

Written Transcript of Verbal Comments on Proposed Evaluation, Measurement, and Verification (EM&V) Regulations for Energy Efficiency in Delaware

**Hearing—DNREC
September 6, 2016**

Comment Provided By Anthony DePrima, Delaware Sustainable Energy Utility

ANTHONY DEPRIMA:

“My comment is simply that we think -- I'd like to see better alignment between the definitions and the enabling legislation, 8059(h), and one of the definitions in the regulations. Specifically, and as was in the presentation, you know, the enabling legislation, specifically 8059(h), is geared towards affected energy providers. And the definition of an "affected energy provider" under 8059A is – it means an affected electric energy provider or an affected natural gas distribution company. We think that same, exact language should be entered in for the definition of a program administrator. In the regulations, a "program administrator" means an "investor-owned or municipal utility or other entities administering any energy efficient program governed under 8059(h)." Well, 8059(h) makes it pretty clear that what we are governing is only the affected energy providers. Therefore, I would suggest that we substitute as a program administrator would mean "any affected electric energy provider or affected natural gas distribution company." That would be make the definition more clear.”