

## Summary of Technical Reference Manual “Front Matter” Comments

<b>Comment No.</b>	<b>Commenter</b>	<b>Summation of Comment</b>	<b>VEIC Treatment of Comment in June 20 TRM “Front Matter” Draft</b>
Opening Paragraph	Staff	Savings claims that deviate from the TRM require consensus to be reported in an EE docket. Report must also include TRM savings calculation in all instances.	Section 3.4 of the 6/6/12 requires that the TAC be notified of TRM deviations and that they get submitted to the Update Procedure. It does not explicitly require “consensus” but this is implied by the TAC notification and TRM Update requirements. Furthermore, Section 3.2 clearly calls for consensus in TRM matters generally. As a result, no changes have been made.
1	Staff	TRM is approved annually by the ICC in a docketed proceeding.	Section 3.1 of the 6/6/12 TRM is neutral on the topic of how the TRM is filed and the choice of a docketed or informational filing remains open. No changes have been made as a result.
2	Staff	The TRM is “frozen” during the program year.	The 6/6/12 TRM is not in conflict with this comment and it is well understood that the overarching purpose of the TRM to standardize and “freeze” savings claims across utilities within a program year. (with some exceptions that are noted in the next comment) No changes have been made as a result.
3	Staff	Exceptions to using the TRM include errors, custom measures, new measures and changes due to new evaluation information. Use of stipulated agreement for claiming savings due to new evaluation information, etc.	Section 3.4 of the 6/6/12 TRM already speaks to all of these exceptions and is in broad agreement already with how the exceptions are handled. The comment’s suggested use of a stipulated agreement is optional and not restricted by the language in the TRM now. The parties may use a stipulation if desired and no changes have been made as a result.

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4	Staff	Evaluators must provide “dual” savings reports in cases where the TRM was not used and the TRM savings govern unless a stipulation is agreed to.	Section 3.5 of the 6/6/12 TRM does not prevent reporting dual savings and was drafted by consensus between the evaluators on the TAC. As a result, it represents a broad agreement on the part of the TAC in our view and no changes have been made as a result. Furthermore, any new savings values that evaluators recommend will be considered in the annual TRM update process.
5	Staff	Program Administrators must provide “dual” savings estimates in their plan filings in cases where the TRM is not used. The dual savings include savings based on TRM values, and savings based on any TRM deviations the Program Administrator proposes using.	Similar to Comment 4, Section 3.6 of the 6/6/12 does not prevent PA’s from providing the TRM estimates in their plan filings. Furthermore, it states that the TRM is to be used in the plan filings provided that justification is provided. This justification would almost certainly include a comparison to the TRM in the vast majority of cases anyway. No changes have been made as a result.
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.	We certainly agree, and suggest that such protocols to be included in the subcontract and/or scope of work instead of the TRM.