Cal TF Technical Position Paper (TPP) No. 6: Overlapping Measure Consolidation Process (Prior to eTRM Placement)[1]

Overview

As part of implementing the eTRM, there is a need to review and consolidate overlapping measures for statewide use. This document describes the measure consolidation process and also includes an assessment of whether a measure needs to be updated or modified as it being consolidated prior to placement in the eTRM. The measure consolidation process will represent a substantial effort and require active engagement from the IOU and POU staff to ensure successful completion of the project. In addition, CPUC staff involvement at key points is critical so that the resulting measures developed for eTRM placement are ultimately approved when the eTRM is submitted to the full Commission for review and approval.

Current Practice

Historically Program Administrators have developed workpapers to address portfolio program needs, and there was limited effort to coordinate measure development across the IOUs. The extent of overlapping measures is significant, particularly for IOU non-DEER workpapers. Overlapping measures are expensive to maintain, update review and use. More recently, the IOUs have been directed to develop statewide workpapers for new measures; consolidating existing measures is consistent with the move towards statewide workpapers.

Statement of Technical Forum Need

To implement a statewide eTRM, it will be necessary to consolidate currently existing overlapping measures to support statewide application. It will also be

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[1] Overlap could include multiple utility WP's addressing the same measure or utility WP and POU addressing the same measure (either via POU TRM or through independently developed measure).

necessary to develop a data template that can be populated with the consolidated measure level information and uploaded into the eTRM.

Objectives

- Develop a process that is comprehensive, clear and efficient, and agreeable to all affected parties.
- Create cost efficiencies via the measure consolidation process

Cal TF Proposal

The list below describes a step-by-step approach for consolidating/reviewing measures. For each step, entities are identified who would have primary responsibility for completing the step. Prior to implementing the measure consolidation, it will be important to review which entity is assigned to each step to ensure sufficient capacity exists within the entity to complete the work needed to fulfill the proposed role(s), to avoid real or perceived conflicts of interest and to ensure project is completed cost-effectively. The identified entities are color-coded as follows for easy review of roles and responsibilities:

- **Cal TF Staff**
- **Full Cal TF**
- **Cal TF Subcommittee**
- **CPUC Staff**
- **IOU/POU Technical Staff**

1. **Identify Measure:** Review workpaper inventory to identify potential overlapping measures (**Cal TF Staff**)
   - Is measure still active? (**IOU/POU**)
   - Are there any planned updates or imminent sunsets? (**IOU/POU**)
   - Is measure high impact measure (HIM)? (**Cal TF Staff**)
   - If low-volume, should it be a low-priority for movement into eTRM (prioritize measures)? (**Cal TF Subcommittee**)
   - Should measure be deemed or custom? (**Cal TF Subcommittee**)

- Should savings be determined through metered data? If so, how will that affect its representation in the eTRM? (**Cal TF Subcommittee**)
- Does the measure need updating due to Title 24/Title 20 changes or CPUC directives (**IOU/POU**)
- Does the measure baseline need to change due to recent CPUC direction (**Cal TF Staff**)

2. **Subcommittee Formation:** Determine whether subcommittee should be formed to review class of measures and key issues associated with the class of measures. For the measure consolidation process, subcommittees will be formed to focus on measures within the same end use categories. Cal TF Staff will recruit non-Cal TF members who are experts in particular end uses to ensure measures are reviewed by leading measure-specific experts. Cal TF staff previously has successfully recruited and garnered active subcommittee participation from non-Cal TF members, and expects to be able to do so for the eTRM project given the high visibility of and interest in the eTRM project. (**Cal TF Staff**)

3. **Identify All Current Workpapers:** Identify and acquire the most current workpaper(s) that characterize the overlapping measure (**Cal TF Staff** w/**IOU-POU input**)
- Consider non-DEER WP, POU TRM, DEER measures
- Determine if workpapers were reviewed by the ex-ante team and document status (**Cal TF Staff**)

4. **Identify Sources for All Measure Parameters:** Are sources of information clearly identified in the WP (key measure parameters like EUL, HOU, IMC, etc.) (**Cal TF Staff**)

5. **Gather/Analyze Sources to be Used for Measure in eTRM:** Gather all sources (DEER and non-DEER) (**Cal TF Staff or Cal TF Subcommittee**)
- Review source and complete brief "Data Source Quality Analysis" template
- Date of source, any more current studies/sources available
- Rigor of study, statistically significant

- o Is data applicable to the measure being evaluated (geography, population, business type, being applied to)

6. **Assess Whether Data is Sufficient to Develop "Reasonable Value" and Meets "Best Available Data" Standard** (Cal TF Subcommittee)
    - o Does other data exist that would be superior to what is currently used?
    - o Should the measure use "existing conditions" baseline?

7. **Complete Overlapping Measure Workpaper Template:** Review all identified workpapers and complete the Overlapping Workpaper Comparison Template which extracts key information from each workpaper under review to allow for comparison (e.g. base and measure description, application type, delivery mechanism, number of unique measure codes, DEER data, calculation methods, building type, load shape, cost information) (**Cal TF Staff**)

8. **Identify WP Differences:** Based on workpaper Template, identify all differences between workpapers and document in template. (**Cal TF Staff**)

9. **Address Differences Identified:** Recommend how to address differences identified and proposed approach for incorporating the measure into the eTRM (**Cal TF Subcommittee**)

10. **Compare to Other TRMs (only by exception per Cal TF feedback): Review at least three (3) other TRMs. Compare approach/data used in other TRMs (using TRM Analysis template) (**Cal TF Staff**)**
    - o modeling vs. algorithm
    - o Compare other measure parameters and sources
    - o Note key differences and any items that should be considered for CA measure consolidation.

11. **Other Potential Issues (**Cal TF Subcommittee**)**
    - o Identify any other concerns or potential issues to investigate or discuss

12. **Challenges to Developing as a Statewide Measure in California**

- Would any party take exception to offering this as a statewide measure? (**Cal TF Subcommittee**; **IOU-POU Technical Representatives**)

13. **CPUC Consultation:** Early CPUC Staff input on DEER requirements, data, methods, assumptions, etc. (**Cal TF Staff** and **CPUC Staff**)

14. **Populate "Draft" eTRM Template for Measure:** Address all data and description details necessary for initial eTRM measure population. This eTRM measure template would replace the ex-ante worksheets and the workpaper Word template.(**Cal TF Staff**)

15. **Upload eTRM Measure Template Into the eTRM Repository (Cal TF Staff)**

16. **Measure Future (Cal TF Subcommittee)**
    - Could it become a HIM? (**IOU/POU Technical Representative**)
    - Immediate Update: Does it need to be updated prior to placement in eTRM based on age of sources, changes to codes and standards, changes to marketplace, or to meet requirements to make it unilaterally applicable in California (climate zones, delivery strategies, etc.) (**IOU/POU Technical Representative**)
    - Future Update (**IOU/POU Technical Representative**):
        - Any expected future updates to codes and standards, market, etc. that would impact measure?
        - When should measure be scheduled for update?

17. **Subcommittee Measure Recommendations (Cal TF Subcommittee)**
    - Approach and data to use for measure, addressing overarching issues that may apply to multiple measures in a given category.
    - How to harmonize differences
    - Whether ready for immediate placement in eTRM or needs updating as part of statewide measure consolidation
    - Measure sunset date: recommendation and rationale

18. **Obtain CPUC Staff Feedback on Recommendations (Cal TF Staff)**

19. **Cal TF Peer Review/Measure Affirmation With CPUC Staff Participation in Discussion (Cal TF)**

20. Populate "Final" eTRM Template for Measure and Upload Into the eTRM Repository (Cal TF Staff)

21. CPUC Staff Approval of Measure (Cal TF Staff and CPUC Staff)

Below is a list of templates referenced throughout this document and they are also included as attachments.

Templates:

1. Overlapping Workpaper Comparison Template
2. Data Source Quality Analysis Template
3. TRM Analysis Template
4. Cal TF Peer Review Checklist
5. e-TRM Data Specification Template (in development)

Measure Review of Non-Overlapping Measures

The measure review for non-overlapping, existing, active measures will follow the same process outlined above, except the process steps related to consolidating overlapping measures don't apply (steps 7-9).

Example- Populated Overlapping Measure

Data Source Quality Analysis Template 2.0

TRM Analysis Template 1.0.docx

CalTF_Peer_Review_ Checklist.docx

Date Issued	
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Approved by:	
Prior Versions	