BEFORE THE

IDAHO PUBLIC UTILITIES COMMISSION

CASE NO. IPC-E-23-10

IDAHO POWER COMPANY

DRAKE, DI
TESTIMONY

EXHIBIT NO. 6

Addendum: Evaluation of NEEA Impacts Allocated to Idaho Power Company and Avista Utilities Within the State of Idaho

SUBMITTED TO: IDAHO POWER COMPANY & AVISTA UTILITIES

SUBMITTED ON: JUNE 15, 2023

SUBMITTED BY: ADM ASSOCIATES, INC.

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Exhibit No. 6
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1. Response to NEEA's Feedback

ADM Associates (herein referred to as the "Evaluators") developed a report summarizing the evaluation, measurement, and verification (EM&V) of the Northwest Energy Efficiency Alliance (NEEA) activities and energy impact estimates as it relates to savings allocated to Idaho Power Company (IPC) and Avista Utilities (Avista) within the state of Idaho for the program years 2017-2021.

NEEA's executive team reviewed the evaluation findings and recommendations and submitted a response to IPC and Avista. ADM reviewed NEEA's response and is supplying this addendum to recharacterize language previously provided in the evaluation report and to clarify final conclusions and recommendations resulting from this evaluation.

1.1 Summary

Upon review of the evaluation report, NEEA provided responses to conclusions and recommendations from the evaluation work summarized above. In this addendum, the Evaluators elaborate on the following recommendations:

- **Recommendation #5:** The Evaluators recommend that measure-level values are detailed as accurately as possible, and that each field is completed in the workbook to allow for year-over-year tracking of regional units, baseline units, retirement units, and unit energy savings values over time. (Based on Finding #3 and Finding #10)
- **Recommendation #6:** The Evaluators recommend that NEEA distribute naturally occurring baseline units more equitably between local program units and total regional units. (Based on Finding #11)
- **Recommendation #8:** The Evaluators recommend that third-party evaluations are completed for the federal standards claimed by NEEA, as well as any federal standards in which NEEA hopes to claim savings for in the future. Using the quantitative estimate of NEEA influence, the Evaluators recommend that NEEA calculate a naturally occurring baseline for each standard. (Based on Finding #15)
- **Recommendation #9:** The Evaluators recommend an evaluation is completed for each code update to estimate NEEA's qualitative and quantitative influence towards the code update. (Based on Finding #17)

The Evaluators outline the revised recommendations in the sections below.

1.2 Recommendation #5

The Evaluators summarize the Evaluators' findings and recommendations, NEEA responses, and the Evaluator's summarizing response for Recommendation #5.

Table 1-1: NEEA Response to Recommendation #5

Finding	▪ **Finding #3:** The Evaluators found that the methodology in which savings were estimated across measures was inconsistent. For some measures, service territory methodology was used, and for others, funder share allocation methodology was used. ▪ **Finding #10:** The database review revealed that a variety of fields (measure life, UES) were empty across measure types due to lack of savings claimed for the measure, which made verification of values difficult and complicates tracking of a measure progress over time.
Recommendation	▪ **Recommendation #5:** The Evaluators recommend that measure-level values are detailed as accurately as possible, and that each field is completed in the workbook to allow for year-over-year tracking of regional units, baseline units, retirement units, and unit energy savings values over time.
NEEA Response	▪ In the savings workbook provided annually to each funder, NEEA already enters all data fields for active programs and measures within each program for which we are reporting savings. NEEA references all the data sources in the workbook.

1.2.1 Evaluator Examples

In response to NEEA feedback, the Evaluators provided examples of incomplete and inconsistent data provided in NEEA's annual reports delivered Idaho Power Company and Avista Utilities between the 2017 and 2021 program years. The table below summarizes the Evaluator's examples as well as NEEA's response to said examples.

Table 1-2: NEEA Response to Recommendation #5 Examples

Evaluator Examples	▪ The inconsistency in allocation method within a single program year is observed in the Avista 2017 and 2018 workbooks. In both years, most measures displayed service territory share, but a handful showed funder share allocation. Although we see that this practice does not continue into more recent years (2019-2021), we note that this should be an area to consider in quality assurance and quality control.
NEEA Response	▪ NEEA allocates the savings using the most disaggregated data available. The data sources can range from service-territory level to regional. When NEEA only has regional data, the reports allocate the savings using funding shares. ▪ Of the 30 observations provided, only 4 of the measures (13%) had savings. The savings for these measures amounted to approximately 1% of the Net Market Effects. In all four cases, NEEA did not have data/analysis available that would have provided a more accurate estimate of the service territory allocation. ▪ NEEA provides all detailed data annually as called out in recommendation #5. The only missing data, as finding #10 states, were fields intentionally left empty due to NEEA not reporting savings for that measure.

1.2.2 Recommendation #5 Summary

The Evaluators provide the following feedback to NEEA's response summarized above.

- The Evaluators understand that measure-level values are dependent on resolution of data available to NEEA. To the fullest extent possible, the Evaluators recommend NEEA weigh regional savings most aligned with funder-selected methodology. Therefore, although the approved service territory share methodology is not entirely feasible with the data available, the results in some way consider the allocation methodology perspective when summarizing results.
- In addition, the Evaluators recommend that for any measures NEEA currently does not claim savings, these measure line items are removed from funder annual reports. This will ensure that funders only receive complete and verified reports.

1.3 Recommendation #6

The Evaluators summarize the Evaluators' findings and recommendations, NEEA responses, and the Evaluator's summarizing response for Recommendation #6.

Table 1-3: NEEA Response to Recommendation #6

Finding	▪ **Finding #11:** The database review revealed that NEEA's current method for distribution of modeled naturally occurring baseline units between local program and NEEA efforts is not reasonable. A portion of energy-efficient technology sales are due to naturally occurring baseline. NEEA nets out modeled naturally occurring baseline to avoid claiming savings for units that would have been sold had no program or NEEA-effort been provided within the market. However, the method in which these baseline units are netted out is not distributed equitably. For some measures, NEEA estimates that a large proportion of local program units are baseline, and therefore a larger proportion of the remaining net market effects is assigned to NEEA efforts. The Evaluators raise concern for this assumption, as it is unlikely locally incentivized, rebated measures display the same free ridership as non-incentivized measures in the region.
Recommendation	▪ **Recommendation #6:** The Evaluators recommend that NEEA distribute naturally occurring baseline units more equitably between local program units and total regional units.
NEEA Response	▪ NEEA disagrees with ADM's assertion that the distribution method of baseline units NEEA uses is not reasonable or equitable. A foundational principle of NEEA, as an alliance, is that local programs support market adoption and are therefore a part of the market transformation taking place. NEEA's baseline market share estimate represents the adoption that would have occurred without the intervention of NEEA or its funders' local programs, so NEEA's approach assumes that a portion of the baseline market share applies to the local incentive units. ▪ Regarding the question of equitability, NEEA does not assign savings to NEEA efforts separately from funder programs; rather, it measures the full market transformation savings from our collective efforts (Co-created Savings) and reports that to funders. To help our funders avoid double-counting, in our savings reports we net out local program savings. The remaining savings, called net market effects savings are not representative of distinct NEEA efforts, nor do they reflect attribution.

1.3.1 Evaluator Examples

The distribution of local program baseline units refers to the value characterized in the annual reports as "retirement units replaced by local programs." In response to NEEA feedback, the Evaluators provided examples of retirement units in which local programs were over decremented, referring to line items provided in Idaho Power Company and Avista Utilities annual reports. The table below summarizes the Evaluator's examples as well as NEEA's response to said examples.

Table 1-4: NEEA Response to Recommendation #6 Examples

Evaluator Examples	▪ The Evaluators found that the retirement units for some measures were distributed entirely to local programs, rather than total regional units. Therefore, a large portion of local program units were nullified. Although this does not affect the aggregate total net market units for the measure, it underestimates the proportion of total net market units that the local program units account for. We provided examples referencing the 2021 annual report for Idaho Power for the clothes washers, clothes dryers, and refrigerators.
NEEA Response	▪ In the examples provided, the "retirement units replaced by local programs" is the estimate of local program units allocated to Baseline. ▪ The share of the local program units allocated to baseline looks high because the report does not show the market shares. ▪ *NEEA provided to the Evaluators back-end calculations portraying how baseline units are calculated for each measure.*

1.3.2 Recommendation #6 Summary

The Evaluators provide the following feedback to NEEA's response summarized above.

- In reviewing the example NEEA provided for calculating total regional unit baseline and local program unit baseline units, the Evaluators rescind our Recommendation #6. NEEA currently integrates a method for distributing retirement units replaced by local programs proportional to estimated market baseline.

1.4 Recommendation #8

The Evaluators summarize the Evaluators' findings and recommendations, NEEA responses, and the Evaluator's summarizing response for Recommendation #8.

Table 1-5: NEEA Response to Recommendation #8

Finding	▪ **Finding #15:** NEEA contracts third-party evaluators to conduct "influence evaluations" for each standard, which summarizes NEEA's overall qualitative and quantitative influence towards federal standards updates. NEEA uses the quantitative assessment as an estimate of federal standards naturally occurring baseline. The Evaluators found that some of these influence scores were not integrated properly to estimate baseline units. The Evaluators also found more than half (13 of 25) federal standard measures lack influence evaluations.
Recommendation	▪ **Recommendation #8:** The Evaluators recommend that third-party evaluations are completed for the federal standards claimed by NEEA, as well as any federal standards in which NEEA hopes to claim savings for in the future. Using the quantitative estimate of NEEA influence, the Evaluators recommend that NEEA calculate a naturally occurring baseline for each standard.
NEEA Response	▪ NEEA does not agree with these two assertions: that influence scores were not integrated properly and that reported energy savings lacked evaluations. The variance was either due to rounding or a reduction of the percentage based on NEEA's participation (Fluorescent Lamp Ballasts). ▪ There is one case (Pumps) where the assumptions contained a preliminary value and is to be updated based on the final evaluation value[1]. ▪ In cases where NEEA reported co-created energy savings and ADM is stating no evaluation was conducted, they are mistaken. NEEA reviewed all appliance standards for which we claimed co-created savings and confirmed evaluations are available in each instance.

1.4.1 Evaluator Examples

In response to NEEA feedback, the Evaluators provided examples of the 13 federal standards update savings claimed by NEEA in which no influence evaluations were conducted. The table below summarizes the Evaluator's examples as well as NEEA's response to said examples.

[1] NEEA does not request any revisions or comment regarding this statement.

Table 1-6: NEEA Response to Recommendation #8 Examples

Evaluator Examples	▪ The Evaluators found that the following standards were claiming savings, but lacked influence evaluation documentation, both in requested information during the evaluation, and during independent research to locate an influence evaluation: ○ Battery standards in Oregon ○ Commercial HPWH (Existing) ○ Commercial HPWH (New construction) ○ Residential AC ○ Clothes Dryers ○ Residential Heat Pumps ○ Nonresidential ceiling fans ○ Nonresidential ceiling fan kits
NEEA Response	▪ For the following measures, NEEA provided program-level evaluation reports completed by third party evaluators: ○ Battery standards in Oregon[2] ○ Commercial HPWH (Existing) [3] ○ Commercial HPWH (New construction)[4] ▪ For the following measures, no influence evaluation was conducted. NEEA never reported Net Market Effects from these standards. The measures are listed in the Table View of the Savings reports because they were part of NEEA's database for other reporting purposes. The Table View of the report is meant to be a database view of the savings reported on the individual tabs. ○ Residential AC ○ Clothes Dryers ○ Residential Heat Pumps ○ Nonresidential ceiling fans ○ Nonresidential ceiling fan kits ○ Residential ceiling fan light kits

1.4.2 Recommendation #8 Summary

The Evaluators provide the following feedback to NEEA's response summarized above.

- In reviewing the document provided for the battery standards in Oregon, the Evaluators found that the program evaluation documentation does not sufficiently estimate NEEA influence towards the standard. The influence evaluations completed for other standards provide clear objectives and conclusions towards NEEA proportional influence towards quantitative savings. Although the document provided in replacement of a battery standards influence evaluation provides verification for estimating energy savings in Oregon overall, the report does not provide a clear quantitative estimate for NEEA influence towards the standard update.
- NEEA confirmed that the Evaluators used the correct influence percentage (24%) for the Pumps standard.
- In reviewing the document provided for the commercial heat pump water heater standard for existing and new construction facilities, the Evaluators again found that the program evaluation

[2] https://neea.org/img/uploads/long-term-monitoring-and-tracking-report-on-2011-activities.pdf
[3] https://neea.org/img/documents/Heat-Pump-Water-Heater-Benefit-Cost-Model-Review.pdf
[4] Ibid.

documentation does not sufficiently estimate NEEA influence towards the standard. The influence evaluations completed for other standards provide clear objectives and conclusions towards NEEA quantitative and proportional influence towards quantitative savings. However, the documents provided in replacement of an influence evaluation for these standards does not estimate or conclude a clear influence value towards NEEA efforts.

- In reviewing the remaining measures (residential AC, clothes dryers, residential heat pumps, nonresidential ceiling fans, nonresidential ceiling fan kits, and residential ceiling fan kits), the Evaluators recognize that savings claimed for these standards are negligible (demonstrating 1.9E-17 aMW savings in total). Therefore, the Evaluators rescind our conclusion for completing influence evaluations for these standards in which no measurable savings are claimed.

1.5 Recommendation #9

The Evaluators summarize the Evaluators' findings and recommendations, NEEA responses, and the Evaluator's summarizing response for Recommendation #9.

Table 1-7: NEEA Response to Recommendation #9

Finding	▪ **Finding #17:** Currently, NEEA does not complete third-party evaluations of NEEA "influence" towards codes updates as is currently done for federal standards updates. Therefore, NEEA currently claims 100% savings for code-built homes. As summarized in the standards influence evaluations summarized in Table 3-35, NEEA influence towards standards ranges between 2.6% and 61%. If codes are evaluated similarly, and portray a similar range of influence, NEEA code savings could be significantly overrepresenting savings. NEEA's current policy is to report 100% of code-built residential and commercial building savings (while integrating compliance rates) for 10 years after the effective code update date. Currently, NEEA does not maintain a model to estimate naturally occurring baseline over time, as it does for its energy efficiency measures. Essentially, the current NEEA methodology assumes that there would be a 10-year lag in current residential and commercial building code if NEEA did not participate in code update efforts.
Recommendation	▪ **Recommendation #9:** The Evaluators recommend an evaluation is completed for each code update to estimate NEEA's qualitative and quantitative influence towards the code update.
NEEA Response	▪ NEEA already conducts third-party evaluation of its energy codes work. Since the current influence approach's application to reported energy savings was recommended by CEAC, any changes would need to be discussed by that committee. Possible implementation in 2025 with cost implications to be determined. ▪ As outlined in Finding #17, NEEA's significant influence in the state building energy code process is distinct from federal appliance standards and therefore we would like to understand ADM's basis for this recommendation before suggesting any changes to process or reporting. If there were a change, their most likely would be cost implications to NEEA.

1.5.1 Evaluator Examples

Additional examples were not provided to NEEA for this recommendation.

1.5.2 Recommendation #9 Summary

The Evaluators did not provide to NEEA specific examples towards Recommendation #9. Instead, the Evaluators provide the following feedback.

- The Evaluators understand that NEEA's current policy effectively claims savings for 1/3 of the code life cycle by claiming 10 years of savings rather than 30 years of savings. Therefore, there does exist some form of baseline integration to the savings claimed for codes. However, the Evaluators note that NEEA's 100% savings for 10 years policy arose from a decision made by the Cost Effectiveness Advisory Group (CEAC) nearly 25 years ago. It is unclear whether this assumption or policy has been reassessed since its original decision over two decades ago. Since then, a framework for quantitatively estimating NEEA's influence has been solidified for standards. It is of the Evaluator's view that a similar framework can be developed for quantitatively estimating NEEA's influence towards code updates. The Evaluators recommend NEEA's 100% savings claimed for 10 years policy is revisited by CEAC and further methods for estimating NEEA influence and market baseline is explored when claiming code savings in future program years.

1.6 Overall Conclusions

The Evaluators took into consideration NEEA's responses and associated documents in order to provide revised findings and recommendations for the evaluation, measurement, and verification (EM&V) effort of the Northwest Energy Efficiency Alliance (NEEA) activities and energy impact estimates as it relates to savings allocated to Idaho Power Company (IPC) and Avista Utilities (Avista) within the state of Idaho for the program years 2017-2021. The findings and recommendations presented in the section below provide the most up-to-date conclusions for this evaluation work.

1.6.1 Revised Findings and Recommendations

The Evaluators provide a summary of the revised findings and recommendations to the evaluation report, based on additional feedback from NEEA.

Table 1-8: Revised Findings and Recommendations

Findings	Recommendations
Finding #1: Utilities that fund NEEA can choose whether savings are reported by allocation share methodology or service territory methodology. The allocation share methodology overrepresents out-of-state and out-of-service territory savings across measures, codes, and standards while simultaneously underrepresenting in-state and in-service-territory savings across measures, codes, and standards. However, the service territory methodology accurately represents benefits directed to Avista and Idaho Power customers within the state of Idaho.	**Recommendation #1:** The Evaluators recommend Avista and Idaho Power request NEEA to report annual savings via the service territory methodology for each measure claimed by NEEA for each Idaho Power electric, Avista electric, and Avista gas.

Finding #2: The data NEEA utilizes to estimate net market savings is available at resolutions that allow NEEA to estimate precise savings for each utility service territory.	
Finding #3: The Evaluators found that the methodology in which savings were estimated across measures were inconsistent. For some measures, service territory methodology was used, and for others, funder share allocation methodology was used.	
Finding #4: NEEA prioritizes cost-effective savings in terms of regional benefit. Therefore, savings and cost-effectiveness are distributed across the region evenly, despite observed distribution of savings across states. Although this philosophy has merit, more precise estimates of utility-level and program-level savings help NEEA's stakeholders relay relevant savings and cost-effectiveness results to their respective regulatory commissions. This remains critical, due to some state-level commission orders to pursue all cost-effective energy efficiency efforts.	**Recommendation #2:** The Evaluators recommend that Avista and Idaho Power request annual savings reports to include estimates of administrative costs, incentive costs, and non-incentive costs by service territory. This will allow each utility to calculate more accurate cost-effectiveness tests for each initiative to determine whether extension of funding is a viable option within each utility's regulatory environment.
Finding #5: The interviews revealed that although the three parties fundamentally want to improve energy efficiency and increase market adoption of emerging technologies, their preferred approaches to this shared goal vary. Unlike the utilities, who strive to demonstrate the cost-effectiveness of their initiatives and investments on an annual or bi-annual cycle, NEEA operates on a five-year funding cycle, which is different than the typical annual or biannual utility planning cycle.	**Recommendation #3**: The Evaluators recommend that NEEA work with utilities to accurately produce service territory-level savings and to best serve each state's current regulatory environment and utility's localized concerns.
Finding #6: NEEA's programs are designed with a broader constituency in mind than that of its member utilities. While the Idaho utilities' programs are targeted to produce benefits for their ratepayers, – NEEA is tasked with developing programs that need to consider what is best for the entire four-state region. At its core, NEEA's ethos assumes that changes made in one state will eventually spillover into another state and that in the long run, regional change will be realized.	**Recommendation #4**: The Evaluators recommend that NEEA track progress for each code change relative to administrative dollars spent towards state-level codes and associated energy savings accrued by each state-level code. With the 20-year market transformation in mind, the service-territory-level savings will still accrue over the 20-year horizon, however, using this methodology,

Finding #7: NEEA currently allocates code savings via funder share methodology, which estimates a proportion of total NEEA funding to each utility based on number of electric retail customers and overall load. Therefore, savings from code adoption in other states are in-part assigned to Idaho. The Evaluators found that out-of-state code building savings are currently being attributed to Idaho utilities. The Evaluators are skeptical that spillover from out-of-state code changes result in energy savings within the state of Idaho. Although the barriers to code adoption from one state to the next may be similar, there is no evidence to suggest that these learnings transfer to observable and measurable savings. NEEA has stated that starting in 2022, code savings will be allocated via service territory allocation.	actual market transformation effects of co-created savings will be more accurately tracked.
Finding #8: The NEEA Cost Effectiveness Advisory Committee (CEAC) meets quarterly with the NEEA objectives to provide space for discussion around results of recently completed evaluation, progress of field studies, relevant updates to programs, and acceptance or questioning of NEEA methodology towards calculation of savings.	
Finding #9: The Evaluators estimated verified Ex Post aMW for the efficiency measures to display 39%, 52%, and 0% realization rates for Idaho Power electric, Avista electric, and Avista gas savings within the state of Idaho, respectively. The difference in claimed savings and verified savings is due to the change to using service territory allocation rather than funder share allocation. The efficiency measures category Ex Ante savings included savings for measures completed in Washington, Oregon, and Montana – therefore, for some measures, the funder share allocation methodology underestimated Idaho-specific savings while others overestimated out-of-state savings. The overall effect of this change resulted in a lower than 100% realization rate.	The Evaluators reference **Recommendation #1**: The Evaluators recommend Avista and Idaho request NEEA to report annual savings via the service territory methodology for each measure claimed by NEEA for each Idaho Power electric, Avista electric, and Avista gas.
Finding #10: The database review revealed that a variety of fields (measure life, UES) were empty across measure types due to lack of savings claimed for the measure, which made verification of values difficult and complicates tracking of a measure progress over time.	**Recommendation #5:** The Evaluators recommend that measure-level values are only included in annual reports for measures in which savings are claimed. In addition, the Evaluators recommend NEEA continue to document each value as accurately as possible, and that each field is completed in the workbook to allow for year-over-year tracking of regional units, baseline units, retirement units, and unit energy savings values over time.

Finding #11: The database review revealed that NEEA's current method for distribution of modeled naturally occurring baseline units between local program and NEEA efforts is reasonable.	**Recommendation #6:** Rescinded based on additional information provided by NEEA.
Finding #12: The Evaluators reviewed the utilized UES via the Regional Technical Forum (RTF) workbooks, field study data, and simulation analysis findings and note no large concerns with NEEA UES methodology or market baseline assumptions.	
Finding #13: The Evaluators found that NEEA calculates cost-effectiveness of its portfolio using the total regional savings rather than the net market effects. The Evaluators determined that this methodology raises concern, and the NEEA cost-effectiveness tests currently account for all measure, standard, and code completions across the entire region, effectively double counting local program savings and simultaneously claiming naturally occurring baseline savings. Because Avista and Idaho Power calculate their own internal cost effectiveness tests, this finding does not impact Idaho Power or Avista reporting. However, the Evaluators highlight this finding, as NEEA savings allocation and cost allocation methods are not currently consistent with regulatory requirements.	**Recommendation #7**: In the case that cost effectiveness tests are completed using NEEA-reported savings, the Evaluators recommend that Avista and Idaho Power calculate cost-effectiveness using net market effects rather than total regional savings, as is consistent with current regulatory requirements to report gross savings that would not have occurred without program intervention.
Finding #14: The Evaluators estimated verified Ex Post aMW for the standards efforts to display 34% and 50% realization rates for Idaho Power electric and Avista electric within the state of Idaho, respectively. Avista gas did not claim any savings for standards. The difference between claimed savings and verified savings is due to the change to using service territory allocation rather than funder share allocation. A minor cause of discrepancy is due to corrected baseline units using influence evaluation values.	The Evaluators reference **Recommendation #1**: The Evaluators recommend Avista and Idaho Power request NEEA to report annual savings via the service territory methodology for each measure claimed by NEEA for each Idaho Power electric, Avista electric, and Avista gas.
Finding #15: NEEA contracts third-party evaluators to conduct "influence evaluations" for each standard, which summarizes NEEA's overall qualitative and quantitative influence towards federal standards updates. NEEA uses the quantitative assessment as an estimate of federal standards naturally occurring baseline. The Evaluators found that some of these influence scores were not integrated properly to estimate baseline units. The Evaluators also found a small number (3 of 19) federal standard measures in which savings are claimed by NEEA lack influence evaluations.	**Recommendation #8:** The Evaluators recommend that third-party influence evaluations are completed for the federal standards in which energy savings are claimed by NEEA, as well as any federal standards in which NEEA hopes to claim savings for in the future. This third-party evaluation must include the objective to quantitatively estimate NEEA influence towards the standard update as a proportion of incremental savings. This influence evaluation is suitable for removing the market baseline counterfactual in which NEEA did not participate in standards update efforts.

Finding #16: The Evaluators estimated verified Ex Post aMW for the code efforts to display 137%, 125%, and 87% realization rates for Idaho Power electric, Avista electric, and Avista gas savings within the state of Idaho, respectively. The difference between claimed savings and verified savings is due to the change to using service territory allocation rather than funder share allocation. Overall, the funder share allocation underestimated Idaho-specific code savings using the current NEEA policy of claiming 100% code after code is implemented.	The Evaluators reference **Recommendation #1**: The Evaluators recommend Avista and Idaho Power request NEEA to report annual savings via the service territory methodology for each measure claimed by NEEA for each Idaho Power electric, Avista electric, and Avista gas.s
The Evaluators reference **Finding #10** also applies for the codes review: The database review revealed that a variety of fields (measure life, UES) were empty across measure types due to lack of savings claimed for the measure, which made verification of values difficult and complicates tracking of a measure progress over time	The Evaluators reference **Recommendation #5:** The Evaluators recommend that measure-level values are only included in annual reports for measures in which savings are claimed. In addition, the Evaluators recommend NEEA continue to document each value accurately and that each field is completed in the workbook to allow for year-over-year tracking of regional units, baseline units, retirement units, and unit energy savings values over time.
Finding #17: Currently, NEEA does not complete third-party evaluations of NEEA "influence" towards codes updates as is currently done for federal standards updates. Therefore, NEEA currently claims 100% savings for code-built homes. As summarized in the standards influence evaluations summarized in Table 3 35, NEEA influence towards standards ranges between 2.6% and 61%. If codes are evaluated similarly, and portray a similar range of influence, NEEA code savings could be significantly overrepresenting savings. NEEA's current policy is to report 100% of code-built residential and commercial building savings (while integrating compliance rates) for 10 years after the effective code update date. Currently, NEEA does not maintain a model to estimate naturally occurring baseline over time, as it does for its energy efficiency measures. Essentially, the current NEEA methodology assumes that there would be a 10-year lag in current residential and commercial building code if NEEA did not participate in code update efforts.	**Recommendation #9:** The Evaluators recommend an evaluation is completed for each code update to estimate NEEA's qualitative and quantitative influence towards the code update, or, alternatively, incorporating a quantitative method for isolating incremental savings due to NEEA-specific efforts approved by a third-party evaluator.
Finding #18: The Evaluators reviewed simulation model methodology used by NEEA to estimate code savings and found that UES methodology for code savings do not present any concerns.	