

Layton, Kimberly

From: Chris Granda [granda@grasteu.com]
Sent: Monday, June 09, 2014 5:46 PM
To: Comments, Urc
Subject: IURC's EE/DSM Recommendations
Attachments: Comments to IN EEDSM.pdf

To: Beth Kroger Roads Esq.

Please find attached comments regarding Indiana's energy efficiency programs.

Kind regards,

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General Counsel Beth Krogel Roads
Re: IURC's EE/DSM Recommendations
Indiana Utility Regulatory Commission
101 West Washington Street, Ste. 1500 E
Indianapolis, IN 46204

June 9, 2014

Dear Ms. Roads,

I had the pleasure of serving on the consultant team that produced a report on the Indiana demand-side management core portfolio, delivered to the DSMCC in June of 2013. In response to Governor Pence's letter of March 27, 2014 I would like to submit the following comments:

- There has been over twenty-five years of experience with demand-side management in the U.S., involving copious evaluation and documentation, which supports the clear social benefits of cost-effective energy efficiency programs.
- Developing a comprehensive energy efficiency portfolio is a complicated and demanding proposition. Lessons learned from other jurisdictions are important, but must always be adapted to address local conditions.
- Successful energy efficiency program delivery by utilities is dependent upon upper management commitment to the long-term development of a smaller, and quite different line of business than energy generation, transmission or distribution.
- When a jurisdiction is served by multiple subsidiaries of multi-state utilities, those subsidiaries may find it very challenging to obtain sufficient management buy-in for working together to offer a consistent, coherent portfolio of energy efficiency programs.
- Fortunately, alternative models that involve third party energy efficiency program management and coordination have proven effective and now serve Wisconsin, Vermont, much of the Pacific Northwest and New Jersey. These models allow utilities to focus on their core business, while supporting the growth of a domestic energy efficiency industry.

Thank you for the opportunity to provide these comments.

Regards,



Christopher Granda
President, Grasteu Associates Inc.