NAVIGANT

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March 10, 2011

Dear NAESB WEQ Executive Committee,

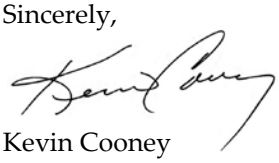
As a member of the NAESB board and a Managing Director at a firm engaged in energy efficiency program evaluation, measurement and verification (EM&V), I have reviewed a copy of the *Late Formal Comments* submitted by the Regional EM&V Forum on February 28, 2011. These comments were submitted by the Northeast Energy Efficiency Partnerships (NEEP), an organization that represents the interests of a wide range of stakeholders in the NE. They sought comments from many in the EM&V community and I think have provided input that will benefit any standards adoption on the issues related to meter accuracy to validate conservation impacts.

With respect to the issue regarding accuracy of *proxy variables that do not directly measure electrical demand*, I think that sensor accuracy should be balanced with the ability to use data from a variety of sources. Sources like building energy management systems (EMS) can provide vital data for base case measurements. Where the choice is between use of these existing data and using engineering calculations, the existing data can provide better accuracy even if the sensor specifications are difficult to locate or are outside of the proposed requirements.

I am therefore writing to convey my support for the recommendation by the Regional EM&V Forum that requests deletion of WEQ.020.3.11.1.9 concerning proxy variable accuracy requirements from the NAESB Wholesale Electric Quadrants (WEQ) Business Practice Standards for Measurement and Verification of Energy Efficiency Products. I have read their late formal comments and concur with the reasons for the recommendation that were noted in the comments.

While I will not be able to attend the WEQ committee meeting, nor the NAESB board meeting this month, please consider these comments when the committee votes on this issue.

Sincerely,



Kevin Cooney
Managing Director, Energy Practice