

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

Comment No.	Commenter	Comment	VEIC Treatment of Comment in June 1 TRM “Front Matter” Draft
1.	Citizen’s Utility Board (Devins) – Supported by ELPC; AG	<u>Role of SAG</u> : The development of the TRM is a collaborative effort, and certain stakeholders should not have a greater role in the development or maintenance of the TRM	Accepted.
2.		<u>Role of Utilities in EM&amp;V</u> : Utilities should not serve as “facilitator” of EM&V review of TRM, or determine data collection needs for updating the TRM, as this compromises independence of EM&V. EM&V review of TRM and data collection needs associated with TRM updating is collaborative process that equally involves the Technical Advisory Committee.	Accepted
3.		<u>Applicability of TRM</u> : Utilities must use the TRM unless the utilities have a new measure not covered by the TRM. Does not support allowing utilities to use non-TRM savings values in savings proceedings.	TRM still includes three exceptions for when TRM does not apply: <ol style="list-style-type: none"> <li>1. New Measure</li> <li>2. Measure treated as “Custom” measure rather than “Prescriptive” measure in utility program (Custom measure uses customer-specific and/or site specific analysis to calculate savings rather than “deemed” savings.)</li> <li>3. TRM measures or savings input assumptions not consistent with how measure is actually</li> </ol>

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			implemented.
4.	<b>Navigant</b> (Erikson)	<u>Evaluators May Use Different Savings Values</u> : The EM&V savings estimates may use inputs to savings calculations that vary from what is in TRM.	Rejected. Evaluators must report savings achievements using TRM values. However, evaluators may, in course of evaluation, identify values they believe are incorrect or need to be updated.
5.	<b>Navigant</b> (Del Basio)	Need to clearly explain what is applied retrospectively and prospectively, and define terms.	Done
6.	<b>Nicor</b> (Weaver)	<u>Tracking Systems</u> : Portfolio Administrators will update tracking systems to collect data needed for the TRM application, and will use TRM values in the tracking system.	Not Applicable to TRM (not included)
7.		<u>Evaluators Will Use the TRM Values in Determining Savings</u> : However, if measure not in the TRM, evaluator can develop appropriate savings calculations, and the calculations may be applied retrospectively.	Accepted
8.		<u>TRM Mistakes</u> : The TRM can be updated mid-cycle if the TRM value clearly contains a mistake.	Accepted
9.		<u>Updating Utility Goals</u> : If measure values updated, gas and electric goals may need to be updated accordingly (consistent with ComEd settlement agreement)	Not applicable to TRM (not included)
10.	<b>ODC (Sutter); Navigant (Erickson) and Nicor (Weaver)</b>	<p><u>“Prospective” vs. “Retrospective” Definitions and Applicability of the TRM in Evaluation</u>. The “evaluator team” (plus Ted Weaver)</p> <ul style="list-style-type: none"> <li>• added two more terms for the glossary and adjusted two that were present.</li> <li>• Re-wrote the evaluator role section of the TRM.</li> <li>• Added language for a section around the use of the TRM in EM&amp;V.</li> </ul>	Accepted

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11.	<b>ICC Staff</b>	<u>ADD: ICC Enabling Policy for TRM</u>	Accepted, but shortened (Section 1.1)
		<u>Utilities/DCEO must use measure tracking codes in tracking database</u>	Accepted
12.		<u>Roles and responsibilities:</u> Edited (Section 2.6.1)	Accepted some language
13.		<u>TRM update process:</u> Edited (Section 2.6.2)	Accepted some language
14.		<u>TRM values must be used in tracking databases</u> (Section 2.8)	Accepted
15.		Extensive line edits (throughout document)	Accepted some language edits
16.	<b>ComEd (Brandt)</b>	<u>No New Utility Reporting Requirements:</u> The TRM should not create extra utility reporting requirements	Accepted
17.		<u>Keep Text Simple and Streamlined:</u> TRM language should be streamlined where possible and not include unnecessary text, such as long quotes from regulatory decisions instead of citations.	Agreed and sought to be consistent with this principle
18.	<b>Ameren (Kansfield)</b>	<u>TRM and Docketed Proceedings:</u> TRM text should not state that future updates will be through docketed proceedings	Accepted
19.		<u>Goals Not Adjusted When TRM Savings Adjusted:</u> TRM should not state that utility savings goals are adjusted when TRM measure-level values are adjusted.	Accepted
20.		<u>EM&amp;V Does Not Determine Portfolio Cost-Effectiveness:</u> EM&V contractors do not determine EM&V	Accepted
21.		<u>Text Should Not State that TRM Administrator Will Maintain Website:</u> Website maintenance is expensive and this may not be role assigned to TRM Administrator going forward.	Accepted
22.		<u>Utilities May Use Their Own Measure-level Values When the TRM Measure Definition Does not Correctly Describe</u>	Accepted (See comment #3, above.)

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		<u>the Utility-Implemented Measure</u>	
23.		<u>Utilities should not be required to report on how changes to the the TRM may impact their portfolios, as this creates a new reporting requirement.</u>	Accepted
24.		<u>EMV should not be required to provide TRM revisions, etc. EM&amp;V can only provide input to the TRM updates when budget exists after EM&amp;V fulfills their primary obligation to verify portfolio savings.</u>	Accepted.
25.		<u>EMV should not be required to report dual savings values based on retrospective vs prospective TRM results</u>	Accepted