

FILE

2

RECEIVED-DOCKETING DIV

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

2009 JUL 15 PM 4: 24

PUCO

In the Matter of Protocols for the)
Measurement and Verification of Energy)
Efficiency and Peak Demand Reduction)
Measures.)

Case No. 09-512-GE-UNC

**INITIAL COMMENTS OF
COLUMBUS SOUTHERN POWER COMPANY
AND OHIO POWER COMPANY**

INTRODUCTION

By Entry dated June 24, 2009, the Commission initiated a process to develop protocols for evaluation, measurement and verification of energy efficiency and peak demand reduction measures in the framework of a Technical Resource Manual (TRM). Columbus Southern Power Company and Ohio Power Company ("AEP Ohio") agrees with the development of a TRM that provides Deemed Measures and Deemed Calculated Measures. This Entry established a procedural schedule for response and invited comments from interested parties. AEP Ohio submits certain targeted comments below in response to the Commission's invitation for input on Appendix B to the Entry.

- Description of the Program Delivery Mechanism is unnecessary for the TRM because the method of delivery does not impact gross kWh savings on a per measure basis. In other words, an individual lighting measure provides the same kWh savings whether delivered through a rebate program, direct install or mark down approach. Providing this information will result in duplicative entries in the manual.
- Coincidence factors will need to be estimated based on the best available information.

This is to certify that the images appearing are an
accurate and complete reproduction of a case file
document delivered in the regular course of business.
Technician SM Date Processed JUL 16 2009

- A column should be added to cite data source(s) for measure values to provide transparency.
- A column should be added to indicate whether the measure requires weather normalization to account for variations in weather conditions in different parts of the state. An example measure could be insulation or heating, ventilation and air conditioning.
- Hours of operation should be included in deemed calculated measures to account for significant variations in business facility use. For example, a hospital may operate its interior lighting system for twenty-four hours per day, while an office facility may use interior lighting for only twelve hours.

AEP Ohio suggests that the Commission adopt a column/row spreadsheet format beginning with the "Description of Efficiency Technology, Measure or Practice" in the first column, with the additional information included in columns to the right, with measures listed in rows below. Such a format will allow for more efficient processing of information.

AEP Ohio does not, at this time, have any suggestions for alternative approaches for characterizing electric demand savings from energy efficiency measures.

Respectfully submitted,



Marvin I. Resnik, Counsel of Record
 American Electric Power Service Corporation
 1 Riverside Plaza, 29th Floor
 Columbus, OH 43215
 Tel: (614) 716-1606
 Email: miresnik@aep.com

Counsel for Columbus Southern Power Company
 and Ohio Power Company