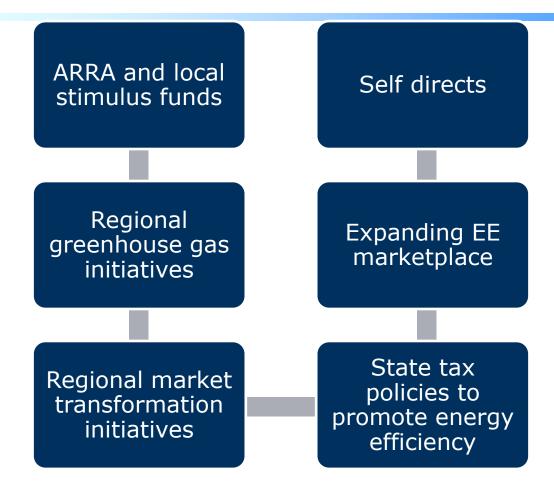


M. Sami Khawaja June 26, 2012

Expansion of Non-Utility EE Programs





Benefits of Non-Utility EE

- Can complement the utility portfolio
 - Hard-to-reach markets (NTG=1.0)
 - Innovative measures or delivery approaches
 - Promote market transformation
 - Leverage non-energy benefits
- Well-executed and coordinated NUEE can expand overall energy savings achievements



Attribution Questions



How do we slice the pie?



OR how do we get the biggest, best pie?

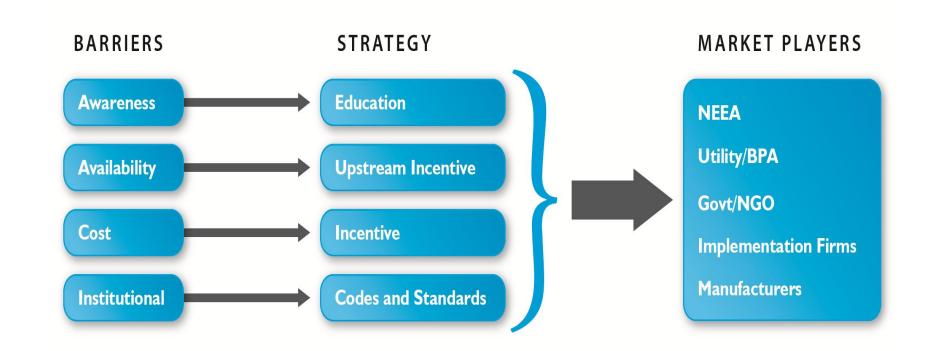


A View from the Pacific Northwest

Cooperation and Any new conservation collaboration is a benefit improves results

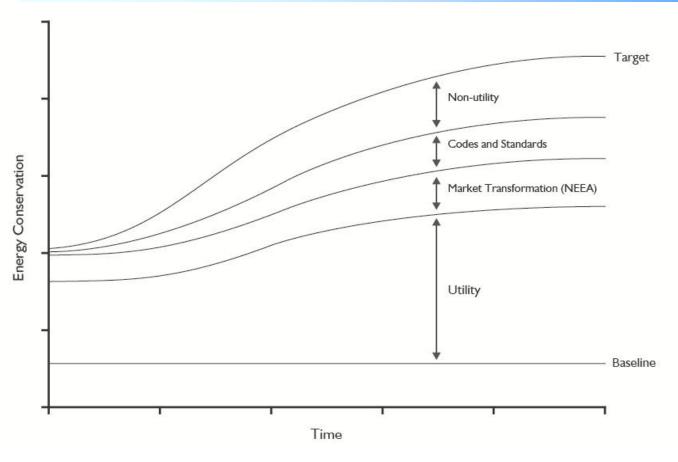


A Collaborative Effort





Targets Reflect Savings from Collaborative Efforts



Regional targets are set by the Northwest Power and Conservation Council (NPCC) without regard to attribution.



Attribution in the PNW

- Level of coordination makes it difficult to appropriately attribute the region's EE to the actions taken by any one entity
- Attribution efforts may have unintended consequences:
 - Creating an atmosphere in which various entities are motivated to compete, rather than cooperate



PNW

- Strong regional infrastructure and reporting structure supports collaboration
 - Regional deemed savings and custom M&V protocols drive consensus on savings claims – deemed savings values updated regularly to reflect changing baselines
 - Under WA I-937, utilities report impacts from programs, market transformation, codes and standards, other market-induced effects
 - Regional progress reporting to NPCC reflects all savings
- NEEA savings currently distributed by contribution



Other

- Massachusetts State Energy Office Ioan loss reserve fund
- Minnesota Office of Energy Security (OES) revolving loan funds
- Michigan Saves and Better Buildings for Michigan energy efficiency loans and community-focused direct installs leveraging utility infrastructure and non-utility funding
- The California Energy Commission, Public Utilities Commission and the investor-owned utilities coordinated to a single statewide, multi-agency, multi-sector retrofit program that targeted residential customers.
 - The state agencies conducted outreach and workforce development but utilities could still claim credit for savings
 - CPUC sees collaboration as key to achieving deep energy savings



Regulatory Frameworks to Promote Collaboration

- Encouraging coordination between utility and NUEE will increase the overall energy saved
 - Attribution methodology should be determined through a collaborative process to develop a rules-based approach
 - NTG policies should address methodological challenges and drive optimal program design
 - Performance incentives may consider more than savings achievement, e.g., a utility's efforts to effectively collaborate and leverage non-utility programs may be considered as performance threshold
 - Targets should align with savings achievement measurement approach



In Summary

- Saying that savings should be allocated fairly and according to actual contributions is obvious
- Easier said than done
- How do you achieve this? How do you track and demonstrate incremental contributions?
- You need an institutional infrastructure. In the NW, for example we have had a history of collaborative program design and implementation (BPA) and institutions like the RTF, that have been in existence for a long time.
- To achieving this in IL, you need:
 - An institutional framework (SAG may help)
 - Oversight (commissions?)
 - Tracking procedures and reporting requirements
 - M&V methods for determining and allocating savings



One last thought

- NTG is ultimately attribution and appropriately crediting savings to parties who make the investment. In general, investments may come from three generic sources:
 - 1. Utility (administrator)
 - 2. Utility customers (participants)
 - 3. Other sources of funds (co-funders)
- The only difference is that the traditional NTG was about allocating savings between the utility and participants (let's forget nonparticipants and spillover for the moment).
- Now we need to worry about a third party entering the game.
- In the conventional NTG, we subtracted savings attributable to participant investments (freeriders) from what was reported by the utility.
- Now we need to credit someone else for them (co-funders).
- Analytically the problem is the same, just a whole lot messier (more negotiation and infrastructure needed).



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