



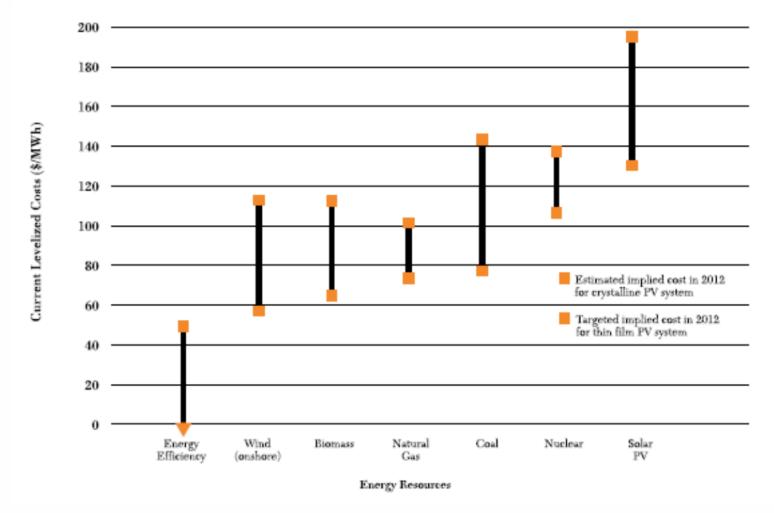
In Pursuit of All Cost-Effective Energy Efficiency

October 23, 2012 Tim Woolf

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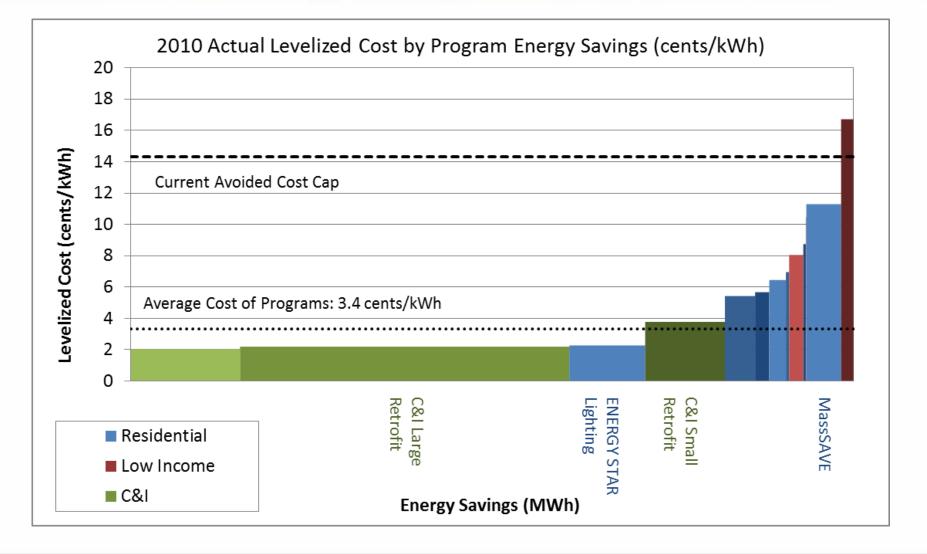
- 1. There is a huge potential of very low-cost energy efficiency savings opportunities throughout the US.
- 2. Efficiency savings cannot be achieved overnight. It takes years to build up the regulatory, institutional and market infrastructure.
- 3. The ability to use efficiency to stop or retire coal or gas plants, is significantly enhanced with sustained, long-term regulatory support for EE in the state.
- 4. Therefore, it is important to advocate for all costeffective energy efficiency, every year, in every state; especially states where you want to stop coal.

Energy Efficiency is Very Cheap



Source: World Resources Institute

2010 Energy Efficiency Costs in Massachusetts



If Energy Efficiency is So Cheap, Why Do We Need EE Programs?

Customers face numerous <u>market barriers</u> that prevent them from adopting energy efficiency:

- Lack of awareness.
- Limited product availability.
- Lack of information.
- Lack of training.
- Lack of capital.
- High transaction costs.
- Split incentives (landlord vs. tenant)

- Short-term perspective.
- Institutional barriers.
- Uncertainty.
- Risk avoidance.
- Lack of awareness of environmental benefits.

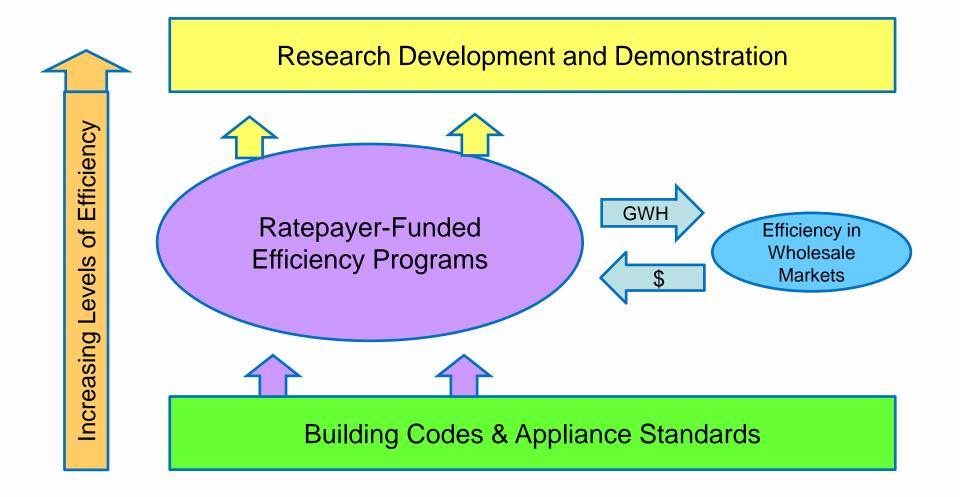
Energy efficiency programs are needed to overcome these market barriers.

Big Picture: Energy Efficiency Mechanisms

Four Mechanisms to Promote Energy Efficiency:

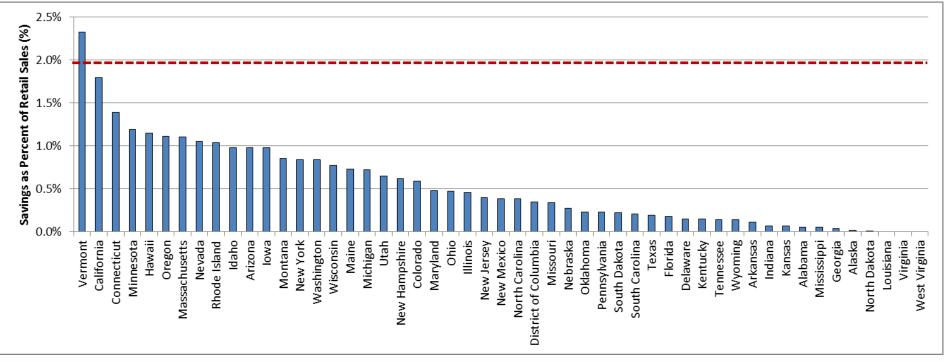
- 1.Building Codes and Appliance Standards.
- 2.Ratepayer-Funded Efficiency.
- 3.Organized Wholesale Markets.
- 4.Research, Development and Demonstration (RD&D).

Relationships Between the Four Mechanisms



Ratepayer-Funded Efficiency: Savings By State

Annual Incremental Savings, as a Percent of Annual Sales; 2010

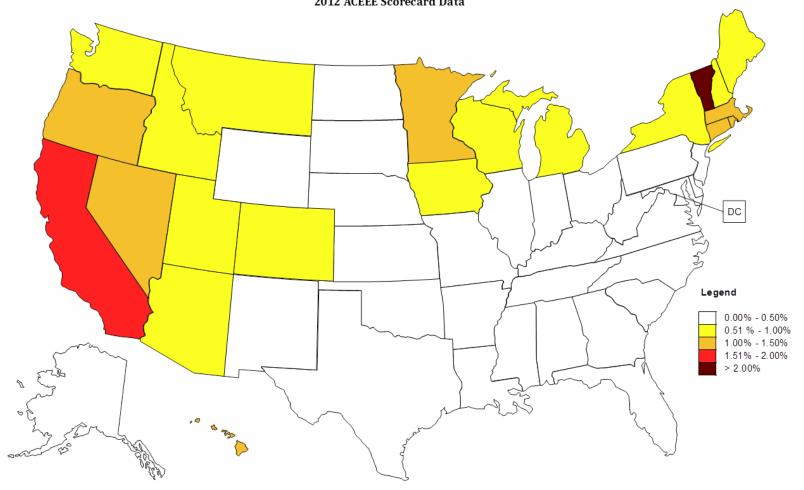


General Conclusions:

- States have really just begun to tap into the efficiency potential.
- Half of the states are achieving very little savings.
- Even the leading states could achieve greater savings.
- All states should be working towards achieving two percent reductions per year.

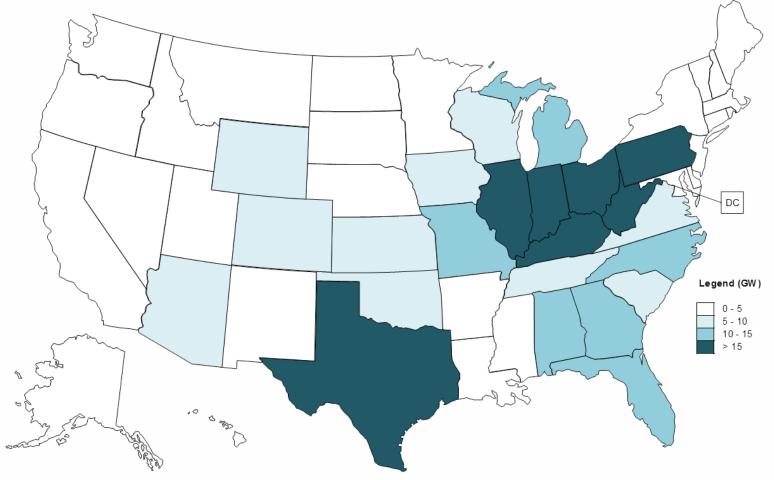
Efficiency Savings Across the States

2010 Net Incremental Electricity Savings by State (as a % of retail sales), 2012 ACEEE Scorecard Data



Coal Capacity Across the States

2010 Coal Capacity (GW), EIA Form 860 2010



Ratepayer-Funded Efficiency: Top Ten Policies

- 1. Clear, stable, long-term regulatory support.
- 2. A mandate to implement all cost-effective energy efficiency.
- 3. Proper treatment of customer concerns.
- 4. Timely and predictable recovery of efficiency program costs.
- 5. A mechanism to allow regulated utilities to recover lost revenues.
- 6. Well-designed shareholder incentives or performance incentives.
- 7. Proper cost-effectiveness test(s) for screening programs.
- 8. Proper estimation of avoided costs.
- 9. Sound integrated resource planning practices, where appropriate.
- 10.Meaningful stakeholder engagement.

Customer Concerns

- Customer concerns are the single biggest reason that states are not achieving higher efficiency savings.
- <u>Rate impacts</u> are the biggest customer concern.
- This has been an issue since the beginning of time.
- This is an issue in every state, even the leading states.
- Unless rate impact concerns are addressed directly, we will never achieve all cost-effective efficiency.

Rate Impacts

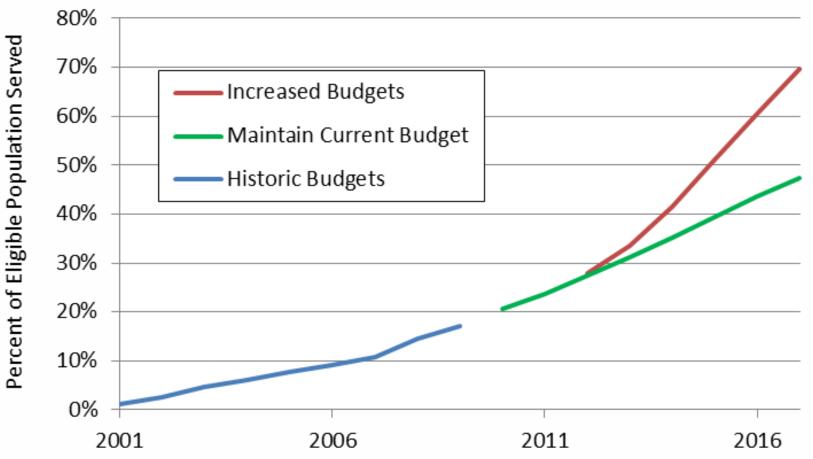
- Energy efficiency rate impacts are often misunderstood, misrepresented and overblown.
- In the majority of states, rate impacts are very small, e.g., less than 1 or 2 percent.
- In the leading states, rate impacts may start to get big, e.g., on the order of 3, 4, maybe 5 percent.
- The standard response to rate impact concerns:
 Yes rates go up, but average bills go down.
- This response has not been effective enough.

The Importance of Assessing Participation Rates

- It is important to identify participants:
 - Program participants' bills decrease.
 - Program non-participants' bills increase.
- As the rate impacts start to get big, so will the number of participants an offsetting effect.
- Rate impacts, bill impacts and participation should be considered over the long-term.
- Rate impacts, bill impacts and participation should be assessed to address the decision at hand:
 - Not to compare proposed EE budget with zero EE.
 - To compare one EE budget with another.

Example of How to View Customer Participation

Small C&I Customer Participation Rates (VT)



Policy Options to Promote Participation

- Gather better data on participation.
- Include participation rate requirements in EE plans.
- Include participation rate requirements in EE targets.
- Incorporate participation rates in utility shareholder incentives.
- Increase participation rates through program designs.
- <u>Increase program budgets</u>, rather than decreasing them, in response to rate impact concerns.
- "All cost-effective energy efficiency for all customers."

The Importance Cost-Effectiveness Screening

- All states use some form of cost-effectiveness tests to screen programs i.e., identify the ones to implement.
- Cost-effectiveness was originally a selling point for energy efficiency.
 - However, in many states it has become a constraint.
- Five standard tests are used:
 - Participant test.
 - Ratepayer Impact Measure (RIM) test.
 - Program Administrator Cost (PAC) test.
 - Total Resource Cost (TRC) test.
 - Societal Cost test.

Defining Cost-Effectiveness: Five Standard Tests

	Participant Test	RIM Test	PAC Test	TRC Test	Societal Cost Test
Energy Efficiency Program Benefits:					
Customer Bill Savings	X				
Avoided Energy Costs		X	X	Х	Х
Avoided Capacity Costs		Х	Х	Х	Х
Avoided Transmission and Distribution Costs		X	Х	Х	Х
Wholesale Market Price Suppression Effects		X	Х	Х	
Avoided Cost of Environmental Compliance		Х	Х	Х	Х
Other Program Impacts (utility perspective)			X	Х	Х
Other Program Impacts (participant perspective)	Х			(X)	Х
Other Program Impacts (societal perspective)) !	Х
Energy Efficiency Program Costs:					
Program Administrator Costs		Х	Х	Х	Х
EE Measure Cost: Program Financial Incentive		Х	Х	X	Х
EE Measure Cost: Participant Contribution	Х			(X)	Х
Non-Energy Costs	Х		Х	Х	Х
Lost Revenues to the Utility		Х			

Other Program Impacts

- We use the term "other program impacts" (OPIs) to include non-energy impacts or <u>non-energy benefits</u>.
- OPIs are those costs and benefits that are not part of the costs, or the avoided cost, of the energy provided by the utility.
- Examples: increased safety, improved health, reduced O&M costs, increased worker and student productivity, water savings, increased comfort, improved aesthetics, etc.
- OPIs also include "<u>other fuel savings</u>," which are other fuels that are not provided by the utility (e.g., oil savings).

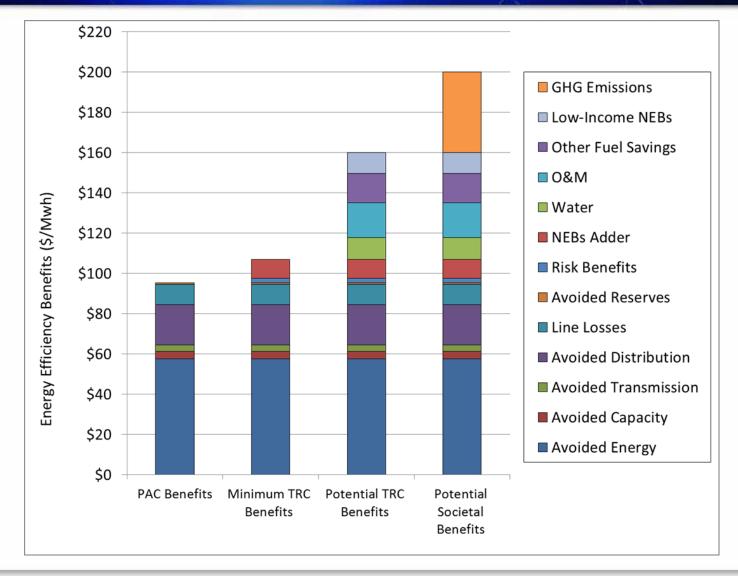
Current Treatment of Other Program Impacts

- Most states use the TRC test, however...
- Most states <u>completely ignore or significantly</u> <u>undervalue</u> OPIs.
- The outcome:
 - The results of the TRC tests are skewed against EE.
 - Significantly less efficiency is identified as cost-effective.
 - Some key programs become uneconomic.
 - Less efficiency is implemented.
 - Customers pay higher costs than necessary.
 - Fewer opportunities to avoid power plants.

Rationale for Including Other Program Impacts

- OPIs should be included in cost-effectiveness tests to ensure that the tests are <u>internally consistent</u>.
 - If the participating customer's costs are included, then that customer's benefits should be included.
- In the TRC test the participant's costs and the participant's non-energy benefits can be quite large.
- Experience indicates that these benefits are very important to many customers, sometimes more important than the energy benefits.

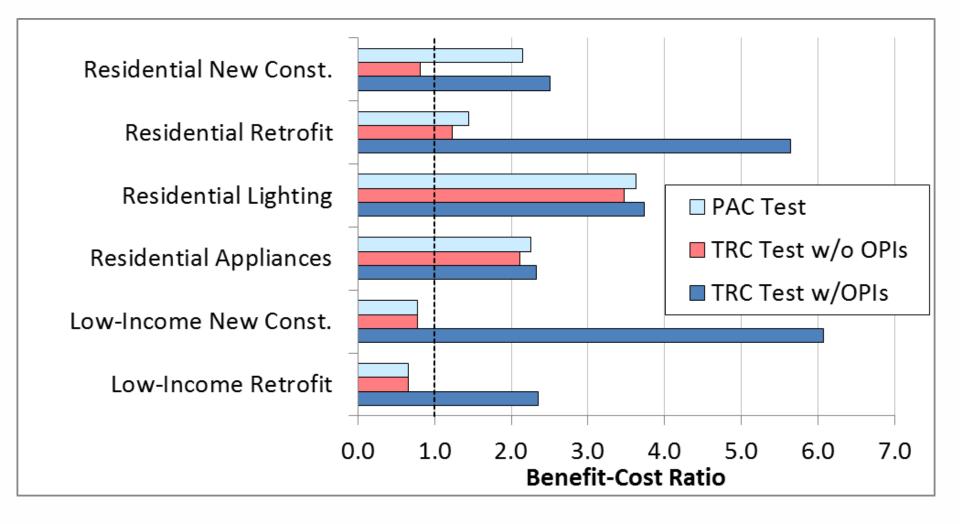
One Example of Other Program Impacts (VT)



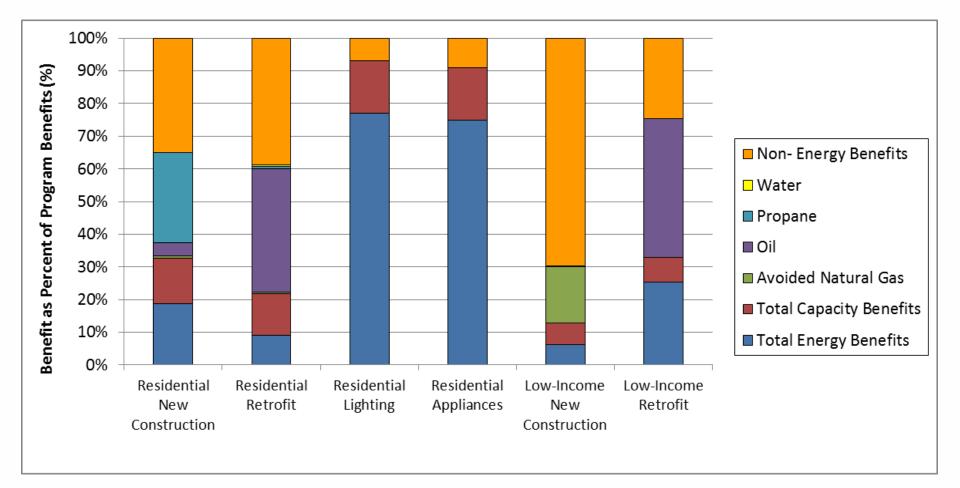
Implications of Other Program Impacts

- Other program impacts can have significant effects on low-income programs, residential retrofit programs and residential new construction programs.
 - Including OPIs has the effect of avoiding lost opportunities, allowing for comprehensive EE treatment, and promoting customer equity.
- Other program impacts can also have significant effects on C&I programs.

Cost-Effectiveness Results: For 2012 Efficiency Plan for a Massachusetts PA



Same Cost-Effectiveness Results: Breakout of Benefits by Type



OPIs Raise Important Customer Concerns

- Including OPIs in the TRC test is likely to expand the universe of cost-effective efficiency.
- This may result in increased energy efficiency budgets, or a different mix of energy efficiency programs within given budgets.
- Including OPIs in the TRC test will also require electric and gas utility customers to pay for achieving nonenergy benefits.
 - These benefits could be seen as <u>outside the sphere</u> of electric and gas utility responsibility.

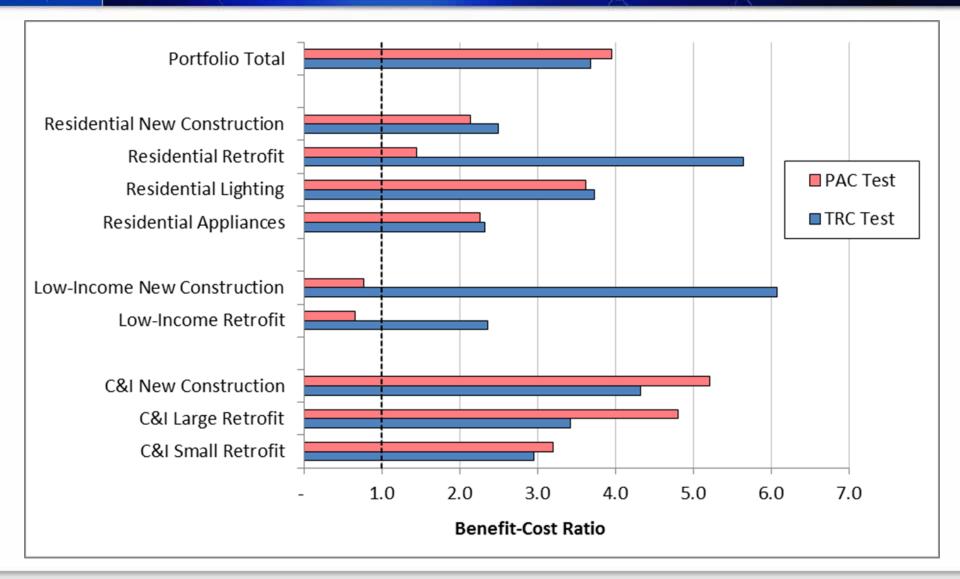
Addressing Customer Concerns

- Including OPIs is necessary to maintaining internal consistency in the TRC test.
 - If regulators decide they do not want to consider costs and benefits outside the utility's sphere, then they should not use the TRC test, use the PAC test instead.
- Including OPIs helps achieve public policy benefits, especially customer equity.
- Overall customer benefits can be ensured by applying the Program Administrator Cost test to the energy efficiency portfolio, as described below.

Recommendations for Applying the Tests

- The <u>Societal Cost test</u> or the <u>TRC test</u> should be used to screen energy efficiency programs.
 - These tests should be used only if they include reasonable estimates of OPIs.
- However, in order to address customer concerns, the <u>PAC test</u> should be applied to the entire <u>portfolio</u> of efficiency programs.
 - This will ensure that the entire set of programs will result in a net reduction in costs to utility customers.
 - In the MA example above, under the PAC test:
 - Utility benefits exceed utility costs by a factor of four.
 - Costs = \$195 mil; Benefits = \$773 mil; Net Benefits = \$578 mil

Portfolio Level Cost-Effectiveness Results



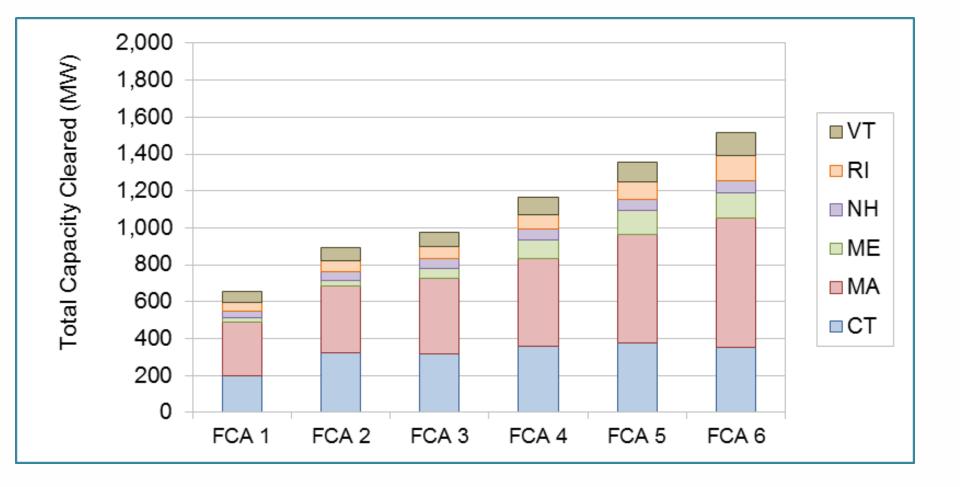
Energy Efficiency in Wholesale Markets: Potential Benefits

- Reduced market prices.
- Increased reliability.
- More efficient operation of the markets.
- Mitigation of market power concerns.
- Environmental benefits. (Will be small or very small.)
- <u>Generate revenues</u> that flow back to ratepayer-funded energy efficiency programs.

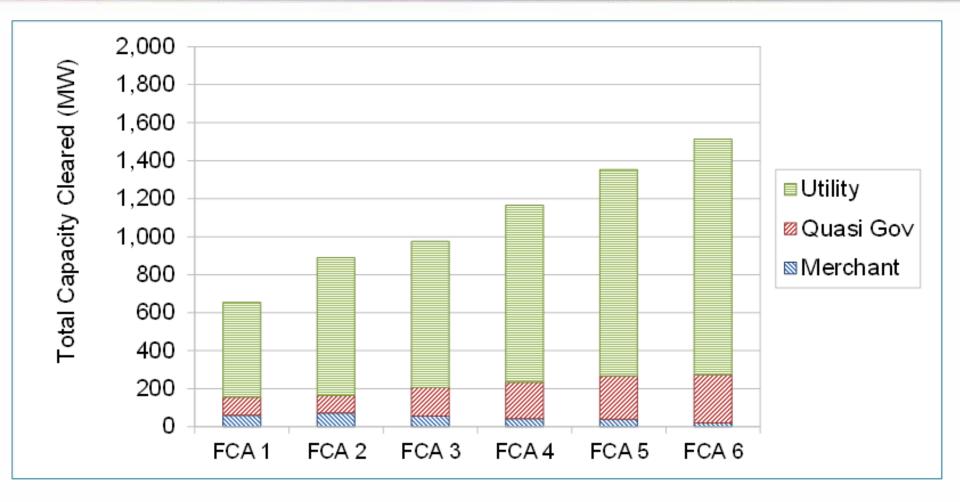
How Energy Efficiency and Demand Response Fit in Wholesale Electricity Markets

- Capacity Markets:
 - Energy efficiency & demand response potentially eligible.
 - Currently allowed in several capacity markets.
- Energy Markets:
 - Only demand response is potentially eligible.
 - FERC supported this approach in Order 745, however the Order is currently held up in appeals.
 - Several markets allow this now, but in a limited way.
- Ancillary Services Markets:
 - Only demand response is eligible.
 - Currently allowed in several regions.

Energy Efficiency in Capacity Markets: Amount Procured to Date in New England



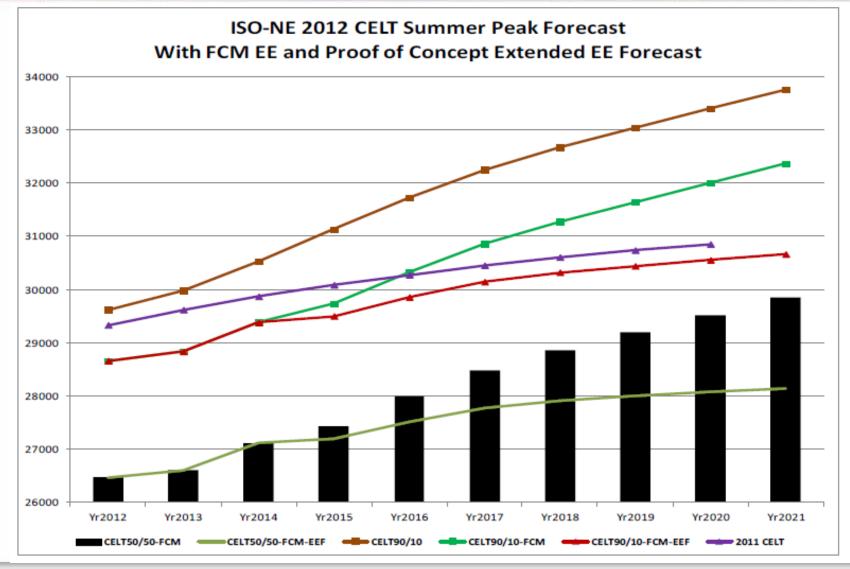
Energy Efficiency in Capacity Markets: Most of the Efficiency is Ratepayer-Funded



Energy Efficiency in Capacity Markets: Key Issues to Get Right

- Include efficiency savings in the load forecast, so that it will influence resource planning.
- Demand-side resources should treated comparably to supply-side resources.
- Demand-side resources should be paid the same as supply-side.
 - Paid the marginal clearing price.
 - Paid for all years that they deliver.
- Evaluation, measurement and verification must meet high standards.

Energy Efficiency in Capacity Markets: The Importance of Accounting for EE in Forecasts



Tim Woolf – All Cost-Effective Energy Efficiency

Summary: Energy Efficiency Priorities

- Ratepayer-funded:
 - Efficiency policies should account for customer concerns.
 - Get the cost-effectiveness tests right.
 - Pursue all cost-effective efficiency for all customers.
 - Pursue all cost-effective efficiency, all states, all years.
- Wholesale Markets:
 - Main reason to promote efficiency is to generate revenues for the ratepayer-funded programs.
- One of the key reasons to get this right is so that when the federal & state governments finally address climate change, we will be able to really push the limits of EE.

Select Energy Efficiency References

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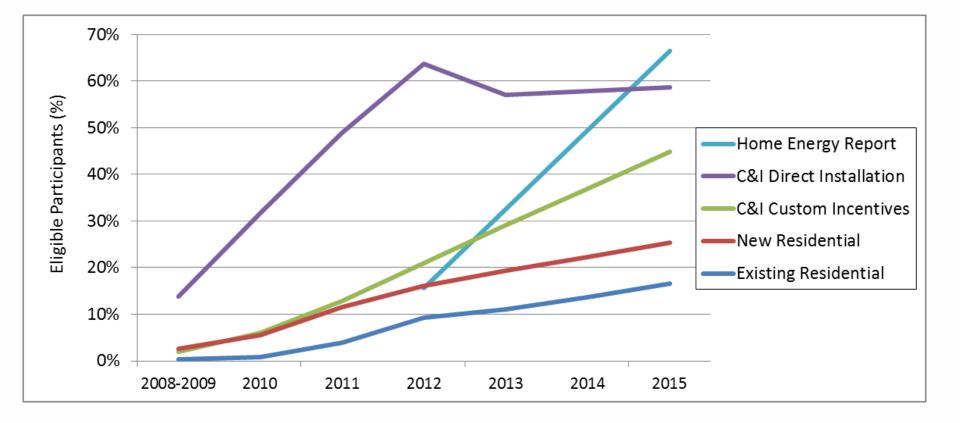
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Appendix

Participation Rates In Nova Scotia – By Program



It's Important to Include All Avoided Costs

Example of Avoided Costs by Component – Massachusetts

