

Response to Comments: Draft Oct 2016 Implementation Manual

Utility/ Stakeholder	IM Section	Section Number	Comment	Resolution	Action Taken	Status
Clatskanie, Bledsoe	Change Summary	00, Change Summary	Page 2 has no heading to indicate that it's the start of the change log	Suggestion accepted	This will be addressed once the document gets converted into the InDesign publishing software.	Closed
EWEB, Reeder	Definitions	00, Conservation vs Efficiency clarification	Conservation – “Any reduction in electric energy consumption resulting from an increase in the efficiency of electric energy use, production or distribution” Conservation and efficiency are not synonymous. Conservation includes curtailment (reductions in energy which include changes in comfort or behavior) and efficiency does not. Efficiency is defined as useful output/Input energy. May be implications for behavior based programs as well depending on interpretation.	BPA has adopted the definition of conservation from the NW Power Act. The Council and RTF have stated that 'conservation' and 'efficiency' are synonymous and that conservation does not include curtailment.	Referred to Planning for greater analysis. Will review for the possibility of making changes for the next annual manual.	Deferred
EWEB, Reeder	Definitions	00, Incentive vs Reimbursement clarification	Incentive – [Not Defined] Appears to be used as synonymous to reimbursement. The two words have different meanings and uses for energy efficiency programs in the NW. A “reimbursement” is money BPA returns to utilities for completed efficiency projects. The money is paid to BPA by utilities in rates and then reimbursed to utilities for meeting specific requirements. An “incentive” is money a utility pays to a customer or contractor for completion of an efficiency project, to specific requirements defined by the utility. These utility requirements meet the BPA reimbursement requirements when reported to BPA for reimbursement. Use of the word “incentive” to mean “reimbursement” distorts the meaning and causes much needless confusion in implementation.	The payment that BPA gives to customers for completed measures and projects is a reimbursement. The term 'incentive' implies that the end-user wouldn't have done the upgrades unless there was a financial benefit. We've will be educating staff internally to use the word 'reimbursement' more frequently when talking about the payments utilities receive.	Referred to Planning for greater analysis. Will review for the possibility of making changes for the next annual manual.	Deferred

EWEB, Reeder	Definitions	00, Payment vs Incentive clarification	Payment – “A term representing monetary incentive levels for the installation of energy efficiency measures” Please see incentive above.	Referred to Planning for greater analysis. Will review for the possibility of making changes for the next annual manual.	Deferred
Industrial Customers of NW Utilities (ICNU), Cowell	Introduction	01, Introduction, third paragraph	Add in Focus 2028 to the IM. “The Implementation Manual rests on the framework specified in the Long-Term Regional Dialogue Final Policy, and the BPA Energy Efficiency Post-2011 Implementation Program, and the Focus 2028 Energy Efficiency Policy.”	Drafting a response letter to ICNU	Deferred
Industrial Customers of NW Utilities (ICNU), Cowell	Introduction	01.1, Overview	ICNU recommends that BPA consider revising the initial paragraph in Section 1.1 (providing an overview of the Manual), in order to not foreclose immediate implementation of Focus 2028 policy changes over the coming year. For example, the draft Manual states that “BPA commits to achieving the share of the [Northwest Power and Conservation] Council’s Power Plan regional energy efficiency target that represents the load of BPA’s public power customers.” However, the manner in which BPA determines its EE target has been a significant issue within recent Focus 2028 process, including recommendations from multiple stakeholders that BPA should no longer simply take a load-based share of the Council’s target without taking into account specific customer needs, consistent with the Administrator’s statutory authority.	Drafting a response letter to ICNU	Deferred

EWEB, Reeder	Introduction	01.6, Official Interpretations	<p>“Only the BPA Contract Administration Manager or Director of Energy Services may issue interpretations, determinations and findings related to the Manual unless delegated to other BPA staff (e.g., Contracting Officer’s Technical Representative (COTR)). Such interpretations, determinations and findings will be provided to the customer in writing. Only written statements (including e-mail) by BPA officials acting within the scope of their authority are official BPA statements.” Interpretations of the IM are often provided over the phone and not in writing. For this to become workable, BPA representatives must begin to provide all interpretations in writing.</p>	<p>COTRs are the employees who are able to offer official IM interpretations where there is real ambiguity or conflicting customer and BPA interpretations that cannot otherwise be resolved. These communications are usually made in writing and the utility customers are encouraged to keep a copy in their customer file for their records.</p>	<p>clarification provided and an internal "communication protocol refresher" notice was sent out from the IM Coordinator and the Managers.</p>	Closed
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Industrial Customers of NW Utilities (ICNU), Cowell	Funding	02.1.1, Bilateral Funding, LPP	<p>Another subject of discussion in Focus 2028 process has been whether BPA should increase the EE self-funding percentage from 25%. ICNU recently commented that doing so would be consistent with BPA’s “final policy” in the Long-Term Regional Dialogue, i.e., cost-effective conservation consistent with “pursu[ing] conservation at the <i>lowest cost</i> to BPA.” ICNU also believes that the same least-cost analysis used in pursuing cost-effective conservation would justify a modification to the Manual, especially as the “Manual rests on the framework specified in the Long-Term Regional Dialogue Final Policy.” In particular, ICNU recommends a change within Section 2 of the Manual, regarding “Funding” policy for the Large Project Program (“LPP”). Presently, the LPP subsection states that “BPA will review and approve LPP requests on a first-come, first-serve basis based on the date the request is received.” ICNU proposes the following revision, consistent with Focus 2028 discussion and cost-effective policy established in the Long-Term Regional Dialogue: “BPA will review and approve LPP requests on a cost-effectiveness first come, first serve basis based on the date the request is received.”</p>	Drafting a response letter to ICNU	Deferred	
Clatskanie, Bledsoe	Commercial	07.4, Heat Pump	<p>Commercial heat pump section, which mention 'tons of heating capacity'. Tons are traditionally meant to mean tons of cooling capacity, as 1 ton is *amount of heat absorbed by 1 ton of ice in 24 hours* It's an outdated, jargon term that is far more scientifically termed 12,000btu/hr of heating capacity. I've never seen a DHP rated in terms of 'tons'. Their heating AND cooling capacity is listed on manufacturer spec sheets in btu/hr. I would recommend changing all reference of 'tons' to mean 12,000 btu/hr</p>	<p>PM/engineering recommendation is to leave as is, but instead add a definition of "Ton" in the IM. Definition: "A ton is a measure of the cooling or heating capacity of an HVAC system. One ton is equal to 12,000 Btu per hour."</p>	<p>Add a definition of "Ton" in the IM. Definition: "A ton is a measure of the cooling or heating capacity of an HVAC system. One ton is equal to 12,000 Btu per hour." Update Change Summary and Definitions Table.</p>	Closed

Cowlitz, D. Swier	Commercial	07.4.2, DHPs, Requirements and Specs	Pre-conditions, last bullet point. Recommended saying "conditioned by" instead of "replacing".	Change last bullet point to "The space conditioned by the DHP is not conditioned by an air source, ground source, or ductless heat pump"	Corrected	Closed
Cowlitz, D. Swier	Commercial	07.4.2, DHPs, Requirements and Specs	Pre-conditions, last bullet point. Recommended removing "air source". Otherwise, might not folks think that spaces currently conditioned by 'ground source' heat pumps ARE eligible for DHP rebates? Suggested revised language: "The space conditioned by the DHP is not conditioned by a heat pump."	Change last bullet point to "The space conditioned by the DHP is not conditioned by an air source, ground source, or ductless heat pump"	Corrected	Closed
Cowlitz, D. Swier	Commercial	07.4.2, DHPs, Requirements and Specs	Post-conditions, second to last paragraph. request that final IM include a hyperlink to the DHP QPL URL for this so that utilities can easily determine if a specific manufacturer & model is "BPA qualified". Will this be the same QPL as the residential one?	The QPL will be the same as the residential DHP QPL.	Will add a "DHP Qualified Product List" link which leads to the Res DHP QPL under the Required Documents margin in the IM for section 7.4.2.	Closed
Flathead Electric, Bopp	Commercial	07.4.2, DHPs, Requirements and Specs	Pre-conditions. Age Restriction has been removed indicating this is an eligible measure for an instantaneous retrofit in a new building?	This measure is for retrofits only. Newer buildings may apply, but not new construction.	None	Closed
Springfield Utility Board, Harris	Commercial	07.4.4 Heat Pump Upgrade	Basis for Energy Savings. Does a new DHP qualify for this measure (replacing an existing HP)?	No, a DHP is eligible only under the 7.4.2 measure.	None	Closed
Consumers Power, Thomas Elzinga	Commercial	07.4.6, Variable Refrigeration Flow System	Requirements and Specs; Pre-Conditions section. The word "been" is used an extra time here.	Editor please format.	First "been" removed. Corrected	Closed

Flathead Electric, Bopp	Commercial	07.5.2, Windows for Commercial Buildings	Requirements and Specs, Pre-Conditions. Is there a requirement/way to differentiate older non-thermally broken double pane metal framed windows with newer thermally broken ones? I am glad to see this option just concerned it could be used to upgrade windows for aesthetic reasons where the window is ok thermally.	It is true that thermally broken windows have less heat loss. There is not a requirement to differentiate between older windows that do not have a thermal break, and newer windows with a thermal break, even though the older ones may save more. Replacing newer windows that do have a thermal break with the required new window of U=.30 will have sufficient savings to justify the incentive.	None.	Closed
Springfield Utility Board, Harris	Commercial	07.7.5 Walk-in or Display Case Evaporator Fan Motor	Payment table is missing text: 23 Watts" and "Watts", respectfully	Add these corrections to the second and third lines of the payment table.	Add these corrections to the second and third lines of the payment table.	Closed
Consumers Power, Thomas Elzinga	Commercial	07.9.1 Energy Star Commercial Clothes Washers	Payments table, first measure. Forgot to include the word "Dryer" at the end of Electric Dryer to be consistent with the other rebate amounts	Editor please format.	"dryer" added, corrected.	Closed
Cowlitz, D. Swier	Industrial	09.3.1.1, Energy Project Manager	Requirements and Specs; sentence d.iv and d.vii. Recommending removing sentence d.vii and tagging footnote 23 to "SEM" in sentence iv.	Suggestion accepted	IM updated. Removed sentence d.vii and tagged "SEM" in sentence d.iv with footnote 23: SEM project first year savings and subsequent years' incremental savings may be applied toward the EPM savings goal.	Closed

Cowlitz, D. Swier	Industrial	09.3.1.2, SEM Projects	<p>Performance Period Measure Life by Year table, Year 1. 1 Year: "Since the reported/booked Year2 SEM savings will just be the 'incremental' savings (performance relative to Year1), I recommend that the assigned measure life for Year1 be TWO years (not one) so that the lifetime value of the savings is more accurately expressed.</p> <p>For instance, if there were 100,000 kWh savings in Year1 and there were no additional/incremental savings in Year2, then the total 'lifetime' savings was actually 200,000 kWh (100,000 kWh in each of the two years). However, BPA's records would only show 100,000 kWh lifetime savings (100,000 kWh x 1 year for "Year1", plus 0 kWh incremental x 1 year for "Year2")."</p>	The IM references savings, the savings then have to be converted to incremental savings for reporting in IS2.0. In the example given, if the incremental savings are converted back to savings relative to the baseline period, the result is 200,000 kWh.	clarification provided; no IM edits needed	Closed
Cowlitz, D. Swier	Industrial	09.3.1.2, SEM Projects	Optional - Performance Tracking System. "Why is the PTS considered 'optional'. Without a PTS, then how could actual kWh savings (and resulting incentives) be determined?"	It is possible to develop a statistical model from meter data and logged production values delivered by excel. PTS refers hardware to collect interval meter or process data and is not required in all cases.	clarification provided; no IM edits needed	Closed
Cowlitz, D. Swier	Industrial	09.3.1.2, SEM Projects	Optional - Performance Tracking System, PTS Design Approval table. Comment on the word "optional". "I thought it was a given that BPA reviews and must approve any statistical model by which kWh savings will be verified (?)"	Optional refers to the Performance Tracking System. The Performance Tracking System is hardware separate from the statistical model.	clarification provided; no IM edits needed	Closed
Cowlitz, D. Swier	Industrial	09.3.1.2, SEM Projects	Optional - Tune-Up. Tune-Up (Optional) table. "Why is this shown as a separate block with its own aqua header? Why not simply shown as a 3rd row in the block above? If BPA wants to show this as a separate block, suggest that the title say 'Action Item Implementation' instead of Tune-Up."	Suggestion accepted	Removed the "TUNE-UP (OPTIONAL)" table	Closed

Cowlitz, D. Swier	Industrial	09.3.1.2, SEM Projects	Tune-Up (Optional) table. Comment on first sentence: "This seems confusing and perhaps a remnant of the discontinued T&T program. What exactly is the "action item verification period"? Does this just mean independent (ESI) onsite verification that action items were implemented and of their associated actual costs? Please clarify."	Remove section	Removed the "TUNE-UP (OPTIONAL)" table	Closed
Tillamook, Perry	Residential	10.01, Payment Summary, Weatherization	After looking through the draft IM's Residential Sector it appears that almost all measures have a payment schedule, except for the single family insulation section. I'm wondering why this is?	The IM does not include payment tables for any of the residential insulation measures. The reason is that we have been unable to find a way to include the necessary detail, such as heating source, heating zone, and pre/post insulation level, in a table that fits reasonably within the document.	none	Closed

Doug Dickson Snohomish PUD	Measure List and Residential	10.02.1, LEDs	Change in lumen bins for LEDs (plus other bulbs?). No call out or notice in the Change Summary or manual.	In the October 2016 Measure Changes workbook what Planning did was take the existing measure refnos, key characteristics, payments, and busbar savings and then added a column for new payment, and new busbar savings. While the lumen bin ranges are changing, the new measures map to the old measures quite nicely. Whenever possible, we try to keep the same refnos in a measure set as we have heard that it is easier on customers. Since the new residential lamp measures have the same number of lumen bins (3) and hence same number of measures per lamp type and delivery mechanism, we could keep the same refnos. So the lamp measures did not appear on the new measure structure tab with new lumen bin ranges, but remained on the "UES measure list tab" of existing measures with the old measure lumen bin ranges.	The new lumen ranges will appear in the measure list being released in August, effective in October. Added to Change Summary. Description and Rationale: "In August of 2015 the RTF passed updated residential lamp measures shifting the lumen bin ranges to match the EISA (Energy Independence and Security Act) lumen bins. This happened because EISA federal standards are due to make a significant impact on the residential lamp baseline in 2020, and in order to map the baseline products to the efficient case products and estimate a stream of savings, the lumen bins must map to the EISA lumen bins each which have their own product standards taking effect. Future lamp updates will be made easier and more transparent by aligning with EISA lumen bins. "	Closed
Consumers Power, Thomas Elzinga	Change Summary, Residential	10.06.2, Thermostatic Shut-off Valves	Will there be a QPL?	Yes, we will create a QPL. It will be published the IM Documents Library by mid-August.	Agreed to request.	Closed

Flathead Electric, Bopp	Residential	10.06.2, Thermostatic Shut-off Valves	<p>Payment Table, second row. The payment here is virtually the same as the payment for an efficient shower-head alone. If an efficient showerhead installation is worth \$23 and a TSV installation is worth \$20 why is the combination worth only \$23? I am making the assumption that you cannot claim the TSV with efficient showerhead measure and the efficient showerhead measure for the same shower although that is not explicit.</p> <p>In the RTF workbooks the savings for a TSV and Showerhead installed together with electric resistance electric hot water are slightly lower than if you take the showerhead stand alone savings and subtract the TSV stand alone savings but not by much. This is due to the TSV workbook being more recent with better savings numbers for showerheads but the payments don't make sense from a programmatic perspective.</p> <p>Why would I run a direct install of a TSV and a showerhead which costs more than just installing the showerhead for which I get very similar savings and the same payment? I would game the system and take both to an install and if the showerhead that is in place already has a low flow I would install the TSV alone and if the showerhead is high flow I would install the showerhead alone. Then I get good payments for both and the same savings (basically) as if I had installed a TSV on both.</p>	The TSV savings and program offering will be re-evaluated for the October 2017-2018 Implementation Manual.	Suggestion under consideration for the next annual manual	Deferred
Consumers Power, Thomas Elzinga	Change Summary, Residential	10.06.3, HPWHs	Is there are special installation requirements for a tier 3 install can this be mentioned in the HPWH section?	There are no special installation requirements for Tier 3.	Question answered.	Closed
Flathead Electric, Bopp	Residential	10.06.3, HPWHs	Requirements and Specs. Comment on installation training: See next note on issue with requiring training.	See other HPWH comment		Closed

Flathead Electric, Bopp	Residential	10.06.3, HPWHs	<p>Documentation Requirements, the HPWH form. Comments on the form:</p> <ol style="list-style-type: none"> 1. The existing heating system section doesn't make a lot of sense. Why are we interested in AC but only if you have an electric furnace? What is up with the back-up heat options since most of these are primary heat options... very confusing. I'd rather not use it this way due to the questions I will get from our members as they fill it out. The old form was simpler and if the issue is that it didn't differentiate heat pump types can't we just add that? 2. There is no line indicating if the install is in a new home. Once again... if I don't have this line I will get more calls since as it is written there appears to only be an option for replacement. 3. Manufacturer training... can we abandon this line yet? There are only 2 manufacturers of Tier 2/3 and neither offers training outside of their manual (I know there are a bunch of "manufacturers" listed but they are all the same thing with different names stuck to them). Sure GE has a video but it is virtually useless compared to simply reading the manual. Is there a valid reason to keep this still? Plus the link in the IM sends you to hotwatersolutions.org's training which is not from any manufacturer. Are we really asking installers to go through that training? If yes, than we need to get hotwatersolutions to put up one that is recorded so it is available on demand for owner installs. 4. Since the October form gets rid of the manufacturer's checklist can I stop requesting that now? It is the removal of a requirement and makes life easier. 	<p>The Heat Pump Water Heater form was recently redesigned and standardized.</p> <p>We are not able to relax the requirement for manufacturer training if available. We will reach out to hotwatersolutions.com with this feedback to improve the quality of the online training.</p> <p>The current HPWH form, as linked to in the Implementation Manual, requires the checklist. The requirement will be removed when the new form becomes active on October 1, 2016.</p>	Suggestion under consideration for the next annual manual	Deferred
Doug from USB	Change Summary, Residential	10.07, Fridge and Freezers	Fridge and Freezer measures were noticed to expire in April (screen clipping below) but they are omitted from the October changes and corrections summary. Need to add it.	Added to Change Summary "CFL Fixtures, Refrigerators and Freezers have been removed from the Simple Steps program (10.7)"	Added to Change Summary	Closed

Benton REA, Miller	Residential	10.07, Simple Steps	the table titled "Simple Steps Retail Appliance Measures", Is simple steps doing heat pump water heaters now?	CLEAResult and BPA are currently studying HPWH as part of Simple Steps. Retail measures for HPWH have been created.		Closed
Flathead Electric, Bopp	Residential	10.08.1, DHPs	Requirements and Specs, first bullet. Why is hydronic included in zonal here but as equivalent to forced air under the ashp measure?	The definition and specifications for hydronic has been clarified in the Implementation Manual.	Update IM and Change Notice	Closed
Flathead Electric, Bopp	Residential	10.08.1, DHPs	Requirements and Specs, 7th bullet. Creating this option will create many complications. 1. If the home is zonal and they install a ducted dhp they would receive a lower rebate (\$700 instead of \$800). This is potentially correct. In our climate zone I am pretty confident these have lower savings due to their installation in unconditioned spaces (attics). The installs often are not air sealed for leakage from the home into the attic and the ductwork may not be sealed well. 2. If the home has an EFAF furnace they would potentially be encouraged by the contractor to pursue this due to the higher incentive (\$1600 compared to \$1400). Yet it will install a second small duct system which will have the same issues as listed above. Now we have potentially 2 leaky duct systems and multiple penetrations through the envelope. It makes so much more sense to incent the owner to install a variable speed on their current ducting but this will have a much higher cost (based on the costs we have seen come through for these systems). From a programmatic point of view I would not want to provide a ducted dhp with the same incentive as a ducted variable speed heat pump using existing ducts.	The Residential HVAC team and BPA engineering are currently researching short run ducted mini-split applications. Until otherwise noticed, the program will continue with the Requirement and Specification: Ducted indoor DHP units do not qualify for Payment as a Ductless Heat Pump (DHP) but may be claimed as a PTCS Variable Speed Heat Pump provided the installation meets all PTCS requirements.	None	Closed

Flathead Electric, Bopp	Residential	10.08.1, DHPs	Documentation Requirements, the DHP form. Same issue as for the HPWH form on existing heating types: The existing heating system section doesn't make a lot of sense. Why are we interested in AC but only if you have an electric furnace? What is up with the back-up heat options since most of these are primary heat options... very confusing. I'd rather not use it this way due to the questions I will get from our members as they fill it out.	The Ductless Heat Pump form was recently redesigned and standardized. Evaluation needs were expressed for some additional questions.	Suggestion under consideration for the next annual manual	Deferred
Benton REA, Miller	Residential	10.08.2.1, ASHP	Requirements and Specs. bullet #3, the rest of these indicate that these measures are for "air source heat pumps"; this one doesn't	Requirements and Specs bullet 2 will be updated to state: New Air Source Heat Pumps (Upgrades or Conversions) must be rated as having a minimum of 9.0 HSPF and 14 SEER and equipment must be AHRI tested and certified. Manufacturer claims of "equivalent to AHRI certified equipment" will not be accepted.	Update IM	Closed
Flathead Electric, Bopp	Residential	10.08.2.1, ASHPs & VSHPs	Requirement and Specs, first bullet (ASHPs & VSHP upgrades). If DHP's qualify as Variable speed ashp's than I could incent the install of one on a home with a gas forced air furnace?	While this could be feasible, the situation would require further consideration by the Program and COTR.	None	Closed
Flathead Electric, Bopp	Residential	10.08.2.1, ASHPs & VSHPs	Requirement and Specs, third bullet (conversions). See comment on ducted dhp's qualifying as these in the dhp comment I made on page 121.	The Residential HVAC team and BPA engineering are currently researching short run ducted mini-split applications. Until otherwise noticed, the program will continue with the Requirement and Specification: Ducted indoor DHP units do not qualify for Payment as a Ductless Heat Pump (DHP) but may be claimed as a PTCS Variable Speed Heat Pump provided	None	Closed

				the installation meets all PTCS requirements.		
Flathead Electric, Bopp	Residential	10.08.2.1, ASHPs & VSHPs	Requirement and Specs, third bullet (conversions). Why is hydronic considered equivalent to EFAF when in a dhp install home it is considered equivalent to zonal?	The definition and specifications for hydronic has been clarified in the Implementation Manual.	Update IM and Change Notice	Closed
Flathead Electric, Bopp	Residential	10.08.2.1, ASHPs & VSHPs	Requirements and Specs. 4th bullet (upgrades or conversions) is redundant with 2nd bullet (upgrades or conversions)	This duplication issue will be remedied.	Update IM to remove duplication	Closed
Flathead Electric, Bopp	Residential	10.08.2.2, Ground Source Heat Pumps	Requirements and Specs. Second and third bullet under new construction homes seem to contradict each other	This formatting issue will be remedied.	Update IM to put a bullet in front of the sentence: For new construction homes, the baseline is considered to be an electric forced air furnace.	Closed
Benton REA, Miller	Residential	10.10.3, New Energy Star	Basis for Energy Savings. Page 128, first paragraph. It says "real- world" (the hyphen is off-center)	Correctly formatted in the draft version.		Closed
NEEA, CLEAResult, Bell	Residential	10.10.3, Residential New Construction	Change reference to ENERGY STAR and NW Compliance Report Instead of NW Energy Star	In order to ensure utility program stability, BPA has agreed to provide advanced notice of any programmatic changes. This is a change that would require notice, therefore we cannot make it at this time.		Closed
NEEA, CLEAResult, Bell	Residential	10.10.3, Residential New Construction	Remove builder option packages from compliance options	In order to ensure utility program stability, BPA has agreed to provide advanced notice of any programmatic changes. This is a change that would require notice, therefore we cannot make it at this time.	"	Closed
NEEA, CLEAResult, Bell	Residential	10.10.3, Residential New Construction	Require utilities to report through the NEEA Axis database in order to claim BPA payment	In order to ensure utility program stability, BPA has agreed to provide advanced notice of any programmatic changes. This is a change that would require notice, therefore we cannot make it		Closed

				at this time.		
NEEA, CLEARResult, Bell	Residential	10.10.3, Residential New Construction	Remove "Northwest" from program name as no longer supported by NEEA and instead reference national program	In order to ensure utility program stability, BPA has agreed to provide advanced notice of any programmatic changes. This is a change that would require notice, therefore we cannot make it at this time.		Closed
NEEA, CLEARResult, Bell	Residential	10.10.3, Residential New Construction	Remove allowance for DHP as part of builder option package	In order to ensure utility program stability, BPA has agreed to provide advanced notice of any programmatic changes. This is a change that would require notice, therefore we cannot make it at this time.		Closed
NEEA, CLEARResult, Bell	Residential	10.10.3, Residential New Construction	Remove note that "NEEA is in the process of developing an New Construction protocol for IDAHO and Montana" in the Additional Information section.	Edit made	Change Made	Closed
NEEA, CLEARResult, Bell	Residential	10.10.3, Residential New Construction	Change name of "New Standard Protocol Pilot" to "Custom Utility Savings" pilot	Edit made to define as "custom program" according to BPA terminology	Change Made	Closed
NEEA, CLEARResult, Bell	Residential	10.10.5, New ENERGY STAR Multifamily Construction	Provided references to energy star website	BPA will maintain in document library	Documents maintained	Closed
NEEA, CLEARResult, Bell	Residential	10.10.5, New ENERGY STAR Multifamily Construction	Change "Northwest Energy Star" to ENERGY STAR	In order to ensure utility program stability, BPA has agreed to provide advanced notice of any programmatic changes. This is a change that would require notice, therefore we cannot make it at this time.	Deferred/under consideration for the April 2017 Change Notice Summary	Closed

NEEA, CLEARResult, Bell	Residential	10.10.5, New ENERGY STAR Multifamily Construction	Add language noting Builder Option Packages will sunset on 12/31/16	In order to ensure utility program stability, BPA has agreed to provide advanced notice of any programmatic changes. This is a change that would require notice, therefore we cannot make it at this time.	Deferred/under consideration for the April 2017 Change Notice Summary	Closed
NEEA, CLEARResult, Bell	Residential	10.10.5, New ENERGY STAR Multifamily Construction	Reference NEEA new multifamily measure	Because the IM represents the agreement between utilities and BPA, BPA does not include information about speculative or predictive future programs in the document.	not applicable for the IM	Closed
NEEA, CLEARResult, Bell	Residential	10.10.5, New ENERGY STAR Multifamily Construction	Change documentation requirements	In order to ensure utility program stability, BPA has agreed to provide advanced notice of any programmatic changes. This is a change that would require notice, therefore we cannot make it at this time.	Deferred/under consideration for the April 2017 Change Notice Summary	Closed
Springfield Utility Board, Harris	Residential	10.11, Weatherization	The "Electric Heating" requirements differ for Weatherization measures and DHP measure - it would be best if they were consistent	The inconsistency is a result of how the energy savings were originally calculated and changes in measure grouping over time. Unfortunately, regrouping the measures would require reevaluating the energy savings of each group.	none	Closed

Springfield Utility Board, Harris	Residential	10.11.1, Insulation	Table. The "Measure Starting R-Value" should be consistent - indicating the top end of the allowable starting R-value range. Regarding the Mnfd Home Floor Measures, the table is missing the measure with Existing "R-11 to R-22". Regarding the Mnfd Home Floor Measures, How is it that a measure may start at existing R-22 and also end at R-22? The "Measure Starting R-Value" should be consistent--indicating the top end of the allowable starting R-value range. <i>Please see the screen clipping on the second tab of this spreadsheet.</i>	We will change the Manufactured home measure to read R0 - 21. However, based on prior feedback the program is utilizing a range.	Partial change made	Closed
Benton REA, Miller	Residential	10.11.2, Prime Window	Documentation Requirements. under the table for new windows documentation requirements and under the heading for "documentation description", it says "A description of primary heating type (electric zonal, electric forced-air furnace, air source heat pump, ground/watersource heat pump, ductless heat pump" Are each of these going to have a separate refno now?	There will be a refno for "any electric heat" as well as refnos for each heating type. The utility may choose whether to use the "any" measure or further break out.		Closed
Benton REA, Miller	Residential	10.11.2, Prime Window	Payment Table. Several of the heat sources have an asterisk and I didn't see what asterisk applied/referred to...	Thank you. This was an accidental carry over from an old version. We will delete the asterisk.	Change Made	Closed
Benton REA, Miller	Residential	10.11.2, Prime Window	Additional Information. "HVAC-specific" hyphen is off center		Corrected.	Closed
Port Angeles, Currie	Residential	10.11.2, Windows	Although adding incentives to the residential window program is great, we need to get more specific information on the requirements in a more timely fashion so that we can pass this info on to our contractors early enough for them to be ready to take advantage of the new measure starting October 1st.	(Assuming this is related to the new storm window measure) Thank you for the input. We will take this under advisement the future.	None	Closed
Flathead Electric, Bopp	Residential	10.11.3, Low-E Storm Windows	Requirement and Specs. Hyperlink for the QPL doesn't work.	Engineering is finalizing the QPL which will be posted to the IM Documents Library by 8/22 (when the IM gets		Closed

				published)		
Benton REA, Miller	Residential	10.11.6, Prescriptive Air Sealing	Documentation Requirements. it says "Equipment/contractor invoice showing (a) measure requirements have been met (e.g., manufacturer, model number, type, size and quantity of equipment or product installed/used), (b) the order/purchase date and (c) cost" My question is: what kind of equipment is meant to be referenced here? The same lingo is used for the prescriptive measure too.	Updated to remove the words "equipment" and "equipment or" from the documentation requirements.	Change Made	Closed
Springfield Utility Board, Harris	Residential	10.11.7, Low-income WX, DHP and DS	There is an errant phrase in the following sentence (red font): "To be eligible, homes must have an electric heating system as the primary "Verifiable" refers to any documentation that can be verified by another source (e.g. pay stub, copies of IRS form 1040, Section 8 eligibility, certification by a CAP agency, etc.) system (see definitions); or homes must have one of the following as an existing heating system: ..."	Thank you. This item should be a sentence about proof of income. We will make the appropriate change in the IM.	Change Made	Closed
Springfield Utility Board, Harris	Residential	10.11.7, Low-Income WX, DHPs, and DS	Item #4 (in the WX existing heating system situations) is somewhat confusing. See the following places in the IM for context: Definition of a Primary Residential Heating System (pg 9), 10.8.1 DHPs (pg 121) "Homes were plug-in electric heaters are the primary heating system in the home qualify for DHP Payment. The customer should determine if a weather-related heating signature exists that demonstrates electric resistacne heating use, 10.11 WX (pg 137), and 10.11.7 LI WX, DHP, and DS (pg 149).	The inconsistency is a result of how the energy savings were originally calculated and changes in measure grouping over time. Unfortunately, regrouping the measures would require reevaluating the energy savings of each group.	none	Closed
Anonymous	Multi-Sector	12.2.2, Measure Distribution Process	Extra period in the Requirements and Specs section for Direct Install (second paragraph)	Editor please format.	Removed	Closed

Cowlitz, D. Swier	Multi-Sector	12.3.1, Electric Storage Water Heaters	Information Moved section. "Since it was discontinued a year ago, seems like this section could be deleted altogether."	Suggestion accepted	removed Electric Storage Water Heaters from the multi-sector section	Closed
EWEB, Reeder	Multi-Sector	12.3.3, Non-Res Lighting	"BPA's lighting calculator attempts to align with the RTF Non-Residential Lighting Protocol around issues like baseline determination, control savings fractions, and HVAC interactive effects." RTF is currently advertising their RTF Non-Residential Lighting Protocol as for evaluation only and not for programs. These two policies (BPA and RTF) should be aligned, it is unworkable for the RTF to develop a protocol for one specific purpose and then BPA to use that protocol for another different purpose.	This is a long-standing issue that Programs and Planning & Evaluation will address in a more appropriate forum.	Follow up internally between Programs and Planning.	Deferred
Industrial Customers of NW Utilities (ICNU), Cowell	Funding	General comment on granting LPP funding requests	Previously, BPA found a first-come, first-serve approach to be more reasonable due to its "simplicity," in comparison to a cost-effectiveness approach deemed "more complicated and time-consuming." ⁴ ICNU encourages BPA to reconsider this view. Practically, a cost-effectiveness approach can be administered in such a way as to not be mutually exclusive to considerations on the timing of LPP requests. For example, ICNU previously suggested that BPA establish a "window" for LPP submissions. Yet, without needing to formally establish a window period, BPA could still review LPP requests periodically, in reasonably sized "review batches." This would reduce BPA's administrative burden and potentially reward early submitters, but still allow BPA some flexibility in choosing projects which further the fundamental cost-effectiveness standard. Conversely, strict application of a first-come, first-serve approach could lead to undesirable results—e.g., the \$10 million LPP funding limit being reached through a project submitted a few hours ahead of a far more cost-effective project, with the latter being rejected under an implementation of BPA's present standard.		Drafting a response letter to ICNU	Deferred

Anonymous	Residential	N/A, All	double check to make sure the "measure distribution process" links in the Documentation Requirements section go to the Measure Distribution Process in chapter 12	Suggestion accepted	Will check all links once drafted in the InDesign publishing software.	Closed
Port Angeles, Currie	Residential	N/A, Change Summary	When was the negative change notice issued for the decreased DHP incentive for baseline FAF in residences?	This change notice was issued in April 2016: 1) Change Notice Summary, page 20 2) October 2016 Measure Changes file	None	Closed
Industrial Customers of NW Utilities (ICNU), Cowell	Focus 2028	N/A, EE Target Determinations	Thus, ICNU proposes modified language to allow for policy changes which may soon be implemented from Focus 2028: "BPA commits to achieving the share of the Council's Power Plan regional energy efficiency target <u>as determined by the Administrator</u> that represents the load of BPA's public power customers. " If BPA does not revise its policy on EE target determination within the next year, then ICNU's proposed modification will still be an accurate statement of policy, while having the advantage of being consistent with any future policy changes. Moreover, the proposed language tracks the terminology used by Congress in the Northwest Power Act ("NWPA"), which provides that acquisition of conservation resources "shall be consistent with the [Council] plan, <i>as determined by the Administrator.</i> "		Drafting a response letter to ICNU	Deferred

Industrial Customers of NW Utilities (ICNU), Cowell	general comments	N/A, general comments	<p>BPA has already demonstrated that it takes regional concerns about the agency’s market competitiveness seriously, which ICNU acknowledges and appreciates. That said, much work still remains to ensure that BPA is a viable economic service provider when the Regional Dialogue contract expires. Accordingly, ICNU recommends that the EE program begin making allowances for and anticipating potential changes arriving through the ongoing Focus 2028 initiative. The modifications to the Manual proposed here should be one small but important step in that direction.</p>	Drafting a response letter to ICNU	Deferred
Industrial Customers of NW Utilities (ICNU), Cowell	general comments	N/A, general comments to request to align EE programs with Focus 2028	<p>ICNU recommends that the Manual be amended to reflect that, whatever specific EE program outcomes result from Focus 2028, BPA’s framework for EE implementation will allow for ready incorporation of future policy.</p>	Drafting a response letter to ICNU	Deferred

Industrial Customers of NW Utilities (ICNU), Cowell	Industrial	N/A, General Comments. Request to extend time requirement periods	ICNU also recommends that BPA consider revisions that may be beneficial in aligning the cost-effective EE acquisition standard with timing requirements and specifications within Section 9, covering the “Industrial Sector.” For example, an industrial end user is required to achieve energy savings, and demonstrate progress, within time periods which may be prohibitively short to incentivize full participation in BPA programs. ICNU recommends that BPA add an express provision to Section 9 to state that BPA will consider extending time requirement periods, so long as the likelihood of cost-effective acquisition justifies limited waiver of certain specifications.	Comment isn't clear to which component the comments are directed (timing required could impact several industrial components). The comments seems to be most applicable to Industrial Energy Project Manager (EPM) requirements. The current EPM requirements meet the requested objective of being flexible in respect to timing. The EPM is intended to multiple-years (an EPM can be renewed) and the reimbursement (incentive) is proportional to achieved savings. The combination of renewals and proportional reimbursement, allows for flexibility while maintain cost-effective criteria.	Drafting a response letter to ICNU	Deferred
Consumers Power, Thomas Elzinga	Measure List	N/A, Measure List	The draft UES measure list should be made available in draft form and should also be made available for comment as well. Savings methodology could then be commented on along with missing or incorrect measures that correspond with the draft IM. The two are intertwined and should not be separated.	Planning staff have noted this issue and discussed this with the EERs and the USB, and are looking into aligning the ML updates with the IM process better during future IM updates.	Additional internal discussion needed.	Deferred
Springfield Utility Board, Harris	Measure List	N/A, Measure list content clean-up	Please make the data in the columns unique by column (especially the Technology, Key Characteristics, and Programs columns) so that when using a column's text filter it returns a complete list without eliminating measures with the same text in another column.	Planning staff have been working closely with program staff to better align and consolidate columns like Key Characteristics. Detailed changes will be available when the ML is released.	Additional internal discussion needed.	Deferred

Springfield Utility Board, Harris	General Comments - Heating and Cooling Zone Designation	N/A, Request to change SUB's CZ	Please review the Cooling Zone designations and map and consider revising. The map at the following link shows Springfield in CZ 1 but both NOAA and SUB's weather station data indicates Cooling Degree Days that are in the CZ 2 range. http://www.bpa.gov/EE/Sectors/Residential/Documents/PNWHeatingandCoolingClimateZoneAssignmentsbyCounty.pdf . Please see the screen clipping on the second tab of this spreadsheet.	BPA's GIS team has updated the HZ and CZ maps in December 2015 and classified SUB as a CZ1. This is in alignment with the Council. However since this doesn't match SUB's local data, I would recommend we refer this to the Council/GIS team and if they agree, we adopt SUB's request in IS2, effective Oct 2016.	Deferred, not related to the IM	Deferred
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