



By electronic mail
November 10, 2011

TO: Michael Stoddard, Executive Director, Efficiency Maine Trust
CC: Naomi Mermin, Trust Chair, Elizabeth Crabtree, Program Manager

**Comments of Natalie Hildt, Manager of Public Policy Outreach
Northeast Energy Efficiency Partnerships (NEEP)
Efficiency Maine Trust - Triennial Plan Workshop**

On behalf of Northeast Energy Efficiency Partnerships (NEEP)¹, I thank you for the opportunity to comment on the Efficiency Maine Trust's Triennial Plan programs as the Trust prepares its Annual Update to the Public Utilities Commission. These comments are in addition to my in-person remarks made at the workshop on November 2. In summary:

- Efficiency Maine programs are delivering great benefits to residential and business customers. The fact that the programs are doing so well and in some cases exceeding goal shows that there is strong demand even in this soft economy.
- With efficiency as the most cost-effective resource, programs should not have budget caps set by any mechanism other than the potential for all cost-effective energy efficiency to be realized. The Public Utilities Commission (PUC) should work with the Trust to find ways of structuring funding mechanisms to meet both consumer demand and the state's identified energy efficiency potential, while also aligning interests of the utility companies with broader public policy goals.
- It is important for customers and delivery partners (contractors, vendors, etc.) to know that the programs will be there when they need them, with strong and stable funding.
- We encourage the Trust to look at best practices elsewhere and adapt those to fit Maine. These could be in terms of program delivery strategies; synergies with complementary public policies such as building energy codes, appliance efficiency standards and building energy rating and disclosure; efforts to fund oil heat efficiency; rate mechanisms; and evaluation, measurement and verification (EM&V).
- We certainly encourage the state to leverage work being done across the region in terms of things like EM&V studies and market initiatives, that are *much* more cost effective as shared investments with other states. Some of this type of work is hosted by NEEP. While evaluation of Efficiency Maine programs themselves is important, detailed studies on topics such as measure life persistence and peak load coincidence factor are being undertaken in a joint fashion by program administrators across the region, the results helping to shape future program delivery. More information is available on NEEP's website in the [EM&V Forum Library](#).

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



- Likewise, we point out that NEEP often refers to the best practices in place in Maine when advising other states on their programs and policy frameworks. This is true in terms of your stakeholder Efficiency Maine Trust board, comprehensive and coordinated marketing and delivery of programs across the state, and efforts to deliver whole-building solutions for customers.
- We encourage more holistic treatment of facilities, and helping larger C&I customers come up with staged, long-term improvement plans for their facilities. Again, taking this long-view means that sustained funding is critical.
- According to conversations with those working on programs, it would be beneficial to increase the focus on custom projects for commercial customers. While these types of projects necessitate more technical support and customer engagement, they can in some cases deliver greater and more cost-effective savings than prescriptive approaches.
- The [Save Like a Mainer](#) website is an outstanding resource for the people and businesses of Maine. These great success stories by recognized Maine companies show the real benefit of these programs in action. We encourage the PUC and the legislature to support strong and ample marketing of programs, and to also understand that marketing will drive even more awareness and program demand. This positive recognition of program value needs to be supported by budgets that are sufficient and sustained to meet customer demand.
- Finally, we encourage the Trust to continue to make its operations more timely and transparent. We are glad to learn that remote dial-in capabilities will soon be offered again for board meetings. Additionally, we hope that staff will find a way to post or at least circulate documents such as minutes and the executive director's report more quickly than is currently the case, even if only in draft form.

In closing, we urge the Trust Board, the PUC and legislators to take note of how well the programs are working. We hope the state will put a priority on finding ways to value and capture energy efficiency as a priority resource, and fund the Trust to continue helping more Mainers save energy.

Thank you again for the opportunity to provide comments. Please do not hesitate to contact me or other at NEEP with questions, as we look forward to being a resource to Maine in its efforts to harness the power of energy efficiency.

A handwritten signature in blue ink that reads "Natalie Hildt".

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