Written Testimony - July 14th at 5:00 PM.

Final review of Rule 460.246 Energy Optimization Program Evaluations Rule 1, 2, 3

Questions/Comments:

- Section 2(e), Independent validation of net energy savings achieved by the providers' energy optimization program. A recommendation concerning the process for making adjustments to identify net energy savings will be developed by the Evaluation Collaborative and submitted to the Collaborative Steering Committee for approval and will include:
 - (i)The identification of provider-specific net to gross ratios for each program. Providers may file a joint net to gross ratio analysis for programs
 - (ii) Determining the frequency with which net to gross ratios will be updated.
 - (iii) A recommendation regarding the deeming of net-to-gross ratios for programs or program components with low participation, as these may not warrant allocation of evaluation dollars What does that exactly mean "validation"
- Answer: Net-to-gross
- Section 2f Independent validation of assumptions and calculations used to identify deemed savings values in the MEMD. Based on results from evaluation research, the Evaluation Collaborative will identify MEMD measures requiring review and possible adjustment. A recommendation concerning the process for altering or updating MEMD values will be developed by the Evaluation Collaborative and submitted to the Collaborative Steering Committee for approval. Different assumptions for the deem savings values
- Question: What if a provider excepts the MEMD as validation?
- They may not have the money to allocate? Yes
- Add when relevant and practicable.
- Changed some of the lettering.
- DTE Is Net-to-gross is all inclusive? Yes
- Section 2(e)(iii) A recommendation regarding the deeming of net-to-gross ratios for programs or program components with low participation, as these may not warrant allocation of evaluation dollars.
- Strike low participation? Yes will take that out.
- Who is recommending? The utility.
- Is the standard for net-to-gross the same across states?
 - o Most states are struggling on how to use this affectively.

o A key thing for Michigan is the Incentive Mechanism.

Process for submitting the rules with the support of multiple parties

- What is the process of how the written rules are submitted?
 - o Letters of support
 - o They get submitted by a group of people and we suggest that this is how the rules in this section should be. They will look at how much agreement was made.

Discuss process for formal recommendation that will be submitted to Steering Committee

- The next steering committee meeting is not until August.
- We can submit the information to Art Thayer and he can be a spokesman for the group to the steering committee.
- The group could also submit a dispute to the steering committee.
- The group feels they do not need to submit these rules with the steering committee. They are on a time constraint.
- When will we be discussing the MEMD? Upcoming meetings.
- Email Karen Gould with updates for the MEMD before the next meeting for discussion. gouldk1@michigan.gov

Upcoming dates

Evaluation: June 15, 2010 1:30-4:30 p.m.

Design and Implementation: June 15, 2010 9:00-12:00 p.m.