

DOCKETED

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Sent: Thursday, January 20, 2022 10:24 AM
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Cc: Priya Cortes; Andrew Brooks
Subject: BUILD Program - AEA Feedback on Guidelines & EM&V Plan

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CEC Team,

AEA offers the following feedback:

BUILD Program Guidelines

- Definition of Eligible Applicant
 - We overall agree with the definition of an eligible applicant, but would want to make sure there could be flexibility down the road.
 - CEC might consider reducing the required development experience to 1 or none.
- Hours of TA
 - Raise the total number of hours of TA allowed per applicant, but perhaps consider a set number across a portfolio rather than some projects getting “unlimited” TA and others are limited to a small number of hours. A high enough cap would allow for complex TA to be delivered but also simplify the accounting for TA hours spent.
- Incentive Level Adjustment
 - We would encourage CEC to allow incentives to increase (assuming funds are available) between Steps 2 & 3 if projects end up installing more efficient equipment.
- Kickers
 - Ensure that the CTA-2045 kicker is awarded when it is *installed* on a HPWH, not just purchased
- Table B.2
 - Add AHRI 390 (SPVH) as an approved pathway for packaged terminal heat pumps. Ephoca and other units may be rated as 390 instead of 310/380
 - Modify the efficiency requirements for Central HPWH to allow products that don’t have UEF ratings. Most commercial equipment does not have a UEF rating. NEEA will eventually be rating CHPWH by sysCOP, but that standard is not yet finalized.
- Table B.3
 - Add PTHP and SPVH to mid+high rise. They are a great option. AHRI 310/380 + 390 applies here as well
 - Will need to speed up process to get new products into modeling software. It has historically taken a long time, and we don’t want that process to prohibit BUILD projects from installing high-quality high-performance equipment just because it is new to market and hasn’t been added to the compliance software yet.
- Table B.4
 - For the induction, we assume “permanent fixture” is to prevent portable countertop plug-in models, but might want to clarify that “permanent” includes plug-in slide in ranges.
- E. Eligible Equipment List
 - Consider adding a pathway where CEC can review, on an one-off basis, equipment that is emerging and soon to be, but not yet included on one of the following lists. Or at least allow it to be approved pre-install, but have language that it must be on the list by time of post-install, to be eligible. Having something here would allow for coordination with D.1.b

BUILD Program EM&V Plan

- We had serious concerns about the feasibility of the December version of the EM&V plan that would have required participants to install specific equipment to track appliance level energy usage. Based on our experience with affordable housing, as well as detailed energy data collection, we felt that approach would have been very costly for both the program and participants, unlikely to yield actionable data to inform the program design. Specifically, we felt the plan would have faced major challenges around data privacy, as well as remote data access and reliable network connections.
- We are encouraged to see the change in direction in the more recent version of the EM&V plan.

Thanks,

Nick Young (he/him)

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