

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Concerning
Energy Efficiency Rolling Portfolios, Policies,
Programs, Evaluation, and Related Issues.

Rulemaking 13-11-005
(Filed November 14, 2013)

**REPLY COMMENTS OF
THE NATIONAL ASSOCIATION OF ENERGY SERVICE COMPANIES
ON THE COMMENTS OF OTHER PARTIES ON THE
ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENT ON
ENERGY EFFICIENCY BASELINE POLICY AND RELATED ISSUES**

May 24, 2016

Donald Gilligan
President

NAESCO
1615 M Street NW
Washington, DC 20036
Phone: 978-498-4456
E-mail: dgilligan@naesco.org

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NAESCO offers a single reply comment on the comments of other parties on the staff White Paper (WP) on implementing AB 802.

We support the comments of Cal UCONS that the mandate of AB 802 is to base savings calculations on gross savings, using normalized customer meter readings (Cal UCONS at 5). We believe that the the elaborate procedures for calculating net savings, such as those proposed in the ORA/TURN comments that utilize control or comparison groups (ORA/TURN at 4) are a continuation of the complex and unavoidably subjective calculation of savings that AB 802 eliminates, and should be rejected by the Commission.

We believe that the the AB 802 mandate that the utilities maintain and make available to customers at least one year of historical energy use data means that the Program Administrators (PAs) and/or the third party implementers can formulate a savings baseline for any customer. We have confidence that the PAs and/or the third party implementers can immediately use the field-tested methodologies of the IPMVP, the FEMP M&V standards and other established protocols to calculate savings for large customers, and that the PAs and/or third party implementers have the capabilities to quickly develop and deploy new systems for calculating the savings of smaller customers where those new systems are needed. We did not mean to imply in our initial comments (NAESCO at 9) that this development and deployment is too difficult for the current stakeholders to handle, especially if they are encouraged by the Commission.

Respectfully submitted by,



Donald Gilligan
President
NAESCO
1615 M Street NW
Washington, DC 20036
Phone: 978-498-4456
E-mail: dgilligan@naesco.org