

## Comparison Exhibit: TRM Front Matter

No.	Commenter	Comment	Rationale	Alternate Position	Rationale	Comment
1	Staff	TRM is approved annually by the ICC in a docketed proceeding.	<ul style="list-style-type: none"> <li>• Single proceeding yields a single set of TRM values.</li> <li>• Review of TRM in multiple utility dockets is administratively costly and is likely to result in different TRMs.</li> <li>• Goal is to have ICC approve TRM values so that they can be relied on.</li> </ul>	Legal will resolve this.		<p>VEIC will submit final, complete TRM (Version 1).</p> <p>Staff has the authority to open a docket to approve the TRM. Goal is for ICC to approve values that will be used in savings dockets and portfolio plan approval dockets.</p> <p>General concern about timing of ICC approval of TRM (Ver. 1) and annual updates.</p>
2	Staff	ICC should use TRM values in counting goals achievement.	<ul style="list-style-type: none"> <li>• Certainty</li> </ul>			Consensus
3	Staff	TRM values <b>must</b> be reported by EM&V in savings reports, but alternate values should also be reported in the following circumstances (TRM exceptions):	<ul style="list-style-type: none"> <li>• Reasonable that ICC and other parties are given the information about what impact any alternate values have on savings.</li> <li>• Always reporting TRM values ensures</li> </ul>	Only TRM values reported. In the event a mid-year adjustment is agreed to, EM&V will also report those savings. Savings will be based on adjusted values.		Consensus

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		<ul style="list-style-type: none"> <li>• errors,</li> <li>• custom measures,</li> <li>• new measures.</li> </ul> <p>Alternate values can be used towards savings claims if in a stipulated agreement.</p>	<p>consistency in reporting across utilities.</p> <ul style="list-style-type: none"> <li>• Allowing TRM exceptions in limited circumstances is reasonable.</li> </ul>			
4	Staff	<p>Evaluators must report savings based on TRM, and also savings based on any measure-level changes they determine through evaluation. However, TRM values will be used to count towards goal.</p>	<ul style="list-style-type: none"> <li>• Reasonable that ICC and other parties are given the information about what impact any evaluation change has on savings</li> <li>• Reporting TRM values ensures consistency in reporting across utilities</li> <li>• Basing savings on TRM values helps utilities manage risk</li> </ul>	<p>Alternate savings based on new evaluation information will be reported separately and in a later time during the update process. TRM values will be used to count towards goal.</p>		<p>Minor difference, let's discuss.</p>
5	Staff	<p>Program Administrators must provide "dual" savings in their plan filings in</p>	<ul style="list-style-type: none"> <li>• Reasonable that the ICC and other parties are given the information about what impact</li> </ul>			<p>Consensus.</p>

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		cases where the Program Administrator does not want to use the TRM in the plan filings. The dual savings include savings based on TRM values, and savings based on any TRM deviations the Program Administrator proposes using.	any proposed measure changes have on plan savings. <ul style="list-style-type: none"> <li>• Reporting TRM values ensures consistency in reviewing portfolio plans across utilities.</li> </ul>			
6	Staff	The TRM Administrator should be required to adhere to the same protocols as the independent evaluators to ensure their independence in the TRM update process.	<ul style="list-style-type: none"> <li>• Ensures independence of TRM administrator. Does not prevent utilities from firing TRM administrator for cause.</li> </ul>	Legal advises it is not appropriate to dictate ICC activity.		This does not need to go in the TRM.

**Bottom Line:** We do not need to change TRM language, pending outcome of #4, above.