



State of New Jersey
DIVISION OF RATE COUNSEL
140 EAST FRONT STREET, 4TH FL
P. O. BOX 003
TRENTON, NEW JERSEY 08625

CHRIS CHRISTIE
Governor

STEFANIE A. BRAND
Director

KIM GUADAGNO
Lt. Governor

April 27, 2015

VIA HAND DELIVERY AND ELECTRONIC MAIL

Hon. Kenneth J. Sheehan, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, New Jersey 08625

**Re: Comments of the New Jersey Division of Rate Counsel
CEP Proposed Revisions to NJCEP Protocols**

Dear Secretary Sheehan:

The Division of Rate Counsel ("Rate Counsel") would like to thank the Board of Public Utilities ("BPU" or "Board") for the opportunity to present the within comments on the proposed revisions ("Draft Protocols") to the Clean Energy Program Protocols ("Protocols") submitted in red-line form to stakeholders for comment by the Office of Clean Energy ("OCE") on April 16, 2015.¹

Enclosed please find original and ten copies of comments submitted on behalf of Rate Counsel in connection with the above-captioned matter. We are enclosing one additional copy of

¹ The draft of the Protocols was entitled: "New Jersey Board of Public Utilities, New Jersey Clean Energy Program, Protocols to Measure Resource Savings: Revisions to March 17, 2014 Protocols, Release Date TBD." Red-lined draft circulated on April 16, 2015. "

the comments. Please stamp and date the extra copy as ‘filed’ and return it in our self-addressed stamped envelope.

Presently, the OCE and the Market Managers for Clean Energy Program’s (“CEP”) energy efficiency (“EE”) and renewable energy (“RE”) programs use the current version of the Protocols to Measure Resource Savings to track the energy and demand savings (and RE generation) resulting from participation in CEP programs. Energy and demand savings data submitted by the CEP Market Managers – calculated using the Protocols – is compiled by the OCE’s CEP Program Coordinator, who then prepares quarterly and annual reports on CEP activity and results to the Board. In addition, the Protocols have been used by several utilities to estimate prospective energy savings associated with the EE measures and programs found in their energy efficiency economic stimulus (“E3”) programs initially approved by the Board in 2009. Furthermore, the Protocols are used by the BPU to evaluate program performance. For the above reasons, the Protocols are an important component of the CEP.

Rate Counsel notes the substantive changes found in the latest draft of the Protocols as well as the revisions embodied in the earlier drafts pursuant to the Board’s prior Orders addressing the Protocols.² Rate Counsel does not object to the proposed revisions to the March 17, 2014 draft of the Protocols which largely update the document to address industry norms and technological advancements as well as revisions to the CEP programs, including the Pay for Performance program. However, Rate Counsel reserves its right to submit further comments on the Protocols and the underlying programs in response to new data and in response to any future OCE

² See I/M/O Revisions to New Jersey’s Clean Energy Program September 2010 Protocols to Measure Resource Savings, BPU Dkt. No. EO09120975 (Order, 9/13/12) (“2012 Protocols Order”). I/M/O Revisions to New Jersey’s Clean Energy Program August 2012 Protocols to Measure Resource Savings, BPU Dkt. No. EO09120975 (Order, 5/21/14) (“2014 Protocols Order”).

solicitations for comments.

Finally, Rate Counsel also respectfully submits that future versions of the Protocols should reflect the anticipated findings of the now pending CEP's Data and Evaluation working group proceeding as well as any measurement and verification methodologies required for participation in PJM Interconnection, LLC's EE and Demand Response programs.

Thank you for your consideration of the within comments.

Respectfully submitted,

STEFANIE A. BRAND
Director, Division of Rate Counsel

By:



Kurt S. Lewandowski, Esq.
Assistant Deputy Rate Counsel

c: OCE@bpu.state.nj.us
publiccomments@njcleanenergy.com
Elizabeth Ackerman, BPU
Marisa Slaten, Esq., BPU
Jerome May, BPU
B. Scott Hunter, BPU
Anne McShea, BPU
Cynthia E. Covie, Esq., BPU
Rachel Boylan, Esq., BPU
Caroline Vachier, DAG
Michael Ambrosio, AEG

From: James Pfeiffer
To: publiccomments@njcleanenergy.com
Subject: Re: Proposed Revisions to NJCEP Protocols
Date: Thursday, April 16, 2015 4:38:45 PM

Staff,

I wish to comment on the *Combined Heat & Power (CHP)* section starting on page 98.

You have changed the section to *Combined Heat & Power (CHP) and Fuel Cell Program* with the new text in red. This change concerning the inclusion of "fuel cell" has also been made throughout the section. For what purpose is this change? Is not a fuel cell just a type of CHP unit as is a microturbine, a reciprocating engine or a large turbine? Why is there a need to differentiate fuel cells from any other CHP device?

I feel strongly that all CHP technologies should be held to the same standards whether it be emissions or total efficiency. I do not see any reason to call out a particular technology which seems to imply some sort of pending double standard.

Regards,

James Pfeiffer, CEM
EnGeneration, LLC
President of the NJ Chapter of the Association of Energy Engineers
201-251-3815 office
201-264-5361 mobile

-----Original Message-----

From: Jones, Sherri <Sherri.Jones@bpu.state.nj.us>
To: Renewable Energy Committee (Notification) <renewables@njcleanenergy.com>; ee <ee@njcleanenergy.com>
Sent: Thu, Apr 16, 2015 2:58 pm
Subject: RE: Proposed Revisions to NJCEP Protocols

Sorry folks, attached is the actual red-lined version.

From: renewables-bounces@njcleanenergy.com [<mailto:renewables-bounces@njcleanenergy.com>] **On Behalf Of** Jones, Sherri
Sent: Monday, April 13, 2015 1:47 PM
To: ee@njcleanenergy.com; renewables@njcleanenergy.com
Subject: Proposed Revisions to NJCEP Protocols

The Protocols to Measure Resource Savings (the "Protocols") is a document approved by the NJ Board of Public Utilities (the Board) that includes the algorithms and inputs used to estimate energy savings or renewable energy generation from projects that receive NJCEP incentives. As has been the practice over the past several years, the Protocols are updated from time-to-time to incorporate new measures that are added to the programs and to reflect updated information including new codes or standards, updated baselines, or information from more recent evaluations.

Attached please find a redlined draft of the Protocols and also a summary of the proposed changes.

Staff is requesting comments on the proposed changes to the Protocols prior to submitting

them to the Board for consideration. Comments should be sent to:

publiccomments@njcleanenergy.com

When submitting comments, please use the caption "Proposed Revisions to NJCEP Protocols" in the subject line. Comments are due by COB on April 27, 2015.

Thank you,

Sherri Jones
New Jersey Board of Public Utilities
44 South Clinton Avenue
Trenton New Jersey 08625
609.292.7471
www.nj.gov/bpu

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list

Renewables@njcleanenergy.com

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