



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

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Application of Southern California Edison Company (U338E) for Approval of its 2009-2011 Energy Efficiency Program Plans And Associated Public Goods Charge (PGC) And Procurement Funding Requests.	Application 08-07-021 (Filed July 21, 2008)
Application of Southern California Gas Company (U904G) for Approval of Natural Gas energy Efficiency Programs and Budgets for Years 2009 through 2011.	Application 08-07-022 (Filed July 21, 2008)
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Application of Pacific Gas and Electric Company for Approval of the 2009-2011 Energy Efficiency Programs and Budget. (U39M).	Application 08-07-031 (Filed July 21, 2008)

**COMMENTS OF THE NATIONAL ASSOCIATION OF ENERGY SERVICE  
COMPANIES (NAESCO) ON THE PROPOSED DECISION OF ALJ GAMSON AND  
THE ALTERNATE DECISION OF COMMISSIONER GRUENEICH ADDRESSING  
PETITION FOR MODIFICATION OF DECISION 09-09-047**

Submitted by:

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PETITION FOR MODIFICATION OF DECISION 09-09-047**

The National Association of Energy Service Companies (NAESCO) appreciates the opportunity to file these comments on the November 16, 2010 Proposed Decision of ALJ Gamson (PD) and the Alternate Decision of Commissioner Grueneich (AD) in this matter.

NAESCO numbers among its members some of the most prominent companies in the world in the HVAC and energy control equipment business, including Honeywell, Johnson Controls, Siemens, Trane, Comfort Systems USA Energy Services, and Schneider. Our members also include many of the nation's largest utilities: Duke Energy, Pacific Gas & Electric, Southern California Edison, and the New York Power Authority. In addition, ESCO members include affiliates of several utilities including ConEdison Solutions, FPL Energy Services, Pepco Energy Services, Constellation Energy Projects and Services and Energy Systems Group. Prominent national and regional independent members include, AECOM Energy, NORESKO, Onsite Energy, EnergySolve Companies, Ameresco, UCONS, Chevron Energy Solutions, Synergy Companies, Wendel Energy

Services, Control Technologies and Solutions, Clark Realty Capital, McClure, and Lockheed Martin. NAESCO member companies deliver between \$4 and 5 billion in energy efficiency projects annually to institutional, commercial, residential and industrial customers nationwide and have delivered hundreds of millions of dollars worth of projects in California.

### **Summary of Comments**

NAESCO offers the following comments in this matter. Please note that the comments repeat many of the points we made in our November 12, 2010 reply comments, because the reply comments were not recognized in either the PD or AD.

1. NAESCO supports the decision of Commissioner Grueneich that the *ex ante* values of high-impact, non-DEER measures in the utility workpapers will be frozen for the duration of the 2010-2012 program cycle.
2. NAESCO opposes the decisions of both ALJ Gamson and Commissioner Grueneich to approve the proposed Energy Division (ED) process for approving customized project *ex ante* measure values because the ED proposal puts additional and unnecessary burdens, risks and delays (and additional administration costs) on program implementers and customers that will significantly retard the ability of California to achieve its EE goals.
3. In the current program cycle, the appropriate role for the ED and its consultants is a continuous-improvement process evaluation of the custom measure analyses performed by the implementers and the utilities, not another set of concurrent/sequential measure analyses that add little value to projects.
4. Trigger levels proposed by the ED are too low for effective evaluation. NAESCO proposes that trigger levels should be at least 1,000,000 kWh in annual savings, 400kW in demand savings and 20,000 therms in annual natural gas savings.
5. In the longer term, the ED proposal contains a number of major policy decisions that should be separated and presented to the Commission in a form that illuminates their costs, their effects on the basic structure of the EE programs, and the likelihood of their success.
6. The ED appears to be proposing to expand the DEER database, or develop a DEER-like standard library of standard calculations for custom measures. NAESCO believes that this

will entail a multi-year, multi-million-dollar research undertaking, which may or may not produce the end product desired by the ED, and cannot realistically be made a part of the current cycle's project development and implementation process.

7. The ED appears to be re-defining its role in the EE program delivery system, which appears to run counter to the historical Commission definition of the role of the ED.

## **Discussion**

The next few pages outline our arguments on the points listed above.

- 1. NAESCO supports the decision of Commissioner Grueneich that the *ex ante* values of high-impact, non-DEER measures in the utility workpapers will be frozen for the duration of the 2010-2012 program cycle.**

For the last several years in this proceeding, NAESCO has argued for the importance of establishing program rules at the beginning of a program cycle, and holding them constant for the duration of the program cycle. While our proposed system may not be perfect, it is the only workable method for implementing a program of the size and scale of the California energy efficiency programs which involve dozens of different programs, hundreds of program implementers, and hundreds of thousands of participating customers. It is unreasonable to expect the IOU program administrators to achieve their aggressive savings goals if, one year into a three-year program cycle, they cannot rely on the savings values of the measures and programs. As Commissioner Grueneich noted in her Findings of Fact, "The IOUs have presented the only set of complete and final *ex ante* values for non-DEER high impact measures in the record." (AD at 34)

In contrast, the Energy Division proposes a process for determining the *ex ante* measure savings with no set time limits. This proposal is, in effect, a continuation of the battle about the results of the 2006 program cycle, which has been ongoing for several years and shows no sign of imminent resolution. The current method of trying to simultaneously implement programs and change program rules is not only hurting California, but has removed the state, which for a decade was arguably the world leader in the design and implementation of energy efficiency programs, from its leadership position. What other state could seriously consider today following the California model that spends more than \$100 million on program EM&V and cannot establish program results?

- 2. NAESCO opposes the decisions of both ALJ Gamson and Commissioner Grueneich to approve the proposed Energy Division process for approving customized project *ex ante* measure values because the ED proposal puts additional and unnecessary burdens, risks and delays (and additional administration costs) on program implementers and customers that will significantly retard the ability of California to achieve its EE goals.**

The ED proposal would impose an additional layer of review in the approval process for a project that implements custom measures. Assuming that the ED had in place the full capabilities to perform this additional review in a timely fashion, and add value in this review by providing expertise that neither the utility or the implementer have, it would be burdensome to customers because the standards for the ED review are evolving and the proposed methodology is, on its face, broad-ranging in its requests for additional information. Other parties have acknowledged in previous comments that requests for additional information frustrate customers and often cause them to drop from the EE programs. While the ED asserts in their comments that there is no reason to believe that the proposed ED review process will require additional data from customers, recent experience with ED reviews, however, contradicts this assertion. The ED review of the measures for which the utilities proposed to fix *ex ante* values indicates that many outcomes of the ED review are in the two categories – *No Approval at This Time* and *Approval Upon Inclusion of Revisions* – that in all likelihood will require more customer information in order to obtain the approvals being sought.

In addition, custom measures, by their very nature, are site specific and the savings analysis is dependent on knowledge of specific processes and systems at customer facilities. Projects/measures already go through a thorough, multi-step review process, which involves the customer, a third-party contractor, a utility third-party reviewer, and internal utility review. To add the ED review will just slow down an already arduous process. If as the ED claims, there will be no additional data requirements to be imposed on customers and program implementers, it is difficult to see how, using the same data points as the other parties, the ED's evaluation would produce meaningful enough differences sufficient to justify the costs and time delays sure to ensue with the addition of another review entity to an existing multi-party review process.

Furthermore ED's proposal that utilities archive and provide copies of essentially all analytic tools used in the analyses of custom measure savings indicates that ED is not just looking for additional data points about specific project measures but is making an unreasonably large and possibly impossible data collection request which indicates that the ED is, in fact, unfamiliar with

the methodologies and tools that are commonly used in the analyses and is pursuing a universe of data without parameters indicating a lack of focus and generating concerns about the ED's actual intentions. This lack of familiarity with the range of tools and methodologies that are used in the huge variety of industry-specific custom measures in the California EE programs is not limited to the ED, as there probably is no single organization nationwide completely familiar with the complete range of tools and methodologies. However, this lack of familiarity means that it is also unrealistic to expect the ED to provide a value-adding review of the full range of custom measures in a timely and cost effective fashion. While the ED may choose in future program cycles to propose to seek a new role, their proposal, coming in the midst of the current program cycle, is certainly not the time for the ED to pursue new resource capabilities and seek an expanded review capacity.

Finally, it is not clear to NAESCO where the ED proposes to get the personnel resources it needs to review the hundreds of projects each year, each of which contains multiple custom measures, that would appear to exceed the project size review "trigger points" that the ED proposes. To NAESCO and many other parties, the ED staff appears to be overburdened by its current workload, and is in no position to take on an additional responsibility of this magnitude. If the ED is thinking about contracting out these reviews to third parties, NAESCO suggests that it will take months for the ED to analyze its contracting requirements, identify the potential vendors of the full range of specialized analysis services, and complete a procurement process. This team of consultants could then begin the process of reviewing the backlog of pending applications. But many of the customers, frustrated by the uncertainty and delays, would be long gone, taking with them a substantial portion of the savings that the Commission expects to achieve from custom measures in the current program cycle.

**3. In the current program cycle, the appropriate role for the ED and its consultants is a continuous-improvement process evaluation of the custom measure analyses performed by the implementers and the utilities, not another set of concurrent/sequential measure analyses that add little value to projects.**

Given the limitations of its current capabilities, and its apparent lack of capacity to deliver its proposed review function in a timely fashion, NAESCO suggests that it is not appropriate for the ED to interpose itself in the project "production line" of project implementation. Rather, we suggest the ED recast its proposed role in the current program cycle to one of ongoing process review and evaluation. This role would allow the ED to sample a meaningful set of the hundreds of custom measure proposals that exceed appropriate "trigger points," allow an appropriate amount of time for

the review and critique of the project savings analyses by ED staff or consultants, and provide an orderly process for the utilities and the implementers to review the evaluations and integrate value-adding modifications into their analytic processes for future projects and program cycles.

**4. Trigger levels proposed by ED are too low for effective evaluation. NAESCO proposes that trigger levels should be at least 1,000,000 kWh in annual savings, 400kW in demand savings and 20,000 therms in annual natural gas savings.**

The ED appears to be compounding the problem of its limited current capabilities by proposing review “trigger points” that are too low to enable the ED to do effective evaluations. At the proposed trigger point of 250,000 kWh per year, the ED will be swamped with projects to review and will struggle to deliver even the most cursory reviews, which will add little value to the effort to improve the program, in a timely fashion. NAESCO therefore suggests that the review trigger points be raised to at least 1,000,000 kWh in annual savings, 400kW in demand savings and 20,000 in annual natural gas savings. This level will enable the ED to provide effective and meaningful evaluation on projects of significant size.

**5. In the longer term, the ED proposal contains a number of major policy decisions that should be separated and presented to the Commission for decision.**

NAESCO believes that the ED proposal raises significant questions about the role of ED in the implementation of California EE programs that the Commission has not addressed. We believe that the questions should be separated and presented to the Commission in a form that illuminates their costs, their effects on the basic structure of the EE programs, and the likelihood of their success. The Commission should not allow the ED proposal to proceed further until the critical decisions have been made based on this analysis.

**6. The ED appears to be proposing to expand the DEER database, or develop a DEER-like standard library of standard calculations for custom measures. This is a multi-year, multi-million-dollar research undertaking, which may or may not produce the end product desired by the ED, and cannot realistically be done “on the fly” as part of the current cycle’s project development and implementation process.**

NAESCO shares with the ED and the other parties in this proceeding the goal of continually improving the analysis, projection, monitoring and verification of project savings. It is an essential element of the work we are all engaged in to establish EE as the foundation resource in the California energy portfolio. NAESCO reminds the Commission that NAESCO’s dedication to this goal began in the mid-1990s, when it was instrumental in the creation of the IPMVP, the current

“gold standard” for project M&V. The NAESCO M&V protocol, upon which the IPMVP was initially based, was in its day the only non-utility protocol approved for use for verification of energy savings by the California Public Utilities Commission. So we certainly understand the desire of the ED to move the analysis of more and more measures from custom, “one-off” methodologies to standardized methodologies and/or DEER-like data tables. However, we think this may well be an unachievable goal based on the uniqueness of many projects and measures and the site-specific analysis required.

But even if it were theoretically achievable, this goal would require a multi-million dollar, multi-year research effort that is well beyond the scope of the ED proposal. We believe it should be recognized by the Commission as an ongoing activity that is separate from the project implementation “production line” of the current program cycle. A useful analogy may be the organization scheme used by web-based information providers, who have a development website that is separate from the production website that users see. The development website is used to research and develop new functionality, and the functionality is transferred to the production website only when it has been fully tested and debugged. No one would dream of doing research and development on the production website that is in daily use.

If it decides to undertake this research project, NAESCO suggests that the Commission should appropriately fund it and include in the research the full participation of interested stakeholders as well as experts in the various technologies that are implemented as custom measures. We also believe that all of the parties should recognize that the outcome of the research is uncertain. We don’t know today how many of the custom measures can be standardized, or how the availability of smart grid and smart meter technologies will affect the savings estimation and M&V methodologies.

**7. The ED appears to be re-defining its role in the EE program delivery system, which appears to run counter to the role the Commission has defined for the ED.**

The ED proposal appears to put itself into a key implementation role in the current project cycle that the Commission does not intend, because the ED would be the gatekeeper that could effectively control the implementation of projects with custom measures. NAESCO respectfully suggests that the ED cannot help but disrupt the implementation of projects that contain custom measure applications when it is trying to simultaneously develop a new set of protocols for custom measure evaluation while reviewing hundreds of current cycle projects. Several years ago, the

Commission experimented with having the ED in a key implementation role, and decided that was not an appropriate role for ED. NAESCO agreed with that Commission decision at that time, and urges the Commission to consider whether it wants the ED to, in effect, control the implementation of a significant part of the utilities' program portfolios.

### **Conclusion**

NAESCO appreciates the opportunity to submit these reply comments and urges the Commission to act on them as follows.

First, the Commission should adopt the decision of Commissioner Grueneich that the *ex ante* values of high-impact, non-DEER measures in the utility workpapers will be frozen for the duration of the 2010-2012 program cycle.

Second, the Commission should reject the decisions of both ALJ Gamson and Commissioner Grueneich to approve the proposed Energy Division process for approving customized project *ex ante* measure values because this process will impose additional and unnecessary burdens, risks and delays (and additional administration costs) on program implementers and customers that will significantly retard the ability of California to achieve its EE goals.

Third, the Commission should re-affirm that in the current program cycle the appropriate role for the ED and its consultants is a continuous-improvement process evaluation of the custom measure analyses performed by the implementers and the utilities, not another set of concurrent/sequential measure analyses that add little value to projects.

Fourth, the Commission should recognize that the review trigger levels proposed by ED are too low for effective evaluation and should set the trigger levels at a minimum of 1,000,000 kWh in annual savings, 400kW in demand savings and 20,000 in annual natural gas savings.

Fifth, in considering the longer term, the Commission should recognize that the ED proposal contains a number of major policy decisions that should be separated and considered by the Commission in a form that illuminates their costs, their effects on the basic structure of the EE programs, and the likelihood of their success.

Sixth, the Commission should recognize that the ED appears to be proposing to expand the DEER database, or develop a DEER-like standard library of standard calculations for custom measures. NAESCO believes that this may well be unachievable because of the unique site-specific requirements for custom measures, but, if it is attempted, will entail a multi-year, multi-million-dollar research undertaking, which may or may not produce the end product desired by the ED, and cannot realistically be made a part of the current cycle's project development and implementation process.

Finally, the Commission should recognize that the ED appears to be re-defining its role in the EE program delivery system in a way that appears to run counter to the historical Commission definition of the role of the ED, and the Commission should re-affirm its historical definition of the ED role.

Respectfully submitted by,

*Donald Gilligan /s/*

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**CERTIFICATE OF SERVICE**

I, Donald Gilligan, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

On December 3, 2010 I served the attached:

**COMMENTS OF THE NATIONAL ASSOCIATION OF ENERGY SERVICE COMPANIES (NAESCO) ON THE PROPOSED DECISION OF ALJ GAMSON AND THE ALTERNATE DECISION OF COMMISSIONER GRUENEICH ADDRESSING PETITION FOR MODIFICATION OF DECISION 09-09-047**

on all eligible parties on the attached list **A.08-07-021** by sending said document by electronic mail to each of the parties via electronic mail, as reflected on the attached Service List.

Executed this December 3, 2010 at Salem, Massachusetts, by

A handwritten signature in black ink, appearing to read 'Donald D. Gilligan', with a long horizontal flourish extending to the right.

Donald D. Gilligan  
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