storage as an alternative to gasoline powered generators?
- What is the difference between the implied value of lost load (\$/kWh) of Equity Resiliency storage systems versus gasoline powered generators? If the storage system is more expensive per kilowatt hour of backup energy provided, does the value of reduced GHG emissions per kilowatt hour (\$/kWh) make up the difference?
- What are the actual costs of storage systems (equipment) and installations?
- What is the influence of the SGIP on the battery storage market?
- What is the market structure for storage: simultaneous installation of solar and storage relative to separate installations?

In addition, the storage, generation, and HPWH market assessment sections of the Annual SGIP Impact Evaluations should track energy storage, generation, and HPWH market trends and SGIP's role in those trends. The generation and HPWH market assessment sections that tracks generation and HPWH market trends will be included in the PY 2024 and PY 2025 impact reports.

The Annual SGIP Impact Evaluations must address, at a minimum, all the above bullet points. Energy Division may also recommend that reports consider other research questions.

Renewable Fuel Use Reports

The RFURs have two main objectives:

- Verify that SGIP projects receiving renewable incentives are in compliance with minimum renewable fuel use requirements (i.e., not “fuel switching”)
- Identify GHG emission impacts associated with renewable fuel use projects, trends in the impacts, and overall implications of renewable fuel use projects and GHG emission reductions.

This M&E plan proposes to continue requiring the submission of RFURs through 2026. In accordance with D.02-09-051 and D.16-06-055, SGIP projects using renewable fuels must achieve specified fuel use requirements. In addition, with increased interest in reducing GHG emissions, there is increased emphasis on the ability of SGIP technologies to use renewable fuels and to understand the operational and cost implications of increased renewable fuel use. Beginning in 2020, generation projects consuming natural gas must use 100% biogas to receive an SGIP incentive.²⁰

Fundamentally, the overall goal of the RFURs is to help CPUC staff and the SGIP PAs in making recommendations concerning modifications to the renewable project aspects of the SGIP. Consequently, the first objective of these reports is to identify and report on the compliance of renewable fuel use projects receiving incentives under the SGIP with renewable fuel use requirements. As noted above, to maximize the ability to use the RFURs to sanction those SGIP participants that do not meet renewable fuel use requirements in a timely fashion, the RFUR shall include an analysis of renewable fuel use data collected through June 30th of the year the report is delivered.

As with the previous M&E plan, annual RFU reports are required to be submitted in August of each calendar year with exception to the RFU report covering Q3 and Q4 of PY 2025, which will be due March 31, 2026.

Final Program Summary Report

By existing statute, SGIP may only continue through 2025.²¹ Due to the wide variety of technologies deployed and the extensive amount of data collected over the course of SGIP, the program will be able to provide truly unique insights into the actual costs, performance, practices and processes of distributed energy resources (DER) deployed in a commercial setting. A summary report on SGIP can

²⁰ See D.16-06-055 at 2.

²¹ Public Utilities Code § 379.6(a)(2).

provide both a retrospective set of lessons learned and a springboard for setting future DER policies and programs.

The Final SGIP Summary Report shall provide a comprehensive review of SGIP from its inception through December 31, 2025. Topics in the report will include, but not be limited to, the following:

- Goals of the program and progress toward achieving them (original and changes as new policies emerged);
- Projects installed (e.g., overall, by DER type, rebated capacity and locations);
- Impacts (e.g., electricity generated, coincident peak contributions, system efficiency impacts, grid service impacts and GHG emission reductions);
- Trends (e.g., costs, technology specific and cumulative rebated capacities, average capacity factors by technology and overall, changes in efficiencies and renewable fuel use);
- Market transformation goals and levels of success;
- Lessons learned and recommendations;
- PY 2025 Review of Administrative Performance of Each PA; and
- PY 2025 Annual SGIP Impact Evaluation.

With respect to the Market Transformation (MT) component of this report, it should be written with the following in mind. The key defining metric of MT achievement is whether the market for the products and services supported by SGIP is self-sufficient in the absence of the program.²² Additionally, this M&E plan anticipates that the following MT metrics identified in the draft 2015 SGIP MT report may also be analyzed, although these are subject to change:

- There will be no significant barriers preventing utility customers and utilities to routinely use distributed generation and energy storage technologies as part of their energy solutions;
- Changes in market operation along with performance and cost improvements will allow distributed generation and energy storage to be adopted without incentives; and
- The market will encourage development and adoption of even more efficient distributed generation or energy storage technologies, services, and solutions into the market.

SGIP Non-Energy Impact Evaluation

This report will consider the impacts of SGIP holistically and will have little to no content overlap with any of the previously mentioned reports. Possible areas of study include life-cycle societal and

²² See, e.g., D.09-09-047 at 89 for a discussion of MT in the energy efficiency context. See *also*, the 2015 Energy Division Staff Proposal on SGIP at 8.

environmental impacts of technologies incented, effects of the SGIP on the market for storage technologies, the extent to which SGIP technologies could impact CAISO grid planning, etc. Final determination of what to include in this report will be made by Energy Division staff.

Data Quality and Reporting Requirements

Numerous evaluation reports from previous years indicate that there has been a systematic failure regarding data quality and reporting from some SGIP projects. Most SGIP data providers appear to be reporting data to evaluators adequately, but many SGIP data providers do not or report data in such a way that it is not usable by evaluators. Examples include:

- In Renewable Fuel Use Report No. 29, the authors noted that certain blended on-site and directed biogas projects could not have their compliance status determined due to the availability of insufficient data.²³
- In the 2014-2015 Impact Evaluation Report, a storage vendor provided only anonymized customer data, precluding matching of those customers with utility load data.²⁴

Systematic failures to provide accurate and reliable data such as these are contrary to the statutory requirement of all SGIP projects to provide relevant data for evaluation purposes upon request.²⁵

All SGIP projects are expected to report data that will allow evaluators to make the findings required by statute and CPUC Decisions. The developers or project owners responding to a request for data should use a data request template provided by the evaluator. SGIP projects should report data in accordance with the parameters defined in the template, including the time zone to use for interval consumption data reports. SGIP developers should endeavor to have a single point of contact within the organizations to respond to data requests from the evaluator.

Furthermore, customer load data required for the evaluations must be provided to the evaluator by the utility in a timely manner.

This M&E plan also establishes, for the sake of clarity, that individual customer confidentiality must be maintained throughout the M&E process. The M&E reports generated by the evaluator using confidential data should include generalized descriptions of the data that do not reveal an individual customer's personally identifying information (PII). However, any customer participating in SGIP must continue to specifically allow developers, PAs and SGIP evaluators to separately and jointly use data that may include their PII as part of the evaluation process.

This M&E plan specifically authorizes a single PA (PG&E), chosen by a plurality of the SGIP Working Group, to oversee the contracting required to execute the plan and conduct the bidding process for the contracting work as necessary.

²³ Renewable Fuel Use Report No. 29 (November 2020) at 5.

²⁴ 2014-2015 Impact Evaluation Report (November 2016) at 6-1.

²⁵ P.U. Code Sec. 379.6(f).

**PG&E Gas and Electric
Advice Submittal List
General Order 96-B, Section IV**

AT&T	East Bay Community Energy Ellison	Pioneer Community Energy
Albion Power Company	Schneider & Harris LLP Energy	Public Advocates Office
	Management Service	
Alta Power Group, LLC	Engineers and Scientists of California	Redwood Coast Energy Authority
Anderson & Poole		Regulatory & Cogeneration Service, Inc.
		SCD Energy Solutions
Atlas ReFuel	GenOn Energy, Inc.	San Diego Gas & Electric Company
BART	Goodin, MacBride, Squeri, Schlotz &	
	Ritchie	
Barkovich & Yap, Inc.	Green Power Institute	SPURR
California Cotton Ginners & Growers Assn	Hanna & Morton	San Francisco Water Power and Sewer
California Energy Commission	ICF	Sempra Utilities
	International Power Technology	
California Hub for Energy Efficiency		Sierra Telephone Company, Inc.
Financing	Intertie	Southern California Edison Company
		Southern California Gas Company
California Alternative Energy and	Intestate Gas Services, Inc.	Spark Energy
Advanced Transportation Financing	Kelly Group	Sun Light & Power
Authority	Ken Bohn Consulting	Sunshine Design
California Public Utilities Commission	Keyes & Fox LLP	Tecogen, Inc.
Calpine	Leviton Manufacturing Co., Inc.	TerraVerde Renewable Partners
		Tiger Natural Gas, Inc.
Cameron-Daniel, P.C.	Los Angeles County Integrated	
Casner, Steve	Waste Management Task Force	TransCanada
Center for Biological Diversity	MRW & Associates	Utility Cost Management
	Manatt Phelps Phillips	Utility Power Solutions
Chevron Pipeline and Power	Marin Energy Authority	Water and Energy Consulting Wellhead
City of Palo Alto	McKenzie & Associates	Electric Company
		Western Manufactured Housing
City of San Jose	Modesto Irrigation District	Communities Association (WMA)
Clean Power Research	NLine Energy, Inc.	Yep Energy
Coast Economic Consulting	NRG Solar	
Commercial Energy		
Crossborder Energy	OnGrid Solar	
Crown Road Energy, LLC	Pacific Gas and Electric Company	
Davis Wright Tremaine LLP	Peninsula Clean Energy	
Day Carter Murphy		
Dept of General Services		
Don Pickett & Associates, Inc.		
Douglass & Liddell		