

**DRAFT**

December~~January~~ 14, 2011~~10~~

Mark D. Marini, Secretary  
Department of Public Utilities  
One South Station – 2<sup>nd</sup> Floor  
Boston, MA 02110

**Re: D.P.U. 11-120: Investigation by the Department of Public Utilities on its own Motion into Updating its Energy Efficiency Guidelines**

The Energy Efficiency Advisory Council (“Council”), as created by §22 of the Green Communities Act (“GCA”), appreciates the opportunity to offer these preliminary comments regarding the appropriate method of calculating energy efficiency savings and the avoided environmental compliance costs, “in particular those associated with the emission of carbon dioxide.” In fulfilling its duties under the GCA, the Council works with and advises the Massachusetts gas and electric energy efficiency program administrators (“PAs”) in developing and implementing energy efficiency programs and policies. The Council recognizes that accurately valuing energy efficiency savings and the avoided cost of carbon emissions are integral pieces in determining whether energy efficiency programs are cost-effective as mandated by the GCA.

Given the nature of the Council<sup>1</sup> and the timing of the Order opening the investigation,<sup>2</sup> at this time the Council is offering these preliminary comments concerning the procedural timing of the investigation. ~~and the~~ The Council will continue to work through the issues presented in the investigation. Work on the development of the 2013-2015 gas and electric energy efficiency plans has begun, and the PAs and Council consultants are working to reflect the priorities of the Council and the requirements of the GCA in those plans. As mandated by the GCA, the first drafts of the plans are to be submitted to the Council on April 30, 2012. Because the savings calculation and avoided cost of carbon, as part of a broader suite of avoided costs attributable to energy efficiency, are vital to the development of cost-effective energy efficiency plans, the

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<sup>1</sup> The voting members of the Council serve voluntarily, the Council meets monthly to transact its business and is subject to the Open Meetings Law.

<sup>2</sup> The D.P.U. 11-120 Order was issued on November 29, 2011, the Council’s December meeting is scheduled for December 13, 2011, the Council’s January meeting is scheduled for January 10, 2012, while Initial Comments are due January 11, 2012.

Council urges resolution of the D.P.U. 11-120 investigation in a timely manner so that the results may be carefully and deliberately incorporated into the 2013-2015 plans prior to their submission to the Department on October 30, 2012.

To this end, the Council respectfully requests that the Department convene a technical session/procedural conference to develop a schedule for this docket that allows adequate time for a comprehensive investigation into the identified issues and a timely resolution regarding changes, as necessary, to the Department's Energy Efficiency Guidelines. This schedule would recognize the significant work required by the PAs to adapt the 2013-2015 energy efficiency plans to incorporate any necessary changes resulting from the investigation prior to submission of the plans to the Department. Such a procedural conference would be beneficial for the Department, Council, PAs and interested stakeholders as we move towards resolution of these issues.

The Council looks forward to participating in this investigation.

Sincerely,

Mark D. Sylvia  
Chair, EEAC