PRAISE FOR SUCCESS AND HIGHEST GOALS:
The Council reiterates its understanding that the Green Communities Act requires bold action to acquire all available cost-effective energy efficiency and demand resources. The Council recognizes and commends the PAs on the significant achievements made during the first two three year plans, in particular the economic and energy benefits that nation-leading comprehensive energy efficiency programs have delivered to the ratepayers of Massachusetts. The Council applauds the PAs for building on that success and proposing, on a state-wide basis, some of the highest levels of efficiency savings ever achieved by major utilities.

IN CASE ANNUAL SAVINGS DO NOT INCREASE (YEAR OVER YEAR):
The Council accepts that impacts of new lighting standards coming into place during the 3 year plan period and declining overall sales creates a higher than normal degree of uncertainty in estimating market potential and therefore the yearly savings targets within the 3 year overall savings goals have been adjusted accordingly. The uncertainties of predicting lighting and market trends years in the future however do not necessarily represent a decline or leveling off of available cost-effective efficiency or demand reduction. In fact, the Council notes that benefit-cost ratios are increasing over the three years of the Plan and will work with the PAs during the 3 year plan to review market conditions and impacts to ensure that the goal of reaching all cost-effective efficiency investments available in the market is attained.

DIFFERENCES IN PA LEVELS:
The Council has accepted the statewide savings, budgets and benefits proposed in the Revised Plan as appropriate but notes there exists significant variation in the goals and budgets among individual PAs. The Council urges the PAs to work to address these variations in savings, benefits and costs to achieve better consistency among service areas in state-wide programs. The Council encourages the PAs to continue the joint planning and best practices efforts, which to date have resulted in more consistent planning inputs and reduced variations across the individual PAs.

SPLIT PI: INCLUDE IN DRAFT (even if not in final)
The Council is concerned that throughout both the 2010-2012 and 2013-2015 three year plans C&I programs are not attaining goals or meeting budgeted expenditures . AccordinglyCouncil believes that it is appropriate for to provide for a separate performance incentive for C&I. The Council encourages the PAs to divide each of the gas and electric performance incentive pools into one for C&I programs and another for Residential and Low Income programs, with maximum performance levels set proportionate to the relative share of three year lifetime savings attributed to each sector at the design level. By using such a mechanism, the Council believes that the DPU can more firmly secure for the Commonwealth's ratepayers the most cost-effective efficiency savings from the C&I sector.

Comment [AB1]: The desire to split the PI comes from the concerns repeatedly expressed by the Council (and the DPU) about not only underperformance, but also the lack of clarity around why, what the PAs are doing to address it (segmentation, CHP, midsize, linear LED) and data supporting whether those efforts are working as intended. Should the PAs come back with a much stronger plan n C&I – and detail about how information regarding implementation will be shared with the council – that may be sufficient to address this issue.

DATA

We expect the Council and PAs will continue to work collaboratively throughout the implementation of the 2016-2018 Plan, through continued quarterly reports and regular updates by PAs in EEAC meetings that focus on issues to be determined by the Council.

The Council encourages the PAs to [collect better, more meaningful metrics, more consistent across PAs, consistent definitions, more quickly/easily verifiable, maintaining best practices] data. The Council expects to be involved in tracking, monitoring, and using data to stay abreast of program implementation and provide feedback and input on programmatic evolution and will do so through the quarterly reports and PA presentations on specific topics.

Comment [AB2]: Someone more familiar with the nuances of the issue should choose the right words to describe exactly what we want.

The importance of significant, reliable data is particularly true for the initiatives newly introduced (renter and moderate income) or significantly changed (multi-family) for this three year term. The Council believes that the renter and moderate income initiatives, in particular, have the potential to address two historically underserved markets, improving equitable access. We look forward receiving from the PAs updates in semiannual presentations on these initiatives, including metrics on participation levels and conversion rates by renters and their landlords by PA, and participation rates by PA to ensure that these initiatives are effective, serve the target populations well, address the major drivers of energy consumption, and quickly introduce improvements to address barriers and continue innovation, when appropriate. Similarly, we expect the PAs to deliver [list of specific metrics] regarding the multi-family program.

Comment [AB3]: Same – someone with this expertise should include the list here.

In addition, the Council expects more transparent data and reporting on C&I sectors and measures. In particular the Council expects to see PA presentations on small and medium C&I initiatives, specifically focused on key underserved sectors such as small hospitals, not-for-profits and small businesses. Finally, as CHP, linear LEDs, and residential lighting are predicted to go through significant shifts during the course of the three year plan, the Council expects to see updates on the impacts of these particular measures through the quarterly report process.

Finally, the Council notes that data tracking and reporting issues have not been satisfactorily resolved by the Mass Save Data website.