

October 2015 IM Response to Public Comments

| Stakeholder/Utility | IM Section | Comment | Action Taken/Explanation |
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| Grey/EWEB | Definitions | Add definition of "Programmatic savings" - reference located in 1.1 Overview section | This definition has been added. |
| Grey/EWEB | Definitions | Add definition of "Momentum savings" - reference located in 1.1 Overview section | This definition has been added. |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Enrollment and Staffing. To enroll in the SEM components, a customer must meet these enrollment and staffing requirements outlined below. Comment: Should say "end-user" staffing. | IM language changed to "To enroll in the SEM components, the customer must meet these enrollment and end-user staffing requirements outlined below." Also added the word "End-user" before the last three enrollment activities in the table. |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Enrollment and Staffing. Send a request to BPA (e-mail eedocs@bpa.gov) and send a link from ESI SharePoint. Question: Should say "or" instead of "and"? Do all utilities have ESI SharePoint access? | The IM language was revised to read: "Send an e-mail request to BPA (eedocs@bpa.gov)." Upon utility enrollment and prior to any SEM activity, utilities will receive a "user name" and "password" to access the secure online ESI Secure File Share (SharePoint site), all Energy Management project files will be shared by sending a secure link from the SharePoint site via e-mail and/or when submitting projects into eedocs@bpa.gov; the ESI team will train utility and end-user staff accordingly. |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Enrollment and Staffing. Engagement: Two employees must attend training sessions during the performance period. Question: How frequent are the trainings and how long are the training sessions? | Revised (SEM Projects - Enrollment and Staffing Engagement) IM language to read: "Two employees must attend training sessions during the performance period. The length and frequency of the training sessions will vary based on the type of engagement (e.g., formerly HPEM, T&T, ROC, and/or SI HPEM)." Consolidating SEM projects requires BPA to be more general. Training is generally monthly; however, not exclusively monthly. The former HPEM cohort would typically meet 10 times within the first year (~monthly); whereas a ROC cohort is more concentrated, meeting 5 times, although the trainings are closer together (roughly 3 weeks apart). The length of cohort training is similar to past HPEM sessions. Some training sessions are 1-2 hours; other training sessions are a half-day. |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Performance Period: Customers will be credited with 100% of the verified energy savings as reported in Year 1. Question: Are Year2 savings reported to BPA? If so, then for I-937 utilities, what will BPA be reporting to the State of Washington if Year2 savings were less than Year1 savings? | IM language was revised to "Customers will be credited with 100% of the verified energy savings for each reporting year (e.g., Year 1 of the SEM engagement and again for Year 2)." BPA does not report to the State of Washington; the I-937 utilities do. |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Component Implementation - Optional – Performance Tracking System. Question: If there is no PTS, then how are savings measured/verified for reporting? | No change to IM language. Without a PTS, savings can be measured through utility meter data and facility collected production data. The PTS increases the frequency of data collection and automates the process. |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Component Implementation - Optional – Performance Tracking System. Description. The PTS is metering hardware or electric energy data collection. Change from "or" to "and/or" software...Comment: Change from "or" to "and/or" | The IM language was revised to read: "The PTS is metering hardware and/or electric energy data collection software..." |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Component Implementation - Optional – Tune Up Table. Comment: Isn't BPA trying to move away from T&T and HPEM to just "SEM"? | The Tune-Up is an optional component of an SEM project. Tune-Up does not refer to a Track and Tune project. No change to IM language. |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Component Implementation - Optional – Tune Up Table. Scoping: Energy Champion, with Track and Tune (T&T) Provider (BPA provided, in-house...Comment: Replace "in-house" with "in-house expert" | The IM language was revised to [Scoping] "Energy Champion, with Track and Tune (T&T) Provider (BPA provided, in-house expert, ESIP)..." and again, [Tune-Up] "Facilitate a tune-up with the T&T Provider (BPA provided, in-house expert, ESIP, or contracted provider)..." |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Savings Report - Performance Period. The SEM performance period starts 1. No earlier than either: Kick Off. Question: Needs more clarity. (Date of first training?) | The IM language was revised for (Savings Reports - Performance Period) to read: "The SEM performance period starts 1. No earlier than the BPA kick-off workshop, ..." |

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| Swier/Cowlitz PUD | Industrial | SEM Projects - Savings Report - Performance Period. The SEM performance period starts 1. No earlier than either: a. The end user begins action item implementation. Comment: Should replace with "first receives the Action Plan Report"? | The Action Item Report was considered. BPA is sticking with "action item implementation" because action items are implemented during the Tune-Up event (before the report is issued). No change to IM language. |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Savings Report - Performance Period. The SEM performance period starts 2. No later than the first full monthly billing cycle following either: Kick Off. Comment: Needs more clarity. (Date of first training?) | Revised (Savings Report - Performance Period) language to read: "... 2. No later than either (a) the first full monthly billing cycle following the kick-off workshop, or (b) when the end user begins action item implementation." |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Savings Report - Performance Period. The SEM performance period starts 2. No later than the first full monthly billing cycle following either: The end user begins action item implementation. Comment: Should replace with "first receives the Action Plan Report"? | See previous comment. The Action Item Report was considered. BPA is using "action item implementation" because action items are implemented during the Tune-Up event (before the report is issued). |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Savings Report - Annual Completion Report. Customers are required to send either a secure link to BPA at eedocs@bpa.gov . Comment: Somewhere in the sentence, the word "either" needs to be followed by the word "or". | The IM language was revised to read "Customers are required to send a secure link from ESI Secure File Share or the Annual Completion Report to eedocs@bpa.gov documenting..." |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Payment Table - Annual Completion Report. Does this also apply to activities completed in "Year2" (of 2) of an SEM engagement? | The Payment table applies to each year of the SEM performance period. No change to IM language. |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Payment Table - Annual Completion Report. Question: Do Action Items need to be pre-approved by BPA? | BPA pre-approval of Action Items is no longer required. No change to IM language. |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Payment Table - Annual Completion Report. Question: Is there an upper limit on eligible Action Item costs? | Action Item costs are not capped. Reimbursement is capped at the lesser of 70% of Action Item cost or \$0.075/kWh. No change to IM language. |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Payment Table - BPA Approves PTS: Lesser of the following: Question: Is there a third cap based on the baseline kWh? (ie – annual payment limited to \$0.0005 per baseline kWh)? | The \$0.0005 per baseline cap has been removed. The \$10K cap is more restrictive for all sites > ~2 aMW. SEM participants are generally larger than 2 aMW. The utility may set a smaller cap, if desired. No change to IM language. |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Payment Table - BPA Approves PTS: Question: Are end-users eligible for this in each of the 2 years of an SEM engagement? | Effective October 1, BPA is retiring the advance PTS payment option. End users may request PTS installation reimbursement or a PTS maintenance payment each year. End users with a PTS from an earlier performance period may request a PTS maintenance payment in each subsequent year (i.e., a potential \$20K over two years), however it can be capped by the utility. No change to IM language. |
| Swier/Cowlitz PUD | Industrial | Payment table: Track and Tune and High Performance Energy Management Projects. Question: This section appears to have been eliminated. Should also be eliminated from this table? | This reference has been deleted from the Payment Summary table. |
| Swier/Cowlitz PUD | Industrial | Insert word "or". The customer must send to BPA a link from the ESI SharePoint site by e-mail to eedocs@bpa.gov | Utilities need to send links from ESI Secure File Share. No change to IM language. |
| Schumacher/Benton PUD | Agricultural | SIS - Reporting for Scientific Irrigation Scheduling (SIS) Benton PUD has approximately 55,000 acres participating in SIS. The new requirement is to provide a unique site ID, address (e.g. field location, meter number, GPS coordinates or legal property description. We have 5 to 6 corporate farms that participate with many farm managers. One corporate farm may have thousands of acres. The only way to determine the site ID is by Farm Name. It is not realistic and we are unable to list by GPS coordinates or legal property description or by meter number. | The IM language has been revised to "End-user identifying information including unique site ID and address (e.g., field location, meter (or pump) number, GPS coordinates, farm name, or legal property description). The "...address (e.g.,...)" language should not be viewed as a 'new requirement' but rather it provides 'allowable examples' to bring more flexibility - and BPA hopes this will reduce and/or eliminate any ambiguous terms for the "address" such as "Hwy 395," etc. |
| Swier/Cowlitz PUD | Industrial | Font size adjustment. SEM Projects/ Requirements | The font size was correct, the wording needed to be "gray shaded". This has been corrected. |
| Swier/Cowlitz PUD | Industrial | SEM Projects - Component Implementation - Energy Management System: Assess of current energy management practices (e.g., does end user track, manage or reduce energy usage?). Question: Change to Assessment | Revised IM language to read: "Assess current energy management practices.....Establish an energy management policy..." etc. |
| Swier/Cowlitz PUD | Multi-Sector | Calculated Lighting Measures. A utility may manually enter the value of the efficient product...Comment: needs formatting correction | Formatting updated. |

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| Little/Seattle City Light | Section 3 | Section 3.2.1 - Calculators for Option 2 utilities. Please make a comment regarding how a utility can get to the Customer Portal to see their Option 2 Custom Project Calculator. (I talked with Margaret Lewis about this on 8-13-2015) | Additional language was added to explain how a utility can get to the Customer Portal to see the Option 2 Custom Project Calculator. |
| Little/Seattle City Light | Section 4 | Question: I'm using the track changes version of your document, is the numbering correct in Section 4.34, 4.43? | Numbering is correct in final version. |
| Little/Seattle City Light | Section 4 | Formatting detail with Section 4.63: can we see the entire table on a single page. In the present form, the table headers are on one page and the remainder of the table is on the following page. | In the final version the table is displayed on one page. |
| Little/Seattle City Light | N/A | Comment: Would you consider using the same formatting/numbering convention that is used in the first five chapters of the IM? Chapters 6+ don't have any numbering convention; might be easier to reference specific details if it did. | As we reformat the document for final release on Oct. 1 BPA will work to achieve as much consistency in formatting as possible. |
| Gibb/Seattle City Light | Definitions | Comment: Add "Invoicing Period" to the definitions list. | The IM language has been changed; "invoicing period" has been replaced with more clear language. |
| Little/Seattle City Light | Section 4 | Section 4.1: using the Custom Project Calculator Version 2.0 or later for new custom projects. Is this for Option 1 utilities only? Or is this applicable to both Option 1 and Option 2 utilities? | This only applies to Option 1 custom project calculator. A clarification has been added to IM language. |
| Little/Seattle City Light | Section 4 | Section 4.1 Custom Projects: New construction incremental costs being calculated at 2.86% of the whole building. How do we (SCL as an Option 2 utility) document and report this incremental cost? | A clarification was added to IM Section 5.2: Option 2 customers need to show invoices from the general contractor to reflect total building cost at the highest level. For example, \$4M multiplied by 0.0286 to get the incremental project cost. |
| Little/Seattle City Light | Section 5 | Section 5.2: When talking about cost-effectiveness and expressing it as being greater than 1, are you talking about the TRC or are you talking about the B/C ration being greater than 1 applied at the total resource cost? | "TRC" and "cost-effective" both refer to TRC cost-effective. For Custom programs, as the language states, M&V Custom Programs must be TRC cost-effective (TRC>1.0) at a calculator level, while Evaluated Custom Programs must be cost-effective at the program level (impact evaluation level) with TRC of 1.0. No change has been made to the IM language. |
| Little/Seattle City Light | N/A | Question: Is there a process to secure RefNo's for unique or custom measures? | Yes, customers can request new custom measure reference numbers through their EER. No change has been made to the IM language. |
| Grey/EWEB | Section 4 | Clarify 4.3.2.2 | IM language was clarified. "One sector each" means that each project can only have one sector. For example, you couldn't have a single project classified as both industrial and commercial. This is partly due to the differing incentives between sectors. |
| Grey/EWEB | Section 4 | 4.3.2 (.5 & .6) – clarify the difference between the two articles (.5 & .6) | There was duplicate language in the draft IM that went out for comment. The duplicate has been removed. |
| Grey/EWEB | Definitions | Add definition of "Market transformation" – reference located in 1.1 Overview section | A definition has been added to that section of the IM. |
| Bopp/Flathead Electric Coop | Residential | Payment Table - Prime Window and Patio Door Replacement. Comment: I think this \$8 is incorrect. See my comment in the relevant section. | The payment of \$8 is accurate. UES measure details can be found in RTF UES workbook (http://rtf.nwcouncil.org/measures/measure.asp?id=152), rows 33 and 34. BPA opted to add these higher efficiency windows into our offering with the payments of \$8 of Class 22 windows and Class 30 patio doors. No change was made to the IM language. |
| Bopp/Flathead Electric Coop | Residential | PTCS - Requirements - Commissioning, Controls. Question: Why is this bulleted under Commissioning/Controls/Sizing when this applies to all ASHP's? | This applies to all PTCS Heat Pumps. We moved this requirement to ensure it is clear. |
| Bopp/Flathead Electric Coop | Residential | Ground Source Heat Pumps - Requirements. These measures are eligible to be combined with the Montana House New Construction measures. Question: Why is this called out here but not for ASHP/Variable Speed Heat Pumps? Because it is new? | The note about GSHPs was removed from the IM language to be more consistent with the rest of the section. For clarity, details of the Montana House measures will only appear in the Montana House section. |

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| Bopp/Flathead Electric Coop | Residential | Ground Source Heat Pumps - Requirements - For new construction. Comment: This doesn't make sense here since this is for new construction which would not have a pre-existing loop system or heat pump. | Please see row 7 of the RTF UES workbook. "In new or existing site-built or manufactured homes in heating zones 2 and 3, GSHP system upgrade from Air Source Heat Pump or conversion from electric Forced Air Furnace (with or without Central AC). Optional upgrade of Electric Water heater with Desuperheat pre-heating." No change has been made to the IM language. |
| Bopp/Flathead Electric Coop | Residential | Ground Source Heat Pumps - Requirements -For existing homes. Question: Shouldn't all of these be noted for both new homes and existing rather being bulleted under existing? | Yes, this was a formatting issue which has been corrected. |
| Bopp/Flathead Electric Coop | Residential | PTCS Prescriptive Duct Sealing - Requirements. Question: Why is this bulleted under Prescriptive when it applies to both? | The section was re-ordered to address the comment. This change was made to the IM language. |
| Bopp/Flathead Electric Coop | Residential | Montana House - Basis for Energy Savings. Question: Where is the new option for the MT Home that was passed by the RTF in October? Can this not be created as a new measure since it updates the baseline to current code and provides another path. It is definitely different. A utility would have to choose to use one or the other? Then you could provide a negative change notice and remove the old measure next year. | BPA treats these as changes to existing measures, which requires notice if we are going to make a change. The Montana House measures were updated at the April 2015 RTF meeting, too late for us to provide notice for October 2015 IM (the workbook is not yet available). If we receive the finalized UES workbook by December 2015 we will be able to provide notice in April 2016 for update in the October 2016 Implementation Manual. |
| Bopp/Flathead Electric Coop | Residential | Montana House - Requirements - Question: What about a home built with electric resistance and a ductless heat pump? Do we claim it as a MT Home with zonal electric and then also claim the dhp separately? | The RTF UES workbook treats a DHP as zonal heat. See row 19 of the RTF UES workbook. "(A) Measures for zonal electric heat includes combinations for heating zone (3) and foundation type only (4) = 12 total measures. A hybrid DHP (in the main living area)/Zonal (in the rest of the house) heating system was modeled and savings found to be similar to the pure zonal system, so the zonal electric measure identifier includes houses that are build with the hybrid system." No change was made to the IM language. BPA is working to develop a DHP measure for New Construction. Until then, DHP installs in a Montana House may be proposed as a <u>Custom Project. No change has been made to the IM language.</u> |
| Bopp/Flathead Electric Coop | Residential | Prime Window and Patio Door Replacement - Payment Table - Multifamily - Single Pane Patio Door - Where did these \$8 numbers come from? We've never had this option before. Maybe I am forgetting and the RTF passed this but I don't think so... | This UES measure is in the RTF UES workbook http://rtf.nwcouncil.org/measures/measure.asp?id=152 , rows 33 and 34. BPA opted to add these higher efficiency windows into the offering with the payments of \$8 of Class 22 windows and Class 30 patio doors. No change was made to IM language. |
| Elzinga/Consumers Power, Inc. | Residential | LED bulbs and fixtures - Document Requirements - Measure Distribution Processes - Question: Why is the above box not checked?) | There was a formatting error. The IM language was changed: added "X" to Customer File column. |
| Elzinga/Consumers Power, Inc. | Residential | Showerheads - Document Requirements - Measure Distribution Processes - Question: Why is the above box not checked?) | There was a formatting error. The IM language was changed: added "X" to Customer File column. |
| Elzinga/Consumers Power, Inc. | Residential | Advanced Power Strips - Document Requirements - Measure Distribution Processes - Question: Why is the above box not checked?) | There was a formatting error. The IM language was changed: added "X" to Customer File column. |
| Elzinga/Consumers Power, Inc. | Residential | New High Performance Manufactured Homes - NEEM has an online tracking and certification system. Comment: (Is this the organization and contact group for questions on home specs and how to relay information to the builders? It isn't very clear who to contact for that information nor does it seem available) | As indicated in the text, Northwest Energy Works (NEW) is the organization to contact. "NEEM has an online tracking and certification system and is operated by Northwest Energy Works. Contact Northwest Energy Works (888) 370-3277 ext. 102 for current information." No change was made to the IM language. |
| Elzinga/Consumers Power, Inc. | Residential | Prime Window and Patio Door Replacement - Requirements - Multifamily does not qualify for 0.22 windows or 0.30 patio doors at this time. Question: Why is this sentence here if the chart does qualify multifamily homes with .22 windows or .30 patio doors? | Class 22 windows and Class 30 patio doors now qualify for multifamily homes and the IM has been updated to include them. |
| Ritchie/Idaho Falls Power | Residential | Prime Window and Patio Door Replacement - Payment Table - Question: Why are you willing to pay \$6.00/sf on multifamily and not for single family? I have always understood that there are actually less savings in a multifamily compared to single family. Please correct me if I am wrong. | The BPA Willingness to Pay calculation supports this higher payment for multifamily. This may change when the RTF re-examines the savings. Because multifamily properties have additional barriers for Weatherization, BPA chose to keep these payments at the higher level for now. When the savings decrease, the payment will be reduced. No change has been made to the IM language. |

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| Ritchie/Idaho Falls Power | Residential | Low Income Weatherization - Payment Table. Comment: Why are you willing to pay dollar for dollar up to \$20.00/sf on windows for low income and dollar for dollar on insulation? Do not misunderstand my question. I completely agree with helping low income, in fact we are one of few utilities that are participating in low income and happy to do so. My confusion is the argument that there are not enough savings to justify a higher incentive for standard income/single family. It seems to me that the savings are the same whether it is a low income single family construction or a standard income single family construction. It doesn't appear to be based on savings as much as who you are. Can you explain to me the reasoning for single family/standard income incentives being reduced in windows and insulation, yet the low income has stayed the same? I already understand the argument that you want them to make changes. I want to know how you justify the savings one verses' another? If the incentives are based on the findings of the RTF then it should be reflected in all categories. | Low Income is considered a Lost Opportunity (won't happen unless we can pay 100% of costs). BPA's last market assessment of costs indicated that \$20 sufficiently covered the cost of qualifying windows. Payment levels for the standard income offer aims to provide not more than 70% of incremental costs and not exceed \$.35/kWh. When the savings of a measure decreases, BPA will re-evaluate the Willingness to Pay. No change was made to the IM language. |
| Ritchie/Idaho Falls Power | Residential | LED Bulbs and Fixtures - Requirements and Specifications - Question: is it only Mailed Non-Request that are limited to 4 LED's per house hold? | Yes. Only the Mailed Non-Request bulb measures carry this limit of four bulbs per household per year. This limit applies to both LED and CFL bulbs independently. No change was made to the IM language. |
| Gibb/Seattle City Light | Residential | Lighting - Comment: Where sections are identical, collapse into one statement rather than two to avoid having to read through two sections, especially in lighting for residential. For example, the "Basis for Energy Savings", "Distribution processes", "RBSA room type and hours" "Additional Information", etc apply to both CFL and LED, but are repeated, wasting space. Suggest a lighting discussion to cover general themes, with differences spelled out in the LED and CFL sections. "Additional Information" shows up repeatedly. | BPA will look for some opportunities to streamline the lighting section. The analysis for CFLs and LEDs is not exactly identical, nor is the RTF's treatment of the baselines or efficient case for these very different technologies. On "Additional Information", previous feedback from customers asked that BPA include information by technology, rather than ask all readers to wade through the entire lighting section. Not all customers support both CFLs and LEDs. No change has been made to the IM language. |
| Gibb/Seattle City Light | Residential | LED Bulbs and Fixtures - Comment: The statement below is confusing. What is the purpose of the phrase "bulbs only" as it relates to Mailed non-request? The limit of four applies only to Mailed non-request, but I'm not sure. Suggest using semi colons to break it up: LED bulbs may be distributed via: Retail; By Request; Mailed Non-Request (bulbs only, limited to four LEDs per household per fiscal year); or Direct Install. | The language for "bulbs only" was added to address confusion about whether or not the rule applied to fixtures. No change has been made to the IM language. |
| Gibb/Seattle City Light | Residential | Simple Steps and Appliances: Comment: Move Simple Steps Appliances and Appliances together. Currently Advanced Power Strips are sandwiched between. | Simple Steps includes: lighting, showerheads, advanced power strips, appliances. It could include water heaters and more in the future. BPA will consider moving this section to new location in a future IM. No change has been made to the IM language. |
| Gibb/Seattle City Light | Residential | Advanced Power Strips - Question: Advanced Power strips are not all infrared, some are RF I believe | The specification for the Residential Advanced Power Strip measure is an infrared remote sensing strip. The specification does not currently include Radio Frequency (RF). BPA will consider a revision to the specification in the future. No change has been made to the IM language. |
| Gibb/Seattle City Light | Residential | Appliances - Additional Information: Question: For how long does the following statement go into effect? Is there a time limit: "As ENERGY STAR specifications change, BPA will continue to accept pre-existing models that were ENERGY STAR qualified at the time they were manufactured." | No, there is no time limit. If a device was ENERGY STAR qualified on the date it was manufactured it is considered ENERGY STAR qualified until it is sold. The risk on this is mitigated by low manufacturing backstock and very low reported numbers. No change has been made to the IM language. |
| Gibb/Seattle City Light | Definitions | Comment: Add electrically heated home to the definitions, to include the various scenarios possible, or perhaps just pointing to the section in weatherization. It is a fundamental definition. | The additional flexibility for "electrically heated" is intended to apply only to Weatherization. BPA chose to be specific about additional allowances for DHP eligibility. BPA could explore additional application in the future. No change has been made to the IM language. |
| Gibb/Seattle City Light | Residential | Weatherization - Electric Heat - Questions about the weatherization electric heat section: 1) Why include permanently installed electric heat with no other source, as it seems obvious and makes one wonder if there is a technicality here. Suggest: "A home with permanently-installed electric heating, that can also have a wood stove, pellet stove, fireplace, fireplace insert (wood or pellet) or wood furnace 2) What does integrated non-electric mean. How integrated does it have to be? Can a home with two separate systems qualify? 4) Does BPA fund the decommissioning and removal of non-electric heating systems? The way this is written makes it appear that a home that comes into our program with a functioning non- electric system can be served and BPA will pay to switch it to electric heat. I think you mean that if some non-BPA entity takes care of this, BPA will fund the home as an electrically heated immediately after. There has been debate and confusion in our office on this. Thanks | This policy decision addressed utility requests for flexibility to decommission dangerous or non-working non-electric HVAC systems, and weatherize the home. The assumption was that without this flexibility a homeowner might be stuck using an unsafe heating system or plug in space heaters. The four numbered scenarios listed all qualify as "electrically heated": 1) is essentially BPA's past 'primary electric heat' definition, 2) is a heat pump with a non-electric backup furnace, 3) describes a home with only wood heat and non-permanent electric heat (plug-in space heaters), and 4) is a home with both electric and nonelectric heating systems (with the non-electric being decommissioned). For standard income measures the measures costs are clearly defined. For Low Income Weatherization, removal of the nonelectric system is neither a measure installation cost or a repair cost and would not be funded by BPA. Once the nonelectric system has been decommissioned (4) the home may be considered electrically heated and would qualify for weatherization. No change has been made to the IM language. |

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| Couto/Seattle City Light | Residential | Appliances - Clothes Washers - Question: From a conversation with Jenny Francis on 7/23/15 I arrived at the understanding that BPA would allow a utility to report on CEE Tier 2 & 3 as well as Energy Star clothes washers in the same reporting period. Thus, allowing for a higher rebate for a high efficiency (CEE Tier 2 & 3) model and a lower rebate on an efficient (Energy Star model). My reading of the excerpt below from the DRAFT October 2015 Implementation Manual Redline Showing Track Changes seems to point towards this potentially being an issue. Page 129 reads, "Utilities who report appliances to the tiered measures should not also use the Any measures within the same invoicing period." This line makes sense for the fridge measures where you have Any Energy Star model or the CEE Tiers. But, all of the washer measures are "Any" appliance measures and some of them are also CEE tiered measures. I recognize that the Any measures are designed with weighted averages, and the goal is to ensure utilities do not try to maximize their savings by picking and choosing measures when advantageous. I wonder if perhaps there is some confusion resulting from the terminology Any versus Tiered, and that in fact there are weighted measures (called Any) and non-weighted measures (called Tiered) where the Any Clothes Washer – CEE Tier 1-3 are actually what you call an "Any appliance measure." If that is the case perhaps use a word other than tiered when speaking of the non-weighted measures. If the intention is to require utilities to select the CEE tiers or the Any Energy Star measures this would prohibit a program from: 1) Offering a higher rebate for CEE Tier 2 & 3 and lower rebate for Energy Star. 2) Rewarding CEE Tier 2 & 3 purchases where gas water heaters and electric dryer are used. Sticking with CEE tiers only, a CEE Tier 3 model using a gas water heater would not be eligible or it would require utilities report all washers as Energy Star gas/unknown water heater. | The IM language was revised; the word "Any" was removed from the tiered clothes washer measures. |
| Grey/EWEB | Residential | LED Bulbs and Fixtures - Comment: Instead of stating, "...on the Lighting Design Lab (LDL) Qualified LED Lamp List", it should probably state, "...on the Lighting Design Lab (LDL) Qualified LED Fixture List" | BPA is using the name of the document as listed on the Lighting Design Lab web site to help users find it. No change has been made to the IM language. |
| Grey/EWEB | Residential | There are inconsistencies in baseline requirements for weatherization vs HP vs DHP measures that create confusion so that the IM needs to be frequently referenced. For weatherization, there are 4 allowances if a home does not have primary electric heat. These exceptions do not align with other measures. For example: One exception is if there is permanently-installed (non-primary) electric heat with (or without) wood heat, then Wx measures apply. Another exception is if some (non-primary) electric heat exists and the non-electric system has been decommissioned, then Wx measures apply (regardless of the replacement heating system). Also, there is not an exception for homes with non-electric primary heat (such as an oil furnace) where space heaters are used. For DHPs, there is no exception for non-electric primary electric heat. Example where a non-electric system is decommissioned. Some examples of situations of these inconsistencies: A home has a single (non-primary) bedroom electric wall heater, but heats with wood, and gets new windows and a ductless heat pump (DHP). The IM says that Wx measures apply, but not the DHP measure. But if they installed a ducted heat pump (HP), the ducted heat pump measure appears like it would apply. A home has a single bedroom electric wall heater, with a well-used oil furnace that is decommissioned when new windows are installed. The IM says that Wx measures apply, regardless of the heating system that is installed. Also, if a heat pump is installed, the IM says that a ducted heat pump measure would apply, but not a DHP measure. A home has an oil furnace, but chooses to heat with space heaters instead, with a strong heating signature. The IM says if a DHP is installed, the DHP measure applies, even if the oil furnace is not decommissioned. But it says that Wx measures can't be used, since the non-electric fuel is oil (and not wood), unless the oil furnace is decommissioned and there is an electric heating system (which may or may not need to be "permanent"?). | These exceptions are unique to weatherization and HVAC. BPA may explore expanding these opportunities in the future, but would need to weigh the consequences of negatively impacting the reliability of savings (for measures like DHP). No change has been made to IM language. |
| Grey/EWEB | Definitions | Conditioned space (Residential) – add "zonal electric heating system" to definition | This definition was modified in the IM language to be more inclusive of both ducted and nonducted HVAC systems. |
| Grey/EWEB | Definitions | Unconditioned space (Residential) – add "zonal electric heating system" to definition | This definition was modified in the IM language to be more inclusive of both ducted and nonducted HVAC systems. |
| Grey/EWEB | Definitions | Add definition of "Residence" – EWEB's understanding of Residence is a location with a living area, kitchen and bathroom | No change to the IM language has been made. BPA has provided definitions of Residential Single Family, Manufactured and Multifamily homes. |
| Elzinga/Consumers Power, Inc. | Section 1 | 1.6 Official Interpretations - Comment: It should be stated here what the process is for submitting a request for interpretation | A 'request' could come from many different people on behalf of the customer or anyone needing clarification. How BPA works through the interpretation is described in the IM. |
| Swier/Cowlitz PUD | Commercial | Qualifying ARC Retrofit applications must meet the following requirements: Constant Air Volume - Could use some additional clarity. (ie – constant-speed supply fan and no control dampers in ductwork). | We modified the requirement in the IM to be more specific with what the existing state needs to be- and also added clarification around specifically what it can't be. |
| Swier/Cowlitz PUD | Commercial | ESG Requirements: "Participating customers must (1) sign a participation agreement with CLEAResult and (2) deliver a completed ESG Program Sign-up Form (available in the Document Library) to BPA (e-mail eedocs@bpa.gov or fax 1-866-535-7955). The sign-up form requires selection of the program option, funding amount and program scope. " Is this relevant anymore considering that ESG is entering a 'wind down' phase on 10/1/15? | Yes, this requirement is necessary despite ESG wind-down on 10/1/15 because a sign-up is needed to: 1) enroll in the six-month wind-down of the program, 2) assign rebate budget for BPA to manage on behalf of the participating utility, and 3) establish program scope. No change has been made to the IM language. |

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| Swier/Cowlitz PUD | Commercial | Clarification LED Case Lighting: LED case lighting for reach-in refrigerated display cases must be installed in new or existing grocery stores. Question: Only Grocery Stores eligible? What about Convenience Stores? Cafeterias? Florists? Food Banks? Why not just any commercial enterprise that has a reach-in refrigerated display case? | There are grounds to revise the applicability language for this measure. Per the new RTF workbook (7-28-2015), the measure applies to all building types with Retail Food Sales, which is a change from the previous workbook and also our UES Measure list v3.0 that merely called out "grocery." The IM language has been modified to reflect this expansion. |
| Swier/Cowlitz PUD | Commercial | LED case lighting for open refrigerated display cases must be installed in new or existing grocery stores. Question: Only Grocery Stores eligible? What about roadside Fruit Stands? Convenience Stores? Etc? Why not just any commercial enterprise that has a reach-in refrigerated display case? | We believe there are grounds to revise the applicability language for this measure. To be consistent with the reach-in case LED measure, this open case LED measure should also apply to all building types with Retail Food Sales. The IM language has been changed to reflect this. |
| Swier/Cowlitz PUD | Commercial | Payment table LED case lighting for open refrigerated display case: This table needs clearer definition of "High Power" versus "Low Power" LED. | We have added this information into the payment table for clarification, but did not add it to the definitions section of the IM. |
| Swier/Cowlitz PUD | Commercial | This measure is for the installation of condensing and remote condensing refrigeration systems in existing grocery stores. Question: Why only limited to grocery stores? What about food banks? Convenience Stores? Etc? | The RTF workbook explicitly stated that this measure is applicable to grocery sector only. So, to reflect this in the IM, We revised the applicability to show retail food sales, but not including restaurants. |
| Swier/Cowlitz PUD | Commercial | Payment table: Walk-in or Display Case Evaporator Fan Motor – Shaded Pole to Electronically Commutated Motor (ECM). Display Case: Shaded Pole to ECM. Question: Can this measure be applied to Walk-In Coolers or Walk-In Freezers with evaporator fan diameters of under 10 inches? | The RTF workbook requirements clearly state the measure is not applicable for walk-ins with motors with fans less than 10" in diameter. No change to draft IM language. |
| Swier/Cowlitz PUD | Commercial | Payment table: Walk-in or Display Case Evaporator Fan Motor – Shaded Pole to Electronically Commutated Motor (ECM). Walk-in Cooler or Freezer, Motor Rating > 23 W: Shaded pole to ECM. Question: Is the "23W" for the baseline or post-project? Also, interesting that it's the same \$140 incentive for <=23W and for >23W. | The RTF workbook shows greater-than and less-than 23 watts distinction reflects ECM motor output watts. 23 watts refers to the post-project ECM. To clarify this in the payment table, BPA added the word "ECM" to both cases. To the second question, for years, BPA and ESG had only one measure for shaded pole to ECM (reflecting all sizes of motors), but the RTF recently expanded the category to include less-than 23 watts and greater-than 23 watts. When this change was made, BPA did not adjust the Willingness-To-Pay, preferring instead to stay consistent with a \$140 incentive. No change to draft IM language. |
| Swier/Cowlitz PUD | Commercial | Walk-in Evaporator ECM Fan Speed Control – Constant to Variable. Post-retrofit requirements: • Evaporator fan low speed: 500<=RPM>=600: Question: Confusing? How can the fan speed be both <=500rpm and >=600rpm? | The low speed fan requirement is in the RTF workbook and showed notations that the industry recommended setting for low speed fans range from 500-600 RPM. BPA has corrected and clarified in the IM language that the low speed fan requirement is 500-600 RPM. |
| Swier/Cowlitz PUD | Commercial | Door Gasket Replacement for Walk-in and Reach-in Coolers and Freezers. This measure is for the replacement of door gaskets in walk-in and reach-in coolers and freezers in new or existing grocery stores. Question: Why only grocery stores? Lots of other commercial enterprises besides grocery stores have walk-in and reach-in coolers and freezers. | The corresponding RTF workbook is not fully conclusive. BPA has modified the IM language to make this measure be applicable to building types with retail food sales. |
| Swier/Cowlitz PUD | Multi-Sector | Retrofit Projects for Existing Buildings - For non-standard measures, the minimum payment ...Question: Is this a minimum "per unit" or "per measure" payment? | "Per measure" payment. The BPA Lighting Calculator automatically adds up the savings from all units included in a measure. The measure itself must add up to an incentive which merits a \$5.00 incentive. The calculator is also enforcing a 10% measure level savings threshold. It is the same treatment- not applied per unit, but at the measure level. The current IM language calls out 'non standard measures.' To make this more clear, language has been revised. BPA has added the word 'measure' behind both the \$5 minimum incentive clause and the 10% savings requirement clause. |
| Bopp/Flathead Electric Coop | Commercial | Heat Pump Water Heater - Requirements - Question: Is it allowed to claim a Tier 2 as a Tier 1? Due to GE release of a new Tier 2 product I would guess we will see more Tier 2 units installed in the future than Tier 1. | Yes. If a HPWH did meet the Tier 2 specifications and was being installed in the commercial sector- a utility could claim it as Tier 1 because by default it would achieve the Tier 1 requirements. BPA will look at incorporating additional payment levels for Tier 2 products in the next year. The IM language has been revised to state directly that if a HPWH is above Tier 1 - it should be claimed as Tier 1. |
| Elzinga/Consumers Power, Inc. | Commercial | Commercial Insulation - Roof/Attic - Comment: More description needs to be included here for the difference between attic and roof insulation. The UES measure list doesn't provide any clarification either.) | The RTF insulation measure differentiates between roof and attic insulation, and the BPA Qualified insulation measures treat them as the same. Language has been added to the Additional Information section that explains why this is the case and also provided guidance around the difference between attic and roof insulation. |
| Elzinga/Consumers Power, Inc. | Commercial | Demand Controlled Kitchen Ventilation - Payment. Comment: (I am not perfectly clear but is this payment based on horsepower? Not labeled the same as other payments based on horsepower) | Yes. The unit of measure is fan horsepower. The units in the Payment Schedule table has been changed to show "fan horsepower" in the Payment column. In the DCKV section (body) of the IM, the payment heading states "Payment/Horsepower of Fan" with the dollar amounts in the table below. |
| Elzinga/Consumers Power, Inc. | Multi-Sector | Lighting Calculator - Measure Types and Approval Procedures - 1. Deemed Lighting Measures. Question: Shouldn't all references to deemed measures be changes to UES or are lighting measures still deemed? | The lighting calculator does not use UES measures. The incentives themselves are mostly prescriptive or deemed but they don't have deemed or prescriptive savings amounts tied to them. It would be inaccurate to call them UES measures in the lighting calculator. No change has been made to the IM language. |

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| Ritchie/Idaho Falls Power | Commercial | Retrofit Windows - Requirements and Specifications - Residential Style Wood-Frame Construction. Question: This is the same construction as a "residential" home, right? So it doesn't matter if that building becomes an office, a store, single family residence or low income residence, it's the same construction. Why does this get \$6.00 /sf but a residential single family home does not? | BPA's plans to consider the Willingness to Pay for this measure and if it needs to be updated there will be six month notice in the April. No change has been made to the IM language. |
| Ritchie/Idaho Falls Power | Commercial | Commercial Insulation - Question: Does this mean that if they have an R-5 or R-11 existing that there is no incentive to raise to R-19 or R-49? Or does it mean that anything in between R-0 to R-19/R-0 to R-49 gets and incentive? Thanks | The IM states you must be coming from a base case of R-0. Several edits have been made to the language in the IM to make the measure more clear but nothing has been changed specific to the requirement for an R-0 baseline. |
| Little/Seattle City Light | Commercial | ESG - Comment: Payment schedule, for the BPA ESG Program, should note that CLEAResult ESG program is ending September 30, 201 or refer to the Commercial Refrigeration Section of the IM. | This note was added to the IM language: BPA ESG Program (Note: the ESG program sunsets March 31, 2016. In place of ESG, the UES refrigeration measures can be used, per the commercial refrigeration section of the IM). |
| Swier/Cowlitz PUD | Commercial | Add CBSA to Definitions section | CBSA has been added to the IM definitions section. |
| Elzinga/Consumers Power, Inc. | Commercial | Commercial DHP - Payment Table - Comment: Statement above and below table is duplicative | A change was made in the IM to reflect this issue. |
| Little/Seattle City Light | Section 3 | Section 3.3 Comment: I want to voice my support for BPA's oversight review process that communicates BPA's authority to perform impact and process evaluations. These process steps are outlined in Section 3.3. We believe this is an appropriate role and a valid approach to ensuring cost-effective conservation is being delivered. | No response necessary. |
| Gibb/Seattle City Light | N/A | Comment: Thanks for the opportunity. Basis for energy savings is very helpful. | No response necessary. |
| Hanks/City of Ashland | N/A | Comment: General Comment - I would like to thank BPA staff for implementing the results of the post 2011 final recommendations in regards to the development process for this IM release. As a member of the USB, it was very beneficial to be a formal step in the IM draft document process and I hope the USB feedback was helpful to BPA staff as well. As a utility, having the IM published and distributed prior to the beginning of the rate period is very helpful to our staff in being prepared and being able to be proactive in communicating program changes to our customers. | No response necessary. |