

## Summary of Key Questions:

### Workgroup Process

- Should the Workgroup's recommendation process extend beyond May? Additionally, after the regulations are set, should the Workgroup meet more often than once yearly to continue guidance on annual benchmarks and program evaluation?

### Definitions and Compliance Issues

- Should the energy efficiency goals be statewide versus provider specific? Examine the pros and cons. How would that work in terms of equity in funding distribution?
- What will the impact of compliance be on large industrial, commercial, and agricultural customers? Should they be included and what types of programs are appropriate?
- Should large customers over 300kW be excluded from EERS reduction targets? Is it feasible to run both DR and DSM programs for these customers?

#### Issues/concerns:

- Difficulty in building incentives for demand response for third party supplied customers because of these customers have a flat rate and no demand charge-- no economic signal to lower use from CPP.
- Don't have coincident peak data available for some of the large C&I customers so it will distort data for the C&I class
- Despite difficulty in designing effective programs, this segment has the potential to achieve the most significant savings, particularly in the case of DP&L, where majority consumption and peak is from large customers with third party suppliers
- How does the EERS account for the addition or deletion of large load customers? For example, the opening of the Fisker Automotive plant or if a new data center were to move into the state.
- Should coincident peak be defined by PJM or by each utility's own system? What is more beneficial and what is practical—to define peak with DP&L and PJM or to each run programs for own system coincident peak?

- Does customer-sited renewable energy count toward meeting the EERS targets?

#### Issues/concerns:

- Depends on intent of law— is it to reduce a customer's total energy consumption or reduce consumption being delivered to customer by the utility?
- How does the inclusion of renewables affect the EERS implementation? Cost?
- RE typically thought of as supply and energy efficiency as demand.

- How would the inclusion of RE as an eligible energy efficiency measure impact the RPS goals, financing/REC market, etc.
- Is the current definition of “recycled energy savings” sufficient? Does it need refinement?

#### Implementation logistics

- Do we start with a top down or a bottom up approach for determining the types of measures and programs needed and the achievability of the targets? This exercise could help to align goals and responsibilities of SEU and utilities.
- What energy savings measures get counted toward compliance? Only those that are accounted for by the SEU programs?

#### EM&V

- What M&V protocol determinations need to be made to aid in the Energy Efficiency Charge discussion?
- The Workgroup needs to make further recommendations on the evaluation protocol. As an initial decision, the members have determined that the gross savings approach should be used for program M&V. If concerns arise as programs are initiated, then the alternative should be addressed. Factors to consider:
  - Protocol should be developed in concert with participants of regional NEEP M&V Forum and using prescriptive measures, supplemented by guaranteed savings from performance contracts
  - SEU CA must make recommendation of protocol to SEU Oversight Board
  - PJM is developing its own protocol for trading which is likely to be much more rigorous- therefore, it is likely that two protocols will be necessary
  - Need to develop EM&V protocol of natural gas savings
  - How do you account for and verify peak savings?