Sundermeyer, Susan

From: Dietrich, Natelle*
Sent: Wednesday, November 10, 2010 2:59 PM
To: Sundermeyer, Susan
Subject: FW: MoPSC DSM Potential Study

From: Suggett, Gaye L [mailto:GSuggett@ameren.com]
Sent: Friday, October 01, 2010 1:04 PM
To: Dietrich, Natelle*
Cc: Wood, Warren
Subject: MoPSC DSM Potential Study

Natelle,

Thank you for the opportunity to respond to the first deliverable from KEMA– the "Measure Data Interim Memo". We also appreciate you sending the work papers late yesterday (although we have not had a chance to review). While the timeline to respond did not allow a thorough analysis, below are our immediate comments and concerns. We would appreciate more time to review the workpapers and give a more thorough review. We look forward to working with you on this project, and feel the AmerenUE DSM Study already completed should be used as a basis for a more complete statewide project.

Below are some of our concerns. We want to work with you to make sure the end product will add value to Missouri.

- Introduction
  - Statements have been made that data from utilities is inconsistent, so how will that be reconciled?
    - What data sources are used for the data presented? Is the data Missouri specific; if not, how can it be a Missouri potential study?
  - It is unclear from the document what timeframe is used to develop these results. The table simply states past studies.
  - What past studies are referenced?
  - While our potential study does categorize saving by sector (Single Family, Multi-Family, Manufactured homes), it is difficult for us to cross reference with the presented data (non-weather sensitive) because we do not know what measure(s) are grouped into the general categories that are identified within the table. Also, as part of our analysis, the non-weather sensitive measures such as CFL lights save the same amount, regardless of the residential sector. We only segregated weather sensitive Residential measures into the various housing sectors.
  - The combination of the following 3 items from the table are counter-intuitive
    - CFLs vs Incandescents are cost effective
    - LEDs vs CFLs are cost effective
    - LEDs vs Incandescents are NOT cost effective
  - We don't agree that a conservation practice serves as an energy efficiency measure.
  - Did the Window Replacement pass the TRC analysis?
    - This measure did not pass our TRC screen
- Figure 2

- AmerenUE's study does not support that 18 watt CFLs are really the #1 energy saving measure in the Commercial Measure list.
- Our study does not include PC equipment because most equipment is already Energy Star compliant and equipment switch out occurs naturally within a short timeline.
- LED lighting for street lights and outdoor lighting show as passing TRC
  - What is the timing of this and what is the life ascribed to the LED measures
    - Early LED costs are extremely high and studies have shown that the estimated LED EULs are exaggerated

- Figure 3
  - What is the baseline for the 50W metal halide, and what is the application?
    - We showed that Ceramic Metal Halide in the 50W range passed when replacing incandescent in display lighting
- Figure 7
  - The percentage values in the table seem generous to us
  - Multiple references to LED lighting are made
    - Again, what are the lives associated with the LED measures
    - Many of the LED measures are presented as replacements for fluorescent tubes
      - The DOE (Jim Brodrick) has indicated the this type of measure is not mature enough at this point in time
        - With this in mind, how is the analysis of the LED lighting in this case representative of the past?

Thank you again for the opportunity to comment. Please let us know if you have any questions.

Gaye

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