

Docket Optical System - Please docket this email from NRDC for (09-IEP-IF) Fwd: Additional NRDC recs for AB 2021 status report

From: Che McFarlin
To: Docket Optical System
Date: 7/9/2009 3:36 PM
Subject: Please docket this email from NRDC for (09-IEP-IF) Fwd: Additional NRDC recs for AB 2021 status report

Thank You

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>>> "Ettenson, Lara" <lettenson@nrdc.org> 7/8/2009 7:58 PM >>>
 Hi Irene –

Thank you for your call. I appreciate the time you all took to discuss items before the workshop and also greatly appreciate your current time constraints. As noted in our attached comments, we generally support your recommendations and appreciate the addition of the industry metrics that you noted would be included at the June workshop. However, we note a few recommendations below that we didn't want to include in our public comments, and hope you will consider as you finalize the 2009 AB 2021 Status report.

Please let me know if you have any questions and thank you for considering our recommendations.

Best,
 Lara

1. Please clarify the page numbers of the ES vs. the actual report
2. We suggest that you include all of your recommendations in the ES
3. Page iii: The report states that IOU verified savings fell below reported savings, "calling into question the success of both past and current programs." We strongly urge you to take this out of the report. I don't think this is necessarily true and we don't want to call the programs "unsuccessful" b/c the verified savings are lower than expected. (Especially since the IOUs reached savings that were significantly above their goals and despite the savings being reduced, they may not fall below their targets after all) I understand this report took into the consideration the CPUC EM&V report for 2006 and 2007 savings, but as you heard at the workshop, these numbers are still highly contended. In addition, it is generally expected that EM&V results may reduce reported savings (especially given the way that the NTG ratios have been modified for the IOUs) and we don't want to scare the POUs from fully engaging in rigorous EM&V analysis.
4. Page iii (and p.1 of the ES): While we appreciate the efforts of those POUs that have plans and reports, we do not believe there is enough information to include the statement that POU verified savings "confirm the 2008 reported program savings." Moreover, on page 3 (page 3 of the report - not of the ES) it states "For the POUs, program evaluation results on verified savings are too recent and too few to consider making savings adjustments based on evaluation realization rates." Therefore, we recommend you

remove the sentence on page iii and ES p.1 since it seems the statement in the Abstract-p.iii and the ES-page 1 is inconsistent with later statements in the report.

5. Page 3 (of the ES) – We agree that one benefit of EM&V is to improve program delivery. However, M&V studies are also critical to enable the utilities to rely on energy efficiency as a procurement resource and to use the data to show the boards/budget committee/etc. that the measured energy savings are real and can be relied upon to defer the procurement of conventional sources of energy. We recommend that you modify the recommendation on p.3 of the ES to reflect this.
6. Page 3 (of the report): – Do you mean to reference the CPUC Verification report evaluating the 2006-2007 IOU savings? or the 2004-2005 as stated? Later (p.5 of the report) you state that the 06-07 verification report used updates that were based on 04/05...I think page 3 of the report just requires a quick clarification.
7. Page 3 (of the report) – It states that “none of the utility savings accomplishments have been adjusted to reflect M&V results. Is this also true for the savings as a percent of sale (IOU and POU) that was presented at the workshop? My understanding was that included realization rate based on the 2006-2007 M&V results from the CPUC. Please clarify.
8. Page 21: We recommend putting the caveat (into the text) that the realization rates (85 to over 100) were not based on free ridership rates and were only calculated based on the small sample size of POU EM&V reports.
9. Pages 16-21: We appreciate the efforts of some of the utilities to complete plans and studies. However, we urge you to evaluate whether the plans and actual studies are complete or need to be improved and to offer recommendations for enhanced studies. These studies will be crucial to ensure that the POUs can depend upon EE as a resource as they plan for their procurement needs.