

To: Interested stakeholders

From: Richard G nec , BPA Vice President of Energy Efficiency

Date: April 12, 2016

Re: BPA’s response to stakeholder interest in BPA’s development of a baseline library

Thank you to those that took time to review and provide comments on BPA’s proposal to scope and develop a baseline library. In early 2016, BPA proposed developing a baseline library in collaboration with public utilities and regional energy efficiency organizations. This library would facilitate baseline alignment and provide a technical resource for utilities to consider using in their Conservation Potential Assessments (CPA). BPA would use this baseline library to avoid double counting of energy savings if BPA reports Momentum Savings to utilities in the future.

We received comments from individuals representing eight organizations: Orlando Utilities Commission, Grays Harbor PUD, Mason PUD 3, PUD No. 1 of Clallam County, Northwest Power and Conservation Council Staff, EES Consulting, Seattle City Light, and Benton PUD (See table below for a full list of comments). Overall, these stakeholders were in favor of BPA developing a baseline library in collaboration with key stakeholders, as well as seeking clarification on the process.

In response to these comments, BPA is moving forward to scope the development of a baseline library, beginning with these steps:

BPA will have a meeting with the utility CPA consultants and RTF and Council staff for a technical working session to develop the technical requirements of a baseline library and outline any technical implementation challenges that might exist.

BPA will then hold a meeting with interested utilities and stakeholders to outline the scope of the baseline library and process.

We will be posting updates and information on our webpage: <http://www.bpa.gov/goto/BaselineLibrary>

If you have questions about BPA’s next steps, please contact me (503-230-5881, rbgenece@bpa.gov), or Carrie Cobb (503-230-4985, clcobb@bpa.gov).

Table 1. Comments Received on BPA’s Proposal to Develop a Baseline Library

Name/Organization	Comment
Tom Gross, Orlando Utilities Commission	I fully support this important and useful work. This effort can also serve as a blueprint to duplicate nationwide which is also necessary. I've been working with LPPC's DSM Benchmarking committee for the past four years and have found it difficult to compare apples and oranges. When different utilities and/or states use different baselines to count achieved conservation it makes it difficult to identify the most cost effective measures or programs that all of us would want to emulate. As lighting, HVAC, Appliances and other equipment efficiency standards/requirements increase, it is important to create standard baselines that can be used to compare apples to apples. Something like a national Technical Resource Manual (TRM) where the main variable is climate.
Jacob Henry, Grays Harbor PUD	<p>To whom it may concern:</p> <p>Grays Harbor PUD would like to thank BPA for its efforts in identifying and documenting the extent in which Momentum Savings impact utilities and the region as a whole. We support BPA's proposal to implement a Momentum Savings Baseline Alignment Library. GHPUd recognizes the importance of Momentum Savings and a Baseline Alignment Library not only for the purpose of meeting I-937 mandates, but that it may also provide for more accurate regional conservation targets. We would like to echo the comments of Mason PUD #3 and the importance of identifying stakeholders in the region that could increase the effectiveness of such a tool, especially consulting groups who conduct Conservation Potential Assessments for utilities. The accuracy of Momentum Savings along with consistent and cooperative potential assessments could help to keep the costs down for the region’s ratepayers in acquiring the resource of conservation.</p> <p>Sincerely, Jacob Henry Power Supply and Energy Services Analyst Grays Harbor PUD</p>
Justin Holzgrove, Mason PUD 3	<p>As an I-937 utility, Mason PUD 3 conducts a Conservation Potential Assessment (CPA) once every two years (on the odd number year) for target setting compliance. Having a Baseline Alignment Library for the purpose of accurately reporting Momentum Savings to BPA utilities is a critical step to avoid the potential double counting of energy savings.</p> <p>Please be sure to include the consulting firms who assist many utilities with their CPAs in the development of the library to ensure compatibility and ease of use. Other interested parties may include the Washington State Auditor's Office, Washington State University Energy Office, and the Washington Department of Commerce, as they are available.</p>

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<p>Mattias Jarvegren, PUD No. 1 of Clallam County</p>	<p>Dear Carrie:</p> <p>As a utility subject under Washington State's Energy Independence Act (EIA), PUD No. 1 of Clallam County (Clallam) has a keen interest in collaborating with BPA to develop a Baseline Alignment Library. Every two years, on odd numbered years, Clallam conducts a Conservation Potential Assessment (CPA) in order to establish an energy savings target for EIA compliance. Having a Baseline Alignment Library for the purpose of accurately reporting Momentum Savings to BPA utilities is a critical step to avoid the potential double counting of energy savings.</p> <p>Integral to this process Clallam is of the opinion that an agreed upon allocation process for how Momentum Savings are allocated to utilities. Without allocation process we are not certain as to how a Baseline Alignment Library will benefit us. We are supportive of an allocation process and a Baseline Alignment Library being developed for the benefit of the region.</p> <p>To facilitate the development of this Baseline Alignment Library, please include the consulting firms who assist many utilities with their CPAs in the development of the library to ensure compatibility and ease of use. Other interested parties includes the EES Consulting and other consultants that have provided CPA services to regional utilities, Washington State Auditor's Office, Washington State University Energy Office, as well as the Washington Department of Commerce.</p> <p>If you have any questions or comments regarding this letter, please feel free to contact me by either phone (360.565.3263) or email (Mattiasi@ClallamPUD.net).</p> <p>Sincerely, Mattias jarvegren Utility Services Advisor II</p>
<p>Tina Jayaweera, Northwest Power and Conservation Council Staff</p>	<p>The Northwest Power and Conservation Council staff have reviewed the proposal for development of an energy efficiency baseline library. Staff appreciate Bonneville's interest in elevating the transparency and importance of the baseline's assumed in the Power Plan, utility programs, and utility conservation potentials assessments (CPAs). We believe that engaging stakeholders in the development of this library will further increase this understanding. We request that Council and RTF staff be involved in discussions of this library to help ensure consistency with our work. Council staff also think it is important to include consultants who develop CPAs for regional utilities. Aligning the claimed momentum savings against the development of targets from CPAs may have unforeseen challenges. Finally, we hope that resources spent in development of this library will not diminish the time devoted to the market research needed to quantify momentum savings.</p>

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<p>Amber Nyquist, EES Consulting</p>	<p>Dear Ms. Cobb,</p> <p>EES is pleased to offer comment on BPA’s proposal to develop an energy efficiency measure baseline library. If BPA provides utility-specific estimates of Momentum savings, these estimates will ultimately help I-937 (Energy Independence Act, EIA) utilities meet biennial targets for conservation as well as provide information to non-I-937 utilities about the potential Momentum savings in their service area. EES has been conducting conservation potential assessments (CPAs) for I-937 utilities since implementation. As such, EES offers the following comments on BPA’s proposal:</p> <p>BPA proposes to include both RTF and Council measures in the baseline library. EES’s CPA input assumptions have closely followed RTF and Council assumptions for measure baselines. In most cases, EES uses Council models and RTF data directly to ensure consistency with the latest Power Plans, code changes, and market data. Therefore, BPA’s proposal to include RTF and Council data in the library is consistent with baseline data utilized in CPAs conducted by EES for WA I-937 utilities.</p> <p>Regards, Amber Nyquist EES Consulting</p>
<p>Brendan ODonnell, Seattle City Light</p>	<p>Thank you for the opportunity to comment on BPA’s proposed baseline library. Seattle City Light appreciates BPA’s leadership in the region to research, quantify, and document energy savings that fall outside of the traditional boundaries of utility energy efficiency programs. Therefore, Seattle City Light strongly supports BPA facilitating the creation of a common baseline library.</p> <p>We would suggest that BPA continue to communicate this as an optional resource for utilities in assembling Conservation Potential Assessments (CPA) and be very specific in how baselines align with the Regional Power Plans. Seattle City Light would also suggest that BPA engage key Washington state stakeholders as it relates to Energy Independence (I-937) target setting and achievement-related compliance. Specifically, the key stakeholder are the analytical community embedded within consulting firms that are tasked with completing CPAs in the region and the Washington State Auditor’s Office which enforces compliance with I-937. Analyst will have a far more detailed knowledge of how this would be implemented and are much better suited to offer on the ground perspective than utility practitioners. Also, because the Washington State Auditor’s will verify target setting and achievement, they must have insight into how the baseline library will be used. We hope that BPA can incorporate stakeholder input into your ongoing process.</p> <p>Again, thank you for the opportunity to comment, we support BPA putting resources towards implementing a baseline library, and we look forward to BPA’s continued leadership in this area.</p>

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<p>Tom Schumacher, Benton PUD</p>	<p>Benton PUD appreciates the extensive work that has been done on the Momentum Savings concept and developing baseline savings for utilities to use in their Conservation Potential Assessment (CPA).</p> <p>It is important for I-937 utilities to be able to establish a baseline for their CPAs so that they are in line with the most recent Power Plan published by the Northwest Power and Conservation Council.</p> <p>Option 1 suggested by BPA is to develop a measure library that each utility/consultant can use for the baseline in their CPA. This measure library could be used by regional utilities when updating CPA's to establish a utility baseline that would be compared to the Councils most recent Power Plan and more accurately reflect current status of recent or pending State and Federal code changes. This could create consistency in program reporting across the region for expected momentum savings.</p> <p>Thanks again for recognizing the baseline concern and researching how to report savings to each utility. We also thank you for the regional dialog with customers and the State Auditor for those I-937 customers.</p>