

2022-2023 Implementation Manual (IM) Q&A

The following questions were asked in the [IM Rate Period Webinar](#) held on Feb 24, a video of the webinar and the most current version of the IM are available on the [IM webpage](#).

If you have further questions, please contact your respective energy efficiency representative.

Section 5: Custom Programs

Question: For Custom Programs what does pre-screening mean?

Answer: Pre-screening is the phase where customers work with their energy efficiency representative (EER) and an assigned BPA engineer to determine whether a custom program is the appropriate method for the project(s) or whether a simpler approach would meet the utility's needs. If a custom program is appropriate, this process will also determine whether an evaluated custom program or Measurement and Verification (M&V) custom program is appropriate.

Section 7: Agricultural

Question: Does the horsepower change apply with new pumps?

Answer: Expansion on the horsepower range is only for the Variable Frequency Drive (VFD) measure, not the new more efficient pump measures.

Section 8: Commercial

Question: Please confirm that no cost is needed for commercial windows or insulation per the BEETS table.

Answer: No manufacturer, model, installed cost needs to be entered into the Unit Energy Savings (UES) template for commercial windows or insulation when submitting into BEETS.

Question: Will there be updates to commercial heat pump Integrated Energy Efficiency Ratio (IEER) and Coefficient of Performance (COP) efficiency requirements? Vendors are unable to find units with 12.5 IEER and 3.4 COP.

Answer: BPA is aware that there are limited options for qualifying units in certain sizes and configurations (split vs unitary) of the commercial Air Source Heat Pump (ASHP) measure. This issue is being exacerbated by the current supply chain challenges, which further reduce buyer options. We are evaluating the current performance metric requirements with an eye to identifying opportunities to better align with market availability and will communicate more broadly as soon as details are available.

Section 11: Residential

Question: Regarding Residential DHP conversion baselines, a non-working ASHP is essentially operating as an Electric Furnace, so would you please address that?

Answer: Residential Ductless Heat Pump Conversions and Upgrades: A failed heat pump system operating with electric resistance back-up heat is not considered electric-resistance for the purposes of meeting baseline requirements.

Question: Why is by request (not*) available in WA (regarding lighting)?

Answer: WA has new state lighting requirements which prevent use in WA. BPA has a policy to not incentivize technologies that are used to meet code or law.

Question: How should residential clothes washers be reported before and after April 1, 2022, and with the new IM?

Answer: Consortium for Energy Efficiency (CEE) After April 1 they will be reported as Energy Star top-load or front-load. Prior to April 1 CEE tiers are used to report. The CEE Qualified Product List (QPL) will remain in the Document Library for measures completed before April 1 with the effective date in parenthesis. CEE tiers are more stringent than Energy Star. CEE Tier one is essentially the Energy Star specification, and CEE Tiers two, three, and advanced all surpass the Energy Star specification. Starting on April 1, 2022 BPA will only carry the Energy Star specification, so any models that are CEE certified, at any tier, will qualify for an incentive.

Question: Why are new construction Heat Pump Water Heaters (HPWH) not incentivized?

Answer: HPWHs are a cost effective and common way to meet building codes in Oregon and Washington. Recent research by Northwest Energy Efficiency Alliance (NEEA) on new construction code compliance showed that HPWHs are indeed commonly being used to meet building codes. BPA has a policy to not incentivize technologies that are used to meet code.

Question: When will the April 1, 2022 UES Measure List be available?

Answer: The UES Measure List will be available on or prior to April 1.

Question: Will there be format changes to the UES Measure List?

Answer: There will not be any changes to the UES Measure List format.

Question: Will PTCS contractors be notified of these simplification changes by BPA?

Answer: Yes, we will be putting out announcements in the PTCS Registry, sending out contractor emails, and actively communicating with contractors.

Question: Beginning April 1, 2022, the Commercial DHP Upgrade pre-condition requirements will allow the space to be conditioned by an operational or failed ASHP. Is residential the same?

Answer: Working or non-working heat pumps that are ducted are not an allowable baseline for residential DHP conversions, and will not qualify. The Residential sector does have a DHP upgrade measure for failed DHPs. ASHPs are not an allowed baseline for this Residential sector DHP measure, regardless of condition.

Question: It seems like there has been discussion about the \$800 rebate not being cost effective for non-low income DHPs. How can a \$4,400 rebate for low-income be cost effective?

Answer: Low-income payments are not necessarily a factor used in the Total Resource Cost (TRC) cost effectiveness calculations. Payments do enter into the Utility Cost Test (UCT), but we do not use that test to assess cost effectiveness.

BPA assesses cost effectiveness at the Sector and Technology/Activity/Practice (TAP) levels and low-income activity is considered in that measure mix. Low-income EE program activity is small compared to standard income EE program activity, so Low-Income activity has a low impact on overall Sector and TAP cost effectiveness.

The April 1, 2022 increases in cost caps for DHPs, HPWHs, and PTCS ASHPs are to address an increase in overall market installation prices. Utilities have the option to offer low-income measures if they would like to. This Low-Income EE program provides much more than savings acquisition as it provides much needed support to vulnerable populations, covers reimbursements for related repair costs, and provides a long list of non-energy benefits

Question: Will the summarizer be updated?

Answer: Yes, we'll have a new Summarizer version, though the timeline has not been set at this point.

Question: Regarding Residential DHP conversion baselines, a non-working ASHP is essentially operating as an Electric Furnace, so would you please address that?

Answer: Residential Ductless Heat Pump Conversions and Upgrades: A failed heat pump system operating with electric resistance back-up heat is not considered electric-resistance for the purposes of meeting baseline requirements.