

Linda Wetzel

From: ee-bounces@njcleanenergy.com on behalf of ILight8@aol.com
Sent: Friday, May 04, 2012 12:55 PM
To: Mike Ambrosio; ee@njcleanenergy.com; renewables@njcleanenergy.com
Subject: Re: Request for Comments on Proposed Changes to the NJCEP- question
Attachments: ATT1270386.txt

Hello,

I just have a quick question re: this new proposal.

As I usually ask - IF the existing fixtures are ""Healthy" - meaning not rusty, deteriorated or broken in any way - why throw away all that metal.

I know many times electricians think it is easier to just "throw away" the existing fixtures - & pop-in the new fixture - however - IF the existing fixtures are still useable & "healthy" -- why throw them away or truck them to be recycled -

The overall view of sustainability / energy Savings - is what the ultimate goal is -

25 watt T8'system -800 / Hi- CRI series- lamps/ appropriate ballast factor ballasts -in a not too high ceiling -- can retrofit into existing 2x4 T12 fixtures. Higher ceiling height - 28 or 32W lamps.

Also, is there any new regs re: prevailing wage needed for ballast changing ??

Thank you.

Highest Regards,

Meredith Nole

Meredith Nole, MIES

American Efficient Lighting

Efficient Lighting Expert

Certified Energy Auditor

Wholesale Lighting Supplies

SSL lighting partner

NYSERDA Lighting Partner - The Right Light

"" Be Kinder than necessary ""

In a message dated 5/4/2012 11:59:31 A.M. Eastern Daylight Time, mambrosio@appliedenergygroup.com writes:

On March 23, 2012, the OCE requested comments on a number of proposed changes to the NJCEP. One of the proposed changes concerned replacing T12 fixtures in schools. A high level summary of the proposed T12 replacement program was provided at that time. TRC has now developed a detailed proposal for the T12 school replacement program which is attached to this email.

Deborah Petrisko

From: Flynn, Don [dflynn@nexant.com]
Sent: Friday, May 04, 2012 12:43 PM
To: publiccomments@njcleanenergy.com
Subject: Additional Proposed Changes to the 2012 NJCEP Compliance Filings

Dear Mr. Winka and OCE Staff,

Nexant has reviewed TRC Energy Services' letter dated May 3, 2012 regarding Proposed C&I Program Changes for 2012 School Lighting Initiative. Nexant provides the following in response to the OCE's request for public comment:

1. Why is it proposed that "TRC may conduct 100% pre and post inspections of all projects"?
2. TRC's letter does not specifically reference the Attachment. Nexant suggests the following be added to the first bullet on page 1 of the letter for reference clarity, "Incentive amounts to be paid under the 2012 Schools Lighting Initiative are listed in the Attachment and are based on site-specific fixture and lamp types and installation heights".
3. Are all existing fixture types listed in the Attachment anticipated?
4. What is the basis for the incentive amounts listed and what steps did TRC take to develop the amounts?

Respectfully submitted,

Don Flynn, MBA, CEM, CEA
Regional Program Manager & Office Head,
Demand Management

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 **Nexant**

Deborah Petrisko

From: Herb Kaiser [herbkaiser@SE2Sol.com]
Sent: Friday, May 04, 2012 1:57 PM
To: publiccomments@njcleanenergy.com
Subject: Request for Comments on Proposed Changes to the NJCEP - T12 Replacement Program

Why are LED tubes excluded?????

LED tube lighting, newer technology, superior lighting, without the negatives, could help schools and many other installations because they are:

Energy Efficient: Easily replace fluorescent lighting products with LED replacement products. Up to 75 % reduction in power consumed.

Extra Long Life Span: Up to 50,000 hours of typical use depending on working environment.

Environmentally Friendly: Contains no dangerous chemicals, mercury, phosphorous powders and is easily disposed of.

Low Maintenance: No ballast needed, eliminates ballast noise, and interference. No more ballast, and bulb change-outs.

Durable: Withstands frequent switching and is cold temperature compatible -40° C to + 60° C

No Noise and No Flicker: Instant start for healthy living. No disruptive hum, no flicker. No strobe light effect.

Our Lights are Easy on the Eyes: Energy saving while maintaining a pleasant work environment. Available in a variety of temperatures. LED lighting is easy on the eyes and provides a better environment to work and play under, especially for children sensitive to poor lighting, like so many children with autism and other afflictions.

Easy Disposal: No restrictions, ordinary trash disposal.

Low Heat Generation: Lowers air conditioning demand, less energy wasted producing heat.

The LED Green Company LED light tubes, UL Classified, can replace or retrofit fluorescent tubes and fixtures, with all of the above benefits. No changes to fixtures are required, only the ballasts are bypassed, saving significant time and money, now and in the future.

Many locations, even famous buildings, in NYC, NJ, and worldwide, are switching to this better lighting solution. LED lighting is the "clean energy" solution for NJ.

I would be glad to meet with anyone to explore how LED lighting can help provide a healthier environment and save time and money for all.

Thanks.

Take care,
Herb Kaiser
Smart E2 Solutions
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Rumson, NJ 07760
Mobile 732-241-6070
Fax 732-758-1169



State of New Jersey
DIVISION OF RATE COUNSEL
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CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

STEFANIE A. BRAND
Director

May 10, 2012

Via Overnight Delivery and Electronic Mail

Honorable Kristi Izzo, Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Floor
P.O. Box 350
Trenton, New Jersey 08625-0350

Re: **In the Matter of Comprehensive Energy Efficiency and Renewable Energy
Resource Analysis for 2009-2012 Clean Energy Programs: 2012 Programs
and Budgets: Compliance Filings
BPU Docket Nos. EO07030203 and EO10110865
Additional Proposed Changes to the 2012 NJCEP Compliance Filings –
Submitted by TRC dated May 3, 2012
Comments of the New Jersey Division of Rate Counsel**

Dear Secretary Izzo:

Enclosed please find an original and ten copies of comments submitted on behalf of the New Jersey Division of Rate Counsel in connection with the above-captioned matters. Copies of the comments are being provided to all parties by electronic mail and hard copies will be provided upon request to our office.


We are enclosing one additional copy of the comments. Please stamp and date the extra copy as "filed" and return it in our self-addressed stamped envelope.

Honorable Kristi Izzo, Secretary
May 10, 2012
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Thank you for your consideration and assistance.

Respectfully submitted,

STEFANIE A. BRAND
Director, Division of Rate Counsel

By: 
Felicia Thomas-Friel, Esq.
Deputy Rate Counsel

FTF/sm

c: publiccomment@nicleanenergy.com
OCE@bpu.state.nj.us
Mike Winka, BPU
Mona Mosser, BPU
Benjamin Hunter, BPU
Anne Marie McShea, BPU
EE Committee Listserv

**In the Matter of Comprehensive Energy Efficiency
and Renewable Energy Resource Analysis
for 2009-2012 Clean Energy Programs:
2012 Programs and Budgets: Compliance Filings
BPU Docket Nos. EO07030203 and EO10110865
- Additional Proposed Changes
to the 2012 NJCEP Compliance Filings**

**Comments of the New Jersey
Division of Rate Counsel**

May 10, 2012

Introduction

The Division of Rate Counsel (“Rate Counsel”) would like to thank the Board of Public Utilities (“BPU” or “Board”) for the opportunity to present our comments on the Request for Comments Regarding Additional Proposed Changes to 2012 New Jersey Clean Energy Program (“NJCEP”) Compliance Filings, circulated to stakeholders by the Applied Energy Group (“AEG”) on behalf of the Office of Clean Energy (“OCE”) in an e-mail notice issued May 4, 2012 (“May 4 Request”).

The May 4 Request sets forth the proposal by TRC, the Commercial and Industrial (“C&I”) Market Manager, to implement a T-12 florescent lighting replacement program for schools as a part of the Direct Install, Pay for Performance, and C&I Retrofit programs. Also, the May 4 Request sought comments on a proposal that the Board authorize two payments totaling \$13,490 to National Association of State Energy Offices (NASEO) for FY2010 and FY2011 membership fees. Rate Counsel’s comments discuss each of these areas below.

T-12 Replacement Program

In the request for comments circulated by e-mail on March 23, 2012 (“March 23, 2012 Request”), TRC proposed to implement a T-12 replacement program for schools as a part of the Direct Install, Pay for Performance, and C&I Retrofit programs. Rate Counsel’s response to the

request dated April 12, 2012 suggested that additional details on the T-12 program proposal were needed in order for stakeholders to provide meaningful comments.¹ Since the May 4 Request, TRC has provided additional information on the proposed design of the initiative. Rate Counsel has considered the additional information and further clarifies its concerns about the proposed T-12 fixture replacement program as follows:

- a. In general, incentives for C&I customers could be set to provide a one or two year payback period. The payback threshold should be informed by eligible customers' perceived market barriers to participating in the program. OCE or TRC should revise the T-12 fixture replacement proposal to clearly state the market barriers facing K-12 public and private schools.
- b. Rate Counsel maintains its position that the total incentives provided for energy efficiency projects should be less than 100%. Rate Counsel has expressed throughout the various CEP and utility energy efficiency proceedings the need for interested applicants to have some financial stake in the project in the interest of fairness to ratepayers. Neither the March 23 Request, the May 4 Request nor OCE's verbal comments at the May 8, 2012 Energy Efficiency Committee meeting provided sufficient evidence that an incentive designed to cover 100% of the cost of fixture replacement is necessary. OCE or TRC should revise the T-12 fixture replacement proposal to clearly state why an incentive covering 100% of the cost of fixture replacement is needed (versus another incentive level, such as 80% of the cost), and why a different approach such as targeted marketing toward small school districts while keeping the current incentive level would not work to encourage small school

¹ Please refer to the attached comments filed on April 12, 2012 on behalf of the Division of Rate Counsel.

districts to replace old T-12 fixtures. In general, it is Rate Counsel's position that OCE should develop and undertake innovative marketing strategies for such hard-to-reach customers before considering increasing incentive levels.

- c. At the May 8, 2012 Energy Efficiency Sub-committee meeting, OCE expressed its intention that the initiative would be targeted at small school districts that have not yet participated in an Energy Savings Improvement Plan (ESIP). It was also noted that this initiative will be marketed to such customers as the last opportunity to replace their old T-12 lighting fixtures. Rate Counsel does not object to this approach but suggests that an expiration date for this incentive should be proposed in order to create a sense of urgency in the marketplace and to "jump start" the ESIP process, a stated objective of the T-12 initiative per the March 23 Request for Comments.
- d. If OCE or TRC cannot demonstrate that an incentive designed to cover 100% of the cost of fixture replacement is needed, they could provide a demonstration of the proposed program's cost effectiveness, i.e., using the Program Administrator Cost Test and the Participant Cost Test. The Board should not approve the program without either a demonstration of need or a demonstration of cost effectiveness, but preferably both should be provided.
- e. The T-12 replacement initiative could offer the opportunity for more comprehensive screening for energy efficiency retrofits. If the participant chooses the prescriptive C&I Retrofit program path for T-12 replacement (which does not require an audit), initiative participants should be encouraged to participate in the Local Government Energy Audit program or an ESIP (which requires an audit).

NASEO Membership Dues

Rate Counsel does not object to the proposal that the Board authorize two payments totaling \$13,490 to NASEO for FY2010 and FY2011 membership fees.

Conclusion

Regarding the T-12 replacement program proposal, Rate Counsel reiterates its position that OCE or TRC 1) revise the proposal to clearly state the market barriers facing K-12 public and private schools, 2) reduce the incentive to cover less than 100% of the cost of the T-12 replacements, or else clearly demonstrate why providing 100% of the cost of fixture replacement is needed, 3) demonstrate the cost effectiveness of the proposed program, 4) consider establishing a time frame for this incentive, and 5) encourage participants to participate in the Local Government Energy Audit and/or an ESIP if they are seeking T-12 replacements through the C&I Retrofit program for prescriptive measures. Rate Counsel recommends that the Board not approve the T-12 replacement program without, at a minimum, a demonstration of need or a demonstration of cost effectiveness. Regarding the proposal to authorize payments totaling \$13,490 for FY2010 and FY2011 NASEO membership fees, Rate Counsel has no objections.

Rate Counsel reserves its right to supplement these comments based on additional information received from the OCE, the Market Managers, or other parties to this proceeding.