

Better Buildings Residential Network Peer Exchange Call Series

Passing the Test: How Are Residential Efficiency Cost Effectiveness Tests Changing?

February 11, 2021



Agenda and Ground Rules

- Agenda Review and Ground Rules
- Opening Poll
- Residential Network Overview and Upcoming Call Schedule
- Featured Speakers
 - Julie Michals, E4TheFuture
 - Sherry McCormack, AEP SWEPCO
 - Martin Kushler, ACEEE
- Open Discussion
- Closing Poll and Announcements

Ground Rules:

- 1. Sales of services and commercial messages are not appropriate during Peer Exchange Calls.
- Calls are a safe place for discussion; please do not attribute information to individuals on the call.

The views expressed by speakers are their own, and do not reflect those of the Dept. of Energy.





Better Buildings Residential Network

Join the Network

Member Benefits:

- Recognition in media and publications
- Speaking opportunities
- Updates on latest trends
- Voluntary member initiatives
- One-on-One brainstorming conversations

Commitment:

 Members only need to provide one number: their organization's number of residential energy upgrades per year, or equivalent.

<u>Upcoming Calls (2nd & 4th Thursdays):</u>

- Feb 25: The Latest on Windows: Thin Triples and Other Advances in Efficiency
- Mar 11: Carrying the Load: What Is the State of Load Flexibility and Energy Efficiency?
- Mar 25: Electrification: What Does It Mean for Energy Efficiency?

Peer Exchange Call summaries are posted on the Better Buildings website a few weeks after the call

For more information or to join, for no cost, email bbresidentialnetwork@ee.doe.gov, or go to energy.gov/eere/bbrn & click Join







Martin Kushler
American Council for an Energy-Efficient Economy
(ACEEE)



Cost-Effectiveness Testing for Energy Efficiency Programs

Background, Current Status and Recommendations for Best Practices Going Forward

Martin Kushler, Ph.D.

American Council for an Energy-Efficient Economy

Presentation to:

Better Buildings Residential Network Peer Exchange

11 February, 2021



SOME HISTORY BEHIND B/C TESTING FOR EE

- Energy Efficiency as a utility resource was a disruptive concept
- Opposition to energy efficiency requirements by utilities and other powerful parties (e.g., industrial customers)
- High "burden of proof" placed on energy efficiency as a resource
- Scrutiny disproportionate to any other utility expenditure
- The legacy continues today
- e.g., comparison of energy efficiency to other "alternative resources"
 - All but one state requires benefit-cost testing for energy efficiency
 - Only 27% required B/C testing for load management programs
 - ❖Only 21% required B/C testing for renewable energy programs

[NOTE: utilities are regulated at the <u>state</u> level. So each state establishes its own benefit-cost test policy]



PURPOSES OF BENEFIT-COST TESTING FOR UTILITY ENERGY EFFICIENCY PROGRAMS

- To help ensure that ratepayer dollars are prudently spent (in this case, defined as the "benefits" being equal to or greater than the "costs"..... i.e., a B/C ratio of 1.0 or greater)
- To help prioritize amongst resource/program options (i.e., larger B/C ratios deliver more benefits per dollar)*



^{*} Of course, other factors also influence selection of programs (e.g., equity across customer groups)

INFORMATION SOURCES: 1) ACEEE 2020 NATIONAL EM&V SURVEY*

- Surveyed all states with ratepayer funder EE programs (44 state completed the survey)
- Primary contacts were regulatory staff—2ndary were key stakeholders

https://www.aceee.org/research-report/u2009

Study also incorporated: *Database of Screening Practices* (DSP) from National Energy Screening Project (NESP) which provides detailed data on cost-effectiveness testing

https://www.nationalenergyscreeningproject.org/state-database-dsesp/



^{*}National Survey Of State Policies And Practices For Energy Efficiency Program Evaluation

2) ACEEE 2020 REPORT ON NATURAL GAS UTILITY ENERGY EFFICIENCY COST-EFFECTIVENESS*

- Inspired by challenges gas EE programs have faced in recent years with extremely low natural gas market prices
- Reviewed general status of gas utility EE cost-effectiveness around the nation
- Did a more detailed review of the top 10 states in gas energy efficiency savings from the ACEEE State Scorecard report

https://www.aceee.org/white-paper/2020/10/sustaining-utility-natural-gas-efficiency-programs-time-low-gas-prices



^{*}Sustaining Utility Natural Gas Efficiency Programs in a Time of Low Gas Prices

TRADITIONAL APPROACHES TO B/C TESTING: THE 5 "CALIFORNIA" TESTS*

- The Participant test [PART]
- The Utility or Program Administrator test [UCT or PACT]
- The Total Resource Cost test [TRC]
- The Societal cost test [SCT]
- The Ratepayer Impact Measure test [RIM]

* From the California Standard Practice Manual



COMPONENTS OF THE 5 TRADITIONAL TESTS

	Partic.	RIM	TRC	SCT	UCT/ PACT
Benefits		,			
Primary Fuel(s) Avoided Supply Costs		✓	✓	✓	✓
Secondary Fuel(s) Avoided Supply Costs			✓	✓	
Primary Fuel(s) Bill Savings (retail prices)	✓				
Secondary Fuel(s) Bill Savings (retail prices)	✓				
Other Resource Savings (e.g. water)	✓		✓	✓	
Environmental Benefits				✓	
Other Non-Energy Benefits			Rarely	In Theory	
Costs					
Program Administration		✓	✓	✓	✓
Measure Costs		•			
Program Financial Incentive		✓	✓	✓	✓
Customer Contribution	✓		✓	✓	
Utility Lost Revenue		✓			



3 KEY PROBLEMS WITH TRADITIONAL B/C TESTING

- The TRC test*, as generally applied, is fundamentally imbalanced ...it includes all customer costs for an energy efficiency project, but ignores all of the customer 'non-energy benefits' from the project.
- States frequently do not adequately account for all of the utility system benefits that energy efficiency provides
- The standard tests do not capture or address other energy-related policy goals a state may have

^{*}Note: a Societal Test can have the same imbalance, if not properly calculated



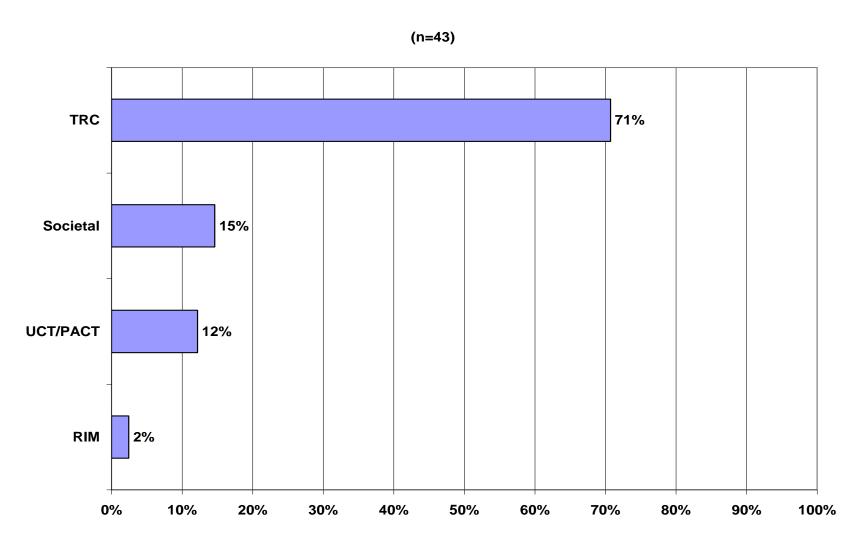
CONCERNS ABOUT THE 'IMBALANCE' IN THE TRC

TRC= (utility costs + participant costs) vs. utility benefits only

- Not conceptually logical customers invest their money in EE projects for a variety of benefits - - not solely to save energy. Why include all costs they incur but exclude many benefits in a B/C calculation?
- Systematically biased against EE these extra 'customer' costs are not considered when selecting supply-side options (e.g., purchased power, distributed generation, customer-sited renewables, etc.)
- Out-of-step with common practice in program design and marketing (which often emphasizes NEBs)
- Will result in 'screening out' programs that would be cost-effective from a utility resource perspective



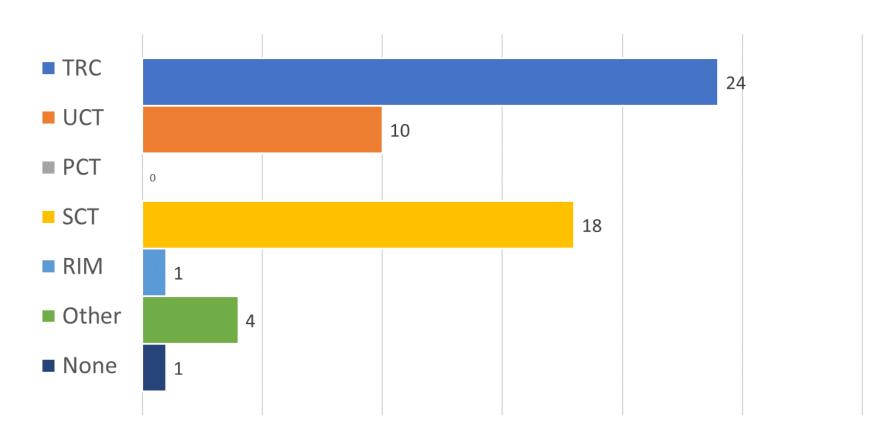
PRIMARY B/C TEST USED BY STATES IN 2011





CURRENT USE OF PRIMARY B/C TESTS AMONG STATES

Primary cost-effectiveness test





UTILITY SYSTEM BENEFITS OFTEN UNDER-VALUED

- •All *costs* typically included (administration, rebates, eval., etc.)
- Energy and capacity benefits typically included (albeit inconsistently)
- But many other benefits often not included or under-valued
 - Avoided T&D costs often excluded or under-valued
 - Reserve margin benefits often omitted
 - Avoided environmental compliance costs often excluded
 - Wholesale price suppression effects not commonly captured
 - Risk mitigation benefits rarely included
 - oLower credit/collection costs rarely included
 - oLine loss reductions commonly understated
 - ➤ Higher at peak than rest of year only sometimes addressed
 - ➤ Should use marginal loss rates, but average losses used instead

Result: Efficiency typically under-valued in all screening tests.



LOW-INCOME PROGRAMS = A SPECIAL CATEGORY

- Benefits included in a typical comprehensive low-income weatherization program:
 - Energy use reduction
 - Home repair
 - increased comfort
 - Indoor air quality (mold, allergens, radon, CO, etc)
 - Poisons (house cleaners, lead, etc)
 - Safety (furnace, housing structure, electrical, etc)
- The value of these "non-energy" benefits typically exceeds the value of the "energy" benefits (e.g. see the 2014 ORNL study:
 - https://www.energy.gov/sites/prod/files/2015/09/f26/weatherization-works-retrospective-evaluation.pdf
- While these benefits are rarely quantified by states, nearly all states have special provisions for low-income energy efficiency programs



SUMMARY

- Benefit-cost testing can be informative, and useful for decisionmaking....if properly done
- Use of benefit-cost tests for assessing ratepayer-funded energy efficiency programs is essentially universal in the states
- Reliance upon TRC for cost-effectiveness screening is still very widespread (much due to legacy and entrenched practice)
- The TRC test (as commonly applied) has some serious shortcomings
- Utility system benefits often under-valued in all of the B/C tests
- The standard tests don't capture related state policies
- These and other concerns about benefit-cost testing are leading to a re-examination of this issue in the industry and the regulatory community (e.g., see the NSPM for DERs)



RECOMMENDATIONS: BEST PRACTICES IN EE COST-EFFECTIVENESS ASSESSMENT

- Ensure that the test is 'symmetrical'
- Appropriately value all utility system benefits and costs (e.g., include peak demand savings and avoided T&D costs, include time and locational value of the savings, marginal line losses, etc.)
- o [IF INCLUDING PARTICIPANT COSTS] Include appropriate nonenergy benefits (e.g., health, comfort, safety, O&M savings, etc.)
- Base decisions on other costs and benefits on relevant state policies
- Provide for special treatment of low-income programs (e.g., exemption from passing the B/C test)
- Appropriately value environmental benefits (including CO₂)
- Apply cost-effectiveness requirements at the portfolio level
- Use a low-risk or societal discount rate
- o Include assessment of the risk of future natural gas price increases



Thank you!

For any follow-up questions:

Contact: mgkushler@aceee.org





Julie Michals E4TheFuture





Passing The Test: How Are Residential Efficiency Cost Effectiveness Tests Changing?

And how the National Standard Practice Manual (NSPM) is Changing Benefit-Cost Analysis of EE and Other Distributed Energy Resources

Julie Michals – E4TheFuture February 11, 2021

Better Buildings Residential Network Peer Exchange



About NESP and the NSPM

National Energy Screening Project (NESP): stakeholder organization open to all organizations and individuals with an interest in working collaboratively to improve benefit-cost analysis BCA) of energy efficiency (EE) and other distributed energy resources (DERs)

Products include:

- NSPM for EE (2017)
- NSPM for DERs (2020)
- Database of Screening Practices (DSP)

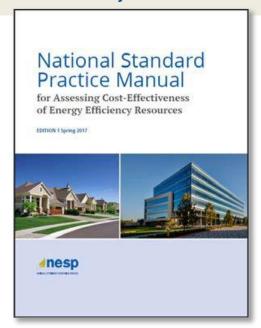
NESP managed by E4TheFuture, with state outreach via key partners, and funded by E4TheFuture with support from US DOE.

NSPM guidance documents informed by extensive Advisory Group with diversity of perspectives and affiliations.

https://nationalenergyscreeningproject.org/

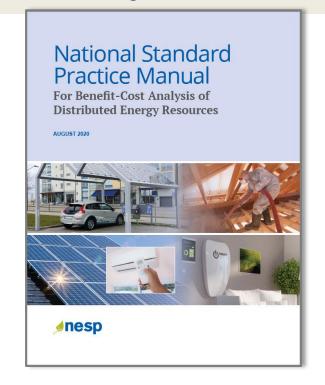


NSPM for EE May 2017

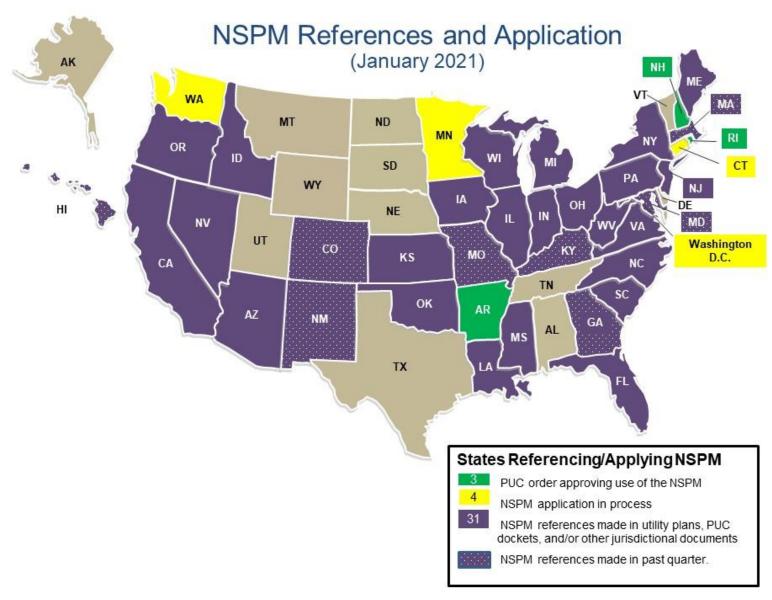


The NSPM for DERs incorporates and expands on the NSPM for EE. See comparison

NSPM for DERs August 2020









NSPM for DERs - Contents

Executive Summary

1. Introduction

Part I: BCA Framework

- 2. Principles
- 3. Developing BCA Tests

Part II: DER Benefits and Costs

- 4. DER Benefits and Costs
- 5. Cross-Cutting Issues

Part III: BCA for Specific DERs

- 6. Energy Efficiency
- 7. Demand Response
- Distributed Generation
- 9. Distributed Storage
- 10. Electrification

Part IV: BCA for Multiple DERs

- 11. Multiple On-Site DERs
- 12. Non-Wires Solutions
- 13. System-Wide DER Portfolios
- 14. Dynamic System Planning

Appendices

- A. Rate Impacts
- B. Template NSPM Tables
- C. Approaches to Quantifying Impacts
- D. Presenting BCA Results
- E. Traditional Cost-Effectiveness Tests
- F. Transfer Payments
- G. Discount Rates
- H. Additional EE Guidance



NSPM BCA Framework

Fundamental BCA **Principles**

Multi-Step Process to Develop a **Primary** Cost-effectiveness Test When and How to Use **Secondary** Cost-Effectiveness Tests



28

NSPM BCA Principles

- 1. Recognize that DERs can provide energy/power system needs and should be <u>compared with other energy resources</u> and treated <u>consistently</u> for BCA.
- 2. Align primary test with jurisdiction's applicable policy goals.
- 3. Ensure <u>symmetry</u> across costs and benefits.
- 4. Account for all <u>relevant</u>, <u>material impacts</u> (based on applicable policies), even if hard to quantify.
- 5. Conduct a <u>forward-looking</u>, <u>long-term analysis</u> that captures incremental impacts of DER investments.
- 6. Avoid <u>double-counting</u> through clearly defined impacts.
- 7. Ensure transparency in presenting the benefit-cost analysis and results.
- Conduct <u>BCA separate from Rate Impact Analyses</u> because they answer different questions.



EE and Other DER Benefits & Costs

Utility-system Impacts are foundational – Always include

Туре	Utility System Impact		
Generation	Energy Generation		
	Capacity		
	Environmental Compliance		
	RPS/CES Compliance		
	Market Price Effects		
	Ancillary Services		
Transmission	Transmission Capacity		
	Transmission System Losses		
	Distribution Capacity		
Distribution	Distribution System Losses		
Distribution	Distribution O&M		
	Distribution Voltage		
	Financial Incentives		
	Program Administration		
	Utility Performance Incentives		
General	Credit and Collection		
	Risk		
	Reliability		
	Resilience		

Non-Utility System Impacts – Inclusion depends on applicable policy goals & objectives

Туре	Host Customer Impact	
	Host portion of DER costs	
	Host transaction costs	
	Interconnection fees	
	Risk	
Host	Reliability	
Customer	Resilience	
	Tax incentives	
	Non-energy Impacts	
	Low-income non-energy impacts	

Туре	Societal Impact	
	Resilience	
	GHG Emissions	
	Other Environmental	
Societal	Economic and Jobs	
	Public Health	
	Low Income: Society	
	Energy Security	



	-		
Туре	Host Customer Impact	Description	
	Host portion of DER costs	Costs incurred to install and operate DERs	
	Host transaction costs	Other costs incurred to install and operate DERs	
	Interconnection fees	Costs paid by host customer to interconnect DERs to the electricity grid	
	Risk	Uncertainty including price volatility, power quality, outages, and operational risk related to failure of installed DER equipment and user error; this type of risk may depend on the type of DER	
Host Customer	Reliability	The ability to prevent or reduce the duration of host customer outages	
	Resilience	The ability to anticipate, prepare for, and adapt to changing conditions and withstand, respond to, and recover rapidly from disruptions	
	Tax incentives	Federal, state, and local tax incentives provided to host customers to defray the costs of some DERs	
	Non-energy Impacts	Benefits and costs of DERs that are separate from energy-related impacts	
	Low-income non-energy impacts	Non-energy benefits and costs that affect low-income DER host customers	

DER Benefits & Costs (cont.)

Host Customer Impacts

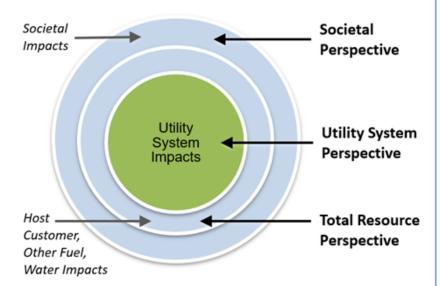
(inclusion depends on policy goals)

Host Customer NEI	Summary Description		
Transaction costs	Costs incurred to adopt DERs, beyond those related to the technology or service itself (e.g., application fees, time spent researching, paperwork)		
Asset value	Changes in the value of a home or business as a result of the DER (e.g., increased building value, improved equipment value, extended equipment life)		
Productivity	Changes in a customer's productivity (e.g., changes in labor costs, operational flexibility, O&M costs, reduced waste streams, reduced spoilage)		
Economic well- being	Economic impacts beyond bll savings (e.g., reduced complaints about bills, reduced terminations and reconnections, reduced foreclosures—especially for low-income customers)		
Comfort	Changes in comfort level (e.g., thermal, noise, and lighting impacts)		
Health & safety	Changes in customer health or safety (e.g., fewer sick days from work or school, reduced medical costs, improved indoor air quality, reduced deaths)		
Empowerment & control	The satisfaction of being able to control one's energy consumption and energy bill		
Satisfaction & pride	The satisfaction of helping to reduce environmental impacts (e.g., one of the reasons why residential customers install rooftop PV)		



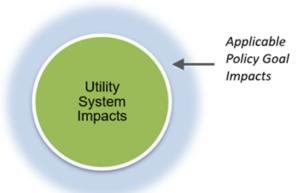
Comparison of NSPM Regulatory Perspective to Traditional Perspectives

Traditional Perspectives



 Three perspectives define the scope of impacts to include in the most common traditional costeffectiveness tests.

NSPM for DERs Regulatory Perspective



- Perspective of public utility commissions, legislators, muni/coop boards, public power authorities, and other relevant decision-makers.
- Accounts for utility system plus impacts relevant to a jurisdiction's applicable policy goals (which may or may not include host customer impacts).
- Can align with one of the traditional test perspectives, but not necessarily.



Comparison of JST to Traditional Tests

Test	Perspective	Key Question Answered	Categories of Benefits and Costs Included
Jurisdiction- Specific Test	Regulators or decision-makers	Will the cost of meeting utility system needs, while achieving applicable policy goals, be reduced?	Includes the utility system impacts, plus those impacts associated with achieving applicable policy goals
Utility Cost Test*	The utility system	Will utility system costs be reduced?	Includes the utility system impacts
Total Resource Cost Test	The utility system plus host customers	Will utility system costs and host customers' costs collectively be reduced?	Includes the utility system impacts, plus host customer impacts
Societal Cost	Society as a whole	Will total costs to society be reduced?	Includes the utility system impacts, plus host customer impacts, plus societal impacts such as environmental and economic development impacts

^{*}Also referred to as the Program Administrator Cost (PAC) Test.



Use of Secondary Tests

NSPM provides guidance on when and how to use secondary tests.

While a jurisdiction's primary test informs whether to fund or otherwise support DERs, secondary tests can help to:

- inform decisions on how to prioritize DERs;
- inform decisions regarding marginally non- and/or costeffective DERs; and
- encourage consistency across DER types.



NSPM Case Studies

Case Study examples





State process for applying NSPM What we are generally seeing...

2-3 months 6-12 months 2-4 months later... 6-9+ months State outreach **PUC** staff **PUC Order PUC** staff led directive/order stakeholder process Webinar and/or Adopt/modify Apply the NSPM stakeholder In-person NSPM framework meeting Can we improve applied recommendations Stakeholders/ CE testing? Check alignment with Prioritize areas **PUC** Report back… principles of focus Develop report & recommendations Processes take time... **Implementation:** PUC staff led changes to CE testing with stakeholder input



New Hampshire – NSPM Review and Application

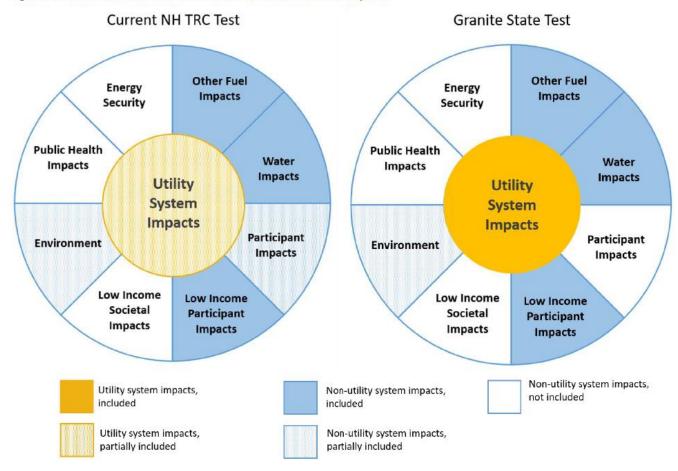
- Late 2018 Informational meetings with PUC staff and stakeholders on the what/why/how on NSPM...
- March to Oct 2019 PUC staff embark on NSPM 7-step process with state Benefit-Cost Working Group and consulting support (Synapse Energy Economics). Working group involves PUC staff, utilities, consumer advocate, various NGOs
- Oct 2019 Synapse issues final report reflecting BC Working Group review and input. Report submitted to commission.
- Dec 2019 Commission Order Approving Benefit Cost Working Group Recommendations (Order 26,322), with changes to cost-effectiveness testing practices to go into effect January 2021

New Hampshire – Primary Test



Before and After NSPM

Figure 1. Current and NH TRC test and Granite State Test impacts



Source: 2019 B/C Working Group discussions.

Notes: The utilities partially account for participant non-energy benefits through a percentage adder in the current New Hampshire TRC Test. The utilities partially account for environmental externalities through a New Hampshire-specific fossil fuel proxy.



New Hampshire – Utility System Impacts a closer look...

Other Fuel Energy Impacts Costs: Security Measure costs Technical support Administrative costs Public Health EM&V costs Water Shareholder incentives Impacts Utility Impacts Benefits: Avoided costs for: energy, capacity, reserves, System T&D, losses, ancillary services, RPS **Impacts** compliance, credit & collection costs, environmental compliance Participant Environment Wholesale price suppression **Impacts** Improved reliability Reduced risk Market transformation Low Income Low Income Societal Participant Impacts Impacts Utility system impacts, Non-utility system impacts, Non-utility system impacts, Non-utility system impacts, included partially included included not included

Figure 4. Granite State Test impacts

Source: 2019 B/C Working Group discussions.

Note: The utilities partially account for environmental externalities through a New Hampshire-specific fossil fuel proxy.



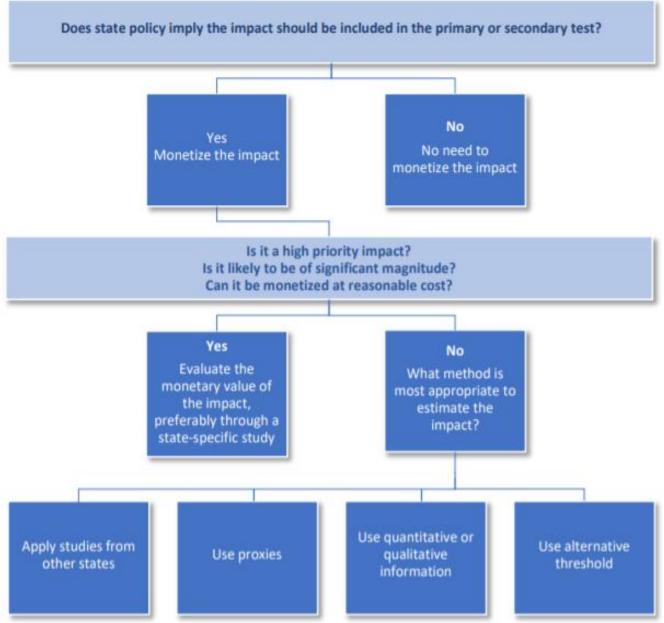
Ensure Symmetry of Benefits & Costs

Illustrative Example: Treatment of Host Customer Costs and Benefits

	Asymmetry	Symmetry		
Costs and Benefits	A. Host Customer	B. Host Customer	C. Host Customer	
	Costs Included,	Costs and Benefits Costs and Benefit		
	Benefits Excluded	Both Included	Both Excluded	
DER Costs				
Utility System Costs:				
- Rebate/Incentive	\$1,875	\$1,875	\$1,875	
- Administrative Costs	\$1,500	\$1,500	\$1,500	
Host Customer Costs:	\$5,625	\$5,625	not included	
Total Costs Accounted for:	\$9,000	\$9,000	\$3,375	
DER Benefits				
Utility System Avoided Costs	\$6,000	\$6,000	\$6,000	
Host Customer Non-Energy Benefits	not included	\$4,000	not included	
Total Benefits Accounted for:	\$6,000	\$10,000	\$6,000	
Net Benefit/Cost	(\$3,000)	\$1,000	\$2,625	
Benefit-Cost Ratio (BCR):	0.67	1.11	1.78	
	X	✓	✓	
Treatment of Host Customer Impacts	Asymmetrical	Symmetrical		



New Hampshire
Determining how to
account for EE
Impacts





A few words on the NSPM for DERs

(and broader application beyond EE...)



DER Benefits & Costs

Utility System Impacts – whether a benefit/cost can depend on various factors...

Туре	Utility System Impact	EE	DR	DG	Storage	Electrification	
	Energy Generation	•	•	•	•	•	
Generation	Capacity	•	•	•	•	•	
	Environmental Compliance	•	•	•	•	•	
	RPS/CES Compliance	•	•	•	•	•	
	Market Price Effects	•	•	•	•	•	
	Ancillary Services	•	•	•	•	•	
Transmission	Transmission Capacity	•	•	•	•	•	
	Transmission System Losses	•	•	•	•	•	
Distribution	Distribution Capacity	•	•	•	•	•	
	Distribution System Losses	•	•	•	•	•	
	Distribution O&M	•	•	•	•	•	
	Distribution Voltage	•	•	•	•	•	
General	Financial Incentives	•	•	•	•	•	• = typically a benef
	Program Administration Costs	•	•	•	•	•	= typically a cost= either a benefit
	Utility Performance Incentives	•	•	•	•	•	or cost depending o application
	Credit and Collection Costs	•	•	•	•	•	o = not relevant for
	Risk	•	•	•	•	•	resource type
	Reliability	•	•	•	•	•	42
	Resilience		•		•	0	



Key Factors that Affect DER Impacts

Depends on specific DERs and use cases:

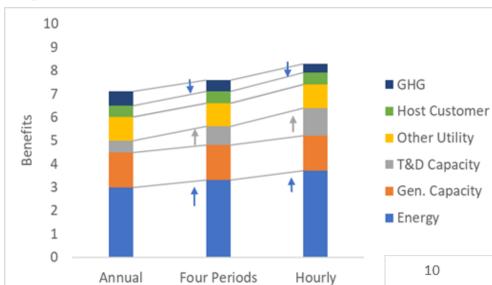
- DER technology characteristics, operating profile
- Resource ownership/control
- Temporal and locational impacts
- Interactive effects
- Behind-the-Meter versus Front-of-the-Meter

Cross-Cutting Considerations

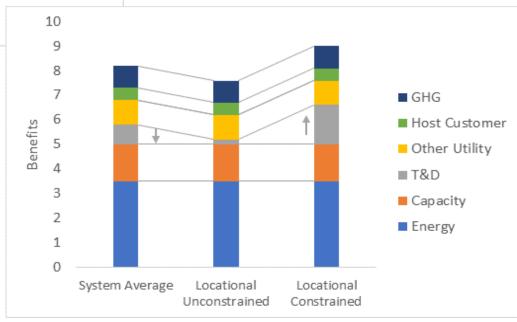
- Air Emission Impacts
- Transfer Payments and Offsetting Impacts
- Variable Renewable Generation Impacts
- Wholesale Market Revenues
- Free Riders and Spillover Impacts
- Discount Rates



Temporal Impacts on EE Benefits Hypothetical Example

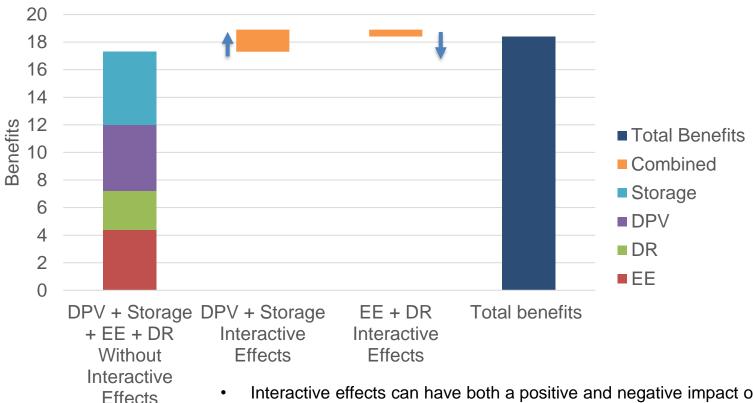


Location Impacts on DR Benefits Hypothetical Example





Multiple On-site DERs Example of GEB Interactive Effects



- Interactive effects can have both a positive and negative impact on BCA;
 e.g., positive interactive benefits between DPV and DS, yet negative interactive effects between EE and DR.
- In analyzing combined net interactive effects, total benefits are higher overall than without interactive effects, but not as high as if only DPV and DS interactive effects were accounted for.
- It is key to ensure that BCAs fully capture the net potential interactive effects.



46

For More Information:

Check out NESP Events for BCA/NSPM topical webinars

Visit the <u>Database of Screening Practices</u> (DSP) to access comprehensive information about cost-effectiveness testing practices for electric and natural gas EE programs

Stay informed with the <u>NESP Quarterly Newsletter</u>

Questions?

Julie Michals, Director of Valuation – E4TheFuture imichals@e4thefuture.org



Sherry McCormack
Southwestern Electric Power Company
(SWEPCO)



Better Buildings Residential Network Peer Exchange

Passing The Test: How Are Residential Efficiency Cost Effectiveness Tests Changing?

Arkansas NSPM Case Study

Sherry McCormack

Manager, Energy Efficiency & Consumer Programs

Southwestern Electric Power Company





Who We Are

- 543,000+ customers
- 1,750 employees
- 33,696 square miles of service area



Overview

- Conducted during 2017-2018 by Parties Working Collaborative (PWC), which includes
 - AR investor owned electric and gas utilities
 - APSC Staff
 - Attorney General's Office
 - Audubon Society
 - Evaluators
- Filed with Arkansas Public Service Commission Oct. 26, 2018 in Docket No. 10-100-R



Findings & Resulting SWEPCO Actions

- Inconsistencies with APSC guidance around Total Resource Cost Test
 - Various approaches to quantifying utility system impacts
 - Avoided T&D costs
 - Average line loss rates versus marginal line loss rates
 - Treatment of incentives paid to free riders
 - Choice of discount rates
- Impact to SWEPCO's reporting
 - Changed from no inclusion to zero dollars
 - Requested marginal line loss included in line loss study
 - Discount rate no longer updated annually WACC approved in most recent general rate case will be used



Inconsistencies Noted Between AR Cost Effectiveness (CE) Analysis & NSPM Principles

- Categories of utility system impacts not addressed
 - Avoided ancillary service costs
 - Avoided credit and collection costs
 - Risk mitigating value of efficiency resources
- Asymmetrical application of participant impacts
 - Inclusion of all costs but excluding some NEBs
- Incorporation of assumptions regarding carbon costs



Inconsistencies Noted Between AR CE Analysis & NSPM Principles – Actions Taken

- Avoided ancillary service costs
 - Quantification not warranted; recommendation of no change
- Avoided credit and collection costs
 - Monitoring cost studies underway in other jurisdictions
- Risk mitigating value of efficiency resources
 - Recommend no change



Inconsistencies Noted Between AR CE Analysis & NSPM Principles – Actions Taken (cont'd)

- Asymmetrical application of participant impacts, including the inclusion of all costs but excluding some NEBs
 - No additional asymmetrical applications found except those associated with low-income energy efficiency programs
 - Three NEBs are currently quantified and reported by utilities
 - Other fuels electricity, natural gas, liquid propane energy savings
 - Public water and wastewater
 - Avoided and deferred equipment replacement costs



Inconsistencies Noted Between AR CE Analysis & NSPM Principles – Carbon Costs Status

- Incorporation of assumptions regarding carbon costs
 - Directive was to propose consistent mechanism for illustrating rate and bill impacts of modeling low, medium, and high carbon cost scenarios on the cost effectiveness of a utility's EE programs
 - Carbon cost calculators are currently under consideration by the APSC



Next Steps

- More consistent inputs to annual cost effectiveness analysis
- New reporting tool for three-year plans
 - Provides additional consistency for stakeholder review



Thank you!

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New Virtual Sessions from Solar Decathlon on Innovative Homes and Energy Careers

The Solar Decathlon announced a new webinar series starting in September that will include virtual tours of innovatively designed homes and address a variety of topics from the rise in zero energy homes to clean energy careers.







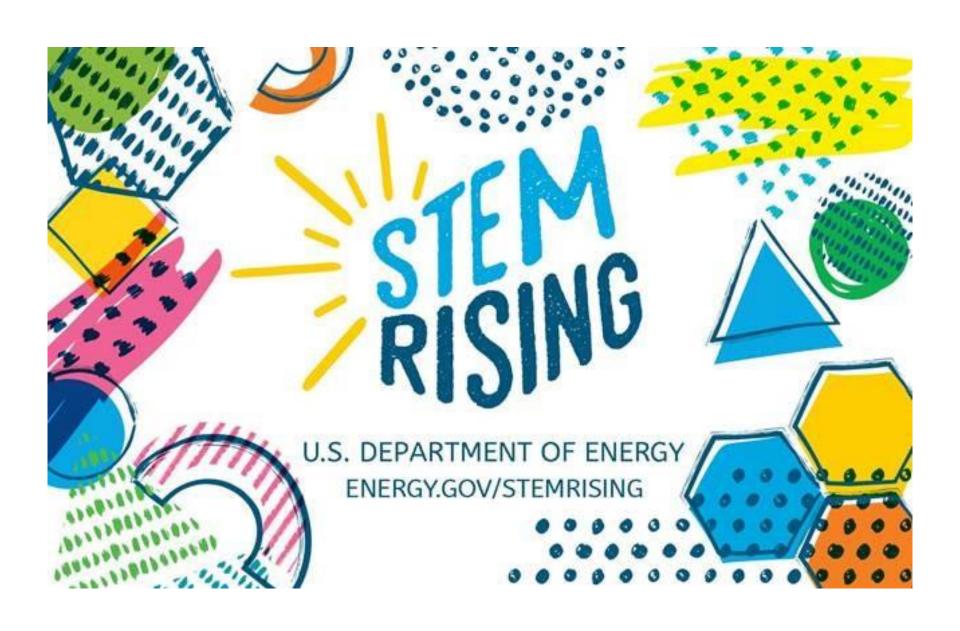
Upcoming DOE Solar Decathlon Virtual Sessions

Register for Upcoming Sessions and Watch Prior Sessions at solardecathlon.gov/virtual_sessions.html

- . Zero Energy Ready Homes: New and Growing Fast Wednesday, February 17, 2021, 1–2 p.m. E.T.
- The Future of Solar: A Tour of Cutting-Edge Solar Research with the U.S. Department of Energy Wednesday, March 17, 2021, 1–2 p.m. E.T.
- Winning Solar Home The DOE Solar Decathlon Build Challenge Winners Wednesday, April 28, 2021, 1–2 p.m. E.T.



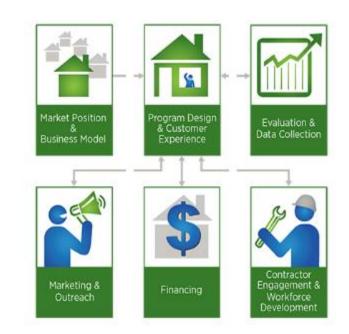




Explore the Residential Program Solution Center

Resources to help improve your program and reach energy efficiency targets:

- Handbooks explain why and how to implement specific stages of a program.
- Quick Answers provide answers and resources for common questions.
- Proven Practices posts include lessons learned, examples, and helpful tips from successful programs.
- Technology Solutions NEW! present resources on advanced technologies, HVAC & Heat Pump Water Heaters, including installation guidance, marketing strategies, & potential savings.



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Please send any follow-up questions or future call topic ideas to:

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