

Request No.: NFG-1

Requested By: Debra LaBelle, Chief, Energy Efficiency Programs

Date of Request: 9/1/2015

Reply Due Date: 9/16/2015

Directed To: Evan M. Crahen, Regulatory Analyst, Rates and Regulatory Affairs

Topic: National Fuel Gas Distribution Corporation 2016-2018 Budgets and Metrics (BAM) Plan and Energy Efficiency Transition Implementation Plan (ETIP)

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**Question(s):**

1. Please quantify the specific cost categories included in the Portfolio Administration budget. To the extent possible map those categories to the existing EEPS budget categories.
2. By program, please describe and quantify the specific cost categories included in the Program Implementation budget. To the extent possible, map those categories to the existing EEPS budget categories.
3. Please provide the company's rationale for allocating approximately 3% of the total annual ETIP budgets to EM&V when, historically, EEPS Evaluation, Measurement, and Verification (EM&V) has accounted for approximately 8% of the company's total expenditures and encumbrances. In addition, please identify the changes the company is planning to support lowering the EM&V budget.
4. The ETIP states the proposed targets are gross, however the Commission's authorized targets are provided as net numbers. Please clarify whether the proposed savings targets are net or gross values with supporting rationale. If net, please provide the net to gross factors applied.
5. Other than Carbon Dioxide, does the company anticipate monitoring green house gas (GHG) emission reductions? If so, please list the additional GHGs the company intends to monitor.
6. The company proposes a secondary target of Carbon Dioxide Emission Reductions. Does the company plan on proposing additional secondary targets in future BAM Plans and ETIPs?
  - a. If the company does plan on proposing additional secondary targets in future BAM Plans and ETIPs, please provide the metrics the company anticipates proposing?
  - b. If the company does not plan on proposing additional secondary targets in future BAM Plans and ETIPs, please provide a justification for not including additional secondary targets.
7. Please describe the information and historical data the company used to develop its forecasted expenditures and achievements. Please provide the work papers.

8. In Exhibit 25 (page 46), footnote 32, the company states that EEPS 2 funding shown is inclusive of EEPS 2 EM&V, please provide a replacement Exhibit in which the Unspent EEPS EM&V is disaggregated from Unspent EEPS 2 and provided in the Unspent EEPS EM&V row.
9. Please provide the work papers supporting the calculation of unspent EEPS funds, with citations to relevant Commission orders.
10. Please provide the work papers for program and portfolio benefit cost analyses (BCA). Please ensure that costs such as Portfolio Administration, Portfolio EM&V, and costs recovered through base rates and customer contributions/costs are disaggregated.
11. What, if anything, has the company done or planned to do to coordinate with the New York State Energy Research and Development Authority (NYSERDA) to ensure the programs work collaboratively rather than competitively with NYSERDA's Clean Energy Fund Programs?
12. Given the expectation that energy efficiency programs will become more innovative and aligned with a REV environment, please describe how the continuation of programs run under EEPS satisfies this expectation beyond a transitional period.
13. To the extent possible, please provide additional detail regarding specific modifications planned for 2017 and 2018 to make programs more aligned with REV principles.
14. Are any of the programs being offered in coordination with other initiatives (e.g. gas conversion programs, state and federal initiatives, etc.)? If so, describe the relationship and what, if anything is being done to avoid duplicative incentives and double-counting of savings.
15. Please provide a list of programs where, due to system constraint or other reasons, the company intends to offer higher incentives to certain customers.