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**ADVICE LETTER 4302-E**  
(U902-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: ENERGY EFFICIENCY TRUE UP ADVICE LETTER PURSUANT TO D.21-05-031**

**I. PURPOSE**

Pursuant to Decision (D.) 21-05-031, San Diego Gas & Electric Company (SDG&E) hereby submits to the California Public Utilities Commission (Commission or CPUC) this Tier 2 True-Up Advice Letter (TUAL), including content and procedural requirements for the TUAL identified in D.21-05-031, D.23-04-035, D.23-06-055, and D.23-08-005.

**II. BACKGROUND**

**A. Regulatory Requirements**

The TUAL requirement was adopted in D.21-05-031 with the requirement that on September 1 of each odd year, when the Energy Efficiency (EE) potential and goals have been adopted by the Commission, each EE program administrator (PA) shall submit either a portfolio true-up (prior to the start of a four-year portfolio) or a mid-cycle review (in year two of a four-year portfolio) Tier 2 advice letter adjusting technical inputs and forecasts, to account for the changes in EE potential and goals.<sup>1</sup>

D.23-06-055 (Business Plan Decision) approved PA EE Business Plan Applications, inclusive of budget amounts for 2024-2027, and ordered the TUAL to be filed, “no later than 60 days after the Commission issues a decision updating the energy efficiency potential and goals in Rulemaking 13-11-005.”<sup>2</sup> D.23-08-005 (EE Goals Decision), was issued on August 16, 2023, thereby making the TUAL due on October 16, 2023.

As adopted in the EE Goals Decision, SDG&E’s cumulative adopted Total System Benefit (TSB) and EE goals for 2024-2027 equate to a TSB value of \$184,147,672, with Codes and Standards goals of 814.4 GWh, 140.6 MW, and 7.6 MMTherms.<sup>3</sup> SDG&E’s cost recovery request is ~

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<sup>1</sup> D.21-05-031 at Ordering Paragraph (OP) 10.

<sup>2</sup> D.23-06-055 at OP 37.

<sup>3</sup> D.23-08-005 at 18, Table 5.

\$273M.<sup>4</sup> SDG&E will collect the authorized budget through the electric and gas Public Purpose Program (PPP) rates annually.

## **B. Filing Requirements**

D.21-05-031 requires each PA's TUAL to show compliance with meeting the following criteria: (1) the PA's portfolio must meet the TSB for the four years, adjusted by the updated TSB for the remaining period of the portfolio; (2) the portfolio must meet or exceed a forecasted Total Resource Cost (TRC) ratio of 1.0 for the resource acquisition segment of the portfolio (with the exception of RENs); (3) the equity and market support segments of the portfolio, combined, must not exceed 30% of the total budget (with the exception of RENs); (4) for investor-owned utilities (IOUs): the statewide and third-party contribution percentage requirements must be met; and (5) must include a report on the progress against metrics relevant for each segment of the portfolio.<sup>5</sup>

The Business Plan Decision approved budgets for 2024-2027 and ordered other changes to PA portfolios. Among the changes, the IOUs were ordered to reflect the statewide contribution changes in their TUALs.<sup>6</sup> The Commission also reduced the IOU's statewide compliance requirement from 25% to 20%, except for Southern California Gas Company (SoCalGas), which has a 10% requirement.<sup>7</sup>

As recognized in the Business Plan Decision, "[t]he [ ] reassessment of the energy efficiency potential and goals in R.13-11-005 will have an impact on the TSB forecasts, cost-effectiveness forecasts, annual budgets, and program segmentation of the portfolio."<sup>8</sup> Indeed, the revised goals assigned to SDG&E through the EE Goals Decision materialized into the aforementioned changes addressed in more detail herein.

Finally, as required by the Business Plan Decision, Energy Division provided an Excel file which was used to populate Appendix 1, Appendix 2, and Appendix 3. Certain tables within Appendix 3 are also included within the narrative and do not appear in consecutive order.

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<sup>4</sup> Funding for Energy Division's portfolio oversight efforts and funding to cover SDG&E's contribution to the Bay Area Regional Energy Network's (BayREN) statewide program is required as per D.23-06-055 and is incremental to SDG&E's approved budget for 2024-2027.

<sup>5</sup> D.21-05-031 at 42 – 43.

<sup>6</sup> D.23-06-055 at OP 1.

<sup>7</sup> *Id.* at 9, Table 3.

<sup>8</sup> *Id.* at Findings of Fact 25.

### III. **DISCUSSION**

#### A. **Portfolio Overview:**

##### 1. **Recent CPUC Decisions Impacting EE Portfolios**

This section discusses multiple decisions impacting SDG&E's EE Portfolio between 2024-2027. The pertinent decisions highlighted in this section are D.23-04-035, D.23-06-055, and D.23-08-05. These three decisions set forth policy and operational changes that SDG&E has included in this TUAL.

##### a. **Business Plan Decision (D.23-06-055)**

As mentioned above, the Business Plan Decision approved budgets for 2024-2027 and changed the IOU statewide allocations and compliance requirements for statewide programs. Various other additions and modifications were enumerated in D.23-06-055, such as the statewide allocation modification, approving BayREN as a statewide lead, requiring IOU funding for CPUC portfolio oversight, requiring PAs to incorporate a Market Access Program (MAP) plan into their portfolios, and other requirements.<sup>9</sup> Significant changes resulting from these orders are discussed in various sections as they are relevant.

##### b. **Natural Gas Incentives Phase Out Decision (D.23-04-035)**

The Natural Gas Incentives Phase Out Decision impacts program year 2024 and beyond by discontinuing most ratepayer funded incentives for non-exempt, non-cost-effective new construction gas measures for residential and commercial resource acquisition and market support and equity programs.<sup>10</sup> SDG&E does not administer its own new construction program; however, the decision impacts SDG&E's statewide upstream and midstream HVAC and Plug Load Appliance (PLA) programs, since these programs offer equipment incentives at the point of sale that could potentially be installed in new construction. As ordered in the decision, SDG&E has updated vendor contracts and has removed affected permutations from the portfolio forecast.

D.23-04-035 also provides for working groups and research efforts to examine and recommend technical guidance for identifying a viable electric alternative (for a given gas measure) and further criteria for custom projects.<sup>11</sup> It is anticipated that these efforts will result in additional restrictions on gas incentives. However, because these impacts are unknown at the time of submission, they are not addressed in SDG&E's TUAL.

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<sup>9</sup> D.23-06-055 at 73-76.

<sup>10</sup> D.23-04-035 at OP 3.

<sup>11</sup> *Id.* at OP 1.

### **c. Energy Efficiency Goals Decision (D.23-08-005)**

The EE Goals Decision was based upon achievable potential as determined by calculating EE savings based on specific incentive levels, program delivery methods, assumptions about existing CPUC policies, market influences, and barriers. The approved EE 2023 Potential and Goals Study forecasts the potential energy savings from various EE programs as well as Codes and Standards advocacy efforts for residential, commercial, agriculture, and industrial. SDG&E's cumulative adopted TSB and EE goals for 2024-2027 is a TSB value of \$184,147,673, with Codes and Standards goals of 814.4 GWh, 140.6 MW and 7.6 MMTherms.<sup>12</sup>

### **2. Portfolio Administration Costs**

Previously, SDG&E allocated Portfolio Administration (PA) Costs<sup>13</sup> based on the budget share of the program and then made individual adjustments based on expected programmatic activity. These costs were allocated at the program level.

SDG&E, along with the other PAs, transitioned to a simplified methodology that allocates costs at the segment level. Allocations are based on the percentage of budget that any one particular segment represents of the portfolio total budget, before evaluation, measurement, and verification (EM&V) and Portfolio Administration budgets are added.

Contract administrative functions consistent with Administrative Overhead costs include, but are not limited to, contract administration labor, accounting support, IT services and support, reporting database maintenance, regulatory and filing support, data request responses, quality verification of project installation and other ad-hoc support required to verify contract invoices.

In addition to its administration and oversight functions listed above, SDG&E plans to continue using utility staff personnel or contracted labor to ensure successful delivery of third-party programs. SDG&E will continue limited delivery functions and incur Direct Implementation costs, such as engineering reviews, quality assurance processes, and site-level inspections for third-party programs as needed to support these programs.

As stated in SDG&E's Business Plan Application, SDG&E will continue general administration functions consistent with Commission-approved administration functions.<sup>14</sup> Administrative expenditures are necessary to support the third-party programs that make up the bulk of SDG&E's EE portfolio.

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<sup>12</sup> D.23-08-005 at 18, Table 5.

<sup>13</sup> SDG&E refers to Portfolio Administration Costs as "Portfolio Support" in the quantitative tables of this TUAL.

<sup>14</sup> CPUC, Energy Efficiency Policy Manual Version 6 (April 2020), Appendix C: Cost Categories and Related Cap and Targets, *available at* <https://www.cpuc.ca.gov/-/media/cpuc-website/files/legacyfiles/e/6442465683-ee-policy-manual-revised-march-20-2020-b.pdf>.

### 3. Forecast Approach Process

SDG&E's True Up forecast approach leverages methodologies employed and approved from SDG&E's Business Plan Application while considering relevant decisions and guidance including: the 2023 Potential & Goals Study and Natural Gas Incentives Phase Out Decisions, 2022 updates to the Avoided Cost Calculator (ACC) as adopted in Resolution (Res.) E-5228, and accounting for Portfolio Oversight funding. Additionally, any changes to program solicitations, whether adding or removing a solicitation, have been incorporated into the forecasts for 2024-2027.

The methods and sources of measure savings assumptions used in the portfolio are as follows:

- Deemed Measures – approved Electronic Technical Resource Manual (eTRM) database measures and Deemed Workpaper Rulebook Version 4.0,
- Custom Calculated Measures – International Performance Measurement and Verification Protocol (IPMVP), CPUC Custom Project Review Team reviewed methodologies, and Statewide Custom Project Guidance Document, Version 1.4,
- Site-Level Normalized Metered Energy Consumption (NMEC) – NMEC Rulebook<sup>15</sup> methods reviewed by the Custom Project Review Team of the CPUC,
- Population-level NMEC – NMEC Rulebook methods reviewed and validated by SDG&E's Measurement and Verification team,
- Existing third-party implementers provided revised forecasts, and
- For planned solicitations, SDG&E uses representative measures that include expected savings/benefits to provide a reasonable forecast.<sup>16</sup>

Additionally, as referenced in SDG&E's Business Plan Application and per D.21-05-031 Conclusion of Law (COL) 41 and guidance in Res E-5152, SDG&E has continued developing its strategy for including Low Global Warming Potential (GWP) measures in its portfolio and forecasting these contributions within this TUAL. SDG&E has continued its collaboration with the CPUC, third-party implementers, industry subject matter experts, and other stakeholders to remain abreast of developments in Low GWP technology and policy. The field is still evolving, and many areas require further study. However, based on its research, SDG&E has developed planning assumptions upon which to base a forecast. In order to forecast, the CPUC's Refrigerant Avoided Cost Calculator (RACC) was used to determine the avoided costs of refrigerant leakage for devices containing a refrigerant, when the refrigerant type or amount is changed or a device is replaced early. SDG&E's forecast is based on a prior version of the RACC, as the latest version (Deemed RACC Version 2.1.2) was released after the development of the low GWP forecast. Given the small impact that it has to the portfolio and that there are no available measure packages yet for low GWP retrofits, the determination was made to not update the forecast. Additionally, Commission staff confirmed in a Memorandum that TUAL forecasts do not need to be resubmitted.<sup>17</sup>

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<sup>15</sup> CPUC, Rulebook for Programs and Projects Based on Normalized Metered Energy Consumption, Version 2.0 (January 7, 2020), *available at* <https://www.cpuc.ca.gov/-/media/cpuc-website/files/legacyfiles/n/6442463694-nmec-rulebook2-0.pdf>.

<sup>16</sup> D.19-08-034 at 30.

<sup>17</sup> Memorandum on Deemed Refrigerant Avoided Cost Calculator (DRACC) Update Requirements for Measure Packages issued on September 22, 2023 by Energy Division Staff.

As a conservative assumption, SDG&E has not forecasted Low GWP installations prior to 2026 as aspects of technology are still in development, and timing to approve Low GWP measure packages will not likely result in approved measure packages until at least 2026. Additionally, California Air Resources Board (CARB) regulations require that most new equipment adopt Low GWP refrigerants by 2026, and it is anticipated that Low GWP refrigerants will become standard practice. As Low GWP measures become available to the market, SDG&E will continue to work with its current and future third-party Implementers to ensure those measures, primarily accelerated replacement, are included in their program offerings as appropriate.

#### 4. Summary of Forecasted Portfolio Impacts:

Please see section IV entitled EE Portfolio Details for significant impacts.

### IV. Energy Efficiency Portfolio Details

#### A. Total System Benefit

SDG&E expects to meet the TSB goal over the four-year cycle based upon the inputs included in this TUAL. As adopted in the EE Goals Decision, SDG&E's cumulative adopted TSB and EE goals for 2024-2027 is a TSB value of \$184,147,673, with Codes and Standards goals of 814.4 GWh, 140.6 MW, and 7.6 MMTherms.<sup>18</sup> Table 2.1 from Appendix 3, copied below, provides SDG&E's TUAL results.<sup>19</sup>

Table 2.1 - Annual and Cumulative Total System Benefit Forecast

Line	Segment	PY 2024	PY 2025	PY 2026	PY 2027	Cumulative
1	Resource Acquisition	\$ 73,258,988	\$ 85,483,270	\$ 86,400,300	\$ 94,376,583	\$ 339,519,142
2	Market Support	\$ 7,989,315	\$ 13,982,823	\$ 15,376,506	\$ 15,915,710	\$ 53,264,354
3	Equity	\$ 507,832	\$ 798,186	\$ 839,153	\$ 589,223	\$ 2,734,395
4	<b>Total TSB Forecast</b>	<b>\$ 81,756,135</b>	<b>\$ 100,264,280</b>	<b>\$ 102,615,958</b>	<b>\$ 110,881,516</b>	<b>\$ 395,517,890</b>
5	CPUC TSB Goal	\$ 45,004,630	\$ 45,267,492	\$ 45,878,572	\$ 47,996,979	\$ 184,147,673
6	<i>TSB Forecast / TSB Goal</i>	<i>182%</i>	<i>221%</i>	<i>224%</i>	<i>231%</i>	<i>215%</i>

#### **Significant portfolio changes contributing to TSB:**

In SDG&E's Application, the TSB amount was \$307,457,992 without Codes and Standards, and \$1,286,185,467 with Codes and Standards. D.23-08-003 adopted TSB goals of \$184,147,673 without Codes and Standards. In SDG&E's TUAL, the forecasted TSB including Codes and Standards decreased by approximately 5% with a forecasted TSB of \$1,217,055,606. When excluding Codes and Standards, the forecasted TSB increased by approximately 29% at \$395,517,890.

<sup>18</sup> D.23-08-005 at 18, Table 5.

<sup>19</sup> Tables in this narrative section of the advice letter do not appear in the same order as provided in the Energy Division templates, therefore, SDG&E is providing Tables 1-4 in Appendix 3, in addition to certain tables appearing throughout the narrative.

The main drivers attributing to the increase in the portfolio's forecasted TSB (excluding Codes and Standards) are (1) the update to the avoided cost calculator (2024 ACC), (2) optimizing the portfolio around TSB rather than energy savings, and (3) the addition of Low GWP measures within the forecast.

First, the update to the avoided cost calculator impacted the forecasted TSB significantly in a favorable way for program administrators. The update resulted in an increase of TSB due to higher near-term distribution avoided costs stemming from increases in counterfactual overload kW and higher transmission avoided costs based on reduced demand forecast and increased system-wide transmission project costs.<sup>20</sup>

The second driver that resulted in an increase in TSB, when compared to the application filing, was the optimization of TSB rather than net savings, which included analysis around measures and their benefits (greenhouse gases (GHG) benefits, lifecycle energy, and capacity) to the portfolio that were not previously captured through first year net savings goals. This change is due to the revised forecasts provided by the third-party implementers, which reflect the data provided from the 2023 Potential and Goals Study, market conditions, and their professional expertise in the EE industry.

Another factor that resulted in an increase in TSB is the integration of the Summer Reliability Market Access Program (SRMAP) and addition of new residential and commercial market access programs into the EE portfolio as these programs were not forecasted in SDG&E's Business Plan Application filing. This change is discussed further in Section F (Request to Open/Significantly Change Programs).

Lastly, although a conservative amount was forecasted, the addition of low GWP measures resulted in additional forecasted TSB, as low GWP measures were not forecasted in SDG&E's Business Plan Application filing. The increase in TSB is mainly attributed to the introduction and use of the CPUC's RACC to determine the avoided costs of refrigerant leakage for devices containing a refrigerant, when the refrigerant type or amount is changed or a device is replaced early.<sup>21</sup> The current forecasted refrigeration and HVAC measures assume a lower GWP refrigerant compared to traditional hydrofluorocarbon (HFC) refrigerants, thus adding positive avoided cost benefits beyond traditional energy efficiency savings and attributed to refrigerant leakage avoided cost. Therefore, to decrease global warming potential, SDG&E's forecast now includes representative low GWP measures that result in increased benefits, which are attributed to the CPUC's RACC. These representative measures have been introduced and forecasted within SDG&E's downstream programs that support refrigeration and HVAC measures.

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<sup>20</sup> CPUC, 2022 Distributed Energy Resources Avoided Cost Calculator Documentation (September 15, 2022) at 3 – 4, *available at* <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/demand-side-management/acc-models-latest-version/2022-acc-documentation-v1b-updated.pdf>.

<sup>21</sup> See the CPUC's website on DER cost-effectiveness for the RACC calculator, *available at* <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side-management/energy-efficiency/idsm>.

Regarding individual programs that had significant increases or decreases in TSB, SDG&E notes the following:

- Statewide programs where SDG&E is the lead decreased in forecasted TSB. Below is each program and the justification for the change.
  - o The SW HVAC Quality Installation (QI)/Quality Maintenance (QM) Program (SDGE\_SW\_HVAC\_QIQM) saw a decrease in forecasted TSB upon the conclusion of contract negotiations, which resulted in a revised forecast developed by the successful bidder. This revised forecast did not include measures as the program is a maintenance training program for HVAC installation contractors.
  - o The SW HVAC Upstream Commercial (SDGE\_SW\_HVAC\_Up\_Com) and Residential (SDGE\_SW\_HVAC\_Up\_Res) and the SW Plug Load and Appliances (SDGE\_SW\_PLA) saw a decrease in forecasted TSB due to reviewing the program's current performance and aligning it with 2023 Potential and Goals Study, market conditions, and the third-party implementer's professional expertise.
  
- The following programs, where SDG&E is the non-lead IOU, saw a decrease in the forecasted TSB due to a revised forecast submitted by the lead IOU and an updated statewide allocation change:
  - o SDGE\_SW\_IP\_Gov SW Institutional Partnerships: Department of General Service and Department of Corrections (Pacific Gas & Electric Company is the lead PA)
  - o SDGE\_SW\_NC\_NonRes\_Ag\_electric SW New Construction Non Residential - Agricultural - All Electric (Pacific Gas & Electric Company is the lead PA)
  - o SDGE\_SW\_NC\_NonRes\_Ind\_electric SW New Construction Non Residential - Industrial - All Electric (Pacific Gas & Electric Company is the lead PA)
  - o SDGE\_SW\_NC\_NonRes\_Pub\_mixed SW New Construction Non Residential - Public - Mixed Fuel (Pacific Gas & Electric Company is the lead PA)
  - o SDGE\_SW\_WP SW Downstream Water/Wastewater Pumping Program (Southern California Edison Company is the lead PA)
  
- The following programs, where SDG&E is the non-lead IOU, saw a significant increase in the forecasted TSB for SDG&E's portion due to a revised forecast submitted by the lead IOU:
  - o SDGE\_SW\_MCWH SW Midstream Commercial Water Heating (Southern California Gas Company is the lead PA)
  - o SDGE\_SW\_FS SW Foodservice Point of Sale Program (Southern California Gas Company is the lead PA)
  - o SDGE\_SW\_NC\_NonRes\_Com\_electric SW New Construction Non Residential - Commercial - All Electric (Pacific Gas & Electric Company is the lead PA)
  - o SDGE\_SW\_NC\_NonRes\_Pub\_electric SW New Construction Non Residential - Public - All Electric (Pacific Gas & Electric Company is the lead PA)



- SDG&E's Commercial Large Customer Services (>20KW) Program (SDGE4004) saw a decrease in TSB due to a revised forecast from the third-party implementer that considered the program's current performance, the 2023 Potential and Goals Study, market conditions, and the third-party implementer's professional expertise.
- SDG&E's Industrial Sector Program (SDGE4006) saw an increase in TSB, as SDG&E consolidated two solicitations – the Industrial Sector solicitation and the Industrial-Port Tenants solicitation (SDGE4007) – into a single program and contract. This is the first program proposed, designed, and implemented by a third party that is specifically targeted at industrial customers, and so moving forward, SDG&E expects to realize greater benefits in this sector.
- The following programs saw increases in TSB due to the updated avoided cost calculator. Historically, SDG&E has not targeted specific sub-sectors in the commercial sector and expects this approach to better suit the needs of its commercial customers. Likewise, SDG&E has never had a dedicated fuel substitution offering and anticipates that its Residential Fuel-Substitution Program will have greater success with electrification. Ultimately, the forecasts for these programs will be adjusted prior to contracting based on the final programmatic design as well as input from third-party implementers, who may have special expertise or relationships with these customer segments.
  - o SDGE4168 Lodging (Hotels/Motels)
  - o SDGE4169 Groceries, Restaurants and Food Storage
  - o SDGE4170 Wholesale/Retail/Office, including Entertainment Services
  - o SDGE4171 Private Institutions/Healthcare
  - o SDGE4175 Local Residential Fuel-Substitution Program
- The following programs saw increases in TSB upon the conclusion of contract negotiations, which resulted in revised forecasts developed by the successful bidder:
  - o SDGE4010 Local Government Customers Program
  - o SDGE4040 IDSM Local Residential Behavioral Program (EE)
  - o SDGE4173 Small Business Outreach
  - o SDGE4184 Non-Residential Behavioral Program

SDG&E's K-12 Customer Services Program (SDGE4011) saw a decrease in TSB due to the current program closing as a result of the third-party implementer suspending business operations. The closure of this program is discussed further in Section G (Request for Program Closures).

### Total Resource Cost

The TRC requirement for the resource acquisition segment was set forth in D.21-05-031, and requires that the forecasted benefits exceed the costs of the resource acquisition segments of the portfolio, as measured by the TRC test, without considering Codes and Standards programs.<sup>22</sup> As shown in Table 3 from Appendix 3 below, the TRC ratio for the resource acquisition segment is **1.34** on a forecasted basis over the four-year period and is therefore deemed to be cost effective. SDG&E's Business Plan Application denoted a TRC ratio of **1.06** on a forecasted basis for the resource acquisition segment, indicating SDG&E's forecasted TRC ratio has improved as a result of this true-up process.

**Table 3 - Portfolio Cost Effectiveness Ratios (PY 2024-2027)**

Line		TRC ratio	PAC ratio	RIM ratio	
1	Segment	Resource Acquisition	1.34	1.62	0.64
2		Market Support	0.79	1.02	0.82
3		Equity	0.14	0.14	0.14
4		Codes and Standards (C&S)	2.30	59.89	40.09
5	Portfolio	<i>Including C&amp;S</i>	1.74	4.10	1.91
6		<i>Excluding C&amp;S</i>	1.17	1.41	0.65

#### **Significant portfolio changes contributing to TRC:**

The primary driver of the increase in TRC for the resource acquisition segment, both at the segment level and the program level, is the update to the Avoided Cost Calculator. Benefits at the program level increased while TRC costs stayed the same or decreased resulting in increased TRC ratios per program. Specifically, higher near-term distribution avoided costs stemming from increases in counterfactual overload kW and higher transmission avoided costs based on reduced demand forecast and increased systemwide transmission project costs were components impacting the update.<sup>23</sup>

<sup>22</sup> D.21-05-031 at OP 3.

<sup>23</sup> CPUC, 2022 Distributed Energy Resources Avoided Cost Calculator Documentation (September 15, 2022) at 3 – 4, available at <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/demand-side-management/acc-models-latest-version/2022-acc-documentation-v1b-updated.pdf>.

Regarding individual programs that had significant increases or decreases in the TRC ratio, SDG&E notes the following:

- SDG&E's Industrial Sector Program (SDGE4006) saw an increase in the forecasted TRC ratio. As mentioned previously, SDG&E consolidated two solicitations – the Industrial Sector solicitation and the Industrial-Port Tenants solicitation (SDGE4007) – into a single program and contract, which SDG&E believes will enable economies of scale.
- SDG&E's Local Government Customers Program (SDGE4010) saw an increase in the forecasted TRC ratio upon the conclusion of contract negotiations, which resulted in revised forecasts developed by the successful bidder.
- SDG&E's K-12 Customer Services Program (SDGE4011) saw a decrease in the forecasted TRC ratio due to the program closing as a result of the third-party implementer suspending business operations. The closure of this program is discussed further in Section G (Request for Program Closures).
- The following commercial sector programs saw increases in TRC due to the updated Avoided Cost Calculator. The commercial sector is SDG&E's largest and most diverse sector, and SDG&E believes that by narrowing the focus to specific sub-sectors, it will allow implementers to tailor their marketing and implementation efforts in a more cost-effective and efficient manner. However, as mentioned previously, the forecasts for these programs will be adjusted prior to contracting based on the final programmatic design as well as input from third-party implementers, who may have special expertise or relationships with these customer segments.
  - o SDGE4168 Lodging (Hotels/Motels)
  - o SDGE4169 Groceries, Restaurants and Food Storage
  - o SDGE4170 Wholesale/Retail/Office, including Entertainment Services
  - o SDGE4171 Private Institutions/Healthcare
- The following statewide programs saw a substantial increase in the TRC ratio due to updated forecasts shared by the lead IOU.
  - o SDGE\_SW\_IP\_Gov SW Institutional Partnerships: Department of General Service and Department of Corrections (Pacific Gas & Electric Company is the lead PA)
  - o SDGE\_SW\_MCWH SW Midstream Commercial Water Heating (Southern California Gas Company is the lead PA)

### **A. Market Support and Equity**

D.21-05-031 orders all EE PAs to segment their portfolios into three categories, with the primary purposes of resource acquisition, market support, and equity, as defined in this decision. The decision limits market support and equity expenditures of these segments to no more than 30% of the total portfolio budget.<sup>24</sup> SDG&E confirms within this TUAL that its expected market support and equity budget is **26.7%**, which does not exceed the 30% portfolio cap over the four-year period.

SDG&E's Business Plan Application was the first time SDG&E was able to propose solicitations for both the market support and equity segments. SDG&E has several current and planned solicitations for this segment, including: Non-Residential Behavioral, Residential Fuel Substitution, Workforce Education and Training 2.0 and Residential Equity Education and Outreach.

#### ***Significant portfolio changes contributing to Market Support and Equity:***

Within the market support and equity segments, SDG&E has limited significant changes to report, all of which have been included in this TUAL.

1. SDG&E's Non-Residential Behavioral program will target small commercial customers with 20kW or less usage. The purpose of the program is to educate and increase the non-residential customers' awareness of their energy usage and motivate them to take actions to reduce such usage. The Non-Residential Behavioral program was previously misclassified as resource acquisition and should instead be classified as market support.
2. To ensure a seamless customer experience, provide consistent offerings, and lower administrative costs, SDG&E will not solicit for the Property Management program, which was scheduled to start in 2025-2027. Due to challenges parsing out this segment group with the available budget, SDG&E will incorporate the components of property management into existing programs and is aiming for a seamless program delivery of services rather than a standalone program. This change will reduce the number of marketing channels and provide a single point of contact for potential participants, creating an enhanced customer experience.
3. In the equity segment, the Residential Single Family Equity Program and the Residential Multi Family Equity Program will now be combined into one program. Efforts for this program will be focused on residential customers in Hard to Reach (HTR) and Disadvantage Communities (DAC). Therefore, it is important to ensure that the messaging is consistent in addressing energy equity and ensuring customers have access to the same offerings.

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<sup>24</sup> D.21-05-031 at OPs 2 and 4.

Additionally, SDG&E is submitting a data update to the Workforce, Education & Training (WE&T) metrics due to changes and corrections in data sources. There is a new version of the CalEnviroScreen (CalEnviro) that will be used to calculate the new baselines and new targets compared to what was originally proposed. SDG&E will use the latest version of CalEnviro, CalEnviro 4.0, instead of 3.0, for the metric percent of disadvantaged participants trained.

Due to an error in calculation based on utilizing the advanced energy jobs number for San Diego County rather than the jobs specific to energy efficiency in the Advanced Energy Economy (AEE) report, the other correction being made is on the metric percent of participation relative to eligible target population for curriculum.

Sector Metric	Baseline	Metric Source	Target
Percent of participation relative to eligible target population for curriculum	Average from 2020-2022 is 9%	<p>Program Data</p> <p>Numerator: The average of unique participants between 2020 and 2022 was 2,216 (this includes customers outside of our service territory). Report from class registration database.</p> <p>Advanced Energy Economy (AEE)</p> <p>Denominator: SDG&amp;E's share of 283,800 advanced energy efficiency jobs which is approximately 23,669 according to AEE 2021 report. Excluding orange county since this is split territory and census does not differentiate.</p>	9%
Percent of total WE&T training program participants that meet the definition of disadvantaged worker	Average from 2020-2022 is 50.67%	Program Data and CalEnviro 4.0	51%

## B. Statewide / Third Party Compliance

Table 4, taken from Appendix 3 and copied below, provides SDG&E's contribution to statewide and third-party programs, which, as evidenced, are both above the minimum thresholds.

**Table 4 - Portfolio Statewide and Third-party Contribution Percentage Requirements (IOU only)**

Line	Budget Component	Qualifying Budget	Cumulative Total Budget w/o OBF Loan Pool	Contribution Percentage	Minimum Threshold
1	Statewide [1]	\$ 61,346,086	\$ 305,891,188	20.2%	20%
2	Third-party [2] [3]	\$ 218,011,874	\$ 305,891,188	71.3%	60%

[1] Decision 16-08-019 OP5.

[2] Decision 16-08-019 OP10.

[3] \$4,000,000 was deducted from Third-Party budget component as the Third-Party solicited residential and commercial market access programs are not expected to launch until 2026. The existing (2024-2025) Summer Reliability Market Access program does not meet the definition of "Third-Party" noted in FN [2].

### Statewide Compliance

D.16-08-019 originally required that each IOU direct at least 25% of its EE portfolio budget to statewide programs, with the exception of SoCalGas, with a minimum of 15%.<sup>25</sup> D.23-06-055 superseded this requirement, acknowledging a reduced statewide target is reasonable, and reduced the minimum percentage to 20% for statewide programs for all of the IOUs, except for SoCalGas, for the 2024-2027 portfolio.<sup>26</sup>

There have been additional statewide developments, including the approval of the BayREN Statewide Home Energy Score California program.<sup>27</sup> D.23-06-055 specifies the Commission, "[does] not have a method to allocate budget or savings beyond IOU funding allocations by load share."<sup>28</sup> Therefore, SDG&E is not including the budget designated for BayREN within its compliance calculation used to determine compliance with the 20% Statewide requirement, and has no savings included as a result of the approval of BayREN's Statewide Home Energy Score California program.

<sup>25</sup> D.16-08-019 at OP 6.

<sup>26</sup> D.23-06-055 at 7-8.

<sup>27</sup> *Id.* at OP 3.

<sup>28</sup> *Id.* at 12-13.

**Third Party Compliance**

D.18-01-004 requires at least 25% of the total portfolio budget going to third-party programs by December 31, 2018, 40% by December 31, 2020, and 60% by December 31, 2022.<sup>29</sup> Beyond 2022, IOUs are required to maintain the 60% compliance requirement. As shown in the table above, SDG&E expects to continue meeting the 60% requirement set forth in D.18-01-004 through the program cycle.

**Significant portfolio changes contributing to SW/Third Party Compliance:**

D.23-06-055 updated SDG&E's statewide allocation. More specifically, SDG&E's electric load share decreased from 15.46% to 9.10%, and SDG&E's gas load share increased from 7.79% to 13.20%. In order to accommodate the updated allocations, SDG&E reviewed the forecasts submitted by its third-party implementers and compared the forecasts to current program performance. SDG&E then adjusted the third parties' forecasts based on current performance, reducing program budgets in cases where performance did not justify maintaining previously approved funding levels. This process ensured that SDG&E not only exceeded the minimum 20% statewide portfolio allocation, but also ensured SDG&E exceeded the threshold to have 60% of its portfolio outsourced to third parties.

**Solicitations**

As mentioned above, SDG&E is compliant with, and exceeds, the 60% third-party requirement from D.18-01-004. SDG&E is able to meet this requirement through ongoing solicitations, which are organized such that as program contracts end, solicitations are simultaneously completed to ensure compliance. SDG&E has several active solicitations with additional solicitations being planned for due to the Business Plan Decision.

- Resource Acquisition:
  - o Retail Offices and Wholesale: RFP stage
  - o Groceries, Restaurants, Food Storage: RFA stage
  - o Private Institutions, Healthcare: RFA Prep stage
  - o Lodging: RFA stage
  - o Residential Multi Family: will begin in 2024
  - o Commercial & Residential Market Access: will begin in 2024
- Market Support:
  - o Non-Residential Behavioral: Contract Negotiation stage
  - o Residential Fuel Substitution: RFA Prep stage
  - o Workforce Education and Training 2.0: Contract Negotiation stage
- Equity:
  - o Residential Equity: Contract Negotiation stage

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<sup>29</sup> D.18-01-044 at OP 1.

### C. Progress on Segment Metrics

D.21-05-031 requires PAs “to develop metrics and criteria for evaluating progress of all programs, with particular focus on market support and equity programs that may not have measurable energy savings.”<sup>30</sup> D.21-05-031 further requires that True-Up or Mid-Cycle Advice Letters include a report on the progress against metrics relevant for each segment of the portfolio.<sup>31</sup> Therefore, SDG&E provides such progress below.

#### Resource Acquisition

Regarding the resource acquisition metrics, SDG&E recommends visiting CEDARS for reporting information relevant to the resource acquisition segment.

#### Market Support and Equity

The process to develop market support and equity metrics is ongoing through CAEECC, and is expected to be resolved in the next few years, as the Business Plan Decision requires:

By no later than March 1, 2025, the PAs must submit a joint Tier 3 advice letter that: (a) Defines the process for proposing and adopting long term market support and equity goals; (b) Defines options for two or three goal constructs each for market support and equity segments, where a construct describes how to recognize success by: i. Demonstrating alignment with objectives; ii. Identifying which metric(s) or indicator(s) should be used for goals; iii. Whether goals should be set statewide, by territory, or by portfolio administrator; iv. Anticipated timeline for goal achievement; and v. Necessary baseline information. (c) Defines what study or studies process is necessary to quantify goals and propose a budget for each study from the funding set aside from the EM&V budgets, as directed above.<sup>32</sup>

Market support and equity metrics are expected to be available for the 2028 cycle.

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<sup>30</sup> D.21-05-031 at COL 10.

<sup>31</sup> *Id.* at 42 – 43.

<sup>32</sup> D.23-06-055 at OP 25.



## **D. Request to Open / Significantly Change Programs**

### **Market Access:**

The Commission required, “[b]y no later than July 1, 2024, the investor-owned utility portfolio administrators (PAs) and Marin Clean Energy shall make available solicitations using market access approaches for residential and commercial downstream opportunities in their territories.”<sup>33</sup> As a result, SDG&E has added new residential and commercial market access programs to its energy efficiency portfolio and will release solicitations no later than July 1, 2024, as directed. In the interim, SDG&E plans to incorporate its existing Summer Reliability Market Access Program (SRMAP) into the energy efficiency portfolio and will continue operating the program until the newly solicited market access offering(s) are able to launch, which is anticipated to occur in mid-2025. This approach aims to maintain the current program’s momentum and avoid a gap in market access offerings. Prior to the 2024-2027 cycle, the funding for SRMAP was authorized outside of the EE portfolio through D.21-12-011 and collected through the electric PPP rates. Beginning in the 2024 cycle, SDG&E reallocated funding from other programs in its EE portfolio to fund the continuation of SRMAP and new market access offerings. SDG&E will continue to assess program performance during implementation and re-allocate funding, as necessary.

### **Business Energy Solutions**

SDG&E seeks to change the target market sector and modify customer eligibility requirements for its legacy Business Energy Solutions (BES) Program (SDGE3226), also known as the Direct Install Program. This program has served SDG&E’s small commercial customer segment – customers whose monthly maximum demand has not exceeded 20 kW within the past 12 months – since 2022 when the Small Commercial Program within SDG&E’s third-party program portfolio closed. SDG&E had intended to close the BES Program at the end of 2023 due to the launch of its new Small Business Outreach Program (SDGE4173) within the equity segment, which is expected to go live at the start of 2024. However, due to the early termination of the K-12 Energy Efficiency Program (KEEP) (SDGE4011), which is discussed further in Section G (Request for Program Closures), SDG&E plans to keep the program active to serve the K-12 customer base and help contribute to its energy efficiency goals. Prior to 2022, the BES Program had serviced public sector customers, but began ramping down when SDG&E started launching its new third-party public sector programs, which included KEEP. Thus, SDG&E anticipates a relatively smooth transition that prevents an extended gap in program offerings for this customer segment until it can plan for a new solicitation.

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<sup>33</sup> *Id.* at OP 26.

### E. Request for Program Closures

As part of SDG&E's TUAL filing, SDG&E is requesting approval to close multiple programs. D.21-05-031 allows PAs to request program closure through a Tier 2 Advice Letter.<sup>34</sup> As such, SDG&E notified the service list on September 1, 2023, and held a program closure webinar on September 26, 2023.<sup>35</sup>

In addition to the program closure webinar, Program Administrators are required to provide the following information to facilitate approval of program closure: (a) a description of the program, the program implementer, and the region and customer/sector served by program; (b) justification for closure, including demonstration of alignment with State GHG emissions reductions goals and EE goals, and a brief discussion of the program closure impact to ratepayers, (c) year program started; (d) date program was due to sunset; (e) most recent three program years (inclusive of current year) filed (i.e., forecasted) budget, Total Resource Cost (TRC), and savings, per TSB metric if applicable; (f) most recent two years (excluding current year) program budget expenditures, claimed TRC and savings, per TSB metric if applicable; (g) a discussion and overview of stakeholder feedback and any changes to transition to closure as a result of input from the webinar to ensure that program implementers are aware of the PA's plan; and (h) what, if any, plans the PAs have to replace the program.<sup>36</sup>

Below, SDG&E provides this data for each program for which it is requesting program closure.

1	SDGE3222	SW-COM-Calculated Incentives-Savings by Design
2	SDGE3246	SW-ET-Technology Introduction Support
3	SDGE3247	SW-ET-Technology Assessment Support
4	SDGE3248	SW-ET-Technology Deployment Support
5	SDGE3254	Local WE&T-Integrated Energy Education & Training (IEET)
6	SDGE3261	Local-IDSM-ME&O-Behavioral Programs (EE)
7	SDGE3317	HOPPs - Building Retro-Commissioning
8	SDGE4011	K-12 Customer Services Program
9	SDGE4015	IDSM Residential Local Marketing Education and Outreach Program (EE)

<sup>34</sup> D.21-05-031 at OP 12.

<sup>35</sup> See EE Program Closure checklist, available on the CPUC's website here: <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/energy-efficiency/rolling-portfolio-program-guidance/posted-program-closure-checklist-required-by-d2105031-12312021.docx> .

<sup>36</sup> *Id.*

**1. SDGE3222 - SW-COM-Calculated Incentives-Savings by Design**

<b>A</b>	A description of program, implementer, region and customer/sector served by program:	The SDG&E Savings by Design (SBD) program served SDG&E’s commercial new construction segment. It promoted integrated building design by providing design assistance with energy efficient alternatives and owner incentives to participants who design spaces that perform at least 10% better than what is required in Title 24 of the California Building Energy Efficiency Standards.					
<b>B</b>	Justification for closure, including: demonstration of alignment with State GHG emissions reductions goals and EE goals and discussion of impact to ratepayers from program closure:	The SBD program was closed to new enrollments in 2021 as the new Statewide New Construction Program was launched, however, projects that were under contract and completed were inspected and processed for eligible incentive payments in 2022. Additionally, projects in the early phases of planning in 2021 were reviewed and contracted according to program guidelines and those projects will be inspected as they are completed throughout the next few years.					
<b>C</b>	Year program started:	The current format of the program began in 2016.					
<b>D</b>	Date program was due to sunset:	SDG&E’s SBD program was closed to new commitments in 2021.					
<b>E</b>	Most recent three program years (inclusive of current year) filed (i.e., forecasted) budget, Total Resource Cost (TRC), and savings, per Total System Benefit (TSB) metric if applicable:	<b>Year</b>	<b>Forecasted Budget</b>	<b>Total Resource Cost</b>	<b>Forecasted Savings kWh (First Year Net)</b>	<b>Forecasted Savings kW (First Year Net)</b>	<b>Forecasted Savings Therms (First Year Net)</b>
		2023	\$ 655,324	3.15	2,075,055	120.58	16,404
		2022	\$ 1,050,922	1.73	1,697,772	98.66	13,421
		2021	\$ 2,417,259	1.78	2,509,178	625.97	153,421
<b>F</b>	Most recent two years (excluding current year) program budget expenditures, claimed TRC and savings, per (TSB) metric if applicable:	<b>Year</b>	<b>Expenditures</b>	<b>Claimed Total Resource Cost</b>	<b>Claimed Savings kWh (First Year Net)</b>	<b>Claimed Savings kW (First Year Net)</b>	<b>Claimed Savings Therms (First Year Net)</b>
		2022	\$ 612,850	.45	317,939	102.45	2,786
		2021	\$ 591,277	1.54	1,471,386	217.04	32,726
<b>G</b>	A discussion and overview of stakeholder feedback and any changes to transition to closure as a result of input from the webinar to ensure that program implementers are aware of the PA’s plan; and:	No feedback was received.					
<b>H</b>	What, if any, plans the PAs has to replace the program:	The Statewide Non-Residential New Construction Program launched in 2021, which replaces program SDGE3222.					

**2. SDGE3246 - SW-ET-Technology Introduction Support**

<b>A</b>	A description of program, implementer, region and customer/sector served by program:	The Technology Introduction Support (TIS) subprogram supports the introduction of new technologies to the market, on a limited scale, through several activities. In the past, these activities included Scaled Field Placement (SFP) projects, Demonstration and Showcase (D&S) projects, market and behavioral studies, and knowledge dissemination and outreach, amongst others. As a direct implementation approach, SFP projects place measures at several customer sites as a key step toward gaining market traction and feedback. Typically, these measures have already undergone an assessment or similar evaluation to reduce the risk of failure. D&S projects introduce measures at a systems level to stakeholders in real-world settings, thus creating broad public and technical community exposure and increased market knowledge. Market and behavioral studies are designed to perform targeted research on customer behavior, customer decision-making, and market behavior to gain a qualitative and quantitative understanding of customer perceptions, customer acceptance of new measures, and market readiness and potential for new measures.																															
<b>B</b>	Justification for closure, including: demonstration of alignment with State GHG emissions reductions goals and EE goals and discussion of impact to ratepayers from program closure:	With the launch of the third-party implemented Statewide Emerging Technology (ET) programs for both natural gas and electricity, the activity types used by the TIS program are also undergoing transition. The TIS program is shifting focus from direct implementation to support of the Statewide ET programs, which will implement similar activities coordinated across California IOUs.																															
<b>C</b>	Year program started:	The current format of the program started in 2013.																															
<b>D</b>	Date program was due to sunset:	The program was closed to new projects in 2021 and is expected to close at the end of 2023.																															
<b>E</b>	Most recent three program years (inclusive of current year) filed (i.e., forecasted) budget, Total Resource Cost (TRC), and savings, per Total System Benefit (TSB) metric if applicable:	<table border="1"> <thead> <tr> <th>Year</th> <th>Forecasted Budget</th> <th>Total Resource Cost</th> <th>Forecasted Savings kWh (First Year Net)</th> <th>Forecasted Savings kW (First Year Net)</th> <th>Forecasted Savings Therms (First Year Net)</th> </tr> </thead> <tbody> <tr> <td>2023</td> <td>\$ 100,486</td> <td>0.0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>2022</td> <td>\$ 131,310</td> <td>0.0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>2021</td> <td>\$ 450,075</td> <td>0.0</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	Year	Forecasted Budget	Total Resource Cost	Forecasted Savings kWh (First Year Net)	Forecasted Savings kW (First Year Net)	Forecasted Savings Therms (First Year Net)	2023	\$ 100,486	0.0	0	0	0	2022	\$ 131,310	0.0	0	0	0	2021	\$ 450,075	0.0	0	0	0							
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F	Most recent two years (excluding current year) program budget expenditures, claimed TRC and savings, per (TSB) metric if applicable:	Year	Expenditures	Claimed Total Resource Cost	Claimed Savings kWh (First Year Net)	Claimed Savings kW (First Year Net)	Claimed Savings Therms (First Year Net)
		2022	\$ 130,086	0.0	0	0	0
		2021	\$ 254,892	0.0	0	0	0
		This program is classified as a market support program and does not have any savings or TRC associated with it.					
G	A discussion and overview of stakeholder feedback and any changes to transition to closure as a result of input from the webinar to ensure that program implementers are aware of the PA's plan; and:	No feedback was received.					
H	What, if any, plans the PAs has to replace the program:	The new statewide gas emerging technology program (SDGE 4140) and electrical emerging technology program (SDGE4107), which replaces program SDGE3246.					

**3. SDGE3247 - SW-ET-Technology Assessment Support**

A	A description of program, implementer, region and customer/sector served by program:	SDG&E's ETP has historically leveraged the Technology Assessment (TA) element as a core function that provides critical support to EE programs through the evaluation of performance claims of new or underutilized technologies that have the potential to become EE measures. A key objective of these assessments has been the adoption of new measures into SDG&E's portfolio. Data from different sources may be used to support assessment findings, including site testing (conducted at customer or other field sites), laboratory testing, or paper studies, such as behavioral studies, market research, or modeling. In addition to other findings, assessments typically generate some of the data that EE incentive programs can use to construct a measure package for each measure, estimating energy and demand savings over the life of the measure.
B	Justification for closure, including: demonstration of alignment with State GHG emissions reductions goals and EE goals and discussion of impact to ratepayers from program closure:	With the launch of the third-party implemented Statewide ET programs for both natural gas and electricity, the activity types used by the TAS program are also undergoing transition. The TAS program is shifting focus from direct implementation to support of the Statewide ET programs, which will implement similar activities coordinated across California IOUs.

<b>C</b>	Year program started:	The current format of the program started in 2013.																													
<b>D</b>	Date program was due to sunset:	The program stopped initiating new projects in 2021 and legacy projects are expected to be completed by the end of 2024. SDG&E's funding obligations have been fulfilled.																													
<b>E</b>	Most recent three program years (inclusive of current year) filed (i.e., forecasted) budget, Total Resource Cost (TRC), and savings, per Total System Benefit (TSB) metric if applicable:	<table border="1" data-bbox="848 337 1938 592"> <thead> <tr> <th data-bbox="848 337 968 495">Year</th> <th data-bbox="974 337 1178 495">Forecasted Budget</th> <th data-bbox="1184 337 1346 495">Total Resource Cost</th> <th data-bbox="1352 337 1514 495">Forecasted Savings kWh (First Year Net)</th> <th data-bbox="1520 337 1682 495">Forecasted Savings kW (First Year Net)</th> <th data-bbox="1688 337 1938 495">Forecasted Savings Therms (First Year Net)</th> </tr> </thead> <tbody> <tr> <td data-bbox="848 500 968 531">2023</td> <td data-bbox="974 500 1178 531">\$ 179,944</td> <td data-bbox="1184 500 1346 531">0.0</td> <td data-bbox="1352 500 1514 531">0</td> <td data-bbox="1520 500 1682 531">0</td> <td data-bbox="1688 500 1938 531">0</td> </tr> <tr> <td data-bbox="848 535 968 566">2022</td> <td data-bbox="974 535 1178 566">\$ 844,708</td> <td data-bbox="1184 535 1346 566">0.0</td> <td data-bbox="1352 535 1514 566">0</td> <td data-bbox="1520 535 1682 566">0</td> <td data-bbox="1688 535 1938 566">0</td> </tr> <tr> <td data-bbox="848 571 968 592">2021</td> <td data-bbox="974 571 1178 592">\$ 718,528</td> <td data-bbox="1184 571 1346 592">0.0</td> <td data-bbox="1352 571 1514 592">0</td> <td data-bbox="1520 571 1682 592">0</td> <td data-bbox="1688 571 1938 592">0</td> </tr> </tbody> </table> <p data-bbox="848 625 1938 682">This program is classified as a market support program and does not have any savings or TRC associated with it.</p>						Year	Forecasted Budget	Total Resource Cost	Forecasted Savings kWh (First Year Net)	Forecasted Savings kW (First Year Net)	Forecasted Savings Therms (First Year Net)	2023	\$ 179,944	0.0	0	0	0	2022	\$ 844,708	0.0	0	0	0	2021	\$ 718,528	0.0	0	0	0
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<b>H</b>	What, if any, plans the PAs has to replace the program:	The new statewide gas emerging technology program (SDGE 4140) and electrical emerging technology program (SDGE4107), which replaces program SDGE3247.																													

**4. SDGE3248 - SW-ET-Technology Deployment Support**

<b>A</b>	A description of program, implementer, region and customer/sector served by program:	The Technology Deployment Support (TDS) subprogram assists private industry in developing or improving technologies. Although product development – the process of taking an early-stage technology or concept and transforming it into a saleable or marketable product – is the domain of private industry, there are opportunities where IOUs are well-qualified or well-positioned to undertake targeted, cost-effective activities supporting technology development efforts. This support decreases innovators’ uncertainties and allows SDG&E the opportunity to directly engage with private industry and influence new technologies while they are under development.																													
<b>B</b>	Justification for closure, including: demonstration of alignment with State GHG emissions reductions goals and EE goals and discussion of impact to ratepayers from program closure:	With the launch of the third-party implemented Statewide ET programs for both natural gas and electricity, the activity types used by the TDS program are also undergoing transition. The TDS program is shifting focus from direct implementation to support of the Statewide ET programs, which will implement similar activities coordinated across California IOUs.																													
<b>C</b>	Year program started:	The current format of the program started in 2013.																													
<b>D</b>	Date program was due to sunset:	The program was closed to new projects in 2021 and is expected to close at the end of 2023.																													
<b>E</b>	Most recent three program years (inclusive of current year) filed (i.e. forecasted) budget, Total Resource Cost (TRC), and savings, per Total System Benefit (TSB) metric if applicable:																														
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		2022	\$ 141,892	0.0	0	0	0
		2021	\$ 212,418	0.0	0	0	0
		This program is classified as a market support program and does not have any savings or TRC associated with it.					
G	A discussion and overview of stakeholder feedback and any changes to transition to closure as a result of input from the webinar to ensure that program implementers are aware of the PA's plan; and:	No feedback was received.					
H	What, if any, plans the PAs has to replace the program:	The new statewide gas emerging technology program (SDGE 4140) and electrical emerging technology program (SDGE4107), which replaces program SDGE3248.					

**5. SDGE3254 - Local WE&T-Integrated Energy Education & Training (IEET)**

A	A description of program, implementer, region and customer/sector served by program:	The Workforce, Education & Training (WE&T) program, also named Integrated Energy Education and Training (IEET) Subprogram focuses on skills and market development training and education. IEET is composed of specific market sectors, including commercial and residential sectors. There are two components to IEET: Technical Upskill and Core Energy Education Collaboration (CEEC). Technical Upskill provides training and education courses to promote industry trends and developments for advancing energy efficiency as a professional discipline. Technical Upskill is tailored towards people in a job/career seeking energy-focused upskilling. CEEC is an initiative to reach training and educational organizations with the goal of forming strategic partnerships to reach a broader range of the workforce.
B	Justification for closure, including: demonstration of alignment with State GHG emissions reductions goals and EE goals and discussion of impact to ratepayers from program closure:	SDG&E competitively solicited the program through the EE PRG third-party solicitation process. This program will no longer be implemented by SDG&E, but it will still be implemented through a third party who will continue to provide EE education and training through both components of the program (Technical Upskill and CEEC). The new Local WE&T Program is expected to launch in 2024. Therefore, SDG&E does not foresee any implications as result of this program closure.



<b>C</b>	Year program started:	WE&T IEET started with the approval of the Decision 18-05-041 in 2018.																													
<b>D</b>	Date program was due to sunset:	SDG&E began the solicitation process at the end of 2022 and will continue to administer the WE&T program in 2023, closing the program at the end of the year. SDG&E anticipates the new third-party implementer will take over the program in 2024.																													
<b>E</b>	Most recent three program years (inclusive of current year) filed (i.e. forecasted) budget, Total Resource Cost (TRC), and savings, per Total System Benefit (TSB) metric if applicable:	<table border="1" data-bbox="848 370 1934 618"> <thead> <tr> <th data-bbox="848 370 968 521">Year</th> <th data-bbox="974 370 1178 521">Forecasted Budget</th> <th data-bbox="1184 370 1346 521">Total Resource Cost</th> <th data-bbox="1352 370 1535 521">Forecasted Savings kWh (First Year Net)</th> <th data-bbox="1541 370 1724 521">Forecasted Savings kW (First Year Net)</th> <th data-bbox="1730 370 1934 521">Forecasted Savings Therms (First Year Net)</th> </tr> </thead> <tbody> <tr> <td data-bbox="848 526 968 557">2023</td> <td data-bbox="974 526 1178 557">\$ 3,555,051</td> <td data-bbox="1184 526 1346 557">0.0</td> <td data-bbox="1352 526 1535 557">0</td> <td data-bbox="1541 526 1724 557">0</td> <td data-bbox="1730 526 1934 557">0</td> </tr> <tr> <td data-bbox="848 561 968 592">2022</td> <td data-bbox="974 561 1178 592">\$ 4,077,452</td> <td data-bbox="1184 561 1346 592">0.0</td> <td data-bbox="1352 561 1535 592">0</td> <td data-bbox="1541 561 1724 592">0</td> <td data-bbox="1730 561 1934 592">0</td> </tr> <tr> <td data-bbox="848 597 968 628">2021</td> <td data-bbox="974 597 1178 628">\$ 4,101,177</td> <td data-bbox="1184 597 1346 628">0.0</td> <td data-bbox="1352 597 1535 628">0</td> <td data-bbox="1541 597 1724 628">0</td> <td data-bbox="1730 597 1934 628">0</td> </tr> </tbody> </table> <p data-bbox="848 651 1934 711">This program is classified as a market support program, providing education and training, and does not have any savings or TRC associated with it.</p>						Year	Forecasted Budget	Total Resource Cost	Forecasted Savings kWh (First Year Net)	Forecasted Savings kW (First Year Net)	Forecasted Savings Therms (First Year Net)	2023	\$ 3,555,051	0.0	0	0	0	2022	\$ 4,077,452	0.0	0	0	0	2021	\$ 4,101,177	0.0	0	0	0
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<b>G</b>	A discussion and overview of stakeholder feedback and any changes to transition to closure as a result of input from the webinar to ensure that program implementers are aware of the PA's plan; and:	No feedback was received.																													
<b>H</b>	What, if any, plans the PAs has to replace the program:	The new Local WE&T Program (SDGE4174) is expected to launch in Q1 2024, which replaces program SDGE3254.																													

**6. SDGE3261 - Local-IDSM-ME&O-Behavioral Programs (EE)**

<b>A</b>	A description of program, implementer, region and customer/sector served by program:	The purpose of the Local-IDSM-ME&O Behavioral (or HER) program, implemented by Opower, was to increase residential customer awareness of their energy use and motivate them to take actions, which may include usage-based or equipment-based changes in behaviors, as well as increased participation in existing and future energy efficiency or demand response programs. This program leveraged comparative energy use reports delivered to residential customers by U.S. mail, email, web portal, or a combination of the three channels, to achieve greater customer awareness and energy savings.																													
<b>B</b>	Justification for closure, including: demonstration of alignment with State GHG emissions reductions goals and EE goals and discussion of impact to ratepayers from program closure:	SDG&E competitively solicited for a new local residential behavioral program through the EE Procurement Review Group (PRG) third-party solicitation process. This program will no longer be implemented by SDG&E, but it will still be implemented through a third party who will continue to provide Home Energy Reports to customers via paper and/or email, along with access to a personalized customer portal and home survey. The new Local Residential Behavioral Program launched in Q2 of 2023. Therefore, SDG&E does not foresee any implications as result of this program closure.																													
<b>C</b>	Year program started:	2016																													
<b>D</b>	Date program was due to sunset:	Q2 2023																													
<b>E</b>	Most recent three program years (inclusive of current year) filed (i.e. forecasted) budget, Total Resource Cost (TRC), and savings, per Total System Benefit (TSB) metric if applicable:	<table border="1"> <thead> <tr> <th>Year</th> <th>Forecasted Budget</th> <th>Total Resource Cost</th> <th>Forecasted Savings kWh (First Year Net)</th> <th>Forecasted Savings kW (First Year Net)</th> <th>Forecasted Savings Therms (First Year Net)</th> </tr> </thead> <tbody> <tr> <td>2023</td> <td>\$ 1,436,800*</td> <td>0.00</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>2022</td> <td>\$ 3,604,948</td> <td>1.49</td> <td>42,998,021</td> <td>7,242.80</td> <td>1,067,526</td> </tr> <tr> <td>2021</td> <td>\$ 3,647,758</td> <td>1.32</td> <td>39,723,172</td> <td>10,450</td> <td>1,020,000</td> </tr> </tbody> </table>	Year	Forecasted Budget	Total Resource Cost	Forecasted Savings kWh (First Year Net)	Forecasted Savings kW (First Year Net)	Forecasted Savings Therms (First Year Net)	2023	\$ 1,436,800*	0.00	0	0	0	2022	\$ 3,604,948	1.49	42,998,021	7,242.80	1,067,526	2021	\$ 3,647,758	1.32	39,723,172	10,450	1,020,000					
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2021	\$ 3,647,758	1.32	39,723,172	10,450	1,020,000																										
		*SDG&E did not originally forecast a budget for this program in 2023 because it was supposed to close at the end of 2023, however, due to the ramp time of the new third party program implementer and to ensure there was no gap in service to customers, SDG&E fund shifted this amount into the program.																													

<b>F</b>	Most recent two years (excluding current year) program budget expenditures, claimed TRC and savings, per (TSB) metric if applicable:	<b>Year</b>	<b>Expenditures</b>	<b>Claimed Total Resource Cost</b>	<b>Claimed Savings kWh (First Year Net)</b>	<b>Claimed Savings kW (First Year Net)</b>	<b>Claimed Savings Therms (First Year Net)</b>
		2022	\$ 3,615,124	1.20	37,759,474	7,246.26	530,790
		2021	\$ 3,524,482	1.38	42,284,732	6,369.30	682,966
<b>G</b>	A discussion and overview of stakeholder feedback and any changes to transition to closure as a result of input from the webinar to ensure that program implementers are aware of the PA's plan; and:	No feedback was received.					
<b>H</b>	What, if any, plans the PAs has to replace the program:	The new Local Behavioral Program (SDGE4040) launched in Q2 of 2023, which replaces program SDGE3261.					

**7. SDGE3317 - HOPPs - Building Retro-Commissioning**

<b>A</b>	A description of program, implementer, region and customer/sector served by program:	The HOPPs RCx program offered financial and technical assistance for customers to undertake retrocommissioning (“RCx”) projects and implement measures that improved their building’s operations and yielded persistent energy savings. The program served SDG&E’s commercial sector and was implemented by CLEAResult.
<b>B</b>	Justification for closure, including: demonstration of alignment with State GHG emissions reductions goals and EE goals and discussion of impact to ratepayers from program closure:	The HOPPs RCx program stopped accepting new projects in 2019. All program installations were completed in 2021 as the new third-party small and large commercial programs were launched, however, projects that were already under contract, have 3-year measurement and verification periods. All remaining projects will complete the measurement and verification periods during 2024. Upon final payments for these projects, the program will be fully closed.
<b>C</b>	Year program started:	The current format of the program began in 2017.
<b>D</b>	Date program was due to sunset:	The program was closed to new projects in 2019 and all installations were completed in 2021. The program will remain active until mid-2024 in order to complete the 3-year measurement and verification periods required by the program.

<b>E</b>	Most recent three program years (inclusive of current year) filed (i.e., forecasted) budget, Total Resource Cost (TRC), and savings, per Total System Benefit (TSB) metric if applicable:	<b>Year</b>	<b>Forecasted Budget</b>	<b>Total Resource Cost</b>	<b>Forecasted Savings kWh (First Year Net)</b>	<b>Forecasted Savings kW (First Year Net)</b>	<b>Forecasted Savings Therms (First Year Net)</b>
		2023	\$ 425,469	0.59	406,363	0	50,527
		2022	\$ 473,800	0.49	406,363	0	50,527
		2021	\$ 897,608	0.76	1,073,696	117	52,747
<b>F</b>	Most recent two years (excluding current year) program budget expenditures, claimed TRC and savings, per (TSB) metric if applicable:	<b>Year</b>	<b>Expenditures</b>	<b>Claimed Total Resource Cost</b>	<b>Claimed Savings kWh (First Year Net)</b>	<b>Claimed Savings kW (First Year Net)</b>	<b>Claimed Savings Therms (First Year Net)</b>
		2022	\$ 305,002	0.27	105,269	0	18,149
		2021	\$ 657,406	2.41	2,156,265	115	401,105
<b>G</b>	A discussion and overview of stakeholder feedback and any changes to transition to closure as a result of input from the webinar to ensure that program implementers are aware of the PA's plan; and	No feedback was received.					
<b>H</b>	What, if any, plans the PAs has to replace the program:	The commercial sector is currently being served by SDG&E's legacy Business Energy Solutions (BES) Program (SDGE3226) and SDG&E's third-party Comprehensive Energy Management Solutions Program (CEMS) (SDGE4004). BES serves small commercial customers with a maximum monthly demand ≤20 kW while CEMS serves large commercial customers with a maximum monthly demand >20 kW. Beginning in 2024, small commercial customers will be served by SDG&E's new third-party Small Business Equity Program (SDGE4173). Large commercial customers will continue to be served by CEMS through the end of 2024 while solicitations are being completed for new commercial programs. In 2025, there will be four new programs to serve the commercial sector based upon building type: 1) Retail, Offices, and Wholesale, 2) Groceries, Restaurants, and Food Storage, 3) Lodging, and 4) Private Institutions and Healthcare.					

**8. SDGE4011 - K-12 Customer Services Program**

<b>A</b>	A description of program, implementer, region and customer/sector served by program:	The K-12 Program is also known as K-12 Energy Efficiency Program (KEEP), is a third-party program for public and charter schools. Savings are calculated using a population Normalized Metered Energy Consumption (NMEC) M&V approach. The program is implemented by California Retrofit Incorporated (CRI). A key feature of the KEEP program is the concierge service, which provides a single point of contact for all questions related to energy efficiency and sustainability.					
<b>B</b>	Justification for closure, including: demonstration of alignment with State GHG emissions reductions goals and EE goals and discussion of impact to ratepayers from program closure:	On August 16, 2023, the implementer for the K-12 program notified SDG&E that it plans to suspend its business operations and will need to close the program as a result. This result is outside of SDG&E’s control and was unplanned, therefore SDG&E has developed an interim plan for serving the K-12 customers, discussed in more detail below, until another program can be solicited for.					
<b>C</b>	Year program started:	2021					
<b>D</b>	Date program was due to sunset:	December 31, 2024					
<b>E</b>	Most recent three program years (inclusive of current year) filed (i.e., forecasted) budget, Total Resource Cost (TRC), and savings, per Total System Benefit (TSB) metric if applicable:	<b>Year</b>	<b>Forecasted Budget</b>	<b>Total Resource Cost</b>	<b>Forecasted Savings kWh (First Year Net)</b>	<b>Forecasted Savings kW (First Year Net)</b>	<b>Forecasted Savings Therms (First Year Net)</b>
		2023	\$ 2,130,950	0.81	1,475,491	234	115,471
		2022	\$ 3,433,752	1.15	3,350,339	494	25,785
		2021	\$ 764,849	2.35	1,048,990	94	136,100
<b>F</b>	Most recent two years (excluding current year) program budget expenditures, claimed TRC and savings, per (TSB) metric if applicable: <sup>37</sup>	<b>Year</b>	<b>Expenditures</b>	<b>Claimed Total Resource Cost</b>	<b>Claimed Savings kWh (First Year Net)</b>	<b>Claimed Savings kW (First Year Net)</b>	<b>Claimed Savings Therms (First Year Net)</b>
		2022	\$118,669	0.0	0	0	0
		2021	\$65,168	0.0	0	0	0

<sup>37</sup> The K-12 program is a population NMEC program, which requires a one-year period of measurement and evaluation therefore savings and TRC is not available. The initial annual estimated savings will be reported in SDG&E’s 2023 EE Annual Report, which will be filed in 2024.

<b>G</b>	A discussion and overview of stakeholder feedback and any changes to transition to closure as a result of input from the webinar to ensure that program implementers are aware of the PA's plan; and:	SDG&E confirmed for stakeholders that the K-12 Program is the only third-party-solicited program for which it is requesting closure. Stakeholders also inquired as to whether SDG&E planned to solicit for a new third-party K-12 program. SDG&E acknowledged that it is still determining its future plans for this customer segment, as the program's closure is a recent development and was unplanned. However, SDG&E did highlight that in the interim, its legacy Business Energy Solutions (BES) Program will serve K-12 customers. Lastly, stakeholders inquired if there would be a change in offerings between the two programs. SDG&E noted that the two programs offered similar measures, which further contributed to its decision to utilize the BES Program to serve the K-12 customer segment. No changes were requested to the transition plan by stakeholders.
<b>H</b>	What, if any, plans the PAs has to replace the program:	Currently, SDG&E intends to expand its legacy program, BES (SDGE3226) to serve this customer base and help contribute to SDG&E's energy efficiency goals. BES is a direct install program that offers no-cost or discounted energy efficiency improvements. Currently, the program is serving small commercial customers whose monthly maximum demand has not exceeded 20 kW within the last 12 months. Historically, the program serviced K-12 customers, but began ramping down when SDG&E launched its new third-party K-12 offering. SDG&E anticipates a relatively smooth transition that prevents an extended gap in program offerings for this customer segment until a new solicitation can be planned for and completed.

**9. SDGE4015 - IDSM Residential Local Marketing Education and Outreach Program (EE)**

<b>A</b>	A description of program, implementer, region and customer/sector served by program:	This program was not included in SDG&E's Business Plan Application and has never been active. SDG&E created new 4000 series program IDs when it originally began transitioning to third-party implementation, and this program ID was created in error. SDG&E is using this TUAL as an opportunity to reconcile its list of programs and their status.
<b>B</b>	Justification for closure, including: demonstration of alignment with State GHG emissions reductions goals and EE goals and discussion of impact to ratepayers from program closure:	This program ID was created in error. Marketing, Education, and Outreach activity and funding have transitioned to third-party implementers.
<b>C</b>	Year program started:	Not applicable – this program has never been active.
<b>D</b>	Date program was due to sunset:	Not applicable – this program has never been active.

<b>E</b>	Most recent three program years (inclusive of current year) filed (i.e. forecasted) budget, Total Resource Cost (TRC), and savings, per Total System Benefit (TSB) metric if applicable:	Not applicable – this program has never been active.
<b>F</b>	Most recent two years (excluding current year) program budget expenditures, claimed TRC and savings, per (TSB) metric if applicable:	Not applicable – this program has never been active.
<b>G</b>	A discussion and overview of stakeholder feedback and any changes to transition to closure as a result of input from the webinar to ensure that program implementers are aware of the PA's plan; and:	No feedback was received.
<b>H</b>	What, if any, plans the PAs has to replace the program:	Not applicable – this program has never been active.

## F. EM&V

### SDG&E Budget Allocation and Justification to 40 percent

D.16-08-019 notes that 27.5% of the budget is allocated to program administrators and that the CPUC may "increase the portion of the EM&V budget allocated to the program administrators to a maximum of 40 percent."<sup>38</sup> D.16-08-019 notes that the increase would only be "...in recognition of the increased emphasis on 1) NMEC and Pay for Performance, and 2) up front planning and market assessment associated with the market transformation and other programmatic emphasis in SB [Senate Bill] 350 and AB [Assembly Bill] 802."<sup>39</sup> The Decision goes on to say, "[a]dditional budget beyond the current 27.5 percent earmarked for program administrators, and up to the 40 percent cap allowed herein, should be designated only for the additional activities associated with the change in EM&V priorities and activities articulated in this decision."<sup>40</sup> Due to significant changes and newly ordered studies, increased funding up to the 40% threshold is needed for (1) eTRM implementation; (2) CPUC Database Tools and assignment of a Project Coordinator to manage database contractors; (3) support for Clean Energy Financing; and (4) to fund various compliance studies.

#### a. CALTF and eTRM implementation budgets within IOUs EM&V budgets

Resolution E-5152 notes that Energy Division "... agree[s] with SDG&E that support for CalTF may be considered either program- or evaluation-related, and therefore grant the IOUs the discretion to determine whether to categorize the activity as program implementation funding or EM&V for budgeting purposes."<sup>41</sup> SDG&E has accounted for eTRM enhancements through EM&V and, as directed in Res. E-5152, provided a breakdown of costs. Resolution E-5152 also notes that,

[u]ltimately, the Energy Division will integrate the eTRM with the California Energy Data and Reporting System (CEDARS) when the Energy Division receives authorization by the California Department of Technology for the appropriate IT procurement activities. The IOUs may pass financial responsibility for ongoing eTRM maintenance and development to the CPUC when the CPUC's IT procured contracts to fund and support the platform are underway in 2022. At this point, the Energy Division will manage the eTRM indefinitely, including vendor contracting, funding, development and maintenance.<sup>42</sup>

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<sup>38</sup> D.16-08-019 at 80.

<sup>39</sup> *Id.* at 80 – 81.

<sup>40</sup> *Id.* at 81.

<sup>41</sup> Res E-5152 at 26.

<sup>42</sup> *Id.* at 9.



However, when Res, E-5221 was approved many months after SDG&E's Business Plan Application was filed, OP 1 confirmed that "[t]he IOUs will continue to fund and administer the eTRM from the IOU portion of the EM&V budgets and will address support activities for eTRM and CalTF in their 2024-2027 Business Plans."<sup>43</sup> Section A.1 of the Resolution also notes "that if budget was not requested, they should make the adjustment in the 2023 True-up Advice Letter."<sup>44</sup> Due to this change, SDG&E is requesting these adjustments through this TUAL.

In the original Business Plan filing, SDG&E planned eTRM enhancement costs that were previously accounted for in SDG&E's EM&V budget in years past would be accounted for by Energy Division, which left funding available to help fund the CalTF implementation budget. SDG&E had accounted for these eTRM enhancements by increasing its allocation by 2.5 to 30 percent when filing for PY2022 and PY2023. For PY2024-PY2027, SDG&E had accounted for these EM&V dollars for the CalTF implementation budget and continued to ask for 30 percent. The remaining costs would have been handled by program dollars. The table below provides the costs of CalTF's budget for 2024-2027 as of July 2023.

**Table EMV-A: Proposed CalTF Budgets PY2024-PY2027**

<b>Program Year</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>
CalTF budget for SDG&E's portion	\$171,488	\$176,148	\$180,808	\$184,536

With confirmation that the addition of eTRM activities will remain with EM&V-IOU budgets and that eTRM can only be funded by EM&V dollars, SDG&E will account for eTRM and now also requests budget allocation beyond its original 30 percent, as further described below. The table below provides the costs of eTRM's budget for 2024-2027 as of July 2023.

**Table EMV-B: Proposed eTRM Budgets PY2024-PY2027**

<b>Program Year</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>
eTRM budget for SDG&E's portion	\$122,092	\$124,888	\$127,684	\$131,412

<sup>43</sup> Res E-5221 at 38.

<sup>44</sup> *Id.* at 26.

### **b. CPUC Database Tools and Project Coordinator Assignment**

An additional justification to increase SDG&E's portion of the EM&V budget is to account for D.23-02-002 regarding the funding of CPUC Database Tools and assignment of a Project Coordinator to manage database contractors.<sup>45</sup> OP 15 of the Decision ordered that by no later than June 30, 2023, one utility portfolio administrator shall submit a Tier 2 AL "describing the impacts to the evaluation, measurement, and verifications budgets, which the utilities are required to use to fund this work, and a scope of work for both the project coordinator and the development and maintenance of the various reporting tools."<sup>46</sup>

As indicated in Southern California Edison Company's AL 5064-E, Table 1,<sup>47</sup> the Impact Percentage to IOU EM&V Budget Allocation is estimated to be 5-10%, which further supports the justification for an increase in EM&V.

### **c. EM&V Support for Clean Energy Financing Program**

SDG&E submitted its Business Customer Clean Energy Financing (BCCEF) program proposal in June 2022. Within the proposal, an EM&V budget was included, "to manage data collection for program tracking and Key Performance Indicators (KPIs), and program evaluation to determine program success and lessons learned."<sup>48</sup>

As indicated in SDG&E's CEF proposal, the CEF EM&V support is expected to be \$297,500, which is another reason to increase SDG&E's EM&V percentage to 40 percent.<sup>49</sup>

### **d. At least \$1.5 million from IOUs EM&V Budgets for Additional Compliance Studies**

Another Decision that impacts increased activities and spending on the IOUs EM&V budget is D.23-06-055. The Decision states "[t]he portfolio administrators (PAs) shall set aside at least \$1 million from their collective evaluation, measurement, and verification (EM&V) budgets and shall select one PA from among them to hire a vendor or vendors to conduct a study to set goals for the market support and equity segment indicators."<sup>50</sup> The selected PA will need to submit a Tier 2 AL by August 1, 2024 describing details of the study and a plan for conducting surveys. The PAs will also submit a joint Tier 3 advice letter by March 1, 2025.

OP 17 orders the IOUs to "select a study lead to, with input from a stakeholder working group including all portfolio administrators and oversight by Energy Division staff, conduct a non-energy benefits study to update and improve quantification of non-energy benefits as an indicator for equity segment program performance. The IOUs may expend up to \$500,000 of evaluation, measurement and verification funds for this study."<sup>51</sup>

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<sup>45</sup> D.23-02-002 at 51-52.

<sup>46</sup> *Id.* at OP 15.

<sup>47</sup> SCE AL 5064-E at 4.

<sup>48</sup> R.20-08-022, San Diego Gas & Electric Company's Clean Energy Financing Proposal Submitted Pursuant to the Assigned Commissioner's Amended Scoping Memo and Ruling (June 15, 2022) at 27.

<sup>49</sup> *Id.* at 4, Table 1.

<sup>50</sup> D.23-06-055 at OP 25.

<sup>51</sup> *Id.* at OP 17.

## Requested EM&amp;V Authorization

In conclusion, the table below provides the forecasted allocated costs for EM&V activities, including all previously mentioned additional IOU-budget related activities, in addition to general labor, NMEC, CalTF, and other studies, in support of increasing SDG&E's share to 40 percent.

**Table EMV-C: Breakdown of EM&V Allocated Costs and Justification to 40 Percent**

	2024	2025	2026	2027
<b>Total EM&amp;V</b>	<b>\$3,060,466</b>	<b>\$3,111,727</b>	<b>\$3,035,347</b>	<b>\$3,028,106</b>
EM&V-ED (@ 60%)	\$1,836,279	\$1,867,036	\$1,821,208	\$1,816,863
EM&V-SDG&E (@ 40%)	\$1,224,186	\$1,244,691	\$1,214,138	\$1,211,242
Labor	\$397,917	\$412,310	\$426,824	\$441,996
CalTF (50% to EM&V)	\$85,744	\$88,074	\$90,404	\$92,268
eTRM	\$122,092	\$124,888	\$127,684	\$131,412
NMEC	\$150,000	\$150,000	\$150,000	\$150,000
CPUC Tools/Proj. Coord.	\$122,418	\$124,469	\$121,413	\$121,124
MS/E goal study		\$150,000		
CEF	\$85,875	\$70,542	\$70,542	\$70,542
Studies	\$260,139	\$124,407	\$227,270	\$203,900

### G. Cost Recovery

Table 1.2, copied from Appendix 3, provides SDG&E's cost recovery amount, inclusive of SDG&E's EE portfolio budget request along with incremental costs required in SDG&E's Business Plan Application, such as Portfolio Oversight and costs for BayREN. The gas and electric split for the cost recovery request is \$273,263,988.

Table 1.2 - Total Cost Recovery Request, Including REN/CCA and Other Costs

Line	Program Administrator	(a) PA Programs	(b) ED Portfolio Oversight	(c) EMV PA	(d) EMV ED	(e) Unspent & Uncommitted Funds for 2024-2027 Offset [2]	(f) Total
1	San Diego Gas & Electric Company (SDG&E)	\$ 293,655,541	\$ 372,800	\$ 4,894,259	\$ 7,341,389	(\$34,000,000)	\$ 272,263,988
2	San Francisco Bay Area Regional Energy Network ("BayREN")	\$ 960,000	\$ -	\$ 11,000	\$ 29,000	\$0	\$ 1,000,000
3	<b>Total</b>	<b>\$ 294,615,541</b>	<b>\$ 372,800</b>	<b>\$ 4,905,259</b>	<b>\$ 7,370,389</b>	<b>(\$34,000,000)</b>	<b>\$ 273,263,988</b>

[1] \$34M Unspent Uncommitted funds calculated as of July 31, 2023. 2024 PPP Rates filing SDG&E AL 4291-E - Electric Public Purpose Programs Rates - PEEBA amortization and unfilled for Gas as of Oct 16, 2023.

**H. IDSM Budget**

At this time, SDG&E is not requesting an IDSM annual budget for 2024 through 2027 but is evaluating options. Per D.23-06-055, SDG&E will submit a Tier 3 advice letter no later than March 15, 2024, if it decides to launch programs with IDSM activities during the portfolio period (2024-2027).

**V. EFFECTIVE DATE**

SDG&E believes this submittal is subject to Energy Division disposition and should be classified as Tier 2 (effective after staff approval) pursuant to GO 96-B. SDG&E respectfully requests that this submittal be approved effective November 15, 2023, which is 30 days from the date filed.

**VI. PROTEST**

Anyone may protest this advice letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact and should be submitted expeditiously. SDG&E is requesting any protest must be submitted electronically and must be received no later than November 06, 2023, which is 21 days of the date of this advice letter was submitted with the Commission. There is no restriction on who may submit a protest.

The protest should be sent via e-mail to the attention of the Energy Division at [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov). A copy of the protest should also be sent via e-mail to the address shown below on the same date it is delivered to the Commission.

Attn: Greg Anderson  
Regulatory Tariff Manager

E-mail: [GAnderson@sdge.com](mailto:GAnderson@sdge.com) and [SDGETariffs@sdge.com](mailto:SDGETariffs@sdge.com)

**VII. NOTICE**

A copy of this submittal has been served on the utilities and interested parties shown on the attached list and Service List R.13-11-005 and A.22-02-005, by providing them a copy hereof electronically. Address changes should be directed to SDG&E Tariffs by e-mail at [SDGETariffs@sdge.com](mailto:SDGETariffs@sdge.com).

/s/ Clay Faber

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CLAY FABER  
Director – Regulatory Affairs



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



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

Company name/CPUC Utility No.:

Utility type:

ELC       GAS       WATER  
 PLC       HEAT

Contact Person:

Phone #:  
E-mail:  
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

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:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

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

Tariff schedules affected:

Service affected and changes proposed<sup>1</sup>:

Pending advice letters that revise the same tariff sheets:

<sup>1</sup>Discuss in AL if more space is needed.

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

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

General Order No. 96-B  
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

Public Utilities Commission  
CA. Public Advocates (CalPA)

R. Pocta  
F. Oh  
P. Cunningham

Energy Division

M. Ghadessi  
M. Salinas  
L. Tan  
R. Ciupagea  
K. Navis  
Tariff Unit

CA Energy Commission

B. Penning  
B. Helft

Advantage Energy

C. Farrell

Alcantar & Kahl LLP

M. Cade  
K. Harteloo

AT&T

Regulatory

Barkovich & Yap, Inc.

B. Barkovich

Biofuels Energy, LLC

K. Frisbie

Braun & Blaising, P.C.

S. Blaising  
D. Griffiths

Buchalter

K. Cameron  
M. Alcantar

CalCCA

Regulatory

CA Dept. of General Services

H. Nanjo

California Energy Markets

General

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

Cameron-Daniel, P.C.

General

City of Poway

Poway City Hall

City of San Diego

L. Azar  
J. Cha  
D. Heard  
F. Ortlieb  
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Clean Energy Renewable Fuels, LLC

P. DeVille

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T. Schmid  
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J. Pau

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D. Liddell

Ellison Schneider Harris & Donlan LLP

E. Janssen  
C. Kappel

Energy Policy Initiatives Center (USD)

S. Anders

Energy Regulatory Solutions Consultants

L. Medina

Energy Strategies, Inc.

K. Campbell

EQ Research

General

Goodin, MacBride, Squeri, & Day LLP

B. Cragg  
J. Squeri

Green Charge

K. Lucas

Hanna and Morton LLP

N. Pedersen

JBS Energy

J. Nahigian

Keyes & Fox, LLP

B. Elder

Manatt, Phelps & Phillips LLP

D. Huard

McKenna, Long & Aldridge LLP

J. Leslie

Morrison & Foerster LLP

P. Hanschen

MRW & Associates LLC

General

NLine Energy

M. Swindle

Stoel Rives LLP

S. Hilton  
L. McKenna  
M. O'Brien  
S. Holdstock

NRG Energy

D. Fellman

Pacific Gas & Electric Co.

M. Lawson  
M. Huffman  
Tariff Unit

RTO Advisors

S. Mara

SCD Energy Solutions

P. Muller

SD Community Power

L. Fernandez  
L. Utouh

Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

C. Frank

SPURR

M. Rochman

Southern California Edison Co.

K. Gansecki

TerraVerde Renewable Partners LLC

F. Lee

TURN

M. Hawiger

UCAN

D. Kelly

US Dept. of the Navy

K. Davoodi

US General Services Administration

D. Bogni

Valley Center Municipal Water Distr

G. Broomell

Western Manufactured Housing

Communities Association

S. Dey

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K. Johnston

Service List

R.13-11-005  
A.22-02-005

San Diego Gas & Electric Advice Letter 4302-E  
October 16, 2023

Appendix 1-3



## Appendix 1

Appendix 1 - 2024 - 2027 Program Portfolio Budget and Targets

(a) Program ID	(b) Program Name	(c) Target Exempt	(d) Program Type	(e) Business Sector	(f) Portfolio Segment	(g) Budget	(h) TSB	(i) kWh	(j) kW	(k) Thm	(l) Change Notes
SDGE3251	SW C&S - Compliance Enhancement (NET SAVINGS)	Yes	Core PA	Codes & Standards	Codes & Standards	\$ 3,230,503	\$ -	-	-	-	
SDGE3252	SW C&S - Reach Codes (NET SAVINGS)	Yes	Core PA	Codes & Standards	Codes & Standards	\$ 1,688,731	\$ -	-	-	-	
SDGE3253	SW C&S - Planning Coordination (NET SAVINGS)	Yes	Core PA	Codes & Standards	Codes & Standards	\$ 1,226,171	\$ -	-	-	-	
SDGE3262	SW-FIN-On-Bill Finance	Yes	Core PA	Finance	Market Support	\$ 968,222	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE3280	3P-IDEEA	Yes	Core PA	Commercial	Market Support	\$ 7,093,897	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE4001	Single Family Program	No	Local Third Party	Residential	Resource Acquisition	\$ 5,999,999	\$ 7,091,018	1,198,153	4,237	405,475	
SDGE4001	Single Family Program (Utility)	No	Core PA	Residential	Resource Acquisition	\$ 1,101,045	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE4002	Multi Family Program	No	Local Third Party	Residential	Resource Acquisition	\$ 17,600,001	\$ 22,222,987	8,456,574	9,346	664,925	
SDGE4002	Multi Family Program (Utility)	No	Core PA	Residential	Resource Acquisition	\$ 1,748,530	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE4004	Commercial Large Customer Services (>20KW) Program	No	Local Third Party	Commercial	Resource Acquisition	\$ 5,862,296	\$ 7,255,960	1,195,762	285	613,428	TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail.
SDGE4004	Commercial Large Customer Services (>20KW) Program (Utility)	No	Core PA	Commercial	Resource Acquisition	\$ 772,733	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE4006	Industrial Sector Program	No	Local Third Party	Industrial	Resource Acquisition	\$ 13,365,969	\$ 31,302,174	31,762,037	3,362	689,301	Budget: SDG&E consolidated two solicitations – the Industrial Sector solicitation and the Industrial-Port Tenants solicitation (SDGE4007) – into a single program and contract. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail. TRC: Refer to the TUAL Narrative section 4A for further detail
SDGE4006	Industrial Sector Program (Utility)	No	Core PA	Industrial	Resource Acquisition	\$ 1,885,150	\$ -	-	-	-	
SDGE4009	Agricultural Growers Services Program	No	Local Third Party	Agricultural	Resource Acquisition	\$ 2,185,240	\$ 3,382,591	2,280,964	353	187,273	
SDGE4009	Agricultural Growers Services Program (Utility)	No	Core PA	Agricultural	Resource Acquisition	\$ 1,018,955	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE4010	Local Government Customers Program	No	Local Third Party	Public	Resource Acquisition	\$ 10,297,678	\$ 23,115,024	15,874,308	2,121	449,029	Budget: Forecast was adjusted prior to contracting based on the final programmatic design as well as input from the third-party implementer. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail. TRC: Refer to the TUAL Narrative section 4A for further detail
SDGE4010	Local Government Customers Program (Utility)	No	Core PA	Public	Resource Acquisition	\$ 1,726,308	\$ -	-	-	-	
SDGE4011	K-12 Customer Services Program	No	Local Third Party	Public	Resource Acquisition	\$ 4,960,936	\$ 4,459,447	3,998,878	419	12,884	Budget: Zeroed out budget for 2024. Current program is closing as a result of the third-party implementer suspending business operations. SDG&E has allocated budget for a new program offering in 2025-2027. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail. TRC: Refer to the TUAL Narrative section 4A for further detail
SDGE4011	K-12 Customer Services Program (Utility)	No	Core PA	Public	Resource Acquisition	\$ 835,105	\$ -	-	-	-	Budget: Zeroed out budget for 2024. Current program is closing as a result of the third-party implementer suspending business operations. SDG&E has allocated budget for a new program offering in 2025-2027.
SDGE4012	Federal Customer Services Program	No	Local Third Party	Public	Resource Acquisition	\$ 16,188,338	\$ 26,350,426	21,710,597	1,935	542,922	
SDGE4012	Federal Customer Services Program (Utility)	No	Core PA	Public	Resource Acquisition	\$ 2,003,575	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE4040	IDSMS Local Residential Behavioral Program (EE)	Yes	Local Third Party	Residential	Resource Acquisition	\$ 17,862,084	\$ 34,031,558	205,573,198	34,797	3,439,858	Budget: Forecast was adjusted prior to contracting based on the final programmatic design as well as input from the third-party implementer. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail.
SDGE4040	IDSMS Local Residential Behavioral Program (EE) (Utility)	Yes	Core PA	Residential	Resource Acquisition	\$ 732,130	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_CSA_Natl	SW Codes & Standards Advocacy - National Codes & Standards Advocacy (NET SAVINGS)	Yes	SW Third Party	Codes & Standards	Codes & Standards	\$ 1,695,597	\$ 130,382,600	190,178,640	49,215	531,089	Budget: Updated forecast was shared by the lead IOU. Statewide budget allocation was also modified. SDG&E provides funding to the Lead PA, PG&E, for this statewide program. Please refer to PG&E's True-Up Advice Letter for change notes
SDGE_SW_CSA_Natl_PA	SW Codes & Standards Advocacy - National Codes & Standards Advocacy (Utility) (NET SAVINGS)	Yes	Core PA	Codes & Standards	Codes & Standards	\$ 236,378	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_CSA_Appl	SW Codes & Standards Advocacy - State Appliance Standards (NET SAVINGS)	Yes	SW Third Party	Codes & Standards	Codes & Standards	\$ 1,115,703	\$ 171,249,105	210,170,131	29,119	2,027,775	Budget: Updated forecast was shared by the lead IOU. Statewide budget allocation was also modified. SDG&E provides funding to the Lead PA, PG&E, for this statewide program. Please refer to PG&E's True-Up Advice Letter for change notes.
SDGE_SW_CSA_Appl_PA	SW Codes & Standards Advocacy - State Appliance Standards (Utility) (NET SAVINGS)	Yes	Core PA	Codes & Standards	Codes & Standards	\$ 242,302	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_CSA_Bldg	SW Codes & Standards Advocacy - State Building Codes (NET SAVINGS)	Yes	SW Third Party	Codes & Standards	Codes & Standards	\$ 3,015,321	\$ 519,906,011	423,411,258	87,605	5,151,553	Budget: Updated forecast was shared by the lead IOU. Statewide budget allocation was also modified. SDG&E provides funding to the Lead PA, PG&E, for this statewide program. Please refer to PG&E's True-Up Advice Letter for change notes.
SDGE_SW_CSA_Bldg_PA	SW Codes & Standards Advocacy - State Building Codes (Utility) (NET SAVINGS)	Yes	Core PA	Codes & Standards	Codes & Standards	\$ 340,466	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_ETP_Elec	SW Emerging Technologies - Electric	Yes	SW Third Party	Emerging Tech	Market Support	\$ 6,507,496	\$ -	-	-	-	Budget: Updated forecast was shared by the lead IOU. Statewide budget allocation was also modified. TSB: ET Programs are excluded from CET. Savings are 0. SDG&E provides funding to the Lead PA, SCE, for this statewide program. Please refer to SCE's True-Up Advice Letter for change notes.
SDGE_SW_ETP_Elec_PA	SW Emerging Technologies - Electric (Utility)	Yes	Core PA	Emerging Tech	Market Support	\$ 1,606,287	\$ -	-	-	-	Budget: Refer to footnote 2.

Appendix 1 - 2024 - 2027 Program Portfolio Budget and Targets

(a) Program ID	(b) Program Name	(c) Target Exempt	(d) Program Type	(e) Business Sector	(f) Portfolio Segment	(g) Budget	(h) TSB	(i) kWh	(j) kW	(k) Thm	(l) Change Notes
SDGE_SW_IP_Gov	SW Institutional Partnerships: DGS & DoC	No	SW Third Party	Public	Resource Acquisition	\$ 1,493,785	\$ 3,069,486	2,288,831	697	120,214	Budget: Updated forecast was shared by the lead IOU. Statewide budget allocation was also modified. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail. TRC: Refer to the TUAL Narrative section 4A for further detail SDG&E provides funding to the Lead PA, PG&E, for this statewide program. Please refer to PG&E's True-Up Advice Letter for change notes.
SDGE_SW_IP_Gov_PA	SW Institutional Partnerships: DGS & DoC (Utility)	No	Core PA	Public	Resource Acquisition	\$ 20,723	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_IP_Colleges	SW Higher Education	No	SW Third Party	Public	Resource Acquisition	\$ 1,496,377	\$ 2,215,455	2,968,153	88	50,886	Budget: Updated forecast was shared by the lead IOU. Statewide budget allocation was also modified. SDG&E provides funding to the Lead PA, SCE, for this statewide program. Please refer to SCE's True-Up Advice Letter for change notes.
SDGE_SW_IP_Colleges_PA	SW Higher Education (Utility)	No	Core PA	Public	Resource Acquisition	\$ 20,732	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_MCWH	SW Midstream Commercial Water Heating	No	SW Third Party	Commercial	Resource Acquisition	\$ 6,936,000	\$ 47,800,414	(301,846)	(6)	2,180,778	TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail. TRC: Refer to the TUAL Narrative section 4A for further detail SDG&E provides funding to the Lead PA, SCG for this statewide program. Please refer to SCG's True-Up Advice Letter for change notes.
SDGE_SW_MCWH_PA	SW Midstream Commercial Water Heating (Utility)	No	Core PA	Commercial	Resource Acquisition	\$ 27,213	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_FS	SW Foodservice Point of Sale Program	No	SW Third Party	Commercial	Resource Acquisition	\$ 8,323,200	\$ 13,885,738	3,443,018	687	767,794	TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail. SDG&E provides funding to the Lead PA, SCG for this statewide program. Please refer to SCG's True-Up Advice Letter for change notes.
SDGE_SW_FS_PA	SW Foodservice Point of Sale Program (Utility)	No	Core PA	Commercial	Resource Acquisition	\$ 28,771	\$ -	-	-	-	
SDGE_SW_PLA	SW Plug Load and Appliances	No	SW Third Party	Residential	Resource Acquisition	\$ 3,846,265	\$ 2,906,317	266,096	113	240,721	Budget: Updated forecast was shared by the third-party implementer that reflects current market conditions. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail.
SDGE_SW_PLA_PA	SW Plug Load and Appliances (Utility)	No	Core PA	Residential	Resource Acquisition	\$ 2,668,593	\$ -	-	-	-	Budget: Refer to footnote 2. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail.
SDGE_SW_WET_CC	SW WET Career Connections	Yes	SW Third Party	WE&I	Market Support	\$ 436,480	\$ -	-	-	-	
SDGE_SW_WET_CC_PA	SW WET Career Connections (Utility)	Yes	Core PA	WE&I	Market Support	\$ 19,476	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_WET_Work	SW WE&T Career & Workforce Readiness (CWR)	Yes	SW Third Party	WE&I	Equity	\$ 872,960	\$ -	-	-	-	
SDGE_SW_WET_Work_PA	SW WE&T Career & Workforce Readiness (CWR) (Utility)	Yes	Core PA	WE&I	Equity	\$ 19,990	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_WP	SW Downstream Water/Wastewater Pumping Program	No	SW Third Party	Public	Resource Acquisition	\$ 1,249,797	\$ 1,778,348	1,819,664	180	45,620	Budget: Updated forecast was shared by the lead IOU. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail. SDG&E provides funding to the Lead PA, SCE for this statewide program. Please refer to SCE's True-Up Advice Letter for change notes.
SDGE_SW_WP_PA	SW Downstream Water/Wastewater Pumping Program (Utility)	No	Core PA	Public	Resource Acquisition	\$ 20,435	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_HVAC_QIQM	SW HVAC QI/QM Program	No	SW Third Party	Residential	Market Support	\$ 3,002,405	\$ -	-	-	-	TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail.
SDGE_SW_HVAC_QIQM_PA	SW HVAC QI/QM Program (Utility)	No	Core PA	Residential	Market Support	\$ 1,838,555	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_ETP_Gas	SW Emerging Technologies - Gas	Yes	SW Third Party	Emerging Tech	Market Support	\$ 1,584,000	\$ -	-	-	-	Budget: Updated forecast was shared by the lead IOU. Statewide budget allocation was also modified. TSB: ET Programs are excluded from CET. Savings are 0. SDG&E provides funding to the Lead PA, SCG for this statewide program. Please refer to SCG's True-Up Advice Letter for change notes.
SDGE_SW_ETP_Gas_PA	SW Emerging Technologies - Gas (Utility)	Yes	Core PA	Emerging Tech	Market Support	\$ 221,659	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_NC_NonRes_Ag_electric	SW New Construction Non Residential - Agricultural - All Electric	No	SW Third Party	Agricultural	Market Support	\$ 167,788	\$ 263,156	67,417	7	9,340	Budget: Updated forecast was shared by the lead IOU. Statewide budget allocation was also modified. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail. SDG&E provides funding to the Lead PA, PG&E, for this statewide program. Please refer to PG&E's True-Up Advice Letter for change notes.
SDGE_SW_NC_NonRes_Ag_electric_PA	SW New Construction Non Residential - Agricultural - All Electric (Utility)	No	Core PA	Agricultural	Market Support	\$ 7,422	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_NC_NonRes_Com_electric	SW New Construction Non Residential - Commercial - All Electric	No	SW Third Party	Commercial	Market Support	\$ 1,080,952	\$ 2,847,032	68,492	13	134,034	TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail. SDG&E provides funding to the Lead PA, PG&E, for this statewide program. Please refer to PG&E's True-Up Advice Letter for change notes.
SDGE_SW_NC_NonRes_Com_electric_PA	SW New Construction Non Residential - Commercial - All Electric (Utility)	No	Core PA	Commercial	Market Support	\$ 8,498	\$ -	-	-	-	
SDGE_SW_NC_NonRes_Ind_electric	SW New Construction Non Residential - Industrial - All Electric	No	SW Third Party	Industrial	Market Support	\$ 283,788	\$ 1,085,153	109	0	51,995	Budget: Updated forecast was shared by the lead IOU. Statewide budget allocation was also modified. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail. SDG&E provides funding to the Lead PA, PG&E, for this statewide program. Please refer to PG&E's True-Up Advice Letter for change notes.
SDGE_SW_NC_NonRes_Ind_electric_PA	SW New Construction Non Residential - Industrial - All Electric (Utility)	No	Core PA	Industrial	Market Support	\$ 7,560	\$ -	-	-	-	Budget: Refer to footnote 2.

Appendix 1 - 2024 - 2027 Program Portfolio Budget and Targets

(a) Program ID	(b) Program Name	(c) Target Exempt	(d) Program Type	(e) Business Sector	(f) Portfolio Segment	(g) Budget	(h) TSB	(i) kWh	(j) kW	(k) Thm	(l) Change Notes
SDGE_SW_NC_NonRes_Pub_electric	SW New Construction Non Residential - Public - All Electric	No	SW Third Party	Public	Market Support	\$ 2,396,752	\$ 8,974,121	39,086	(28)	427,305	Budget: Updated forecast was shared by the lead IOU. Statewide budget allocation was also modified. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail. SDG&E provides funding to the Lead PA, PG&E, for this statewide program. Please refer to PG&E's True-Up Advice Letter for change notes.
SDGE_SW_NC_NonRes_Pub_electric_PA	SW New Construction Non Residential - Public - All Electric (Utility)	No	Core PA	Public	Market Support	\$ 10,054	\$ -	-	-	-	
SDGE_SW_NC_NonRes_Res_electric	SW New Construction Non Residential - Residential - All Electric	No	SW Third Party	Residential	Market Support	\$ 1,713,524	\$ 4,715,133	313	2	225,785	
SDGE_SW_NC_NonRes_Res_electric_PA	SW New Construction Non Residential - Residential - All Electric (Utility)	No	Core PA	Residential	Market Support	\$ 9,245	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_NC_NonRes_Ag_mixed	SW New Construction Non Residential - Agricultural - Mixed Fuel	No	SW Third Party	Agricultural	Market Support	\$ 547,290	\$ 928,459	585,473	187	14,667	
SDGE_SW_NC_NonRes_Ag_mixed_PA	SW New Construction Non Residential - Agricultural - Mixed Fuel (Utility)	No	Core PA	Agricultural	Market Support	\$ 7,866	\$ -	-	-	-	
SDGE_SW_NC_NonRes_Com_mixed	SW New Construction Non Residential - Commercial - Mixed Fuel	No	SW Third Party	Commercial	Market Support	\$ 713,056	\$ 1,689,400	535,762	208	81,096	Budget: Updated forecast was shared by the lead IOU. Statewide budget allocation was also modified. SDG&E provides funding to the Lead PA, PG&E, for this statewide program. Please refer to PG&E's True-Up Advice Letter for change notes.
SDGE_SW_NC_NonRes_Com_mixed_PA	SW New Construction Non Residential - Commercial - Mixed Fuel (Utility)	No	Core PA	Commercial	Market Support	\$ 8,061	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_NC_NonRes_Ind_mixed	SW New Construction Non Residential - Industrial - Mixed Fuel	No	SW Third Party	Industrial	Market Support	\$ 1,216,842	\$ 9,355,139	1,944,258	302	450,811	Budget: Updated forecast was shared by the lead IOU. Statewide budget allocation was also modified. SDG&E provides funding to the Lead PA, PG&E, for this statewide program. Please refer to PG&E's True-Up Advice Letter for change notes.
SDGE_SW_NC_NonRes_Ind_mixed_PA	SW New Construction Non Residential - Industrial - Mixed Fuel (Utility)	No	Core PA	Industrial	Market Support	\$ 8,657	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_NC_NonRes_Pub_mixed	SW New Construction Non Residential - Public - Mixed Fuel	No	SW Third Party	Public	Market Support	\$ 284,939	\$ 871,412	398,167	204	25,325	Budget: Updated forecast was shared by the lead IOU. Statewide budget allocation was also modified. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail. SDG&E provides funding to the Lead PA, PG&E, for this statewide program. Please refer to PG&E's True-Up Advice Letter for change notes.
SDGE_SW_NC_NonRes_Pub_mixed_PA	SW New Construction Non Residential - Public - Mixed Fuel (Utility)	No	Core PA	Public	Market Support	\$ 7,559	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_NC_NonRes_Res_mixed	SW New Construction Non Residential - Residential - Mixed Fuel	No	SW Third Party	Residential	Market Support	\$ 1,245,018	\$ 4,562,943	1,330,068	342	190,246	Budget: Updated forecast was shared by the lead IOU. Statewide budget allocation was also modified. SDG&E provides funding to the Lead PA, PG&E, for this statewide program. Please refer to PG&E's True-Up Advice Letter for change notes.
SDGE_SW_NC_NonRes_Res_mixed_PA	SW New Construction Non Residential - Residential - Mixed Fuel (Utility)	No	Core PA	Residential	Market Support	\$ 8,686	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_NC_Res_electric	SW New Construction Residential - All Electric	No	SW Third Party	Residential	Market Support	\$ 4,830,776	\$ 10,157,747	(385,483)	-	167,357	
SDGE_SW_NC_Res_electric_PA	SW New Construction Residential - All Electric (Utility)	No	Core PA	Residential	Market Support	\$ 12,914	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE4168	Lodging (Hotels/Motels)	No	Local Third Party	Commercial	Resource Acquisition	\$ 1,638,661	\$ 7,271,971	6,065,338	704	106,535	TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail. TRC: Refer to the TUAL Narrative section 4A for further detail
SDGE4168	Lodging (Hotels/Motels) (Utility)	No	Core PA	Commercial	Resource Acquisition	\$ 781,579	\$ -	-	-	-	
SDGE4169	Groceries, Restaurants and Food Storage	No	Local Third Party	Commercial	Resource Acquisition	\$ 5,534,067	\$ 23,191,263	16,883,917	1,699	306,451	TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail. TRC: Refer to the TUAL Narrative section 4A for further detail
SDGE4169	Groceries, Restaurants and Food Storage (Utility)	No	Core PA	Commercial	Resource Acquisition	\$ 977,199	\$ -	-	-	-	
SDGE4170	Wholesale/Retail/Office, including Entertainment Services	No	Local Third Party	Commercial	Resource Acquisition	\$ 14,367,738	\$ 35,200,075	28,090,890	3,389	591,343	TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail. TRC: Refer to the TUAL Narrative section 4A for further detail
SDGE4170	Wholesale/Retail/Office, including Entertainment Services (Utility)	No	Core PA	Commercial	Resource Acquisition	\$ 1,469,734	\$ -	-	-	-	
SDGE4171	Private Institutions/Healthcare	No	Local Third Party	Commercial	Resource Acquisition	\$ 4,103,098	\$ 14,624,226	12,413,818	1,282	198,340	TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail. TRC: Refer to the TUAL Narrative section 4A for further detail
SDGE4171	Private Institutions/Healthcare (Utility)	No	Core PA	Commercial	Resource Acquisition	\$ 893,638	\$ -	-	-	-	
SDGE4173	Small Business Outreach	No	Local Third Party	Commercial	Equity	\$ 11,826,502	\$ 2,734,395	550,670	50	157,512	TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail.
SDGE4173	Small Business Outreach (Utility)	No	Core PA	Commercial	Equity	\$ 1,122,373	\$ -	-	-	-	
SDGE4174	Workforce, Education & Training Programs	Yes	Local Third Party	WE&T	Market Support	\$ 10,835,020	\$ -	-	-	-	
SDGE4174	Workforce, Education & Training Programs (Utility)	Yes	Core PA	WE&T	Market Support	\$ 1,286,488	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE4175	Local Residential Fuel-Substitution	No	Local Third Party	Residential	Market Support	\$ 2,550,000	\$ 2,662,900	(2,312,838)	-	278,539	TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail.
SDGE4175	Local Residential Fuel-Substitution (Utility)	No	Core PA	Residential	Market Support	\$ 1,119,752	\$ -	-	-	-	
SDGE4176	Residential Equity Program	No	Local Third Party	Residential	Equity	\$ 3,400,000	\$ -	-	-	-	Budget: SDG&E consolidated the Residential Single Family Equity Program and the Residential Multi Family Equity Program into a single program.
SDGE4176	Residential Equity Program (Utility)	No	Core PA	Residential	Equity	\$ 716,467	\$ -	-	-	-	Budget: SDG&E consolidated the Residential Single Family Equity Program and the Residential Multi Family Equity Program into a single program.
SDGE_SW_HVAC_Up_Com	SDGE SW HVAC Upstream Commercial	No	SW Third Party	Commercial	Resource Acquisition	\$ 4,669,841	\$ 7,030,547	4,921,497	2,435	68,517	Budget: Updated forecast was shared by the third-party implementer that reflects current market conditions. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail.
SDGE_SW_HVAC_Up_Com_PA	SW HVAC Upstream Commercial (Utility)	No	Core PA	Commercial	Resource Acquisition	\$ 2,599,450	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_SW_HVAC_Up_Res	SDGE SW HVAC Upstream Residential	No	SW Third Party	Residential	Resource Acquisition	\$ 1,120,134	\$ 1,503,514	(208,444)	1	99,500	Budget: Updated forecast was shared by the third-party implementer that reflects current market conditions. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail.

Appendix 1 - 2024 - 2027 Program Portfolio Budget and Targets

(a) Program ID	(b) Program Name	(c) Target Exempt	(d) Program Type	(e) Business Sector	(f) Portfolio Segment	(g) Budget	(h) TSB	(i) kWh	(j) kW	(k) Thm	(l) Change Notes
SDGE_SW_HVAC_Up_Res_PA	SW HVAC Upstream Residential (Utility)	No	Core PA	Residential	Resource Acquisition	\$ 699,133	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE4184	Non-Residential Behavioral Program	No	Local Third Party	Commercial	Market Support	\$ 3,588,301	\$ 5,151,758	41,100,100	4,692	-	Budget: Forecast was adjusted prior to contracting based on the final programmatic design as well as input from the third-party implementer. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail.
SDGE4184	Non-Residential Behavioral Program (Utility)	No	Core PA	Commercial	Market Support	\$ 1,003,287	\$ -	-	-	-	
	<b>ADDED AFTER APPLICATION</b>										
SDGE_SW_HESC	SW Home Energy Score California	No	Local Third Party	Residential	Market Support	\$ -	\$ -	-	-	-	Budget: Refer to TUAL narrative section 4D for further detail.
SDGE_SW_HESC_PA	SW Home Energy Score California (Utility)	No	Core PA	Residential	Market Support	\$ 8,403	\$ -	-	-	-	Budget: Limited costs will be incurred to support this new program.
SDGE4197	Market Access Program - Residential	No	Local Third Party	Residential	Resource Acquisition	\$ 2,399,942	\$ 3,678,282	2,158,399	2,696	-	Budget: Refer to TUAL narrative section 4F for further detail. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail.
SDGE4197	Market Access Program - Residential (Utility)	No	Core PA	Residential	Resource Acquisition	\$ 703,440	\$ -	-	-	-	Budget: Refer to TUAL narrative section 4F for further detail.
SDGE4198	Market Access Program - Commercial	No	Local Third Party	Commercial	Resource Acquisition	\$ 5,599,917	\$ 12,870,733	12,204,676	1,535	-	Budget: Refer to TUAL narrative section 4F for further detail. TSB: Refer to footnote 1 and the TUAL narrative section 4A for further detail.
SDGE4198	Market Access Program - Commercial (Utility)	No	Core PA	Commercial	Resource Acquisition	\$ 2,581,079	\$ -	-	-	-	Budget: Refer to TUAL narrative section 4F for further detail.
SDGE3226	SW-COM Direct Install	No	Core PA	Commercial	Resource Acquisition	\$ 2,435,895	\$ 3,281,589	2,814,276	279	21,719	Budget: Refer to TUAL narrative section 4F for further detail.
SDGE_CS_PortfolioSupport	Codes & Standards Portfolio Support PA Costs	No	Core PA	Portfolio Support	Codes & Standards	\$ 926,463	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_Equity_PortfolioSupport	Equity Portfolio Support PA Costs	No	Core PA	Portfolio Support	Equity	\$ 1,298,296	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_MS_PortfolioSupport	Market Support Portfolio Support PA Costs	No	Core PA	Portfolio Support	Market Support	\$ 4,217,119	\$ -	-	-	-	Budget: Refer to footnote 2.
SDGE_RA_PortfolioSupport	Resource Acquisition Portfolio Support PA Costs	No	Core PA	Portfolio Support	Resource Acquisition	\$ 13,364,718	\$ -	-	-	-	Budget: Refer to footnote 2.
	<b>REMOVED FROM APPLICATION</b>										
SDGE_SW_UL	SW Lighting Program	No	SW Third Party	Commercial	Resource Acquisition						Closed by Lead IOU SCE
SDGE_SW_UL_PA	SW Lighting Program (Utility)	No	Core PA	Commercial	Resource Acquisition						Closed by Lead IOU SCE
SDGE_SW_NC_Res_mixed	SW New Construction Residential - Mixed Fuel	No	SW Third Party	Residential	Market Support						Closed by Lead IOU PGE
SDGE_SW_NC_Res_mixed_PA	SW New Construction Residential - Mixed Fuel (Utility)	No	Core PA	Residential	Market Support						Closed by Lead IOU PGE
SDGE4172	Property Management	No	Local Third Party	Commercial	Market Support						Refer to TUAL narrative section 4C for further detail.
SDGE4172	Property Management (Utility)	No	Core PA	Commercial	Market Support						Refer to TUAL narrative section 4C for further detail.
SDGE4177	Residential Multi Family Equity Program	No	Local Third Party	Residential	Equity						Refer to TUAL narrative section 4C for further detail.
SDGE4177	Residential Multi Family Equity Program (Utility)	No	Core PA	Residential	Equity						Refer to TUAL narrative section 4C for further detail.
<b>Subtotal</b>	Portfolio Subtotal [3]					<b>\$ 293,655,541</b>	<b>\$ 1,217,055,606</b>	<b>1,255,560,378</b>	<b>244,554</b>	<b>21,727,942</b>	
SDGE3281	EM&V-Evaluation Measurement & Verification	No	EM&V	EM&V	EM&V	\$ 12,235,648	\$ -	-	-	-	Budget: Refer to TUAL narrative section 1A for further detail.
SDGE_Portfolio_Oversight	CPUC Portfolio Oversight	No	EM&V	Portfolio Support	EM&V	\$ 372,800	\$ -	-	-	-	Budget: Refer to TUAL narrative section 1A for further detail.
<b>Total</b>	<b>Total Portfolio Budget w/ ED Portfolio Oversight</b>					<b>\$ 306,263,988</b>	<b>\$ 1,217,055,606</b>	<b>1,255,560,378</b>	<b>244,554</b>	<b>21,727,942</b>	

[1] For programs that have TSB and energy savings, targets were revised due to the 2023 Potential & Goals Study, Natural Gas Incentive Phase Out Decision, and the 2022 updates to the Avoided Cost Calculator (ACC) as adopted in Resolution E-5228.

[2] Administrative overhead costs were removed from the program level and are now allocated at the segment level. In addition, program forecasts were revised to reflect historical data, where applicable, as well as current trends.

[3] Excludes EM&V and ED Portfolio Oversight.

## Appendix 2

**Appendix 2 - Energy Efficiency Cap And Target Expenditure Projections (Cumulative for PY 2024-2027)**

Line	Budget Category	Expenditures			Cap & Target Performance		
		(a) Non-Third Party Qualifying Costs	(b) Third Party Qualifying Costs	(c) Total Portfolio	(d) Percent of Budget <sup>[6]</sup>	(e) Cap Percentage	(f) Target %
1	<b>Administrative Costs</b>						
2	PA <sup>[1]</sup>	\$ 29,316,011		\$ 29,316,011	9.6%	10.0%	
3	Non-PA Third Party & Partnership <sup>[2]</sup>	\$ -	\$ 12,382,101	\$ 12,382,101	4.0%		10.0%
4	PA & Non-PA Target Exempt Programs <sup>[3]</sup>	\$ 15,442,564	\$ 2,942,785	\$ 18,385,348			
5	<b>Marketing and Outreach Costs</b>						
6	Marketing & Outreach	\$ 634,284	\$ 8,953,697	\$ 9,587,981	3.1%		6.0%
7	<b>Direct Implementation Costs</b>						
8	Incentives and Rebates [8]	\$ 5,912,263	\$ 89,018,381	\$ 94,930,644			
9	Non Incentives and Non Rebates	\$ 16,735,622	\$ 64,503,484	\$ 81,239,106	26.6%		20.0%
10	Target Exempt (Non Incentives and Non Rebates)	\$ 7,602,923	\$ 40,211,427	\$ 47,814,349			
11	<b>EM&amp;V Costs (PA and ED) <sup>[4]</sup></b>	\$ 12,235,648	\$ -	\$ 12,235,648	4.0%	4.0%	
11a	EM&V - PA	\$ 4,894,259		\$ 4,894,259			
11b	EM&V - ED	\$ 7,341,389		\$ 7,341,389			
12	<b>PA Spending Budget Request</b> (excluding OBF Loan Pool Additions and excluding ED Portfolio Oversight)	\$ 87,879,314	\$ 218,011,874	\$ 305,891,188			
13	<b>Total Third-Party Qualifying Costs <sup>[5]</sup></b>		\$ 218,011,874		71.3%		60.0%
14	<b>OBF Loan Pool Addition</b>	\$ -		\$ -			
15	<b>PA Spending Budget Request</b> (excluding ED Portfolio Oversight)			\$ 305,891,188			
16	<b>ED Portfolio Oversight</b>	\$ 372,800		\$ 372,800			
17	<b>EE-Funded IDSM<sup>[7]</sup></b>	\$ -		\$ -		2.5%	
18	<b>PA Spending Budget Request</b>			\$ 306,263,988			

[1] 10% cap requirement based on D. 09-09-047 for IOU only.

[2] New Third party program definition per D.16-08-019, OP 10. For Row 3 of this table, the "Third Party & Partnership" administrative costs under the "Non-Third Party Qualifying Costs" column are costs for programs that met the old Third Party definition prior to the transition to the new third party definition.

[3] Per EE Policy Manual version 6 April 2020, Target Exempt Line 4 Programs includes: "Emerging Technologies, Workforce Education & Training, [...], Integrated Demand Side Management IDSM, Financing (including On-Bill Financing, but excluding OBF loan amounts), and Codes & Standards programs".

[4] For IOUs, EM&V costs only includes IOU's Total EM&V budget (PA + ED) and does not include REN or CCAs EM&V budget. The EM&V budget is 4% of the PA Spending Budget Request before OBF and ED Portfolio Oversight costs (line 12), and excludes any budget of RENs and CCAs.

[5] IOU's Third-Party Implementer Contracts (as defined per D.16-08-019, OP 10) includes third-party contract and incentive budgets and statewide qualifying contract and incentive budgets. Calculation of (d) Percent of Budget for Third-Party Implementer Contracts uses \$305,891,188 as its denominator.

[6] With the exception of Third Party Implementer Contracts as noted in footnote [5], calculation of (d) Percent of Budget uses \$305,891,188 as the denominator; equal to PA Spending Budget Request before OBF and ED Portfolio Oversight costs (line 12).

[7] Per D.23-06-055 OP 29: Portfolio administrators (PAs) may set aside up to 2.5 percent, or \$4 million, whichever is greater, up to a maximum of \$15 million, from within their total budgets during 2024-2027 approved in this decision to fund innovative integrated demand-side management projects, including ongoing load-shifting that is not event-based. Energy efficiency funding shall not be used for rebating capital costs of non-efficiency technologies, except as already provided for electric panel upgrades in Decisions 19 -08-009 and 23-04-035.

[8] \$4,000,000 was deducted from Third-Party budget qualifying costs category and presented in Non-Third Part Qualifying costs because Third-Party solicited residential and commercial market access programs are not expected to launch until 2026 and the existing (2024-2025) Summer Reliability Market Access program does not meet the definition of "Third-Party" per Decision 16-08-019 OP10 and is therefore presented as Non-Third Party Qualifying Costs for these periods.

## Appendix 3



**Table 1.1 - Portfolio Budget by Sector and Segment (Cumulative for PY 2024-2027)**

Line	Budget Category	Program Segment				Total
		Resource Acquisition	Market Support	Equity	Codes & Standards	
1	Residential Sector	\$ 56,481,296	\$ 16,339,278	\$ 4,116,467	\$ -	\$ 76,937,041
2	Commercial Sector [1]	\$ 69,602,109	\$ 13,496,051	\$ 12,948,875	\$ -	\$ 96,047,035
3	Industrial Sector	\$ 15,251,119	\$ 1,516,847	\$ -	\$ -	\$ 16,767,966
4	Agricultural Sector	\$ 3,204,195	\$ 730,366	\$ -	\$ -	\$ 3,934,561
5	Public Sector	\$ 40,313,788	\$ 2,699,304	\$ -	\$ -	\$ 43,013,092
6	Cross Cutting Sector					
7	Emerging Tech	\$ -	\$ 9,919,442	\$ -	\$ -	\$ 9,919,442
8	WE&T	\$ -	\$ 12,577,464	\$ 892,950	\$ -	\$ 13,470,414
9	Finance	\$ -	\$ 968,222	\$ -	\$ -	\$ 968,222
10	Codes & Standards	\$ -	\$ -	\$ -	\$ 12,791,171	\$ 12,791,171
11	Portfolio Support	\$ 13,364,718	\$ 4,217,119	\$ 1,298,296	\$ 926,463	\$ 19,806,596
12	OBF Loan Pool					\$ -
13	<b>Portfolio Subtotal [2]</b>	<b>\$ 198,217,225</b>	<b>\$ 62,464,092</b>	<b>\$ 19,256,589</b>	<b>\$ 13,717,634</b>	<b>\$ 293,655,541</b>

[1] Includes SDGE3226, which is classified in CEDARS as Commercial, but will serve K-12 customers due to the early closure of the K-12 program.

[2] Excludes EM&V and ED Portfolio Oversight.

**Table 1.2 - Total Cost Recovery Request, Including REN/CCA and Other Costs**

Line	Program Administrator	(a) PA Programs	(b) ED Portfolio Oversight	(c) EMV PA	(d) EMV ED	(e) Unspent & Uncommitted Funds for 2024-2027 Offset [2]	(f) Total
1	San Diego Gas & Electric Company (SDG&E)	\$ 293,655,541	\$ 372,800	\$ 4,894,259	\$ 7,341,389	(\$34,000,000)	\$ 272,263,988
2	San Francisco Bay Area Regional Energy Network ("BayREN")	\$ 960,000	\$ -	\$ 11,000	\$ 29,000	\$0	\$ 1,000,000
3	<b>Total</b>	<b>\$ 294,615,541</b>	<b>\$ 372,800</b>	<b>\$ 4,905,259</b>	<b>\$ 7,370,389</b>	<b>(\$34,000,000)</b>	<b>\$ 273,263,988</b>

[1] \$34M Unspent Uncommitted funds calculated as of July 31, 2023. 2024 PPP Rates filing SDG&E AL 4291-E - Electric Public Purpose Programs Rates - PEEBA amortization and unfiled for Gas as of Oct 16, 2023.

**Table 2.1 - Annual and Cumulative Total System Benefit Forecast**

Line	Segment	PY 2024	PY 2025	PY 2026	PY 2027	Cumulative
1	Resource Acquisition	\$ 73,258,988	\$ 85,483,270	\$ 86,400,300	\$ 94,376,583	\$ 339,519,142
2	Market Support	\$ 7,989,315	\$ 13,982,823	\$ 15,376,506	\$ 15,915,710	\$ 53,264,354
3	Equity	\$ 507,832	\$ 798,186	\$ 839,153	\$ 589,223	\$ 2,734,395
4	<b>Total TSB Forecast</b>	<b>\$ 81,756,135</b>	<b>\$ 100,264,280</b>	<b>\$ 102,615,958</b>	<b>\$ 110,881,516</b>	<b>\$ 395,517,890</b>
5	CPUC TSB Goal	\$ 45,004,630	\$ 45,267,492	\$ 45,878,572	\$ 47,996,979	\$ 184,147,673
6	<i>TSB Forecast / TSB Goal</i>	182%	221%	224%	231%	215%

**Table 2.2 - Annual and Cumulative Codes and Standards Savings Forecast**

Line	Savings Unit	PY 2024	PY 2025	PY 2026	PY 2027	Cumulative
1	GWh Forecast	228.3	213.9	199.8	181.7	823.7
2	GWh CPUC Goal [1]	219.4	206.5	202.2	186.3	814.4
3	<i>GWh Forecast/Goal</i>	104%	104%	99%	98%	101%
4	MW Forecast	45.1	43.1	40.5	37.1	165.8
5	MW CPUC Goal [1]	38.2	35.6	34.9	31.9	140.6
6	<i>MW Forecast/Goal</i>	118%	121%	116%	116%	118%
7	MMThm Forecast	2.2	2.1	1.8	1.5	7.6
8	MMThm CPUC Goal [1]	2.3	2.3	1.5	1.5	7.6
9	<i>MMThm Forecast/Goal</i>	96%	91%	120%	100%	100%

[1] Savings Goals as adopted in CPUC Decision 23-08-005.

**Table 2.3 - Annual and Cumulative Budget**

Line	Segment	PY 2024	PY 2025	PY 2026	PY 2027	Cumulative
1	Resource Acquisition	\$ 51,083,962	\$ 50,019,516	\$ 48,149,459	\$ 48,964,288	\$ 198,217,225
2	Market Support	\$ 14,755,302	\$ 15,956,710	\$ 15,849,921	\$ 15,902,159	\$ 62,464,092
3	Equity	\$ 4,314,606	\$ 5,325,984	\$ 5,376,563	\$ 4,239,437	\$ 19,256,589
4	Codes and Standards	\$ 3,297,320	\$ 3,379,251	\$ 3,472,392	\$ 3,568,671	\$ 13,717,634
5	EM&V (PA and ED)	\$ 3,060,466	\$ 3,111,728	\$ 3,035,347	\$ 3,028,106	\$ 12,235,648
6	<b>Total Budget w/o OBF Loan Pool</b>	<b>\$ 76,511,657</b>	<b>\$ 77,793,188</b>	<b>\$ 75,883,682</b>	<b>\$ 75,702,662</b>	<b>\$ 305,891,188</b>
7	Market Support and Equity, percent of Total Budget w/o OBF Loan Pool					26.7%
8	OBF Loan Pool Addition	\$ -	\$ -	\$ -	\$ -	\$ -
9	<b>Budget excluding Portfolio Oversight</b>	<b>\$ 76,511,657</b>	<b>\$ 77,793,188</b>	<b>\$ 75,883,682</b>	<b>\$ 75,702,662</b>	<b>\$ 305,891,188</b>
10	ED Portfolio Oversight	\$ 93,200	\$ 93,200	\$ 93,200	\$ 93,200	\$ 372,800
11	<b>Total Portfolio Budget w/ ED Portfolio Oversight</b>	<b>\$ 76,604,857</b>	<b>\$ 77,886,388</b>	<b>\$ 75,976,882</b>	<b>\$ 75,795,862</b>	<b>\$ 306,263,988</b>
12	<b>Approved Budget Cap [1]</b>					<b>\$ 308,543,164</b>

[1] Decision 23-06-055 OP5.

**Table 3 - Portfolio Cost Effectiveness Ratios (PY 2024-2027)**

Line		TRC ratio	PAC ratio	RIM ratio	
1	Segment	<b>Resource Acquisition</b>	1.34	1.62	0.64
2		Market Support	0.79	1.02	0.82
3		Equity	0.14	0.14	0.14
4		Codes and Standards (C&S)	2.30	59.89	40.09
5	Portfolio	<i>Including C&amp;S</i>	1.74	4.10	1.91
6		<i>Excluding C&amp;S</i>	1.17	1.41	0.65

**Table 4 - Portfolio Statewide and Third-party Contribution Percentage Requirements (IOU only)**

Line	Budget Component	Qualifying Budget	Cumulative Total Budget w/o OBF Loan Pool	Contribution Percentage	Minimum Threshold
1	Statewide [1]	\$ 61,846,086	\$ 305,891,188	20.2%	20%
2	Third-party [2] [3]	\$ 218,011,874	\$ 305,891,188	71.3%	60%

[1] Decision 16-08-019 OP5.

[2] Decision 16-08-019 OP10.

[3] \$4,000,000 was deducted from Third-Party budget component as the Third-Party solicited residential and commercial market access programs are not expected to launch until 2026. The existing (2024-2025) Summer Reliability Market Access program does not meet the definition of "Third-Party" noted in FN [2].