

Karen,

I wish to offer the following comments with respect to the proposed rules document dated October 8, 2009 provided to myself (along with the EO Collaborative Evaluation Workgroup membership) for review on March 29, 2010, and with requested response by April 9, 2010.

1) As a State of Michigan - Department of Technology, Management and Budget employee, I offer no comment at the present time, and reserve any comment for future discussion at EO Collaborative workgroup meetings.

2) As a citizen of the State of Michigan, and offering my technical review of the document in areas that I have some professional training and experience, I offer the following comments:

- A) Cover page Definitions, part (D) "Construction Contract" leaves no mention for any type of retro-commissioning activity, upgrade of either capital equipment or controls / automation systems, or applied knowledge for operation and maintenance practice and procedure improvements, or related applied knowledge type contracted services.
- B) pp 9 / rule 23 / part (d) - There is no mention of any validation or calibration requirement, either initially or on any periodic basis – only the "type" of meters to be used.
- C) pp 10 / Rule 25 / part (6) – requires reporting energy units in BTUs "where possible" – the use of "shall" and "when possible" is awkward. Also, perhaps Therms would be easier numbers to manage (smaller).
- D) pp 12 / Rule 28 / part 4 – The sentence does not make sense to me in respect to the criteria outlined in part 3.
- E) pp 24 / Rule 46 / (Energy Optimization Program Evaluations) – part 2, section f / (IV) – I would say "the commission staff or designee" etc.

Thank you for the opportunity to review this material and make comments or recommendations.

Regards,

Glenn T. Remington
EO Collaborative, Evaluation Workgroup Member