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Dear NAESB Executive Committee:

DMI has been providing EM&V services for over 15 years, mainly to National Grid, but also to other PAs in New England. I have reviewed a copy of the LATE FORMAL COMMENTS of February 25, 2011, produced by the Regional EM&V Forum with input from stakeholders. We concur with the recommendation to remove the paragraph on proxy variable measurement accuracy requirements from the wholesale draft EE M&V standards, for all of the reasons set forth in the EM&V Forum's letter. While we understand the need for meter accuracy standards, we feel that sensor accuracy must be balanced with the ability to use data from a variety of sources.

In our experience, we have found that the ability to incorporate supporting data such as electronic trend logs, circular charts, and even handwritten operator's logs into our evaluation analyses offers a cost effective means of improving the quality of our results. We certainly understand the need to verify the accuracy of metered data, and we use kW metering equipment that meets the relevant standards. However, for proxy variables collected from trend logs and other similar sources, it is our professional opinion that the requirement to document the accuracy of customer-owned sensors and equipment is certainly possible but not practical.

Collecting this data for the sensors that comprise an energy management system would represent a significant additional cost for each evaluation project. While our firm might stand to gain additional revenue, I wouldn't recommend to our clients that this is a good use of their resources. In addition, the customer may become fed up with the additional time required on their part to support this requirement, when we already feel indebted to them for their general assistance with evaluation projects. Finally, if it is determined that a sensor does not meet the accuracy requirement, and we are therefore disallowed from using it in our analysis, we would have to fall back on other means of estimating these variables that are potentially even less accurate than the trend data that we sought to use.

I am therefore writing to convey my support for the recommendation requesting deletion of WEQ.020.3.11.1.9 concerning proxy variable accuracy requirements from the NAESB Wholesale Electric Quadrants Business Practice Standards for Measurement and Verification of Energy Efficiency Products, and my concurrence with the reasons for the recommendation that were noted in the comments.

Sincerely,

Alec Stevens, PE
President