



Via electronic submission

March 18, 2016

Eric Winkler, Ph. D.  
System Planning Department Technical Manager  
ISO-New England  
1 Sullivan Rd.  
Holyoke, MA 01040

Re: Draft 2016 Energy Efficiency Forecast

Mr. Winkler,

On behalf of Northeast Energy Efficiency Partnerships (NEEP),<sup>1</sup> please accept our comments responding to the Draft 2016 Energy Efficiency Forecast.<sup>2</sup> NEEP is a regional non-profit that works to accelerate energy efficiency in homes, buildings and industry across the Northeast and Mid-Atlantic states. Our Policy Outreach and Analysis group serves as an information resource for policymakers, program administrators, Commissions, and others to support the adoption and implementation of public policies and programs that advance energy efficiency.

In our review of the draft forecast, we noted these items in need of revision:

1. Connecticut- recent regulatory approval (**~8% greater spending approved**)
  - a. Forecast says “based on Commission approved 2015 budget”
  - b. DEEP gave [final approval](#) to [2016-18](#) plans on December 30, 2015.
  - c. Total Electric EE “Revenues” (budget) by year ([pg 42](#)):
    - i. 2015- \$185,829,547
    - ii. 2016- \$192,703,721
    - iii. 2017- \$205,969,994
    - iv. 2018- \$203,879,461
  
2. Massachusetts- recent regulatory approval (**~20% greater spending approved**)
  - a. Forecast says “based on Commission approved 2013-15 budget
  - b. MA DPU gave [final approval](#) for [2016-18 plans](#) on January 28, 2016.
  - c. Total Electric EE Budgets by year ([pg 6](#)):
    - i. 2015- \$516,530,000 ([pg 17](#))
    - ii. 2016- \$598,692,757
    - iii. 2017- \$621,087,935
    - iv. 2018- \$637,721,996

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<sup>1</sup> These comments are offered by NEEP staff and do not necessarily represent the view of the NEEP Board of Directors, sponsors or partners.

<sup>2</sup> ISO-NE Draft 2016 Energy Efficiency Forecast 2020-2025. Available at: [http://www.iso-ne.com/static-assets/documents/2016/02/iso\\_ne\\_draft\\_2016\\_ee\\_forecast\\_2020\\_2025.pdf](http://www.iso-ne.com/static-assets/documents/2016/02/iso_ne_draft_2016_ee_forecast_2020_2025.pdf)

3. Maine- regulatory uncertainty
  - a. Forecast says “based on Commission approved 2017-19 budget”
  - b. The Maine PUC **has not approved** the [2017-19 Triennial Plan \(budget and metrics\)](#)
    - i. In fact, there’s [quite a bit of contention](#) at the PUC right now about that plan.

### Conclusion

NEEP commends the ISO-NE for its efforts to incorporate energy efficiency savings into long-term planning. Please accept these comments in the spirit they are intended: to aid the working group, and ultimately the ratepayers in the region, in securing a more affordable, reliable, cleaner and sustainable energy future.

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