

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of the Application)	
of Ohio Edison Company, The Cleveland)	
Electric Illuminating Company and The)	Case No. 12-2190-EL-POR
Toledo Edison Company for Approval of Their)	Case No. 12-2191-EL-POR
Energy Efficiency and Peak Demand)	Case No. 12-2192-EL-POR
Reduction Program Portfolio Plans for 2013)	
through 2015.		

REPLY BRIEF OF THE OMA ENERGY GROUP

I. INTRODUCTION

The OMA Energy Group (“OMAEG”) filed its post hearing brief on November 20, 2012, in this proceeding. Pursuant to the procedural schedule established by the Attorney Examiners, the OMAEG now submits its reply brief.

II. ARGUMENT

In its post hearing brief, the OMAEG respectfully requested that the Public Utilities Commission of Ohio (“Commission”) modify The Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively “FirstEnergy”) energy efficiency and peak demand reduction portfolio plan “Portfolio Plan” by requiring FirstEnergy to do the following: 1) implement a “track and tune” program and/or an operations and maintenance program; 2) increase the funding amount available to manufacturers for energy audits; 3) verify that audits be conducted by a licensed Professional Engineer in the State of Ohio; 4) bid its energy efficiency

resources into the PJM market; and 5) develop prescriptive measures for manufacturers.

On pages 42 and 43 of FirstEnergy's post hearing brief, it asserts that OMAEG Witness Seryak and NRDC Witness Swisher recommend a retro-commissioning program. FirstEnergy's Post Hearing Brief at 42-43. This is incorrect. According to the direct testimony of Mr. Seryak, a "Track and Tune" or Operations and Maintenance program was recommended. OMAEG Ex. 101 at 3. Mr. Seryak states that "A Track and Tune program is *analogous* to the Retro-commissioning programs for the commercial sector". OMAEG Ex. 101 at 4. Mr. Seryak's recommendation was specific to manufacturers; Mr. Swisher's for the commercial sector; thus, FirstEnergy's assertion that the custom nature of manufacturers is a reason to occlude a program for the commercial sector is based on false premise.

Nonetheless, FirstEnergy's assertion that either track and tune programs or retro-commissioning are sufficiently served as custom measures, and do not warrant their own program, is impractical. As a custom measure, the proof of savings from either track and tune or retro-commissioning is placed on the end user. It is unlikely that manufacturers will have the resources or skill sets to fully learn and execute PJM Manual 18B's, Option C: Whole Facility/Regression, which is the protocol used to document savings. Option C, however, is fairly inexpensive to implement, and should be well understood and inexpensively implemented on the scale of economy that FirstEnergy's efficiency program has the potential to create. Therefore, it is far less costly, and far more effective, for FirstEnergy to create a stand-alone track and tune

program with centralized evaluation measure and verification (“EM&V”) and economies of scale.

On page 43 of FirstEnergy’s post hearing brief, it states that “the Ohio draft TRM does not provide a way to measure the savings realized from a stand-alone retro-commissioning program.” FirstEnergy’s Post Hearing Brief at 43. It is correct that the Ohio TRM does not include an EM&V protocol for retro-commissioning. However, industry standardized protocols exist, and FirstEnergy frequently uses other resources in their plan. For example, in Section 3.1 of the FirstEnergy’s Portfolio Plan, it states that they rely on “...other industry sources, including TRMs from other states.” Other sources, as detailed by FirstEnergy include: the Pennsylvania TRM, the Michigan Deemed Savings Database, the Mid-Atlantic Technical Reference Manual, ACEEE, Energy Star, and ASHRAE. Thus, FirstEnergy implicitly acknowledges that absence from the Ohio TRM is not a reason to exclude programs, assumptions, or other data when other standardized protocols exist. In the case of retro-commissioning, an authoritative source would be PJM Manual 18B: Energy Efficiency Measurement & Verification. PJM Manual 18B has several EM&V protocols which are directly based on the International Performance Measurement and Verification Protocol (“IPMVP”) standards. Of these EM&V protocols, Option C: Whole Facility/Regression, is suitable for retro-commissioning programs, and at a relatively low cost.

Although Mr. Seryak’s direct testimony did not offer a specific program design or budget, AEP-Ohio, for instance, has implemented a similar program called Continuous Improvement Program (“CIP”). Application in Case No. 11-5569-EL-POR at 109-114. The CIP was not fully designed prior to selection of the program contractor. AEP-Ohio’s

proposed budget for their CIP was \$9 million total over 3 years, split equally between program incentives and administrative costs. AEP-Ohio estimated its program to have a TRC of 2.3. Therefore, FirstEnergy can reference AEP-Ohio's program, or other national programs like Bonneville Power Authority's Track and Tune to determine a program budget and design.

III. CONCLUSION

For the foregoing reasons, the OMAEG respectfully requests that the Commission adopt the positions of the OMAEG as set forth in its post hearing brief and reply brief.

Respectfully submitted on behalf of
THE OMA ENERGY GROUP



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Reply Brief of the OMA Energy Group was served upon the parties of record listed below this 30th day of November 2012 *via* electronic mail.



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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/30/2012 4:36:34 PM

in

Case No(s). 12-2190-EL-POR, 12-2191-EL-POR, 12-2192-EL-POR

Summary: Reply Reply Brief of the OMA Energy Group electronically filed by Mr. Thomas J O'Brien on behalf of OMA Energy Group