DRAFT OUTLINE OF COMMENTS: Virginia Energy Efficiency Council to SCC

Introduction. The Virginia Energy Efficiency Council has convened a broadly-representative coalition of stakeholders interested in submitting comments in response to the SCC Scheduling Order dated March 30, 2016 (Case No. PUE-2016-00022).

1. ***Consideration of uniform protocols for measuring, verifying, and validating the impacts of energy efficiency measures. Existing EM&V protocols and their applicability for Virginia.***

   Would a uniform EM&V protocol among utilities and their programs contribute importantly to the quantification, validation, transparency, and level of confidence assignable to the quantitative impacts of EE measures and programs sponsored by regulated utilities in Virginia? We have started to examine such protocols in "peer" states with comparable resources, legislative frameworks, EE histories and cultures, to determine what elements might be most applicable in Virginia.

2. ***A methodology for estimating annual kilowatt-hour savings for such energy efficiency measures; inclusion of automated/metered savings; formulae to calculate the levelized cost of saved energy resulting from such energy efficiency measures.***

   We believe the classical formula for computing "levelized" costs and saving is a useful means of computing and comparing program impacts. Of course the inputs to this formula—annual kWh saved, the year(s) in which such savings are claimed, the weighted average of measure lifetimes, total program costs, and applicable discount rate(s)—require careful definition and agreement on their sources.
   'Smart meters," circuit-level monitoring, cloud-based integrations and projections, and other contemporary techniques have proliferated and could complement sound EM&V protocols if programs are designed to collect the relevant data in advance.

3. ***Sources of input data; protocols and data used by "peer states" and recommended by respected practitioners***

   We have solicited data and opinions from utility and regulatory sources in Arkansas, Kentucky, Georgia, North Carolina; from industry leaders such as OPower and EnergySavvy; and from national sources such as the National Efficiency Screening Project, SEEAction Guide, DOE, LBNL, PNNL.

4. ***Reporting the impacts of energy efficiency measures***
   We recommend transparent, timely reporting of EM&V findings, including "benchmarking" against results from comparable states and national/regional data bases.