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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

October 25, 2012

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Implementation of the Alternative Energy Portfolio Standards of 2006: Technical Resource Manual
2013 Update – Docket No. M-2012-2313373

Dear Secretary Chiavetta,

Enclosed for filing are the Comments of CLEAResult Consulting, Incorporated pursuant to the
Commission's Tentative Order regarding revisions to the Technical Reference Manual entered September
13, 2012, in the above-captioned docket.

Shall you have any questions regarding this matter, please do not hesitate to contact me.

Respectfully Submitted,

Name



H. Edward Carr, Jr

Enclosures

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The Company again thanks the Commission for the opportunity to provide comments on the Commission's proposed updates to the 2013 TRM and look forward to continuing to work with the Commission Staff on this critical aspect of Act 129 compliance.

Respectfully Submitted,



CLEAResult Inc., Mid Atlantic Division
525 Greenfield Road, Lancaster, PA 17601

Dated: October 26, 2012

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

IMPLEMENTATION OF THE ALTERNATIVE §
ENERGY PORTFOLIO STANDARDS ACT OF 2004: §
STANDARDS FOR THE PARTICIPATION OF §
DEEMED SAVINGS RESOURCES - TECHNICAL §
REFERENCE MANUAL 2013 UPDATE §

DOCKET NO. M-2012-2313373

COMMENTS OF CLEAResult CONSULTING, INC TO THE TENTATIVE ORDER REGARDING THE
TECHNICAL REFERENCE MANUAL 2013 UPDATE

I. INTRODUCTION

On September 13, 2012, the Pennsylvania Public Utility Commission ("Commission")
adopted a Tentative Order in the above-captioned proceeding proposing revisions and
recommended updates to the existing Technical Reference Manual ("TRM"), which is being
used to help validate savings and provide support for the implementation of Act 129 of 2008.
By Tentative Order entered September 14, 2012, the Commission requested comments on the
proposed 2013 update of the TRM. CLEAResult Consulting, Inc. ("Company") has reviewed the
2013 TRM Update and generally supports the proposed additions and revisions from the 2012
TRM. Therefore, the Company will limit its comments to suggested additions for more deemed
savings resources, related to reasonable methods of measurement and verification.

II. GENERAL COMMENTS

Overall, the 2013 Draft TRM provides transparent means of calculating energy and
demand savings for a diverse mix of residential and commercial measures. The Company
appreciates the inclusion of clear protocols for evaluation of savings and the Company

appreciates the flexibility the TRM allows and provides guidance for (e.g. the application of operating hour assumptions in commercial facilities). The Company requests consideration of amending the order of measures included in Section 2 Residential Measures and Section 3 Commercial and Industrial Measures according to the following categories:

- a) Lighting,
- b) HVAC,
- c) Appliances,
- d) Refrigeration,
- e) Industrial, and
- f) Other.

Relatively few measures provide clarity on the acceptable application of the measure savings to multifamily properties. The Company requests additional clarity on:

- a) The application of residential measures to multi-family dwelling units and
- b) The application of commercial measures in multi-family common space.

The Company has developed Work Papers and energy and demand savings methodologies for several commercial and industrial measures that have been approved by Commissions and state evaluators in Arkansas, Texas, New Mexico, Oklahoma, and California. The Company also has experience developing deemed and stipulated savings methodologies for common energy efficiency measures for data centers. In the following Section, the Company provides specific requests for these measures to be considered as additions to the 2013 TRM.

III. COMMENTS RELATED TO RESIDENTIAL MEASURES

The Company appreciates the details set forth in Section 2 "Residential Measures" and commends the Staff for including most of the common efficiency measures that can be appropriately characterized using a deemed savings or stipulated calculation approach. The Company was not able to provide a detailed review of all calculation methods and baseline and measure specifications; however, we would like to suggest consideration of the addition of one measure that could be added to strengthen to 2013 TRM:

- a) Conversion from electric resistance heat to heat pumps for residential buildings and multifamily dwelling units.

IV. COMMENTS RELATED TO COMMERCIAL AND INDUSTRIAL MEASURES

The Company appreciates the details set forth in Section 3 "Commercial and Industrial Measures" and commends the Staff for including many common efficiency measures that can be appropriately characterized using a deemed savings or stipulated calculation approach. While the Company was not able to provide a detailed review of all calculation methods and baseline and measure specifications, one item was noticed with which the Company has substantial experience. The Commercial Low Flow Pre-Rinse Sprayer efficient specification of 1.6 gpm could be lowered to 1.25 gpm or less. Affordable quality equipment is available at these lower specifications. In order to keep pace with the market for efficient pre-rinse sprayers, the Company requests the addition of the following low flow specifications and the assignment of deemed savings for these additional specifications:

- a) 1.25 gpm low flow pre-rinse sprayers, and
- b) 0.65 gpm low flow pre-rinse sprayers.

In addition, the Company anticipates several other measures could be added to Section 3 to reflect the current market of commercial and industrial energy efficiency measures. From experience in the data center industry, the Company has developed standard savings methodologies and recommended evaluation protocols for several common data center measures. The Company supports amending the TRM to reference the following data center efficiency measures not identified in the current 2013 TRM update:

- a) ENERGY STAR Data Storage Servers,
- b) ENERGY STAR Servers,
- c) Server Virtualization,
- d) Variable Frequency Drives on Fan Motors for CRAC units, and
- e) Variable Frequency Drives on Chilled Water Pumps serving.

The Company has developed the appropriate cost saving measures for the above items and welcomes the opportunity to work with the Commission on incorporating those measures into the 2013 TRM.

Furthermore, the Company also requests the following measures be added to Section 3:

- a) Refrigeration Tune-Up,
- b) Industrial Nozzles, and
- c) Faucet Aerators (in commercial facilities).

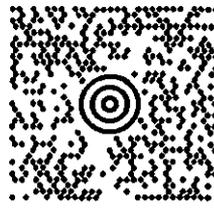
The Arkansas Public Service Commission has recently adopted Work Papers prepared by Company for commercial faucet aerators and low flow pre-rinse sprayers into the 2013 Arkansas TRM.

V. CONCLUSION

FROM:
BECKY GINTHER
(717) 581-8848 418
EIC, INC. / COMFORT HOME
525 GREENFIELD ROAD
LANCASTER PA 17601-5897

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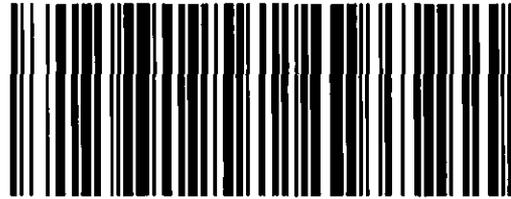
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PA PUBLIC UTILITY COMMISSION
400 NORTH STREET
HARRISBURG PA 17120

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525 GREENFIELD RD. 2ND FL
LANCASTER, PA 17601



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PA Public Utility Commission
Attn: Rosemary Chiavetta
P.O. Box 3265
Harrisburg, PA 17105-3265