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Request IR-1:

Does ENSC expect the greater percentage of savings from the implementation of Enabling Strategies to occur in residential or in the commercial and institutional sectors?

Request IR-2:

Does ENSC expect any savings resulting from the implementation of Enabling Strategies to occur in the industrial sector?

Request IR-3:

In which sectors does ENSC expect major impacts on energy savings from codes and standards to occur in the next three years and from which codes and standards?

Request IR-4:

Where does ENSC expect the majority of its investment in codes and standards to be directed during 2012?

Request IR-5:

Please provide a budget breakdown for all eight of the areas of activity listed under Enabling Strategies?

Request IR-6:

In which sectors would you expect the majority of funding and activity for development and research, fuel substitution, and renewable heating to occur in 2012?

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Request IR-7:

Please describe any new efforts planned to attract participants to the low-income programs in the 2012 DSM Plan.

Request IR-8:

Please provide an estimate of the anticipated number of low income participants in 2012 DSM Plan Programs, the expected number of measures each participant will take-up, the expected energy savings by low income participants and the anticipated program cost per low income participant in 2012 plan programs.

Request IR-9:

Please provide an estimate on the anticipated number of renters in 2012 DSM Plan Programs, the expected number of measures each renter will take-up, the expected energy savings by renters, and the anticipated program cost per renter in 2012 plan programs.

Request IR-10:

Please describe the barriers to participation by renters in the 2012 DSM Plan and how the plan is designed to overcome these barriers?

Request IR-11:

Please provide any working papers and studies with respect to the calculation of savings by Extra Large Industrials?

Request IR-12:

Please provide a breakdown of the savings attributed to past Codes and Standards by each relevant code or standard.

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Request IR-13:

Please provide additional detail and any working papers on how the energy and demand savings from codes and standards were calculated, including any benchmarks that were used in the calculation of savings from codes and standards.

Request IR-14:

Are there any measures with a TRC approaching one included in any of the programs and, if so, how was the inclusion of a measure approaching one justified?

Request IR-15:

Did ENSC use a net to gross ratio of more or less than 1.0 to evaluate individual measures or programs with respect to Total Resource Cost of measures or programs?

Request IR-16:

Did ENSC amend the manner in which it evaluates free ridership and spill over in the design of the 2012 DSM Plan Programs and, if so, how has this been done.

Request IR-17:

What criteria were used to evaluate any trade-offs between ENSC's guiding principles of lowest cost and accessibility?

Request IR-18:

On what basis were choices made when establishing budgets for meeting specific targets as opposed to budgets for building capacity for long term success?

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Request IR-19:

What barriers to participation in Commercial and Institutional Programs were identified and what steps were developed for the 2012 DSM Plan to increase participation by non-participants?

Request IR-20:

What is the purpose of including savings from non-administrator programs in the application and how were these savings used in determining administrator based programs and budgets for 2012?

Request IR-21:

What is the estimated life span of the savings associated with each of the programs proposed for 2012?

Request IR-22:

In Section 5.4 of its proposed 2012 Plan, ENSC recites that it has allocated DSM Program costs among rate classes on a preliminary basis according to the methodology approved by the UARB, in its 2010 DSM Plan Decision. Please explain what is meant by referring to this as a "preliminary" allocation.

Request IR-23:

Please provide the spreadsheets contained in Appendix B in operable format, including all formulae, preferably in Excel.

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Request IR-24:

Please provide and explain each free-rider test or measure ENSC will use to separate out those participants and associated spending and saving that would have participated or occurred, as the case may be, without the DSM program.

Request IR-25:

At p. 14 of the Dunsky report, Appendix C, the consultant opines that "with any diversified business, different products can play different roles in a portfolio approach: some are 'profit centers', generating strong gains on their own at low cost; others may be loss leaders, whose primary purpose is to encourage uptake of higher-return products; and still others may be game-changers, sold at a short-term loss within a longer-term, market-positioning strategy."

a. Please define the terms "profit center," "loss leader," "short term" in the case of a game changer, "longer term" in the case of a market-positioning strategy, and "market-positioning strategy," all in the case of DSM.

b. To the extent a business sells an item at below its short run marginal cost of production, does that action ever satisfy the neo-classical definition of general welfare? Please explain.

c. What is the proper basis for determining the priority of spending by a program administrator on "profit centers," "loss leaders," and "game changers?"

Request IR-26:

With regard to market transformation efforts, what if any rules of thumb or other analytic tools are usable to decide whether a loss-leader investment in the short term will produce a positive net present value of efficiency savings over the long term?

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Request IR-27:

Please provide a copy of or an operational link to a complete copy of the DOE study referenced in footnote 8 of the Dunsky report, Appendix C, on p. 15.

Request IR-28:

Please provide a copy of or an operational link to a complete copy of each of the studies referenced at pp. 15-16 of the Dunsky report, Appendix C, regarding NEBs.

Request IR-29:

Regarding Appendix C, the Dunsky report, at p. 16, please explain why the Utility Cost (or Program Administrator) Test is superior to the TRC in providing a threshold for determining cost-effectiveness and/or a ranking of investment options according to cost-effectiveness.

Request IR-30:

Regarding Appendix C, the Dunsky report, given the Non-Energy Benefits discussed at pp. 15-16, please explain why the neither the report nor the ENSC filing propose to include Non-Energy Benefits in the TRC.

Request IR-31:

Should DSM measures satisfy the requirements of Pareto optimality (no customer in a worse situation as a result of the expenditure, and at least one in a better situation)? If not, why not?

Request IR-32:

Please define "equity" as that term is used in program design and budget allocation by ENSC. Please include an explanation of whether the definition can be translated into an algorithm or other mathematical representation of factors, such as bill impacts, rate impacts, energy and demand savings, effects on avoided or marginal costs, and the like.

Request IR-33:

How should ratepayer money be spent to achieve equity in DSM programming?

Request IR-34:

Please provide a copy of the contract between VEIC and the Vermont Public Service Board for performance-based DSM services, as well as any Board order or other documents establishing and applying the performance-based approach.

Request IR-35:

Please identify all other North American jurisdictions besides Vermont in which DSM is provided by a program administrator under a performance-based contract, describing the performance requirements, and referencing sources of documentation for the arrangements.

Request IR-36:

In a performance-based approach, how would various "equity" concerns be defined and resolved?

Request IR-37:

Aside from overall cost-effectiveness of the contractor's DSM energy and demand results at the end of a performance contract period, what if any other standards should a performance-based contract contain as a condition of receipt of full payment, of incentives, or of further extensions of the contract?

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Request IR-38:

For each program in the proposed suite of 2012 programs, please list the market barriers or imperfections that impede customers from adopting the program's efficiency measures on their own, and explain how the proposed program overcomes each such barrier and imperfection. For pilots, please list the market barriers or imperfections that impede customers from adopting the program's efficiency measures on their own, and explain how the proposed pilot is intended to overcome each such barrier and imperfection.

Request IR-39:

With regard to upcoming low-income programs, please explain why details "of owner contributions will be developed in 2012 or before." Appendix A, page 11. Why is the internal deadline for development of such pilots not in 2011?

Request IR-40:

Please provide a break-out of the information relevant to residential customers in Appendix A, Figure 5.1, between low-income and non-low-income participants.

Request IR-41:

For the following types of measures and types of residential customers, please indicate all the market barriers or imperfections that impede such customers' investment in such measures:

a. low-income tenants who pay the associated energy bills -- weatherization measures (beyond do-it-yourself weatherstripping or sealing), measures with greater than a 1 year payback.

b. low-income tenants who pay the associated energy bills -- lighting and small (or portable) appliance measures, do-it-yourself weatherization or sealing, measures with a 1 year payback or less.

c. low-income home-owners -- weatherization measures (beyond do-it-yourself weatherstripping or sealing), measures with greater than a 1 year payback.

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d. low-income home-owners -- lighting and small (or portable) appliance measures, do-it-yourself weatherization or sealing, measures with a 1 year payback or less.

e. tenants with modest incomes (but above low--income) who pay the associated energy bills -- weatherization measures (beyond do-it-yourself weatherstripping or sealing), measures with greater than a 1 year payback.

f. tenants with modest incomes (but above low--income) who pay the associated energy bills -- lighting and small (or portable) appliance measures, do-it-yourself weatherization or sealing, measures with a 1 year payback or less.

g. homeowners with modest incomes (above low-income) -- weatherization measures (beyond do-it-yourself weatherstripping or sealing), measures with greater than a 1 year payback.

h. homeowners with modest incomes (above low-income) -- lighting and small (or portable) appliance measures, do-it-yourself weatherization or sealing, measures with a 1 year payback or less.

Request IR-42:

Please provide a breakout of the participants in the 2009 and 2010 programs by (a) at least three bands of income, (b) whether tenant or homeowner who pays the relevant energy bills, and (c) those unable to take on additional debt to pay for efficiency measures.

Request IR-43:

With respect to Appendix A, Section 4.3, is it fair to say that objective of the innovative financing strategy is not merely to develop innovative financing that will increase participation in DSM programs, but also to develop innovative financing that will increase customer choice of energy efficiency measures they do not now choose in existing markets?

Request IR-44:

With regard to Appendix C, the Dunsky report, please provide the spreadsheet data used to develop the chart of illustrative alternative funding paths, 1.N.S., at p. 4.

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Request IR-45:

Please provide a list of all on-bill-financing programs considered by Dunsky in the development of its report, Appendix C, with references or links to information about them to the extent available.

Request IR-46:

With regard to Appendix C, the Dunsky report, p. 44, please explain all factors that have limited low-income retrofit program participation to the percentages of eligible customers noted, i.e. 1%-3% of the eligible population per year, and as many as 4%-8% of eligible households/year in leading jurisdictions.

Request IR-47:

Please provide a list of all transferable financing programs considered by Dunsky in the development of its report, Appendix C, with references or links to information about them to the extent available.

Request IR-48:

With regard to the fuel substitution pilot, described at Appendix D, p. 12, would installation of furnaces in electric-baseboard-heated homes be a potential candidate for transferable financing? Why?

Request IR-49:

With regard to the fuel substitution pilot, described at Appendix D, p. 21, please provide the basis for the assumptions that 80% of those who responded that they would definitely convert their heating system away from electricity would do so, and that 20% of those who responded that they would probably convert their systems would in fact do so.

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Request IR-50:

With respect to the fuel substitution pilot, described in Appendix D, charts 13 and 14 (incentive levels), the report appears to show that all but three of the measures are proposed to have incentives of 20% or greater (one of the three would have an incentive of 19%), and that except for one measure, the customer's simple payback after application of the incentive at least 4 years, and ranges from 4 years to 18 years. To what extent will the 4 plus years before payback create a market barrier that will prevent customers from participating? What factors would tend to mitigate that market barrier for some residential customers (e.g. high environmental motivation, high income, etc.)?

Request IR-51:

What is the average maximum payback period for residential customers to invest in energy efficiency measures?

Request IR-52:

Does ENSC agree that success in achieving energy efficiency is not the defined by the level of the budget of ENSC? What constitutes success for ENSC in its electric DSM programming?

Request IR-53:

Please identify any recommendation made by Dunsky in its report, Appendix B, that has not been adopted by ENSC, and explain why such recommendation has not been adopted.

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Request IR-54:

Please provide the Non-participants' or Rate Impact Measure results for all programs proposed for the 2012 program year.

Request IR-55:

Please describe (in absolute or relevant terms) the different cost or savings impacts of DSM programming in the short term and in the long term on three types of residential customers: (a) those who can and do participate and achieve a high level of savings (e.g. whole house treatment, including insulation, lighting, and appliances, etc.), (b) those who can and do participate and can only achieve a low level of savings (e.g., efficient products only), and those who cannot or do not participate in any DSM program and achieve no direct savings from program participation. For the short term, please choose the period of time comfortably before the customer achieves simple payback. For the long term, please choose a period comfortably beyond the achievement of simple payback, up to the typical useful life of the measures. Please describe and explain the term or period chosen. Please distinguish the impacts in these scenarios with as much specificity as possible, and describe the considerations that would require adjustment in the absolute or relative values described, given variances in customer savings opportunities, copayments, and rates within the more general categories identified in this question.

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Impacts →	Combined dollar impacts of program-participation savings and allocated charges for DSM generally, not counting customer contribution		Combined dollar impacts of program-participation savings and allocated charges for DSM generally, net of customer contribution	
Perspective ↓	Short term	Long term	Short term	Long term
Participant: high savings potential				
Participant: low savings potential				
Non-participant				

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