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Evaluation issues

We first need to overhaul how we measure and estimate energy savings. Otherwise, it is hard to know whether we are indeed being able to double savings.

Current EE IOU/CCA/POU program savings are often subject to many rules and policies on what savings are actually counted. These rules result in very conservative, inaccurate energy savings estimates. I saw too many examples of this during 17 years as an EE evaluation team member at PG&E. For example, if a project added attic insulation to currently existing insulation-and the current was more than what was allowed in program rules, then the savings for the project were zero. Or in non-residential situations, where if the customer has some self-generation (usually cogeneration system), a current CPUC rule ONLY allows counting the savings on those hours of the year where the customer has a net positive grid electricity use. This not only reduces savings that are ascribed to a project at this facility, but worse, makes it so the more EE a customer makes, the less savings and incentives will be payable; promoting exactly the opposite of what is desired.

Cleaning up the evaluation rules and policies and processes is needed if we are to have effective EE portfolios.

Further, it is important to enable vendors and portfolio administrators to work in a fashion more aligned to what customers and markets can do, instead of current EE measure, incentives, program and portfolio approval processes that constrain timely interventions and increase costs to all involved, and increase the uncertainty in customers minds on what they actually got for their participation. We have to move to processes that are more customer and market centered and friendly, while maintaining adequate and effective governance of the ratepayer and tax payer funds. Today we are too focused on spending \$\$\$ to ensure that every dollar spent is spent wisely. We need to review how to improve our governance of these funds.