

Docket No. EW-2013-0519

DATE: April 6, 2018
FROM: Missouri Department of Economic Development – Division of Energy
TO: Missouri Statewide Energy Efficiency Advisory Collaborative
SUBJECT: Statewide Technical Reference Manual

The Missouri Technical Reference Manual (statewide TRM) can facilitate streamlined, standardized savings calculations for a number of measures commonly implemented under the Missouri Energy Efficiency Investment Act (MEEIA). The statewide TRM was funded by a grant from the U.S. Department of Energy and cost-sharing between the Missouri Department of Economic Development - Division of Energy (DE), the Missouri Public Service Commission (PSC) Staff, the Office of the Public Counsel, investor-owned utilities, and advocacy groups. The grant application demonstrated strong interest among energy efficiency, utility, regulatory, consumer, and other key stakeholder groups in developing commonly accepted algorithms and input values for defining energy savings benefits. Project funding enabled the development of a tool through which businesses and residents of the state will have access to strong and responsive efficiency programs, providing broad monetary, reliability, environmental, and health benefits. Under the grant and through facilitation by the Vermont Energy Investment Corporation and DE, stakeholders cooperatively developed a statewide TRM with representation from Missouri utilities, government agencies, and local and national experts; participants strove for consensus on decision-making items and noted all areas of, and grounds for, continuing disagreement in the Appendix section of Volume 1 of the statewide TRM. On March 31, 2017, the statewide TRM was presented at a stakeholder meeting, followed by its release on DE’s website at <https://energy.mo.gov/about/trm>; the statewide TRM is included as a part of this filing.

The PSC’s revisions to its rules implementing MEEIA became effective on October 30, 2017. Included in these revisions is 4 CSR 240-20.094(10) – Statewide Technical Reference Manual (statewide TRM). The revised MEEIA rules also provide for the formation and functioning of the Missouri Statewide Energy Efficiency Advisory Collaborative (MEEAC). Among the MEEAC’s charges is to, “Develop statewide protocols for evaluation, measurement, and verification of energy efficiency savings, no later than December 31, 2018, and update those protocols annually thereafter” (4 CSR 240-20.094(9)(B)1.A). As a part of the agenda for the April 24, 2018 meeting of the MEEAC, DE recommended a discussion of this provision and the potential formation of a workgroup to address the underlying issues (see also 4 CSR 240-20.094(9)(B)1.B); the MEEAC agenda includes a discussion of the evaluation, measurement, and verification provision of the MEEIA rules.

Pursuant to the revised MEEIA rules, as the U.S. Department of Energy grant recipient for development of the statewide TRM, DE offers for the MEEAC's consideration the attached statewide TRM that was produced by the collaborative stakeholder effort, presented on March 31, 2017, and posted on our website; supporting documentation is also publicly available at the website noted above, and a copy of this documentation will be provided to the PSC Staff for purposes of this working docket. DE supports a discussion within the MEEAC of appropriate next steps for incorporating the statewide TRM into statewide protocols for the evaluation, measurement, and verification of energy efficiency savings. Such discussions could include, but are not limited to, measure additions or modifications, statewide TRM usage guidelines, integration of the statewide TRM into utility MEEIA filings, funding for annual updates and an electronic platform, and Staff's coordination of annual updates. Following these discussions, DE recommends that the MEEAC submit the statewide TRM for PSC review and approval.

DE appreciates the opportunity afforded by the MEEAC to further the statutory and regulatory goals of achieving all cost-effect demand-side savings (e.g., Section 393.1075.4, RSMo. and 4 CSR 240-20.094(4)(I)1) and recommends the pursuit of the above activities related to the statewide TRM in order to facilitate such achievement of savings. Once adopted by the PSC and other decision-makers, the statewide TRM will have a transformative impact on the delivery of efficiency programs in the state. Continued development and implementation of the statewide TRM, in conjunction with an advanced evaluation, measurement, and verification framework, will position Missouri and the Midwest region to draw on "big data" and other emerging tools to reduce administrative overhead and enable greater focus on efficiency program design and implementation. We look forward to additional collaboration with MEEAC stakeholders to pursue the approval, implementation, and updating of the statewide TRM.

Respectfully submitted,

/s/ Kristy J. Manning

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