

**C&I Sections
of 4-30-09 Draft Joint
Statewide Three-Year Plans**

EEAC Consultant Comments:

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General Comments

1. Commitments are broad, but couched:
 - PAs reserve right to define what program requirements are “in the best interest of the customer” (p. 14, footnote 3)
 - Gas/Electric Integration plans will require unanimity (consensus and non-binding on PA that does not agree) (p. 37) and could take the full three years (p. 38)
 - Programs will be delivered “on a coordinated statewide basis” (p.77) but this is not defined
 - The Joint Standing Technical Committee will recommend common specs., implementation and verification materials, “when appropriate and agreed to by the respective Program Administrators” (p. 147)

- “In each of the next three years, PAs expect to see increased consistency in participation requirements; ... core services and measures; conditions, exclusions and limits; and incentive amounts and/or calculations.”

2. Program descriptions:

- PAs largely describe their existing programs and commit to expand them
- Expansions mostly (not exclusively) describe growth of programs in reach of market share, rather than in depth of savings in buildings
- How “deep” will the C&I programs be?

General Conclusions:

- The PAs produced impressive draft plan documents.
- Do they provide “enough” assurance that PAs can reach the GCA’s lofty goals? Can’t tell. The commitments are a bit hedged and PAs say the details won’t be seen until the fall.
- We didn’t expect to see the issues addressed, but we hoped for identification of the issues and paths and timelines to address them.

Residential and Low Income Sections of 4/30-09 Draft Joint Statewide Three-Year Plans

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Key Residential Sector Questions/Comments

- How deep will the programs go?
- Gas & Electric integration
- On-going program discussions, what will the program designs and strategies ultimately be?
- Multifamily

How deep do the programs go? (What % of savings is lighting?)

- Deeper savings first, then broader
- Deeper savings will cost more per unit savings, and will strive to acquire all available cost-effective EE (per the GCA requirement)
- Lighting assumptions: # of CFLs? Net-to-gross-ratio? Change over 3 years? Federal lighting standards?
- Need the Program-specific data and PA-specific data

Gas & Electric Integration

- Clarify 'Integration' as distinct from 'Coordination'? Integrated 'process' compared with integrated 'program'?
- Example: MassSAVE & Gas Weatherization
- Example: HVAC programs w/overlapping trades
- ENERGY STAR for New Homes: Program that successfully integrates gas & electric. Single vendor.

On-going Program Discussions

- Working group discussions / Consensus-based plans
- Example: MassSAVE working groups
 - Contractors Strategies
 - Market Evaluation
 - Technical Evaluation

Multifamily

- Summary report of MF summit just circulated
- Working group is convening
- Result: Fully fleshed out MF program