



ENERGY EFFICIENCY PROGRAMS

SoCalREN Public Sector
Energy Efficiency Project Delivery
Program
Program Implementation Plan

*Prepared by the County of Los Angeles on behalf
of the Southern California Regional Energy Network*

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Program Overview

The Southern California Regional Energy Network (SoCalREN) Energy Efficiency Project Delivery Program (PDP) fills market gaps and provides public agencies with an integrated, objective and comprehensive energy efficiency solution so that they can become proactive stewards and leaders in energy action. Program services include, but are not limited to, energy planning, energy use analysis, investment grade audits, design performance specifications, scope of work support, incentive and financing application support, financial analysis, procurement assistance, bid analysis, and construction management support. In addition, public agencies receive project management services through a dedicated Project Manager who acts as a single point of contact to guide them through the entire project implementation process. The dedicated Project Manager also supports the public agencies to navigate and gain access to SoCalREN's applicable resource and non-resource programs alike as well as Investor-Owned Utility (IOU) and third-party programs, unlocking and streamlining project implementation to realize a resilient, reliable, and clean energy future.

Program Budget and Savings

1. Program and/or Sub-Program Name

SoCalREN Public Agency Energy Efficiency Project Delivery Program

2. Program / Sub-Program ID number

SCR-PUBL-A1

3. Program / Sub-program Budget Table

Table 1: Program Budget

Budget Category	2021
Administration	\$540,070
Marketing	\$324,041
Direct Implementation - Non-incentive	\$4,536,583
Direct Implementation - Incentive	\$0
Total	\$5,400,694

4. Program / Sub-program Gross Impacts Table

N/A

5. Program / Sub-Program Cost Effectiveness (TRC)

N/A

6. Program / Sub-Program Cost Effectiveness (PAC)

N/A

7. Type of Program / Sub-Program Implementer (PA-delivered, third party-delivered or Partnership)

SoCalREN PA delivered

8. Market Sector(s) (i.e., residential, commercial, industrial, agricultural, public)

Public Sector

9. Program / Sub-program Type (i.e., Non-resource, Resource)

Non-resource

10. Market channel(s) (i.e., downstream, midstream, and/or upstream) and Intervention Strategies (e.g., direct install, incentive, finance, audit, technical assistance, etc.), campaign goals, and timeline.

Downstream. Technical assistance.

Implementation Plan Narrative

Program Description

The SoCalREN PDP offers services to identify and complete public sector projects that are customized to meet the unique needs of each enrolled agency. The goal of PDP is to identify and implement cost-effective energy efficiency projects that yield electricity and gas savings for local governments and communities across the region. In order to achieve this goal, the PDP aims to achieve the following objectives:

1. Fill market gaps in the public sector and provide public agencies with an integrated, objective, and comprehensive EE solution for their facilities and non-facility infrastructure;
2. Increase the percentage of public agencies that engage their communities in energy actions and EE strategies, thereby reducing overall community energy consumption;
3. Increase the ability of public agencies to meet local, regional, and state energy targets and policy goals;
4. Increase the number of participating public agencies in the PDP across the entire regional territory;
5. Position public agencies and strategic regional partners to lead community awareness campaigns, engage stakeholders, build public awareness of local, regional, and state efforts, develop energy action plans with shovel ready project scopes, and drive participation in PA resource programs, and;
6. Expand the implementation of cost-effective EE projects.

The PDP offers energy efficiency services to over 700 eligible public agencies in the Southern California Edison (SCE) and Southern California Gas (SCG) service territories - including cities, counties, tribes, school districts, water districts, sanitation districts, and other special districts - to help agencies reduce energy and maintenance costs at public sites and facilities. This program is a continuation of the Southern California Regional Energy Center (SoCalREC) that was described in the Program Implementation Plans (PIP) filed¹ in 2013 and 2015. It is delivered through a third party implementer who designed the program and is responsible for securing and coordinating all program resources and services to meet all program objectives and targets. This implementer works closely with SCE and SCG for public agency engagement and funneling savings to investor owned utility (IOU) resource programs, as well as with the Local Government Partnerships and third-party programs, to drive cost-effective energy solutions.

At no cost to agencies, the PDP identifies energy saving measures and works side-by-side with public agency staff throughout the project lifecycle, from performance specification to construction completion, to implement energy efficiency strategies. To date, the PDP has 194 enrolled agencies, with over half of those served in disadvantaged communities² and has

¹ 2013 Program Implementation Plan (PIP), https://socalren.com/sites/default/files/Public_Agency_PIP.pdf

² Based on facility zip code leveraging CalEnviroScreen 3.0 criteria.

channeled over 70 million kilowatt hours (kWh), 2 megawatts (MW) and 39,000 therms³ to resource programs.

Program Delivery and Customer Services

The PDP delivers savings by offering public agencies comprehensive and customized project management and technical engineering services through a third-party implementer to implement cost-effective and streamlined energy efficiency projects. The PDP aligns with resource program downstream intervention strategies, and actively works to ensure other Program Administrator offerings, such as upstream, midstream, direct install, and third party programs, are leveraged when feasible. After enrollment into the program, each agency is assigned a dedicated project delivery team composed of project management staff and an assigned engineering firm. Throughout project identification and implementation, the project delivery team works with the agency to address project challenges and proactively identify solutions.

Beginning in 2019, SoCalREN launched the “Regional Partner” model to expand SoCalREN’s program reach across the service territory and provide on-the-ground outreach and engagement to promote and enhance program services. Regional Partners leverage their local knowledge and expertise to improve and increase the outcomes of SoCalREN’s comprehensive service offerings. Additional details on Regional Partners are included in the Best Practices section below.

The PDP utilizes a multi-phase project delivery process to move agency projects from planning and identification to execution and completion. Each phase is made up of sub-tasks to ensure industry best practices, agency alignment, utility coordination, and cost-effective solutions are implemented throughout the project life cycle. The following is a high-level overview of the program delivery process and customer services deployed by the PDP.

Enrollment and Project Identification: An agency is considered enrolled in the PDP once it signs a non-binding enrollment form that acknowledges PDP participation, responsibilities, and services. The enrollment process begins with an initial engagement presentation to introduce SoCalREN Public Agency Programs in coordination with the IOUs, Local Government Partnerships, Regional Partners, and other applicable program partners. The enrollment form is presented to the agency during this meeting; program services are not offered until the form is signed and returned. Enrollment in the PDP also gives Public Agencies access to other available SoCalREN Public Agency Programs. Once enrolled, a PDP project manager is assigned to the agency to begin the project development process.

After enrollment, an agency-wide energy analysis is prepared for the agency. The analysis provides a portfolio-wide snapshot of energy consumption and cost by sector (i.e. water and wastewater pumping, street lighting, facilities, and outdoor lighting), and estimates the potential energy and financial impacts of potential retrofits. The analysis is used as a tool to help identify and develop energy efficiency project opportunities.

Audit: Once a project is identified, the agency is asked to sign a project commitment form that communicates program services and records the agency’s commitment to pursue a viable project prior to the investment of limited program resources. The PDP project manager then works with the designated engineer to complete a detailed facility or site visit and identify a

³ Cumulative first year gross savings as reported by SCE and SCG from 2013 through 2018

preliminary list of recommended energy efficiency measures to present to the agency. After the agency selects which energy efficiency measures to implement, the engineer and PDP staff work together to prepare audit calculations and a project proposal that recommends operational and maintenance improvements and/or upgrades to equipment and controls. The proposal details the business case for the implementation of recommended energy measures by providing estimated project costs, energy bill savings, available incentives, and financing solutions for the package of measures. The PDP team then prepares and submits an IOU incentive application package to reserve incentives and on-bill financing (OBF) available to the agency if applicable. Other financing options may also be applied for and pursued at this time.

When possible, the audit phase is completed in coordination with applicable program partners, such as IOU Local Government Partnerships, Regional Partners, and third party programs. Coordination among partners ensures that a robust array of service offerings are provided to the agency, while also improving cost-effectiveness across programs and avoiding duplication of efforts. Other SoCalREN Public Program offerings are also integrated during this phase if applicable.

Design and Procurement: The assigned engineer completes technical performance specifications for the selected measures. If the agency releases a bid for project construction services, the PDP can provide procurement support in the form of supplementary bid package materials and sample language as required. If the agency is utilizing the PDP's simplified procurement method, a joint scope walk is scheduled at the site with the selected pre-qualified contractor, agency representative, and PDP project team. The contractor provides feedback on the draft technical specifications and, if necessary, revises and finalizes them before a cost proposal is presented to the agency.

Agency Approval: The PDP project manager prepares a detailed project proposal package to assist agency staff with obtaining the necessary approvals for the project, which may include a staff report and draft resolution, scope of work, cost proposal, and any identified utility incentives and/or financing documents. The agency's relevant elected approval authority approves the project, submits the necessary signed documentation, and issues a purchase order to the contractor for construction services.

Construction: During the construction phase, the agency is the "project owner of record" responsible for all construction contracts and costs, as well as designating a construction manager. The agency may choose to manage the construction on its own, or access simplified construction management services through the Program Partners. The PDP project management team provides construction management support throughout the process, including review of contractor submittals and verification that the work is performed in accordance with the design specifications to ensure the expected energy savings are achieved and incentives are captured.

Completion: Once the project is installed and verified, the PDP team will work with the agency and contractor to collect the information required to submit the appropriate project close-out information to the applicable resource program so the agency can receive incentives and the savings can be accrued for the project. The contractor is responsible for the transfer of all appropriate documentation, knowledge, and training to the agency and the facility management personnel for new installed equipment and/or operational changes. After project completion, the agency receives a survey to provide feedback on the impact of program services utilized to complete the energy efficiency project and how the program can improve.

Capacity Building: Outside of the project development services, enrolled agencies are able to access expertise, resources, shared procurement strategies, best practices, and lessons learned in order to leverage the collective knowledge and expertise of the SoCalREN to better reduce costs and address common barriers. The PDP provides access to resources including project managers, technical advisors, engineering firms, contractors, financial advisory services, utilities, and other industry participants. Regular peer-to-peer sharing is also offered through workshops, newsletters, and other outreach methods.

Program Design and Best Practices

Market Barriers

The fragmented way in which the energy industry currently delivers services and incentives makes it challenging to achieve deep energy retrofits. This results in multiple barriers to whole building retrofits and a “project delivery gap” for the customer. A key barrier for public agencies is understanding the benefits of implementing energy projects on a comprehensive scale. Further, agencies often lack sufficient in-house expertise and necessary financial resources. These are important challenges to solve because public agencies are significant players in the energy field, both as consumers and as leaders of their communities. The PDP addresses these barriers by providing services to streamline energy efficiency project implementation with sustained technical assistance, and support in accessing project funding.

Best Practices

To help fill the “project delivery gap” and better enable public agencies to meet key challenges, the PDP has identified several best practices that are integrated into the project delivery process to ensure continued success. The PDP addresses the unique needs of the public agency customer and mitigates the need for agencies to acquire their own in-house expertise and resources. Through a “one stop” approach, the PDP delivers comprehensive energy retrofit services, customizable to the agency’s needs. Participating public agencies can take advantage of the full suite of offerings or select only the services that fit their needs.

The PDP aims for continuous improvement of implementation practices and systems to further improve and enhance the services received by public agencies. Since the PDP’s inception, it has been modified and streamlined to incorporate lessons learned from on the ground experience to design more effective systems for project delivery and implement more efficient tools and techniques. In addition to continuous improvement, there have been significant efforts to improve upon cost-effectiveness. Program strategies are evaluated and developed to control costs and ensure that the most efficient methods are deployed for project implementation. Examples of cost-effective program strategies include:

- A Project Budget Tool that ensures appropriate allocation of program resources based on project and agency characteristics
- Development of a streamlined pathway for engineers to enter project budgets for approval to ensure alignment on project scope and deliverables
- Project Commitment forms integrated into the program process to confirm agency buy-in more frequently as a project progresses and to ensure that PDP resources are carefully managed and delivered

Furthermore, the PDP has incorporated the following best practices into the program design:

- **Regional Partner Agency Engagement:** The Regional Partner strategy was initiated to mitigate gaps created by SCE's closing of Local Government Partnership (LGP) programs and to leverage local experts to better serve diverse communities across SoCalREN's expansive territory. In 2019, SoCalREN began partnering with regional community-based organizations and Council of Governments (COGs) to provide on-the-ground outreach and engagement to promote and enhance program services. Many of the regional partner organizations have previously established relationships with agencies working on energy efficiency efforts through LGPs. Through these regional partners, agencies across diverse climate zones, population sizes, population densities, and other demographic characteristics are targeted for engagement in order to ensure comprehensive service to all eligible SoCalREN agencies.

Regional Partner strategy goals:

- Demonstrate regional reach and delivery of valuable services to the entire service territory;
- Increase impacts of energy efficiency through enrollments and enhanced engagement;
- Increase energy projects and their associated savings;
- Understand and seek ways to deliver and enhance services in subregions, and;
- Identify new opportunities, sub-programs, and strategies to meet specific sub regional needs.

Regional partners enhance SoCalREN's expertise and reach by leveraging their local knowledge, existing relationships with member agencies, and professional relationships that often extend beyond energy efficiency.

- **Utility Coordination and Stakeholder Collaboration:** The PDP promotes early and ongoing cooperation and collaboration with utility partners, third-party program implementers, and stakeholders based on an agreed upon protocol. Coordination among partners ensures that a robust array of service offerings are provided to the agency, while also improving cost-effectiveness across programs and avoiding duplication of efforts. A collaborative approach also improves the customer's experience and helps avoid confusion between programs.
- **Standardized Tools and Templates:** A critical element to the PDP design is the continuous development and implementation of standardized tools and templates, including a comprehensive Project Delivery Manual (PDM). The PDM guides project managers and engineers to ensure quality control and application of best practices through the project delivery process.
- **Procurement Assistance:** Assistance during the procurement process enables public agencies to move projects into the construction phase sooner and ensures the achievement and persistence of expected energy savings. The PDP also offers access to a pool of highly-qualified specialty contractors that have been selected through a competitive process, further driving down project costs.

- **Financing Support:** To overcome the significant hurdle of project funding, the project team helps identify and secure grant funding and project financing. The PDP helps agencies access and apply for a variety of funding and financing sources that include, but are not limited to, Energy Lease Financing (ELF), IOU on-bill financing (OBF), the California Energy Commission (CEC) low interest loan program, local self-funded financing opportunities, and the SoCalREN's Revolving Loan Fund (RLF). Enrolled agencies also have access to a financial advisor for additional expertise on an as needed basis.
- **Marketing and Communications:** Successful marketing and communications strategies are leveraged to drive program activities and enrollment.
- **Evaluation and Reporting:** The PDP completes ongoing evaluation to ensure the goals and targets are met while keeping stakeholders fully informed of PDP operations and outcomes.
- **Workforce Development:** The PDP supports workforce development initiatives by measuring and reporting on job creation metrics that drive the local economy.
- **Outreach to Disadvantaged Communities:** The PDP has identified and enrolled agencies serving disadvantaged communities, providing them with specialized services and deliverables. As of April 2019, almost 60% of enrolled cities represent disadvantaged communities.
- **Customer Satisfaction:** The PDP continues to monitor customer feedback to identify program enhancements and ensure the highest level of customer satisfaction is achieved. Since the PDP's inception, annual customer satisfaction ratings have consistently been 90% or higher.
- **Peer-to-Peer Learning:** The PDP seeks to build agency capacity and expertise in energy efficiency by providing agencies with customized tools and resources that they would otherwise have to develop on their own, thereby saving time, money, and staff resources. The PDP also shares the strategies and best practices used by its agencies to overcome common barriers with other enrolled agencies by hosting webinars and presenting at conferences and workshops.

Innovation

SoCalREN aims to maximize savings opportunities while reducing implementation costs. Innovative program elements include start-to-finish customized energy efficiency project management support, streamlined data analytics, key partnerships, and continuous improvement procedures.

Start-to-finish Project Management Service Delivery: Public agencies face unique barriers across all stages of an energy efficiency project's lifecycle. SoCalREN offers comprehensive, start-to-finish customized project management support to overcome common barriers at every project phase. Additionally, SoCalREN seamlessly integrates and coordinates all available and applicable energy efficiency programs and services to avoid duplication and customer confusion. This integrated approach reduces customer touch points and enables public agencies to complete deeper and more comprehensive energy efficiency projects than would otherwise be feasible.

Streamlined Data Analytics: The PDP leverages various energy analysis tools to compare

agency-owned assets, such as buildings and streetlights, to identify energy intensive infrastructure with opportunities for cost-saving energy efficiency projects. SoCalREN's Comparative Energy Analysis report synthesizes energy usage data to increase public agency awareness of their facility energy usage and to also identify potential projects. Additionally, ENERGY STAR Portfolio Manager® (ESPM) is used for benchmarking and additional analyses.

Partner with Other Program Administrators and Third Parties: SoCalREN will partner and coordinate with program administrators and third-party programs operating locally to coordinate program services that provide additional value to participating public agencies. These may include Regional Energy Networks (RENs), Community Choice Aggregators (CCAs), Investor-Owned Utilities (IOUs), and Municipally-Owned Utilities (MOUs).

Continuous Improvement Procedures: SoCalREN will employ a continuous improvement approach to all aspects of program implementation. This approach will include evaluation and development of program strategies to control costs and ensure that the most efficient methods are deployed for implementing projects. The regular evaluation of feedback and lessons learned from program staff, subconsultants (including Regional Partners), agency participants, and stakeholders will also ensure that SoCalREN is operating as cost effectively as possible.

Metrics

The PDP reports out on the key performance metrics listed in Table 2 below on an annual basis and periodically throughout the program cycle. In addition to the metrics listed below, SoCalREN also reports out annually on Common Metrics as directed by the CPUC.

Table 2: Public Sector Metrics

Metric	Method	Frequency
1st Year Gross kWh Savings Channeled	Savings channeled to energy efficiency resource programs	Annually
1st Year Gross kW Savings Channeled	Savings channeled to energy efficiency resource programs	Annually
1st Year Gross therm Savings Channeled	Savings channeled to energy efficiency resource programs	Annually
GHG Reductions	Total GHG emissions avoided based on energy savings achieved	Annually
Agency Enrollments	Number of new public agency enrollments	Annually
Outreach Activities Completed	Number of outreach activities completed	Annually
Educational Materials Delivered	Number of unique informational and educational materials delivered	Annual

To-Code Savings Claims

This section is not applicable.

Pilots

This section is currently not applicable.

Workforce Education and Training

This section is not applicable to this program, as it does not involve workforce education and training.

Workforce Standards

The PDP does not directly provide the installation of energy efficiency equipment. Nonetheless, the program will provide due diligence to ensure that energy efficiency projects supported by the program adhere to the Workforce Standards for Heating, Ventilation, and Air Conditioning (HVAC) and Advanced Lighting Control Programs as applicable. The program will integrate messaging and direction to public agencies during the project lifecycle to ensure projects installed comply with CPUC Workforce Standards as stipulated in D.18-10-008. These standards will be referenced and reiterated during the delivery of various program services including the following touchpoints:

- Project Proposal will highlight the importance and purpose of the standards.
- Technical specifications will include language that program participants will reference prior to project installation.
- Procurement Kickoff meeting will include an agenda item to highlight the significance of the standards and requirements for agencies to submit applicable documentation and confirm adherence to the guidelines at project closeout.

To demonstrate due diligence, PDP may request program participants share applicable documentation to demonstrate adherence to the Workforce Standards which may include any certifications, apprenticeship programs, accredited degrees, or other workforce training programs.

Disadvantaged Worker Plan

PDP coordinates with SoCalREN's Workforce, Education, and Training programs to present information on career opportunities for disadvantaged workers in the energy efficiency industry.

Additional Information

This section is not applicable.

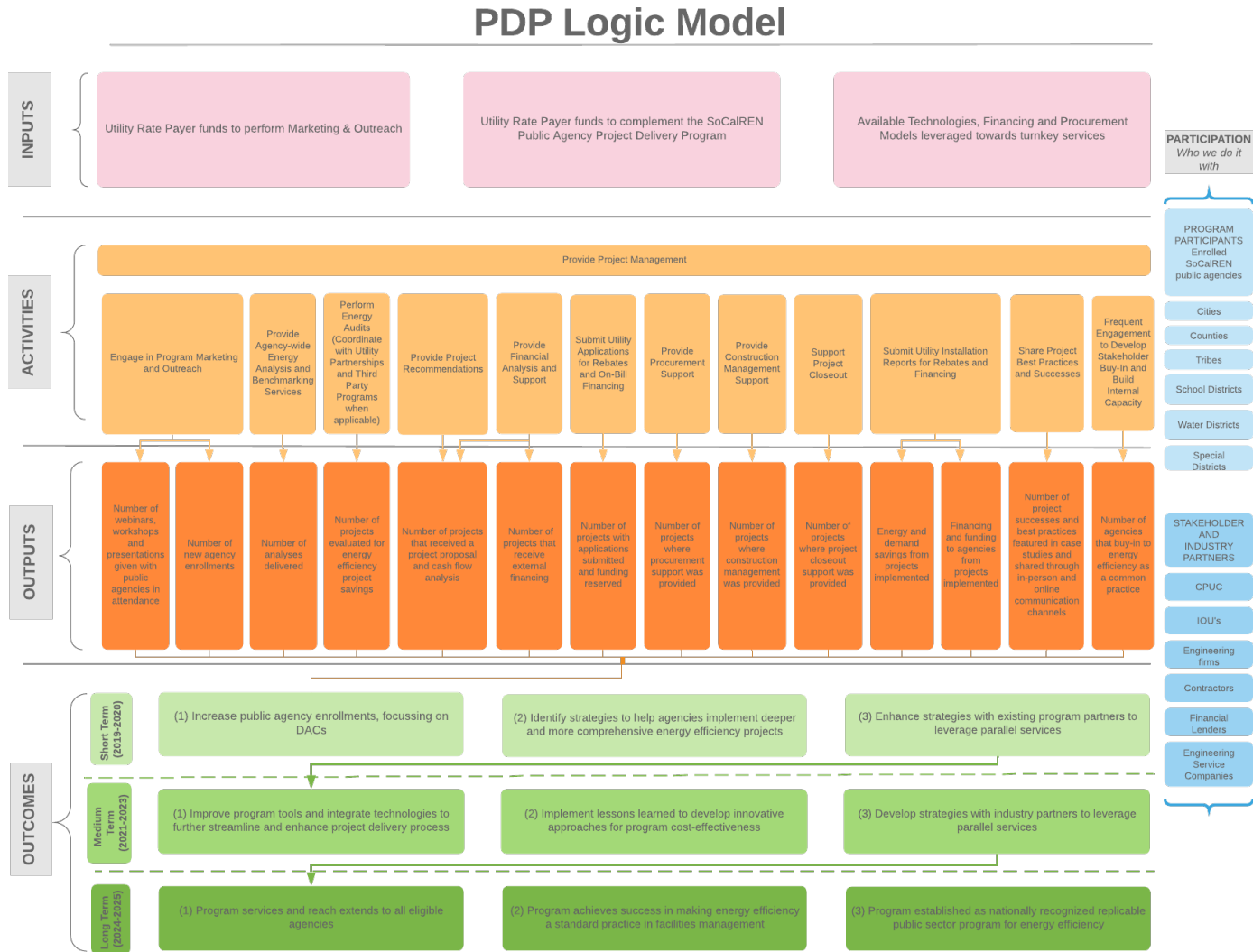
Supporting Documents

Program Manual and Program Rules

Please see attached PDF.

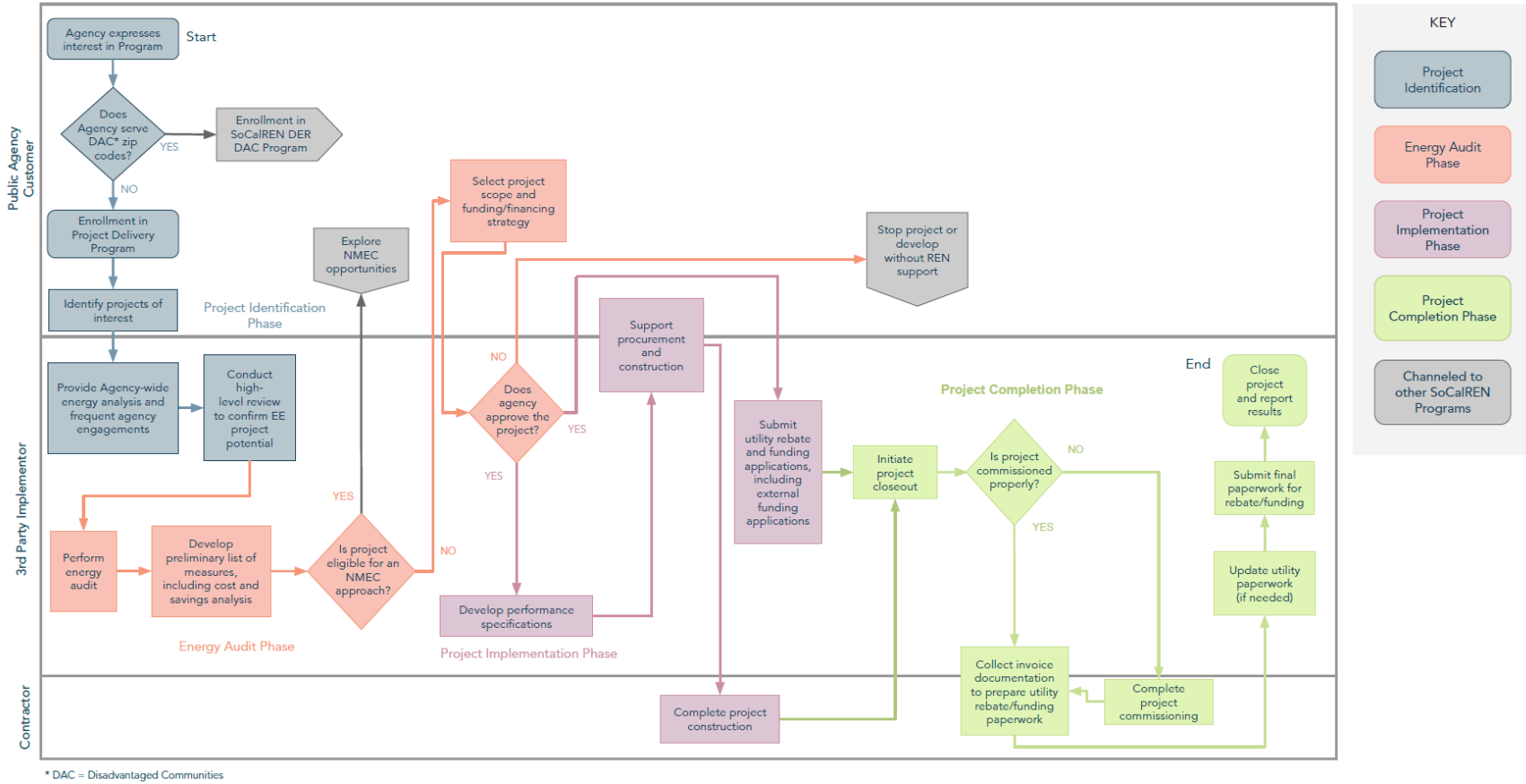
Program Theory and Program Logic Model

Figure 1: Program Theory and Program Logic Model



Process Flow Chart

Figure 2: Process Flow Chart



Incentive Tables, Workpapers, and Software Tools

All EE measures funnel through existing EE resource programs. The below table describes other tools leveraged to support turnkey project delivery services.

Table 3: Tools leveraged by PDP

#	Tools	Short Description
1	Salesforce	Customer Relationship Management (CRM), used to track projects and generate customer reports.
2	Google Studio	Platform used to collect and synthesize energy consumption data and deliver customer energy use analyses
3	Energy Star Portfolio Manager	Online tool used to track energy consumption and greenhouse gas emissions. Allows user to benchmark the performance of one building or a whole portfolio of buildings.
4	GIS	Geographic Information System (GIS) tool allows users to pinpoint exact locations of facilities and tie usage characteristics to those facilities.
5	ezIQC	Provides access to competitively awarded contractors through cooperative purchasing networks, expediting project delivery through a simplified procurement process.

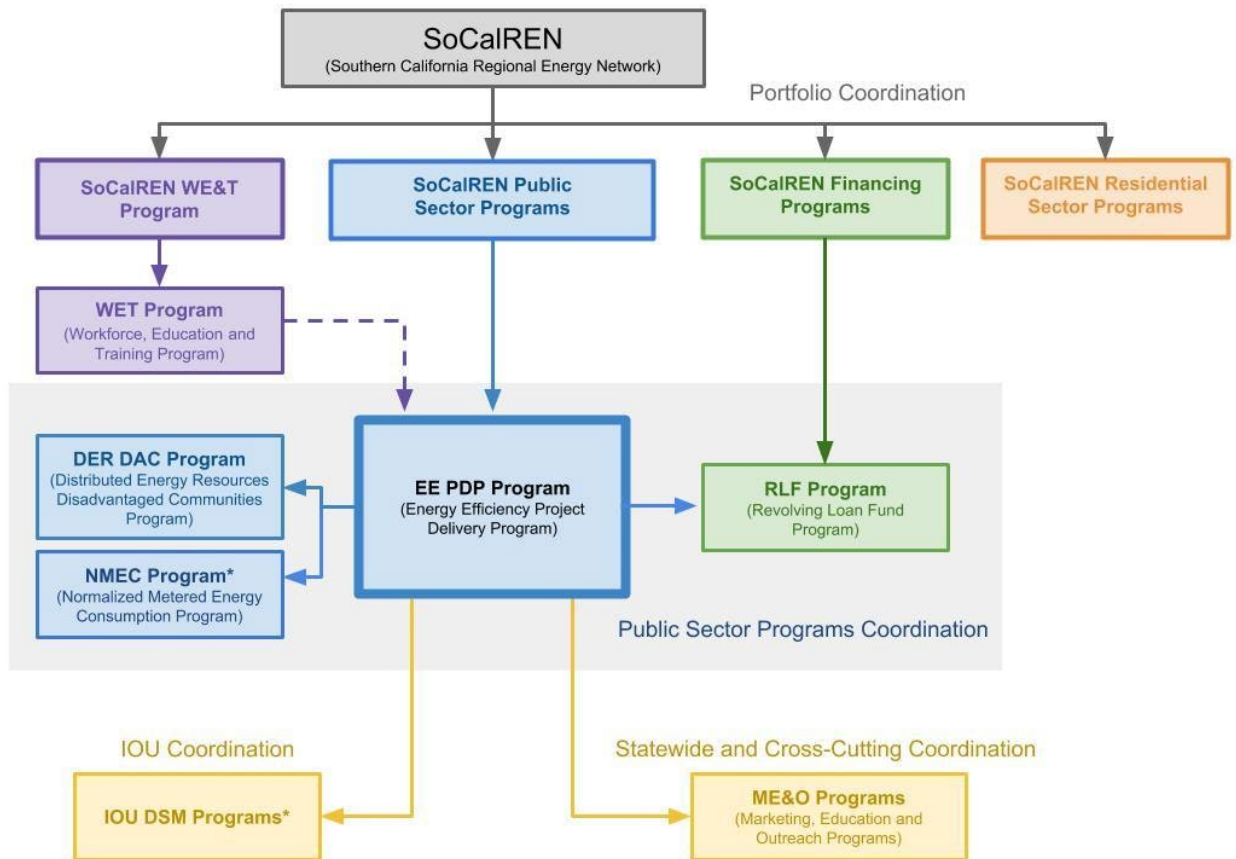
Quantitative Program Targets

Table 4: Quantitative Program Targets

Year	Program Area	Metric	Target
2021	Energy Savings	1st Year Gross kWh Savings Channeled to Resource Programs	10,000,000
2021	Energy Savings	1st Year Gross kW Savings Channeled to Resource Programs	516
2021	Energy Savings	1st Year Gross Therm Savings Channeled to Resource Programs	790
2021	Program Growth	Agency Enrollments	25
2021	Capacity & Expertise	Outreach Activities Completed	15
2021	Capacity & Expertise	Educational Materials Delivered	30
2021	Environmental Benefits	GHG Reductions	4,240 metric tons

Diagram of Program

Figure 3: Diagram of Program



Evaluation, Measurement, and Verification (EM&V)

The PDP is a non-resource program that channels energy savings through existing resource programs. As such, M&V for the program focuses on both customer energy savings claimed as well as program performance metrics for services offered in alignment with the CPUC’s California Long Term Energy Efficiency Strategic Plan⁴. For data related to energy savings projects, the PDP works in close coordination with the IOUs to collect project measure data on a monthly basis through a data transfer process.

The PDP offers technical assistance by conducting audits for the facilities and assets it services, which include estimated energy savings and a list of measures. Energy savings are determined by calculating the energy consumption of the system or facility before (referred to as the “baseline” period) and forecasting savings after the measures are implemented, adjusted for any differences, such as operating and weather conditions. Additionally, behavioral, retro-commissioning, and operational (BRO) strategies may utilize a measured existing conditions baseline, and may require additional energy model or simulation data. Depending on the

⁴ California Energy Efficiency Strategic Plan, <http://www.cpuc.ca.gov/general.aspx?id=4125>

measure type, some calculations must use the most recent California Code of Regulations Title 24 (T24) Energy Efficiency Building Standards or Standard Practice for baseline operating conditions.

The Measurement and Verification (M&V) process built into PDP procedures is in accordance with IOU downstream intervention program requirements and follows M&V standards as required by the resource program through which the project is implemented. For example, per the SCE Customized Calculation Savings Guidelines v. 22.0⁵, a full M&V plan is required for most custom projects with more than 250,000 kWh in savings, though custom projects with less than 250,000 kWh in savings may also require an M&V plan. If a full M&V plan is required for a project, it will be provided by the assigned engineer during development of the Project Feasibility Study. The full M&V plan is approved by SCE, or a third party technical reviewer representing SCE, and includes the minimum required M&V data for the baseline and/or measure equipment and system performance.

The M&V plan methodology is based on the principles, procedures, and guidelines set forth in the International Performance Measurement and Verification Protocol (IPMVP) Options A-D⁶, and the Federal Energy Management Program (FEMP) M&V Guidelines⁷. The full M&V plan can be used as the basis for project verification. The project M&V plan is submitted as an attachment to the Project Feasibility Study at the time of application submission, and attached to the Installation Report after project implementation.

In addition to funneling projects through utility programs, the PDP also delivers non-resource benefits to the public sector. The following describes the approaches and data that is collected in support of continuous improvement and ongoing program evaluation.

The SoCalREN customer relationship database (CRM) is used to record most program and project related information and to generate reports that indicate progress toward program goals. In addition, the PDP seeks feedback from its customers with a project specific survey after each project closeout, via focus groups and through an annual agency survey. Focus group feedback and survey results are analyzed to understand the impact program services have on energy efficiency projects and how the program can improve. Through data collected in the CRM and analysis of survey feedback, as complements to the ongoing customer service by the agency's dedicated project manager, the PDP has the capacity to evaluate its effectiveness and ability to deliver energy savings, build agency knowledge and capacity, conduct outreach activities, meet greenhouse gas (GHG) reduction targets, create jobs, and streamline processes and procedures. The PDP ensures customer satisfaction and effectiveness in the delivery of its services by taking a nimble and highly adaptive approach to program implementation.

Normalized Metered Energy Consumption (NMEC)

This section is not applicable.

⁵ SCE Customized Calculation Savings Guidelines for Non Residential Programs v. 22.0, <https://sceonlineapp.com/DocCounter.aspx?did=670>

⁶ International Performance Measurement and Verification Protocol, http://www.eepformance.org/uploads/8/6/5/0/8650231/ipmvp_volume_i_2012.pdf

⁷ Federal Energy Management Program (FEMP) M&V Guidelines, <https://www.energy.gov/eere/femp/downloads/mv-guidelines-measurement-and-verification-performance-based-contracts-version>