

Recommendation Report Workgroup 2: Implementation Manual

Introduction

Problem statement from Post 2011 Revised Scoping Document: *Depending on one's perspective, the current frequency of changes to the Implementation Manual (IM) may not be frequent enough or too frequent.*

Workgroup #2 met via Live Meeting and conference call on February 11, 2014. Four options that had been provided in the January 7, 2014 Scoping Document were discussed. Additional options were also submitted by the workgroup and presented for discussion. Options discussed ranged from status quo to an Annual Manual with limited change options to a Rate-period Manual also with limited change options. Of the eight options presented, the Annual and Rate-period Manuals were deemed to best address the Problem Statement from Post 2011 Revised Scoping Document. The co-chairs prepared and sent out two preliminary recommendations for review and comment by the 18 group members. Discussion followed at the March 20 regional "Big Tent" and feedback was received from stakeholders outside of the workgroup. On April 8th the work group met again via Live Meeting and conference call where consensus was reached on the Rate-period Manual as the preferred option with an Annual Manual as a secondary option.

Recommendation

Publish Implementation Manual once per rate-period in October. Maintain a change Tracking Document throughout the prior rate period with all changes being locked as of April 1st prior to the release of the IM and release to coincide with the notification of the Customer rate-period budgets.

Understanding that programmatic changes and saving values occur during the course of the rate period, the changes Tracking Document will be kept current throughout the rate-period. BPA could update/edit the change Tracking Document at any time leading up to March 1st in the final year of the rate-period. This allows one month for final program change review for clarifications and corrections. As of April 1st changes are locked and subsequently released with the October 1st IM (six month notice).

- References to kWh savings should be removed from IM and documented in a spreadsheet with fixed savings values for the rate period.
- Corrections and clarifications not negatively impacting program implementation may be made during the rate period.
- Introduction of new measures and Lighting calculators may be made off-cycle and adoption would be optional for Customer until implemented.
- Removal of requirements that are no longer necessary, are burdensome to either BPA or the Customer, or for the purposes of BPA oversight may be made during the rate period.
- The Tracking Document would include "alerts" to Customer as to which measures are currently under RTF review and timelines for future measure and data review.

- A Change Review Board which includes Customer and BPA staff should be created and a structured process to review upcoming proposed changes put in place. (Possibly tasked to USB.)
 - This allows for more time for Customer review and comment and allows for an advanced notice of pending changes instead of having all changes introduced at one time.
 - Customer would have more time to learn about the reasoning and justification behind impending changes which would provide clarity and transparency and reduce confusion about proposed changes.

Critical benefits: Moving from a bi-annual IM provides benefits to both BPA and the Customer.

- Allows utilities to establish programs at beginning of rate-period for the duration of the rate period and budget accordingly.
- Reduces the cycle of IM changes in a given rate-period from four to one.
- Allows for a more streamlined, consistent approach to acquiring EE through:
 - Program security.
 - Reduced uncertainty and confusion.
- Allows for more thorough review of changes to measures and programs prior to publication:
 - Reduces the potential for error and need for clarification and corrections.
 - Should result in fewer BPA policy reversals.
 - Allows for a more transparent process.
- Reduces Customer and/or BPA Marketing costs.
- Reduces Customer and/or BPA printing costs.
- Allows Customer and BPA sufficient time to make adjustments to their program delivery approach and outreach.
- Allows Customer and BPA adequate opportunity to efficiently incorporate changes to internal programming and reporting systems.
 - Reduces potential for errors both in reporting and recordkeeping.
- Facilitates BPA COTR oversight.
 - One manual to reference instead of four for compliance in a rate-period.

Ancillary Benefits:

- Improved Customer satisfaction.
- Enhances Customer/BPA collaboration.
- Reduces opportunity for error.
- Increases Customer end-user satisfaction (the Customer's customers).
- Reduces stress.

Other Remarks/ Unresolved Issues

The group is aware that there are concerns within Bonneville regarding booking savings values that have changed or are no longer cost effective for a longer period of time than before.

If this is a significantly material issue, the Workgroup respectfully requests an explanation from BPA addressing:

- The amount of the overbooked aMW savings due to the “lag” that has occurred historically in six month/one year/15 month intervals from the time the RTF made the change to when BPA implemented the change. (To establish the significance of the amount compromised by adding additional time to the equation).
- Whether BPA has gone back and adjusted booked savings every time the RTF numbers were deemed to be too high and resulted in a reduction in kWh savings? (If so, then this issue is already being accounted for).
- Specific data, including the dates from time of RTF adjustment to BPA implementation on all adjusted measures, including those where the kWh savings were increased.

Please contact co-chairs directly or your Energy Efficiency Representative for follow-up.

Co-chairs:

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