Q&As for ESA Pilot Program re: Energy Management Plans (EMPs)

September 2020

Screening:

Q: What is the anticipated turnaround time for Efficiency Vermont to perform cost-effectiveness screening on projects/measures submitted by an ESA Participant?

A: Efficiency Vermont expects that screening can be accomplished within 2 weeks of submittal. During this time, Efficiency Vermont staff may need to contact the ESA Participant to clarify or gather more information. While Efficiency Vermont will work to complete screening within 2 weeks, if some information is unavailable, it's possible that screening could take longer.

Q: How will an ESA Participant be billed for screening if one or more projects/measures are submitted after the initial submittal requesting screening (given the rate structure based on the number of measures)?

A: If an ESA Participant submits to Efficiency Vermont an additional measure to be screened within 2 weeks of the original request, it will be considered part of the same screening request/submission. After 2 weeks, request for screening will be considered to be separate submissions and billed as such.

EMP and Proprietary/Confidential Information:

Q: How should an ESA Participant handle confidential/proprietary information in the EMP?

A: It is expected that the narrative portions of the EMP template will be filled out in a general sense and would not include information that an ESA Participant wouldn't be comfortable sharing in a public setting (as the EMP will be part of a public regulatory proceeding). Once a draft EMP is submitted for review, if additional information is needed, separate, individual follow-up communications can happen (via email, call, meeting, etc.) in order to discuss the information. In this way, EMP reviewers can acquire necessary information in a way that will keep confidential and proprietary information separate from the EMP and not jeopardize sharing non-public information.

Draft EMP Review:

Q: What is the anticipated turnaround time for Efficiency Vermont and the Department to complete a review of an ESA Participant's draft Energy Management Plan (EMP)?

A: Efficiency Vermont and the Department expect to be able to complete a review of a Participant's draft EMP in one week. Please recognize this is an estimate and particular circumstances and schedules (holidays, sickness, time off, etc.) could result in a longer turnaround time.

Q: To whom should a draft EMP be submitted?

A: An ESA Participant should submit a draft EMP for review via email to:

- Kelly Launder, Department of Public Service (<u>kelly.launder@vermont.gov</u>)
- 2. Barry Murphy, Department of Public Service (barry.murphy@vermont.gov)
- 3. Efficiency Vermont (ESAInfo@efficiencyvermont.com)
- 4. If the project is anticipated to use funding from Vermont Gas, then the draft EMP should also be sent to Richard Donnelly, Vermont Gas (rdonnelly@vermontgas.com)
- 5. If the project is anticipated to use funding from a Distribution Utility under Tier III, then it should be sent to the Distribution Utility for review (or the ESA Participant may request that Efficiency Vermont forward it to the Distribution Utility on their behalf).

[Please note that while the Commission Orders do not specifically reference Tier III projects, we anticipate they would be treated in a manner comparable to Vermont Gas projects. That is, the EMP would describe any project funding streams and how incentives and savings would be shared across ESA and the Distribution Utility.]

EMP Submittal:

Q: After its draft EMP is reviewed, how should an ESA Participant submit its EMP to the Public Utility Commission (PUC)?

A: An ESA Participant may submit its EMP is one of two ways: electronically via ePUC, or hardcopy via snail mail.

- To submit an EMP electronically, the ESA Participant must create an account on the PUC's
 electronic case and document management system, known as ePUC, located online at:
 https://epuc.vermont.gov/
- To submit an EMP hardcopy, the ESA Participant can mail the EMP, along with a cover letter, to:
 Clerk of the Commission, 112 State Street, Montpelier, VT 05620-2701. The submittal should
 reference the case number/name: "19-0302-INV: Investigation to establish an Energy Savings
 Account partnership pilot program, establish a methodology for evaluation, measurement, and
 verification of Self-Managed Energy Efficiency Program and Energy Savings Account projects,
 and review the Customer Credit Program"

If you have any questions about submitting an EMP to the PUC, you may contact them at 802-828-2358 or by email at puc.clerk@vermont.gov.

A copy of the EMP should be emailed to the Department of Public Service, Efficiency Vermont, and the Vermont Agency of Commerce and Community Development (ACCD).

- 1. Kelly Launder, Department of Public Service (kelly.launder@vermont.gov)
- Barry Murphy, Department of Public Service (barry.murphy@vermont.gov)
- 3. Efficiency Vermont (<u>ESAInfo@efficiencyvermont.com</u>)
- 4. Kenneth Jones, ACCD (<u>kenneth.jones@vermont.gov</u>)

<u>Please be advised that once an EMP is submitted to the Public Utility Commission (PUC) there is no official approval of submitted EMPs by the PUC.</u>

Provided that an ESA Participant has addressed any questions or comments from the Department of Public Service and/or Efficiency Vermont in advance of submitting its EMP, there should not be a need for additional regulatory steps before a Participant can begin project work and request reimbursement of project costs. If there remain unresolved questions or comments at the time of filing an EMP, the Department of Public Service may file comments with the PUC as part of the regulatory proceeding that would require follow up by the Participant.