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2022-2027 BPA Draft EE Action Plan – EWEB Comments

- We appreciate your efforts to partner with utilities and third parties to achieve energy savings targets cost effectively.
- Commercial lighting comes at a low cost, with incentives a fraction of many residential measures, and half of many commercial measures. Is BPA studying how much more lighting savings could be achieved by increasing those incentives? These projects are often much simpler to sell, achieve and process than others.
- Can we find a way to more accurately target and achieve savings from replacement of the most inefficient lighting still in use, rather than using a smaller savings value based on a more efficient "market" baseline?
- The opportunity to provide BPA pass-through incentives, much like conservation, for peak shifting measures (think water heaters and EV charging) and renewables such as PV installations could add options for utilities, with benefits similar to energy efficiency.
- Is there a way for BPA to count utility conservation investments for a longer period of time when determining high water marks for post-2028 contracts? Utilities may be reluctant to invest ratepayer funds in conservation if it reduces their future access to lower cost BPA power.
- Is BPA looking at ways to reduce infrastructure costs and utility burden for BPA processes and reporting? Conservation Infrastructure is roughly 25% of BPA budget (Figure 3, page 23). Utilities must also develop and fund their own infrastructure for program delivery, processes and reporting, and there is a lot of money being spent here that does not directly contribute to savings.
- What accounts for the differences in the green shaded numbers between Figure 3 and Table 5? There is a difference of $5.8M in FY 22-23 and $0.8M in FY 24-25.
- What is "Unallocated savings" referring to Table 2 (p. 18, 18.5 aMW in FY 22-23) and Table 5 (p. 24, $34.5M in FY 22-23)?
- Figure 4, p. 24 appears to include "self-funded" savings but NOT "self-funded costs". Why include savings without corresponding costs? It seems misleading. If self-funded savings were excluded, cost would be in the low 20's cents/kWh, instead of 15 cents. If infrastructure costs were included, $54.0M and $52.1M for FY 22-23 and FY 24-25 respectively (Figure 3, p. 23), the number would be in the 30's. Same issue for Fig 9 p32, Fig 14 p39, Fig 19 p46, Fig 24 p53, Fig 29 p61, and Fig 34 p66.
- We appreciate you looking at large volume HPWHs for multifamily buildings. We also appreciate efforts with cold climate heat pumps, and whatever will reduce the use of electric resistance heat as outside temperatures approach freezing.
- We appreciate any efforts to help support utility customers who are negotiating how to best promote BPA measures alongside state and federal funding streams. This can be confusing to negotiate.

- For Figures 7 and 8 (p. 31-32), is weatherization included in the whole building/meter level category?
- Although not called out specifically, savings potential from commercial and institutional new construction is a lost opportunity that needs to be focused on.
- We appreciate and are finding significant value working with the ESI program.
- Something analogous to the Energy Project Manager might be useful for large commercial complexes and campuses.
- There is significant potential in water and wastewater and we appreciate your efforts in this area.
- We find a significant challenge, yet also significant opportunity, for commercial savings from retro-commissioning. We would appreciate increased assistance in this area.