
From: @ McKibbin, Anne
Sent: Thursday, May 22, 2014 12:03 PM
To: Hinman, Jennifer
Subject: Informal comments for May 28 workshop re: oversight and eval issues

Hello Jennifer,

Our comments on the outstanding questions are general in nature, so I have highlighted the specific questions addressed instead of repeating the comment itself.

The Balance Between Operational Flexibility and Accountability

Program implementers need some (but not complete) flexibility to adapt their measure mix, target markets, and marketing methods to a constantly changing environment. This flexibility is necessarily in tension with the desire to provide advance guidance in the form of required RFP and contract terms.

Elevate Energy feels that the Commission and workshop participants are doing a good job of remaining flexible themselves and helping program implementers adapt to changing conditions. Where patterns develop, this group has suggested useful changes. But many problems will be one-off and will require mid-course changes. So, we would recommend that, as the group is considering the range of responses it has to **questions 2.g, 2.h, and 2.i**, it keep to the more flexible end of that spectrum.

Deeming and Evaluation for Previously Approved 16-111.5B EE Programs

Program implementers are very concerned about having program rules changed mid-stream. In addition, administrative complexity is a major cost in implementing programs – particularly programs that target hard-to-reach customer segments and work across fuels. Any decisions on **questions 3.a – 3.f**, that preserves the status quo and eases administration for an implementer that is already working on a program will ease the minds of all implementers and make the IPA portfolio more attractive.

Elevate Energy would recommend that, wherever possible, an implementer be required to only use one TRM at a time. In the situation given in **question 3.c.**, for example, the implementer should be able to use savings values for measures that were not included in its bid that come from the same TRM as is being used for measures that were included in its bid.

Deeming and Evaluation Policy for Future 16-111.5B EE Programs

Consistent with our feelings about previously approved programs, Elevate Energy recommends that **questions 4.a. – 4.h.** be answered with administrative ease and consistency in mind. Implementers can adapt to whatever rules are created, but must know the rules and how they will work in practice as far in advance as possible of signing a contract. Elevate Energy also recommends that, if multi-year programs are to be subject to changing TRM and NTG values, an adjustable goals approach is critical to relieving uncertainty.

Continuity for Multi-Year EE Programs

Elevate Energy has, at various times, had to abruptly shut down programs or stop providing incentives for certain measures because of the regulatory seam between efficiency program plans. Despite our explanations and radical efforts to finish projects in our pipeline, customer reactions range from incredulous to livid, and these situations inevitably create ill will toward energy efficiency as an industry. Even well-planned wind-downs create ill will by requiring the implementer to turn customers away or show a lack of interest in outreach opportunities. Anything that can be done to prevent this situation would be an improvement. Elevate Energy recommends, however, that our community work to eliminate this problem altogether, and that this guide any consensus on **questions 5.a. – 5.e.**

Thank you,

Anne

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p.s. You may have noticed that CNT Energy now has a new name, [Elevate Energy](#). Our resolve to provide smarter energy use for all is stronger than ever. Learn more [here](#).