

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DOCKET NO. UE-100176

EXHIBIT NO. \_\_\_\_ (BWF-4)

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REPRESENTING AVISTA CORPORATION

Impact Recommendations of Cadmus Group

Cadmus Recommendations:	Avista’s Response:
<u>LOW INCOME</u>	
Perform non-energy benefits quantification, possibly including economic, payment, mobility, affordability and increased property value.	The Company will take this recommendation to its advisory group for discussion. There has recently been a sub-committee within the Advisory Group formed to address unique low-income issues, such as this one.
Standardize expected savings calculations across both states to help avoid discrepancies in realization rates.	The Company’s low income programs are administered through six Community Action Agencies (CAA) in two states. CAAs each use different tools, models and unit savings estimates (UES). The Company will consider ways to standardize savings estimates across agencies in order to lessen the impact on realization rates.
Refine expected savings calculations to account for pre-period annual consumption, square footage, and interaction effects. This will help create a more robust savings estimate and avoid over-estimates that may occur through a prescriptive application of deemed estimates.	As mentioned above, CAAs use different tools, models and UES. These tools appear to ignore the interactive effects. The Company will consider ways to improve this process and the resulting savings claims.
Track alternative heating sources. Collecting information on a customer’s primary heating usage at the time of weatherization will allow for more reasonable estimates in cases where, despite being a gas customer, gas is used as a secondary heating source.	The Company is currently in the process of implementing this tracking.
Include high-use customers in program targeting. Targeting high-use customers may help achieve higher energy savings and aid in overly burdened customers with usage higher than average customers.	Historically, Avista’s annual contracts with CAA have been flexible in how they administer their programs. The Company will consider modifying contracts to include targeting of higher use customers.
<u>NON-RESIDENTIAL</u>	
Create a quality control system to double check all projects with savings over 300,000 kWh and/or 10,000 therms.	Currently, the PPA Engineer reviews site-specific projects with incentives over \$50,000 and performance contracts. Avista will establish quality controls around prescriptive projects as well.
Consider performing three- to six-month post-installation random inspections to confirm	Avista will consider and develop a strategy to inspect a sampling of projects three- to six-months post-

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measure persistence and potentially to identify opportunities to improve performance.	installation. Policy and internal evaluation will be coordinated by PPA.
Require all internally and externally developed simulation models to be saved to Avista's server and backed up.	Implementation Engineers will ensure that all simulation models will be saved and backed up to Avista's server.
On large, new construction HVAC projects, confirm the proposed system matches the as-built system.	Avista agrees that this should be implemented.
Consider developing a new construction measure to combine the interactive effects associated with all individual measures at these types of projects.	In the case of LEED, this measure was discontinued in December 2010. Projects completed by December 2011 and certification received by Avista by March 2012 were still eligible for incentives. Since this measure has been discontinued, a new construction measure will not be added. Avista will consider how other new construction measures are handled as well as the development of a new construction category.
Avista should consider adding a program for recommissioning to report energy savings achieved by resolving issues with a measure identified as non-functional during the previous year's evaluation process. Recommissioning measure costs would primarily involve utility and implementer staff costs to resolve issues and re-inspect the measure. Recommissioning measures should be evaluated as a census sample, and the <i>ex post</i> energy savings should not be extrapolated to the overall program population.	Avista agrees with this recommendation and is working to implement this.
While Avista's databases house the information necessary to streamline evaluation, such as site addresses, site contact information, and measure-level details, a simpler extraction process could help improve the process.	The Company is in the process of updating its Customer Service Database and other related systems. In the meantime, the Company will continue to use the existing database and seek ways in which to simplify the extraction process.
Avista may want to consider providing incentives for demand-controlled ventilation, refrigerated warehouses, and steam trap replacements through the Site Specific Program.	Avista has implemented this recommendation and moved these measures from a prescriptive approach to be handled site-specifically.
Avista should consider revising methods for calculating and tracking HVAC/lighting	Avista agrees with this recommendation and will evaluate means to do so.

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interactive effects.	
<b>RESIDENTIAL</b>	
Move all clothes washers rebates to the electric program unless a large penetration of gas dryers exist.	Avista agrees that this should be considered in program design.
Include a Seasonal Energy Efficiency Ratio (SEER) requirement to increase savings for high-efficiency heat pump participation.	Avista agrees that this should be considered in program design.
Consider restricting dual fuel customers acquiring multiple rebates that have interactive effects.	Avista agrees that this should be considered in program design by the Implementation team.
Increase measure level detail capture on applications and include in the database. Specific additional information includes energy factors or model numbers for appliances, baseline information for insulation, and home square footage, particularly for Energy Star Homes.	Currently, appliance model numbers are on the invoices and insulation baseline info are included on the rebate forms, however, this information is not entered into the database. Square footage on Energy Star Homes has recently been added to the database tracking. Avista will consider possibilities to improve the amount of measure level detail within the database.